



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO0001 – PO0100

SEPTEMBER 2020

Plan Order Index

Policy	PO numbers	Plan Order Document
Local Plan		
General Comments	PO0001 to PO0241	SD007.1 to SD007.2
Policy Omission Comments	PO0242 to PO0244	SD007.2
Paragraph 1.3.6	PO0245	SD007.2
Paragraph 1.4 – 1.14	PO0246 to PO0249	SD007.2
Paragraph 1.6.1	PO0250	SD007.2
Paragraph 1.7.1	PO0251	SD007.2
Paragraph 1.7.2	PO0252 to PO0593	SD007.2, SD007.3, SD007.4, SD007.5
Table 2.1	PO0594	SD007.5
Chapter 3	PO0595 to PO0596	SD007.5
Spatial Vision	PO0597 to PO0603	SD007.5
Strategic Aims & Objectives	PO0604 to PO0620	SD007.5
Chapter 4	PO0621 to PO0622	SD007.5
Policy LPA01	PO0623 to PO0683	SD007.5
Policy LPA02	PO0684 to PO0912	SD007.5, SD007.6, SD007.7, SD007.8
Policy LPA03	PO0913 to PO0971	SD007.8
Policy LPA04	PO0972 to PO1333	SD007.8, SD007.9, SD007.10, SD007.11
Policy LPA04.1	PO1334 to PO1396	SD007.11
Policy LPA05	PO1397 to PO2403	SD007.11, SD007.12, SD007.13, SD007.14, SD007.15, SD007.16, SD007.17, SD007.18, SD007.19, SD007.20
Policy LPA05 - Table 4.5	PO2404 to PO2426	SD007.20
Policy LPA05 – Reasoned Justification	PO2427 to PO2456 & PO2488	SD007.20
Policy LPA05 – Table 4.6	PO2457 to PO2483	SD007.20
Policy LPA05 – Reasoned Justification	PO2484 to PO2485	SD007.20
Policy LPA05 – Table 4.7	PO2486 to PO2487	SD007.20
Policy LPA05 – Figure 4.3	PO2489	SD007.20
Policy LPA05.1	PO2490 to PO2553	SD007.20, SD007.21
Policy LPA06	PO2554 to PO3301	SD007.21, SD007.22, SD007.23, SD007.24, SD007.25, SD007.26, SD007.27, SD007.28
Policy LPA07	PO3302 to PO3395	SD007.28
Policy LPA07 – Reasoned Justification	PO3396 to PO3398	SD007.28
Policy LPA08	PO3399 to PO3445	SD007.28, SD007.29

Policy LPA08 – Reasoned Justification	PO3446 to PO3458	SD007.29
Policy LPA09	PO3459 to PO3471	SD007.29
Policy LPA09 – Reasoned Justification	PO3472 to PO3473	SD007.29
Policy LPA10	PO3474 to PO3504	SD007.29, SD007.30
Policy LPA10 – Reasoned Justification	PO3505	SD007.30
Policy LPA11	PO3506 to PO3514	SD007.30
Policy LPA11 – Reasoned justification	PO3515 to PO3516	SD007.30
Policy LPB01	PO3517 to PO3519	SD007.30
Policy LPC01	PO3520 to PO3559	SD007.30
Policy LPC02	PO3560 to PO3583	SD007.30
Policy LPC02 – Reasoned Justification	PO3584	SD007.30
Policy LPC02 – Table 6.3	PO3585 to PO3586	SD007.30
Policy LPC04	PO3587 to PO3591	SD007.30
Policy LPC05	PO3592 to PO3599	SD007.30
Policy LPC06	PO3600 to PO3610	SD007.30, SD007.31
Policy LPC06 – Reasoned Justification	PO3611	SD007.31
Policy LPC07	PO3612	SD007.31
Policy LPC07 – Figure 7.2	PO3613	SD007.31
Policy LPC08	PO3614 to PO3618	SD007.31
Policy LPC08 – Reasoned Justification	PO3619	SD007.31
Policy LPC09	PO3620 to PO3625	SD007.31
Policy LPC10	PO3626 to PO3637	SD007.31
Policy LPC11	PO3638 to PO3643	SD007.31
Policy LPC11 – Reasoned Justification	PO3644 to PO3646	SD007.31
Policy LPC12	PO3647 to PO3660	SD007.31
Policy LPC12 – Reasoned Justification	PO3661	SD007.31
Policy LPC13	PO3662 to PO3671	SD007.31
Policy LPC14	PO3672 to PO3675	SD007.31
Policy LPC14 – Reasoned Justification	PO3676	SD007.31
Policy LPD01	PO3677 to PO3688	SD007.31
Policy LPD01 – Reasoned Justification	PO3689	SD007.31
Policy LPD02	PO3690 to PO3697	SD007.31
Policy LPD03	PO3698 to PO3704	SD007.31, SD007.32
Policy LPD03 – Reasoned Justification	PO3705	SD007.32
Policy LPD06	PO3706 to PO3708	SD007.32
Policy LPD07	PO3709 to PO3714	SD007.32
Policy LPD03 – Reasoned Justification	PO3715	SD007.32
Policy LPD09	PO3716 to PO3718	SD007.32
Policy LPD10	PO3719 to PO3724	SD007.32
Policy LPD10 – Reasoned Justification	PO3725 to PO3734	SD007.32
Appendices	PO3735 to PO3754	SD007.32
Economic Viability Assessment		
	PO3755 to PO3772	SD007.32
Green Belt Review 2018		
	PO3773 to PO3883	SD007.32, SD007.33

Habitats Regulations Assessment		
	PO3884 to PO3885 & PO3887	SD007.33
Heritage Impact Assessment		
	PO3886	SD007.33
Infrastructure Delivery Plan		
	PO3888 to PO3961	SD007.33, SD007.34
Landscape Character Assessment Report		
	PO3962	SD007.34
LPPO Report of Consultation (2018)		
	PO3963 to PO3965	SD007.34
Statement of Community Involvement		
	PO3966	SD007.34
Strategic Housing Land Availability Assessment		
	PO3967 to PO3968	SD007.33
Strategic Housing Market Assessment		
	PO3969 to PO3971	SD007.34
Sustainable Transport Impact Assessment		
	PO3972	SD007.34
Transport Impact Assessment		
	PO3973 to PO3976	SD007.34
Policies Map		
	PO3977 to PO3981	SD007.34
Sustainability Appraisal		
	PO3982 to PO4039	SD007.34
Sustainability Appraisal – Non Technical Summary		
	PO4040 to PO4047	SD007.34
Sustainability Appraisal –Technical Appendix		
	PO4048 to PO4050	SD007.34

PO0001

EF0011



The new St Helens Local plan
sills john
to:
planningpolicy
07/03/2019 13:28

- ① - LPC13
- ② - LPD01
- ③ - GEN.

2 Attachments



lpsd-representation-form-1.pdf IMG_20170630_0001.jpg

attached are some comments relating to the documents...happy to discuss..docs are in pages and pdf...john sills

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Dr	Title:
John	First name:
Sills	Last Name:
Organisation/company:	Organisation/company:
23, Knowsley Park Lane, Prescot, L34 3NA	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 7.March. 2019

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
LPD02 Submi ssion Draft		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/ section)							

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

Please tick as appropriate

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

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

It is encouraging that the Council seem to have taken notice of the outrage produced by the attack on the GREEN BELT and have modified their proposals especially in the Ecclestone Area, where it seemed to me the Council was wishing to produce continuous housing from the A580 to Prescott. With ref to LPD02, this is very difficult to read due to the orientation of the pages (could find no way of rotating the pages, and so have had to look at the pages with my head turned to the left!!!). Re HS08 & HS09, (pp149 & 150) it is good to see that these sites have been retained in the GREEN BELT. Re p47 EA2, the desecration of this site is something the Council should be ashamed of. ✓

re Submission Draft LPC13 p128, and LPD01 p140-2, relating to housing and renewable and low carbon development, I think there should be more emphasis on the need in new builds to design them and build them as energy efficient as possible, thus minimising energy requirements for individual houses, reducing fuel costs for householders and contributing to a reduction in overall energy use. The Council could have a role in this in the process of granting Planning Permission. ① ②

The Council should continue as a principle to seek to use brown field sites for building and development, and given the suggested need for housing in Ecclestone it is disappointing that the site of the former Methodist Church remains undeveloped. It is also a bit of an eyesore! ✓

One final point which has not been touched on as far as I could ascertain is the question of leasehold. The Council may or may not beware that many houses built on the BICC site in Prescott, were built and sold as leasehold rather than freehold. As a result the leaseholds have been sold on and some residents are faced with escalating ground rents, which makes selling of the properties difficult. I would therefore urge the Council to have a policy of "no leasehold" when granting Planning Permission for new housing. ③

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

No

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

Yes, I wish to participate at the oral examination

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

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

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

PO0002

EFO016

① - GEN

② - PARA 1.7.2

11/03/2019 09:28

③ - LPAOS



St Helens Local Plan Submission - Representation Form
Jo Banks to: planningpolicy

From:

To:

planningpolicy@sthelens.gov.uk

1 attachment



LPSD - Representation Form.pdf

Dear Sir/Madam

Please find attached my objection to the latest plans to build on Eccleston/Windle Greenbelt land.

Kind regards

Jo Banks

[Redacted signature]



St. Helens
Council

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

Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Joanne	First name:
Last Name: Banks	Last Name:
Organisation/company:	Organisation/company:
Address: 56 St Thomas Close	Address:
Postcode: WA10 6BN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 March 2019

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

Legally Compliant?	Yes	No x (NO)
Sound?	Yes	No x (NO)
Complies with the Duty to Cooperate	Yes	No x (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?	X
Justified?	X (NO) the plan is based on flawed methodology
Effective?	X (NO) the plan is not deliverable
Consistent with National Policy?	X It does not comply with NPPF 2018

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

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

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.] ②

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.] ③

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 1

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ✓

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. 1

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. 1

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. 1

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. 2

The Plan is not effective.

Please continue on a separate sheet if necessary

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Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren

brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

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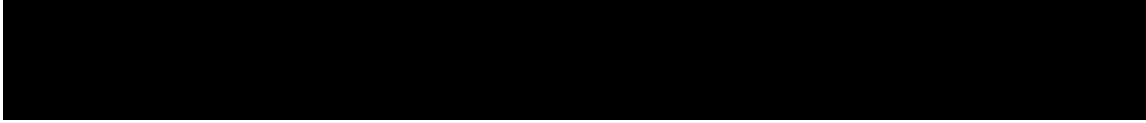
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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0003



Local plan
Cheryl Rank
to:
planningpolicy@sthelens.gov.uk
11/03/2019 14:46



1 Attachment



lpsd-representation-form CR.doc

Sent from my Samsung device

----- Original message -----



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



Subject: lpsd-representation-form CR



St Helens
Council

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

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PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Cheryl	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: <input type="text"/>

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Does not satisfy:-</p> <p>The requirement for sustainable development.</p> <p>The criteria for sustainable transport – promoted increased car dependency.</p> <p>Sustainable housing, based on aspirational employment growth predictions.</p> <p>Effective land use by concentrating on green space over town centre development and brownfield.</p>	

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. ①
- Adequate regional and cross border collaboration has not been undertaken. ③
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. ①
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. ①
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. ④
- Council statement of "contaminated land sites" [2-15] indicated that 3,710 ha of lowest priority contaminated land exists in St Helens. Two green belt sites of 56.6. ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170 ha available if it were to be remediated. There are numerous empty properties in the borough and buildings that can be changed to residential use. There are areas of land that had residential properties on yet have not been redeveloped, eg Eccleston Street. ④
- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. ④
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. ②
- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be ④ ②

suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane. ②

- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Ecclestone and rail links are either in town centre or in Sutton. Steve Rotherham, Liverpool City Region Metro Mayor, Steve Rotherham speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : Nathalie Nicholas, Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."* ②
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed. ②

Please continue on a separate sheet if necessary

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

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only

interested in large scale, easy to clear land.

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When the greenbelt is gone it is gone forever, changing the landscape of the area, there is no need for this.

Plan based on aspirational growth due to the new warehousing being built along the A580, these jobs are often lower paid, whereas building on 8HS is purely to make it easier for large developers to build high priced housing bringing in higher rates to the council and not social housing. Many people cannot get on the property ladder and these developments would not always be in the reach of some people. Demolish the old Tax office in College Street, this is an eye sore and would free up more land that can be used for housing.

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

Please continue on a separate sheet if necessary

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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Please keep a copy for future reference.**

PO0004



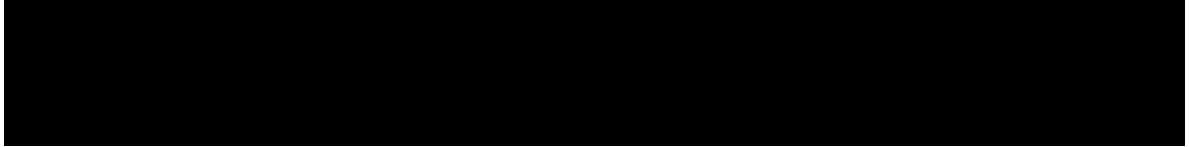
lpsd-representation-form CR

Richard Rank [REDACTED]

to:

planningpolicy

11/03/2019 15:27



1 Attachment



lpsd-representation-form CR.pdf

[REDACTED] has attached the following document:



lpsd-representation-form CR

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



Site 8HS

Ef0020

EMBED
MSPhotoEd.
3

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

Ref: LPSD

(For official use only)

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

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Richard	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
Address: 94 St Georges Avenue Windle	Address:
Postcode: WA10 6HD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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

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

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

Yes ☒ (Via Email)

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?		<input type="checkbox"/> b x
Sound?		<input type="checkbox"/> b x
Complies with the Duty to Cooperate		<input type="checkbox"/> b x

Please tick as appropriate

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

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

The requirement for sustainable development.

The criteria for sustainable transport – promoted increased car dependency.

Sustainable housing, based on aspirational employment growth predictions.

Effective land use by concentrating on green space over town centre development and brownfield.

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. (1)
- Adequate regional and cross border collaboration has not been undertaken. (3)
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. (1)
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. (1)
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. (4)
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- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. (4)
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)

- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane. (4) (2)
- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Ecclestone and rail links are either in town centre or in Sutton. Steve Rotherham, Liverpool City Region Metro Mayor, Steve Rotherhamd speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : Nathalie Nicholas, Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."* (2)
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed. (2)

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

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only interested in large scale, easy to clear land.

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

Please continue on a separate sheet if necessary

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

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

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

PO0005

EF0021



Submission to Draft Local Plan

Peter Astles

to:

11/03/2019 16:03

Cc:

"Peter Astles"



① - LPC06

② - GEN

③ - LPA04

2 Attachments



PBA representation Draft Local Plan 2019.pdf

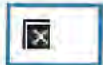


PBA representation form - St Helens MBC Draft Local Plan 2019.pdf

Please find attached my submission to local plan and response form.

I have ticked on the response form to orally present at the hearing if possible I would like to raise a point about specific biodiversity planning

Peter Astles



Virus-free. www.avast.com



St.Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Peter	First name:
Last Name: Astles	Last Name:
Organisation/company: Our Local Voice	Organisation/company:
Address: 81 The Parchments Newton-le-Willows	Address:
	Postcode:
Postcode: WA12 0DX	
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11th MARCH 2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

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

Please see my document response to St Helens Local Plan Submission Draft January 2019 Final sent via email.

Please continue on a separate sheet if necessary

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

Please see my document response to St Helens Local Plan Submission Draft January 2019 Final sent via email.

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

I wish to present the proposal for more effective biodiversity protection via improved planning as set out in my document response

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.**

RESPONSE BY

PETER BRIAN ASTLES

COMMUNITY GROUP OUR LOCAL VOICE

81 THE PARCHMENTS

NEWTON-LE-WILLOWS

MERSEYSIDE, WA120DX

THE RESPONSE IS IN TWO PARTS

1 – BIODIVERSITY ACTION PLAN – SECTION A

2 – GENERAL COMMENTS – SECTION B

SECTION A – BIODIVERSITY ACTION PLAN

Refers to

Policy LPA03 Development Principles

Policy LPA04 A Strong and Sustainable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA09m Green Infrastructure

Policy LPA11 Health and Wellbeing

Policy LPA10 Parkside East

NPPF Statement

“The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature”

The Issue

In addition to bird life the area also is one of the few areas left that contains the endangered Brown Hare.

Roe Deer also regularly roam the area. Other mammals such as hedgehogs, stoats, weasels, field and wood mice are also present.



Evidence of badgers has been found in the area.

✓

Dead badger June 2015 Winwick Lane RTA

SECTION B - GENERAL COMMENTS ON LOCAL PLAN

PEOPLE OBJECTIVE – LOCAL PLAN – CONCERNS OVER MANAGEMENT OF DRAFT LOCAL PLAN

There have been concerned over St Helens MBC's approach to the local plan and engagement with the public one of the core strands of the governments planning policy.

] ②

The approach has been one of confrontation with the public leading many members of the local public to believe largely their input will be ignored

The following supports this perception

A very febrile relationship has developed with the council over the local with senior councillors trading insults with the public over social media.

One example of many below this one from the then leader of St Helens Council

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

There have also been cases of senior councillors have been subject to council internal disciplinary hearings ostensibly within the context of the local plan.

The following council meeting approving the draft local plan 19th December 2018 gives some insight into this confrontation. Whereas it is accepted politics is a passionate environment between competing parties but rarely are the electorate under such attack as is witnessed in this council meeting. Local countryside referred as "concrete coffin" deliberately provocative in the knowledge the public may have an opposing view. Other comments that it was the government that drove the changes. Implying the record 5,625 responses of the public had no effect. Interspersed with insults to the public and childish references to online confrontations.

From St Helens Council Webcast Portal – Full Council Meeting

https://sthelens.public-i.tv/core/portal/webcast_interactive/390498

Whilst this has no relevance to the content of the plan this does reflect very badly on the core strand of public engagement.

It is necessary and unprofessional

I wish this aspect to be directly brought to the attention of the inspector

**ST HELENS COUNCIL DIRECT FINANCIAL INTEREST IN CORE
LOCAL PLAN COMMERCIAL STRATEGIES**

PO0006

Send 8HA
to 8HS

Page 1 of 1

EFO031



Feedback on the St Helens Borough Local Plan 2020-2035

Tony Cowley

to:

planningpolicy@sthelens.gov.uk

12/03/2019 00:51

Hide Details

From: Tony Cowley [REDACTED]

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

① - Gen

② - LPA05

③ - LPA06

2 Attachments



Pat completed form. 11th March 2019.doc My completed objections 11th March 2019.doc

Please find both my Wife and my objections to the Local plan 2020 to 2035

Can you please note the word documents and if you could let me know that are OK

Mr and Mrs Cowley

31 Inglewood Rd
Rainford
St Helens
Merseyside
WA11 7QL

[REDACTED]
Sent from [Mail](#) for Windows 10



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Patricia	First name:
Last Name: Cowley	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 31 Inglewood Rd Rainford St Helens	Address:
Postcode: WA11 7QL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

11th March 2019

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

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

Yes ☐ **Yes, Via Email**

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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3. To which part of the Local Plan does this representation relate?									
Policy	All of it	Paragraph / diagram / table	All of it	Policies Map	All of it	Sustainability Appraisal/ Strategic Environmental Assessment	All of it	Habitats Regulation Assessment	All of it
Other documents (please name document and relevant part/section)				We believe that the local plans for Windle and Rainford is neither, justified, effective, or consistent with the national policy.					

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

Please tick as appropriate

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

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

For both Windle and Rainford the following counts.

- The requirements for sustainable development
- The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs.

1

- Sustainable housing targets proposed are based on aspirational employment growth predictions. (2)
- Effective land use by concentrating on green space development over town centre development with higher density. (2)
- Food security by ignoring agricultural land quality. (2)
- Impact on the local residents and Smog
- Impact on health of our children
- Impact on the Fire service increase area to cover and lack of resources, due to cutbacks
- The Ambulance services, lack of staff to cover the area, increased response times, no communication with the emergency service over this.
- Increase traffic and its impact on response times, for all the emergency services.
- Major issues currently, with policing in the area, no plans set and the government are not increasing funding for policing, how is the plan going to manage a system that is already broken.
- Look at the problems we have now with flooding, so how is the plan going to take account of the extra water runoff?
- The waste drainage system, is already failing, I have talk to your local maintenance engineers, and they have been patching the system up for years. It will not cope with the extra demand from the increase in housing.
- Last off, in this world of ever changing circumstances, the world as we know is falling apart. The USA are looking after themselves, and if you want it, its going to cost the top price. Russia is teaming up with China and others putting an increased risk on crisis within the world. The EU is building a one state system and we are going to be out of it or in part of it but without any say. We the UK look to be in a no-man's land with a government that fails to see the obvious. We need to keep these resources available, think what happened in the War dig for victory, planting crops in your own back garden and look at the land that was available then?
So where are we going to get our food from. Think of Set aside, the EU said, they would pay our farmers to leave land unused so we had to purchase food from the EU not as good as we use to grow in the fields round Windle and Rainford. If you did a risk assessment, like they should have done within these plans. There is no way you would throw away all this arable land that we have now, not when there is an abundance of brown field sites around.

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 idea should be scrapped as it fails to meet any real objectives that benefit the future of the region

Please continue on a separate sheet if necessary

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

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

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

Yes, I wish to participate at the oral examination

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

No thanks, I hope that the inspector will see sense.

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.

PO0007

Sines 8HA
+ 8HS

Page 1 of 1

EFO032



Feedback on the St Helens Borough Local Plan 2020-2035

Tony Cowley

to:

planningpolicy@sthelens.gov.uk

12/03/2019 00:51

Hide Details

From: Tony Cowley [REDACTED]

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

① - GEN

② - LPA05

③ - LPA06

2 Attachments



Pat completed form. 11th March 2019.doc My completed objections 11th March 2019.doc

Please find both my Wife and my objections to the Local plan 2020 to 2035

Can you please note the word documents and if you could let me know that are OK

Mr and Mrs Cowley

31 Inglewood Rd
Rainford
St Helens
Merseyside
WA11 7QL

[REDACTED]
Sent from [Mail](#) for Windows 10



St.Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Anthony Raymond	First name:
Last Name: Cowley	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 31 Inglewood Rd Rainford St Helens	Address:
Postcode: WA11 7QL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

11th March 2019

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Yes ☐ **Yes, Via Email**

No ☐

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
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Justified?	<input type="checkbox"/> No the plan is based on flawed systems or methodology
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For both Windle and Rainford areas the following counts.

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70

- Sustainable housing targets proposed are based on aspirational employment growth predictions.] ⑥
- Effective land use by concentrating on green space development over town centre development with higher density.] ②
- Food security by ignoring agricultural land quality. ②
- Impact on the local residents and Smog
- Impact on health of our children
- Impact on the Fire service increase area to cover and lack of resources, due to cutbacks
- The Ambulance services, lack of staff to cover the area, increased response times, no communication with the emergency service over this.
- Increase traffic and its impact on response times, for all the emergency services.
- Major issues currently, with policing in the area, no plans set and the government are not increasing funding for policing, how is the plan going to manage a system that is already broken.
- Look at the problems we have now with flooding, so how is the plan going to take account of the extra water runoff?
- The waste drainage system, is already failing, I have talk to your local maintenance engineers, and they have been patching the system up for years. It will not cope with the extra demand from the increase in housing. ②
- Last off, in this world of ever changing circumstances, the world as we know is falling apart. The USA are looking after themselves, and if you want it, its going to cost the top price. Russia is teaming up with China and others putting an increased risk on crisis within the world. The EU is building a one state system and we are going to be out of it or in part of it but without any say. We the UK look to be in a no-man's land with a government that fails to see the obvious. We need to keep these resources available, think what happened in the War dig for victory, planting crops in your own back garden and look at the land that was available then? ③

So where are we going to get our food from. Think of Set aside, the EU said, they would pay our farmers to leave land unused so we had to purchase food from the EU not as good as we use to grow in the fields round Windle and Rainford. If you did a risk assessment, like they should have done within these plans. There is no way you would throw away all this arable land that we have now, not when there is an abundance of brown field sites around.

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 idea should be scrapped as it fails to meet any real objectives that benefit the future of the region. And it put the UK at Risk re local and national sustainability. Think not? Well look at what is happening now, lack of drugs in the Pharmacies' Supermarkets running out of food, and shops now the same! How much worse can it get. We need the fields to feed ourselves. What a state we are in and this will make things worse.

Please continue on a separate sheet if necessary

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

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

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

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No thanks, I hope that the inspector will see sense.

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PO0008

① - Green Belt Review 2018

③ - LPA05

⑤ - IDP

Page 1 of 1

② - LPA06, 8HS

④ - GEN

⑥ - Para 1.7.2 EFO037
DTC



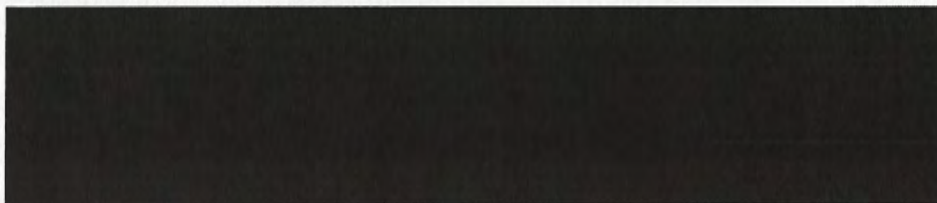
Response to Local Plan 2019

Peter & Frances Murphy

to:

planningpolicy

12/03/2019 13:05



1 Attachment



MFM lpsd-representation-form Example 1.doc

Dear Sir/Madam

Please find attached my response, as an Eccleston resident, to the Local Plan 2019.

Yours sincerely

MF Murphy



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Mary Frances	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston St Helens	Address:
Postcode: WA10 4QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12/03/2019
-----------------------	------------------

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Yes ☐ (Via Email)

No ☒

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

Policy	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/> No The Plan is based on flawed methodology
Effective?	x <input type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No It does not comply with NPPF 2018

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

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

The 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

①

②

prepared.

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 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 lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West.

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.

Adopt the ONS (2018) Housing Need statistics and remove all Green Belt reallocation from the Plan.

Please continue on a separate sheet if necessary

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

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

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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PO0009

① - Green Belt Review 2018 ③ - LPA05 ⑤ - IDP
② - LPA06, 8HS ④ - GEN ⑥ - Para 1.7.2
OTC

Page 1 of 1

EFO038



Response to Local Plan 2019
Peter & Frances Murphy
to:
planningpolicy
12/03/2019 13:09



1 Attachment



PM lpsd-representation-form Example 1.doc

Dear Sir/Madam

As a resident and Council Tax payer of Ecclestone, I wish to submit the attached response to the Local Plan 2019.

Yours sincerely

P Murphy



St. Helens
Council

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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: Peter	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston, St Helens	Address:
Postcode: Wa10 4QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	12/03/2019
------------	--	-------	------------

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Yes ☐ (Via Email)

No ☒

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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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Telephone: 01744 676190

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)			Green Belt Review (2018)		

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/> No The Plan is based on flawed methodology
Effective?	x <input type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No It does not comply with NPPF 2018

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

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

The 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

①

②

prepared.

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 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 lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West.

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.

Adopt the ONS (2018) Housing Need statistics and remove all Green Belt reallocation from the Plan.

Please continue on a separate sheet if necessary

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

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

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

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**Thank you for taking the time to complete and return this response form.
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PO0010



Response to Local plan - 2020-2035
ray thompso
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:07



3 Attachments



lpsd-representation form B Thompson.docx



lpsd-representation-form_R Thompson.docx



Statement in response to the St Helens Borough Local Plan 2020.docx

Please find attached Representation forms and attached supporting document with our objections to the above plan to build on green belt sites at Clock Face St Helens.

Yours Sincerely

Raymond and Barbara Thompson

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Barbara	First name:
Last Name: Thompson	Last Name:
Organisation/company:	Organisation/company:
Address: 9 Crawford Street	Address:
Postcode: WA94XQ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature:

[REDACTED]

Date:

13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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Policy	✓ LPA02, 03 & 05	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				As given in supporting document					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/> Not effective
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

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

As per the supporting document

Please continue on a separate sheet if necessary

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As per the supporting document

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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.
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Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb), on behalf of Bold and Clock Face Action Group.

I trust this document will be submitted, in its entirety as part of the public consultation.

[Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035](#)

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

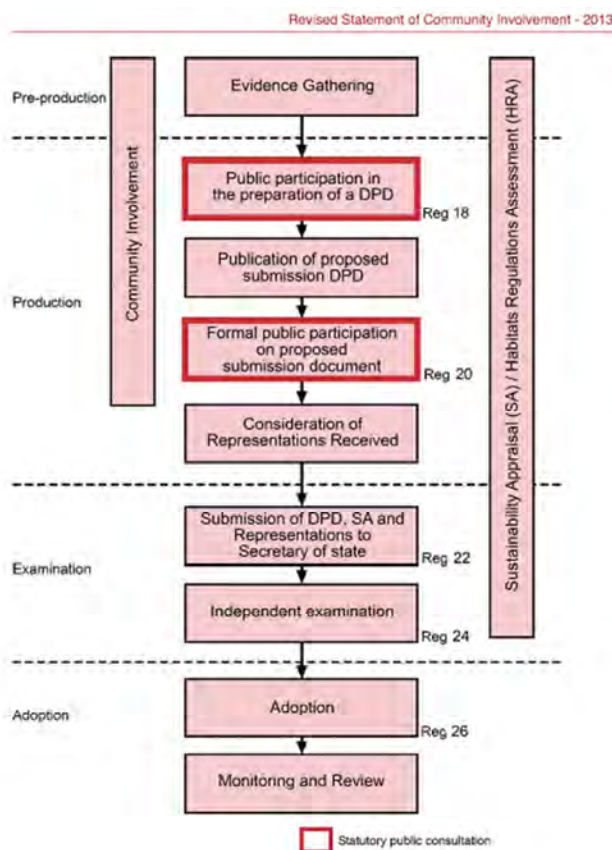
Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

[The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below \(taken from St Helen's SCI 2013 pages 7 and 13 respectively\). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document \(DPD\)' \(Reg.18\) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks \(Reg. 19\). The majority of constituents that live within the](#)

200m area surrounding 4HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

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	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	•		•				
Individual Consultation Letter/email		•		•	✓	•	•
Publication in Community Magazine	•	•	•	•			
Publication on Website		•	•	•		•	•
Public Notice ⁷ or press release		•		•			
Deposit in Public Buildings ⁸		•	•	•	✓	•	
Presentation offered to business and community groups		•	•	•			
Consultation Letter/email to interest groups	•	•	•	•		•	
Articles in Specialist Publications		•		•			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

Soundness

~~Draft St Helens Local Plan 2020 – 2035~~

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. [The National Planning Policy Framework \(NPPF\) \(2019\) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.](#)

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to

St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. [Nor is the plan consistent with National Policy in relation to this issue; NPPF \(2019\) paragraph 137 requires exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.](#)

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs*'. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the [GreenbeltGreen Belt](#). They believed this would have a negative impact on the individuals health and well-being.

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Council's own Green Belt Review, the land cannot be justified in removal from the Green Belt. These reasons include:

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
 - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
 - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
 - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from ~~Greenbelt~~[Green Belt](#) can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at '*setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment*' (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental consideration when considering this land for removal from the ~~Greenbelt~~[Green Belt](#) and allocation towards housing development.

2. Justified

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land ([NPPF, 2019, Section 13](#)). The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

3. Consistent with National Policy

NPPF February 2019 Chapter 9, Paragraph 108, part c, states when assessing sites for development, it must be ensured that, 'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The proposed development of 2,988 homes within one location and a further 2,000 homes within the immediate vicinity cannot be cost be cost effectively mitigated. The area is restricted by established, good quality viable terraced homes that prevent any significant change in structure to the transport network. Many of the directly affected access routes are main walking routes for children to and from school. The vastly increased traffic volumes and subsequent congestion will have a significant impact on the highway safety for these children.

NPPF February 2019 Chapter 9, Paragraph 109 states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'. It can be argued the cumulative impact of 2,988 homes in one location in conjunction with 2,000 further homes in the immediate vicinity, on the road network would be severe, due to the significant amount of extra car journeys this will impose on the main access routes. This would furthermore have an unacceptable impact on highway safety.

[In addition to the information given above, paragraph 72 of the NPPF \(2019\) states that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." In reviewing the additional evidence-based documents supplied by the council, all future infrastructure development is centred around the M6 near Haydock and J7 M62. A large-scale](#)

[development in the Bold Forest Park is currently not supported by any infrastructure plans, so currently, does not conform to the NPPF.](#)

NPPF February 2019 Chapter 11, Paragraph 118, part b, states that it should be 'recognised that some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage and food production'. The land referenced as 4HA in the LPSD, covers a variety of land types and the plan has failed to recognise the many functions these varying land types perform. The land supports many varied types of wildlife, including those on the red list for critically endangered. It provides recreation through the varied public footpaths, access routes to countryside and bridleways. It provides flood risk mitigation in an area that the St Helens Strategic Flood Risk Assessment 2014 identified as having multiple areas at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels of land in the GBR 2016.

NPPF February 2019 Chapter 11, Paragraph 118, part a, states 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for the planning permission should be refused. The land referenced as 4HA in the LPSD, as previously stated, covers a variety of land types. One such type is pasture and meadow land for grazing horses, that has been used for this purpose for many years and continues to be to the present day. The publication by Natural England, 'The Upland Management Handbook' February 2001, emphasised the importance of these pastures and meadows in supporting many endangered British Species including Lapwing and Skylark which have reduced to dangerous levels over the last 25 years. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species and therefore any development would result in significant harm to biodiversity and therefore should be refused.

[The proposals also contravenes NPPF \(2019\) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Releasing the land from Green Belt operates at odds to the NPPF, it does not promote the urban regeneration through recycling of derelict and other urban land.](#)

Conclusion

The Group concludes the St Helens Local Plan 2020 – 2035 cannot be adopted in its current form, particularly in relation to land reference 4HA within the plan. The belief is the plan fails the soundness test inclusive but not exhaustive for the reasons listed above. The statement should be considered along with the Assessment of the Local Plan and Green Belt Review document, completed on behalf of the Group and submitted with this statement.

The new 25 Year Environmental Plan should be given great consideration when reviewing the plan. The Environment Bill will include legislative measures to take direct action to address the biggest environmental priorities of our age; Air Quality and Protection and enhancement of our landscapes, wildlife and habitats. Michael Gove recently reiterated his intention that we become the 'first generation to leave the environment in a better state than we found it. (New Environment Protections Set Out in Flagship Bill, 19 December 2018). Furthermore he has stated in an article published on 26 February 2019, 'The natural world is our greatest asset and we all have a responsibility and role to play in protecting it for generations to come.' (Environment Secretary Michael Gove Welcomes Green Ambassadors for Year of Green Action, 26 February 2019).

The community that is directly affected by the removal of land parcels 4HA and XXX from the Green Belt and its subsequent development is predominantly rural, with the few residential areas classed as part of one of the most deprived areas in the UK. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard. At least one large property developer has procured land within 4HA and XXX and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. Whilst the NPPF encourages the active engagement of such developers, this seems to make the process unreasonable and unfair.

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Modification

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

If conclusions remain consistent with current findings, then Infrastructure plans need to be generated, costed and assessed on a wider Council scale to see if the large scale housing development planned in 4HA is cost effective in comparison to other local council housing and regeneration programmes (for example city centre housing redevelopment in Warrington which is more in-line with NPPF) and that the impact to the environment is justifiable.

PO0011



Response to Local plan - 2020-2035
ray thompso
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:07



3 Attachments



lpsd-representation form B Thompson.docx



lpsd-representation-form_R Thompson.docx



Statement in response to the St Helens Borough Local Plan 2020.docx

Please find attached Representation forms and attached supporting document with our objections to the above plan to build on green belt sites at Clock Face St Helens.

Yours Sincerely

Raymond and Barbara Thompson

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mr	Title:
First Name: raymond	First name:
Last Name: thompson	Last Name:
Organisation/company:	Organisation/company:
Address: 9 crawford street	Address:
Postcode:wa94xq	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
-----------------------	------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	✓ LPA02, 03 & 05	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				As given in supporting document					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/> Not effective
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

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

As per the supporting document

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.

As per the supporting document

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.**

Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb), on behalf of Bold and Clock Face Action Group.

I trust this document will be submitted, in its entirety as part of the public consultation.

[Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035](#)

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

[The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below \(taken from St Helen's SCI 2013 pages 7 and 13 respectively\). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document \(DPD\)' \(Reg.18\) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks \(Reg. 19\). The majority of constituents that live within the](#)

200m area surrounding 4HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

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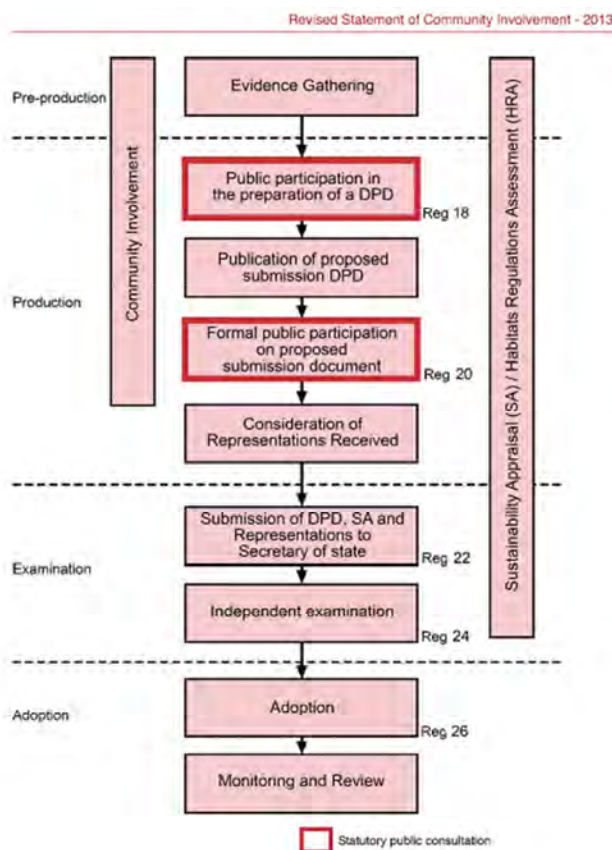


Figure 3.1 Stages in the Preparation of Development Planning Documents

	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	•		•				
Individual Consultation Letter/email		•		•	✓	•	•
Publication in Community Magazine	•	•	•	•			
Publication on Website		•	•	•		•	•
Public Notice ⁷ or press release		•		•			
Deposit in Public Buildings ⁸		•	•	•	✓	•	
Presentation offered to business and community groups		•	•	•			
Consultation Letter/email to interest groups	•	•	•	•		•	
Articles in Specialist Publications		•		•			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

Soundness

~~Draft St Helens Local Plan 2020 – 2035~~

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. [The National Planning Policy Framework \(NPPF\) \(2019\) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.](#)

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to

St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. [Nor is the plan consistent with National Policy in relation to this issue; NPPF \(2019\) paragraph 137 requires exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.](#)

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs*'. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the [GreenbeltGreen Belt](#). They believed this would have a negative impact on the individuals health and well-being.

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Council's own Green Belt Review, the land cannot be justified in removal from the Green Belt. These reasons include:

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
 - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
 - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
 - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from ~~Greenbelt~~[Green Belt](#) can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at '*setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment*' (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental consideration when considering this land for removal from the ~~Greenbelt~~[Green Belt](#) and allocation towards housing development.

2. Justified

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land ([NPPF, 2019, Section 13](#)). The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

3. Consistent with National Policy

NPPF February 2019 Chapter 9, Paragraph 108, part c, states when assessing sites for development, it must be ensured that, 'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The proposed development of 2,988 homes within one location and a further 2,000 homes within the immediate vicinity cannot be cost be cost effectively mitigated. The area is restricted by established, good quality viable terraced homes that prevent any significant change in structure to the transport network. Many of the directly affected access routes are main walking routes for children to and from school. The vastly increased traffic volumes and subsequent congestion will have a significant impact on the highway safety for these children.

NPPF February 2019 Chapter 9, Paragraph 109 states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'. It can be argued the cumulative impact of 2,988 homes in one location in conjunction with 2,000 further homes in the immediate vicinity, on the road network would be severe, due to the significant amount of extra car journeys this will impose on the main access routes. This would furthermore have an unacceptable impact on highway safety.

[In addition to the information given above, paragraph 72 of the NPPF \(2019\) states that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." In reviewing the additional evidence-based documents supplied by the council, all future infrastructure development is centred around the M6 near Haydock and J7 M62. A large-scale](#)

[development in the Bold Forest Park is currently not supported by any infrastructure plans, so currently, does not conform to the NPPF.](#)

NPPF February 2019 Chapter 11, Paragraph 118, part b, states that it should be 'recognised that some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage and food production'. The land referenced as 4HA in the LPSD, covers a variety of land types and the plan has failed to recognise the many functions these varying land types perform. The land supports many varied types of wildlife, including those on the red list for critically endangered. It provides recreation through the varied public footpaths, access routes to countryside and bridleways. It provides flood risk mitigation in an area that the St Helens Strategic Flood Risk Assessment 2014 identified as having multiple areas at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels of land in the GBR 2016.

NPPF February 2019 Chapter 11, Paragraph 118, part a, states 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for the planning permission should be refused. The land referenced as 4HA in the LPSD, as previously stated, covers a variety of land types. One such type is pasture and meadow land for grazing horses, that has been used for this purpose for many years and continues to be to the present day. The publication by Natural England, 'The Upland Management Handbook' February 2001, emphasised the importance of these pastures and meadows in supporting many endangered British Species including Lapwing and Skylark which have reduced to dangerous levels over the last 25 years. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species and therefore any development would result in significant harm to biodiversity and therefore should be refused.

[The proposals also contravenes NPPF \(2019\) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Releasing the land from Green Belt operates at odds to the NPPF, it does not promote the urban regeneration through recycling of derelict and other urban land.](#)

Conclusion

The Group concludes the St Helens Local Plan 2020 – 2035 cannot be adopted in its current form, particularly in relation to land reference 4HA within the plan. The belief is the plan fails the soundness test inclusive but not exhaustive for the reasons listed above. The statement should be considered along with the Assessment of the Local Plan and Green Belt Review document, completed on behalf of the Group and submitted with this statement.

The new 25 Year Environmental Plan should be given great consideration when reviewing the plan. The Environment Bill will include legislative measures to take direct action to address the biggest environmental priorities of our age; Air Quality and Protection and enhancement of our landscapes, wildlife and habitats. Michael Gove recently reiterated his intention that we become the 'first generation to leave the environment in a better state than we found it. (New Environment Protections Set Out in Flagship Bill, 19 December 2018). Furthermore he has stated in an article published on 26 February 2019, 'The natural world is our greatest asset and we all have a responsibility and role to play in protecting it for generations to come.' (Environment Secretary Michael Gove Welcomes Green Ambassadors for Year of Green Action, 26 February 2019).

The community that is directly affected by the removal of land parcels 4HA and XXX from the Green Belt and its subsequent development is predominantly rural, with the few residential areas classed as part of one of the most deprived areas in the UK. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard. At least one large property developer has procured land within 4HA and XXX and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. Whilst the NPPF encourages the active engagement of such developers, this seems to make the process unreasonable and unfair.

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Modification

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

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PO0012



Local Plan Considerations
Anthony Fitzgerald
to:
'planningpolicy@sthelens.gov.uk'
13/05/2019 15:25



1 Attachment



representation-form.doc

Good afternoon,

Please see letter of representation attached re the local plan for 2020-35.

Regards

Tony Fitzgerald

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Mr</u>	Title:
First Name: <u>Tony</u>	First name:
Last Name: <u>Fitzgerald</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>35, Dorgan Close</u>	Address:
Postcode: <u>L35 8PH</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>13/05/19</u>
-----------------------	-----------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Being forced through without due diligence and discussion with local communities

Please continue on a separate sheet if necessary

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

Please use up as much of brown field sites before moving onto green belt and think carefully about cross-border traffic/health/school/facilities etc as I think the plan is lacking in this regard

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

PO0013



The Local Plan

Sue Charles to: planningpolicy@sthelens.gov.uk

24/02/2019 12:39

[REDACTED]

I am appalled with St Helens Council

They are partly to blame for the demise of the town centre which is now a grey

miserable area most people won't visit .

Why all these houses on prime green belt land--there is no work , the area is

prone to flood ,it would create chaos and destroy an area with hundreds more

cars, let alone wildlife habitat

Concentrate on brown field places even in the centre where empty houses

are many

We will never get this land back when houses are built

Susan Charles

Sent from my iPad

PO0014

① - GEN ② - LPA04

E00003



Fw: REPRESENTATION TO THE LOCAL PLAN

to: planningpolicy

25/02/2019 08:49



From: PHIL ROUND <phil.round@blueyonder.co.uk>

Date: 24/02/2019 20:43

Subject: REPRESENTATION TO THE LOCAL PLAN

I wish to make representations reference the local plan.

In no way is this a balanced plan where a large proportion of green belt removal is concentrated on two specific areas, Newton and Haydock. I recognise the need for more housing and it good to see that new housing developments are being built on brown field sites. Unfortunately I do not see the two main developments in Newton, Vulcan and Viaduct sites being backed with necessary infrastructure to deal with traffic and additional population. This is likely to be repeated with the Parkside development, P/2018/0048/OUP which will add to traffic congestion, It is an inappropriate development due to the proximity of a residential area and a high volume of HGV's will end up on totally inadequate local roads. This is also an area of quality management where pollutants are often in breach of quality standards.

I cannot comment on other areas of the borough although there will need to be a change in the way the borough is managed if any local plan is likely to be successfully implemented.

Phil Round
76 Southworth Road
WA12 0DG

ps I AM NOT A ROBOT

PO0015

① - GEN ② - LPA06

E0010



Representation Local plan 2020-2035

Sonia Oakes to: planningpolicy

01/03/2019 14:29



Submitted by: mrs sonia oakes at 11 Padstow drive windle St. Helens wa10 6el. [REDACTED]. I am against the removal of the green belt particularly if the land between the A580, crantock grove, ecclesfield and houghtons lane (now 8HS) and now reclassified as "safeguarded" for development. I consider that the St. Helens borough local plan 2020-2035 is neither justified, effective or consistent with national policy. It is based on flawed methodology as it is based on aspirational employment growth predictions and a housing need using an older forecast (2014) ; it does not comply with NPPF 2018; it makes no mention of brownfield and previously developed land that is not yet available or included in the brownfield register . It is not making use of the existence of brownfield land that already exists and that would satisfy the housing planned by the removal of green belt . The plan is not sound as it doesn't satisfy the requirement for sustainable development and it promotes car dependency . It is not effective because it concentrates on green space development over town centre development with higher densities . Also there are major water pipelines that cut across the 8HS sites that cannot be built on . It would cause further gridlock in the area and delay ambulance services . The NPPF 2018 paragraph 109 states that development should be prevented if there would be an unacceptable impact on highway safety or the residual cumulative impact on the road network will be severe . Pedestrian crossing in the area of windle island is exceedingly difficult and has caused previous fatalities . It is also extremely difficult to turn into St. Helens from bleak hill particularly with other cars attempting to cross in the opposite direction from the petrol station . At the same time reduced bus service in this out of town area require elderly residents and others who do not drive to take taxis - even to get to local health centres and hospitals . The plan does not satisfy food security - particularly at a time when we are planning to leave the EU - by ignoring the country's agricultural needs and building on the agricultural grade 1&2 of 8HS. Once the green belt is lost it is lost for ever and the northwest which is the most congested area outside of London will continue to sprawl and become increasingly polluted creating increasing health and mental problems. The plan would further force people to drive out of the urban sprawl thus again increasing dependence on ownership of cars when the presence of green belt land encourages exercise and promotes well being . On the other hand we would hope that existing brownfield sites would be restored and be used in an attempt towards revitalising depressed areas .

Sent from my iPhone

PO0016

E00014



St Helens Local Plan
Mitchell, Councillor Cathy
to:
planningpolicy@sthelens.gov.uk
04/03/2019 12:40

① GEN
② LPA02

Dear Sirs,

① I represent residents in Burtonwood and Winwick. My concerns over the local plan are primarily in relation to infrastructure. A large number of houses built close to these villages will need separate road infrastructure as the local roads are rural in nature and already support a large volume of traffic.

② In addition, I am concerned that insufficient attention has been given to the role of greenbelt in separating settlements and preventing urban sprawl, particularly around the villages of Burtonwood and Winwick and would ask that this be looked at again.

Best wishes
Cathy

Cllr Cathy Mitchell
Deputy Leader of the Council

Burtonwood & Winwick Ward (Labour)

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PO0017

① - LPA05 ③ - IDP ⑤ - LPA04
② - LPA06 ④ - GEN

Page 1 of 1
E0018



LOCAL PLAN RESPONSE

Maureen B

to:

planningpolicy@sthelens.gov.uk

06/03/2019 08:47



1 Attachment



LOCAL PLAN EMB.docx

PLEASE FIND ATTACHED MY RESPONSE TO LOCAL PLAN 2020-2035 SUBMISSION DRAFT

I have chosen to respond by letter as your online form is not user friendly.

Hard copies of the form do not provide sufficient space for considered response.

ELLEN M BARKER
1 THE NOOK
WINDLE
ST HELENS
WA10 6EN



6 FEBRUARY 2019

LOCAL PLAN
ST HELENS COUNCIL
TOWN HALL
VICTORIA SQUARE
ST HELENS
WA10 1HP

Dear Sir/Madam

Reference: St Helens Local Plan
Green Belt Review (2018)
Policy LPA05

I have chosen to respond by letter as your online form is not user friendly. Hard copies of the form do not provide sufficient space for considered response.

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

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

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

①

②

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

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

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

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

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

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

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal

document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

5

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

YOURS FAITHFULLY

ELLEN M BARKER (MRS)

PO0018



St Helens local plan 2020 - 2035

Sarah Hughes

to:

[Redacted]
[Redacted]
[Redacted]

07/03/2019 13:38

Hide Details

From: Sarah Hughes

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

1 Attachment



Failure to Inform.docx

Please accept the attached letter as formal notification with regards the failure to inform affected residents with regards to the draft St Helens local plan 2020 - 2035. I trust you will consider this letter and act accordingly.

Kind Regards.

Sent from [Outlook](#)

Frenchfields Crescent
St Helens
WA94FZ

To whom it may concern,

Re: Failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035

As part of the Council's adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

I request an immediate extension to the consultation period for the Draft Local Plan beyond the current deadline of 13th March 2019 and that the council take all reasonable steps to inform and ensure involvement from the local community.

Yours Sincerely,

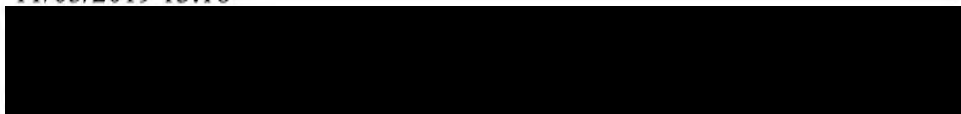
Christopher & Sarah Hughes

PO0019

ELOOS 6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations
 Dan Ingram
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 13:18



1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram
 Senior Planner



Consider the Environment, Do you really need to print this email?

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① - GEN

② - Spatial Vision

③ - Objective 4

④ - key Diagram

⑤ - LPA01

⑥ - LPA02

⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St. Helens
Council

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

EF0176

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

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

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

Representations on Behalf of Andrew Cotton and Family

March 2019

2.0 PLAN PERIOD, VISION, OBJECTIVES AND KEY DIAGRAM

Plan Period

- 2.1 It is noted that the Plan Period for the New Local Plan is 2020 – 2035. Despite this much of the evidence which underpins the Plan covers differing Plan Periods. Examples of this are detailed within the table below:

Description	Plan Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

- 2.2 Whilst it is unclear why these differences exist, it is clear however that the Plan periods are not aligned which introduces unnecessary complexity to the Plan, providing opportunity for misunderstanding and misinterpretation.

Vision

- 2.3 Our Client is generally supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the urban renewal of existing urban areas, the creation of new urban areas, diversification of the local economy and a wider and improved choice of housing catering for a diversity of needs.
- 2.4 Notwithstanding this our Client is concerned that the Vision does not make reference to the Bold Forest Garden Suburb. Given that this is a key aspect of the New Local Plan, and the single-most exciting opportunity for the Borough in decades, our Client considers that specific reference should be made to it within the Vision, as its delivery is a clear aspiration of the Council and one which should be outlined as a priority from the outset.

5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by Barton Willmore on behalf of our Client, Andrew Cotton and Family.

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ①
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ②
- Policy LPA03, establishing the broad development principles for the Borough; ③
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ④
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑤
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑥
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑦

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑧

PO0020



The New 'St.Helens Borough Local Plan 2020-2035'
 Gerry Ryder
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 16:28

EL0058

- ① - LPA02
- ② - LPA05
- ③ - LPA06
- ④ - General

Dear Sir/Madam,

As a Member of Rainhill Civic Society, I wish to comment on the proposed Local Plan for 2020-2035.

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

Policy LPA02

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

①

Policy LPA05 & Appendix 7

The Society objects to Policy LPA05 and Appendix 7, which outline the Council's aim for 486 dwellings per annum across the Borough and 956 units for the safeguarded 3HS site. Housing requirements outlined in Table 4.5 and Table 4.6 lack consistency. Table 4.6 illustrates a requirement for 7,245 houses which equates to an additional 1,437 houses and approximately 57 hectares of land as opposed to the 288 hectares as outlined in Table 4.5. Furthermore, the Local Plan does not acknowledge the availability of brownfield land to accommodate for 5,808 houses, as outlined on St Helens Council brownfield register. There has been a decline in the Borough's local population since 1981, and so the need for additional housing in the area is unjustified. The decline of industries in St Helens since the mid-1980s suggests that income-based salaries to purchase property come from outside of 3HS and the Borough.

②

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

②

The introduction of increased road traffic will add further strain and congestion on local communication routes such as Warrington Road (A57), the only A-road through Rainhill, Rainhill Road (B5413) including Skew Bridge, Portico Lane (B5201) / Prescott Road junction which are currently at capacity according to St

Helens Council. Increased traffic will also impact small resident estates and minor B and C roads including Two Butt Lane, Kendal Drive Estate (Rainhill), Royal Oak Estate (Whiston), Mill Lane, View Road, Stoney Lane, Blundells Lane, Longton Lane and Holt Lane.

②

As a statutory body, Sports England objected to the Stage 1 Local Plan due to the change of use of Eccleston Park Golf Club (3HS). The Council has an obligation to address such objections from statutory bodies either as being resolved or upheld. St Helens Council should provide compelling evidence for over subscription of the golf creational facilities in the local area which is still awaited.

④

Policy LPA06

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

③

Yours faithfully

Gerald Ryder
74 Deepdale Drive
Rainhill
St Helens
L35 4NW

PO0021



Local Plan
Louise Robinson
to:
planningpolicy
11/03/2019 17:36



Sarah Louise Johnston



ELOOG2

① - LPA05

② - LPA04

③ - DEL

④ - SA

I am writing to object to the local plan. Namely:

In respect of the overall figures in the Plan;

there are no exceptional circumstances to justify not using the standard method to calculate housing need

the economic analysis is flawed and based on over-optimistic assumptions
the level of land needed is therefore not as high as set out in the Local Plan

therefore there are no exceptional circumstances to change Green belt boundaries

other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
these alternatives will have less impact on the environment and lead to less need for new infrastructure

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

①

②

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

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

SUGGESTION
M20

Specific points on site HA8 (Rookery Lane)

Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC¹'s own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

④

This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions,

①

both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142 .

The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

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

Specific points on site 9EA - Development of Industrial Area

I question this on Health and Safety grounds.

There are a considerable number of traffic accidents at both ends of Mill Lane. The top of Mill Lane where it meets the Bypass has three blind corners, and makes this stretch of road extremely dangerous for normal car users never mind increased traffic and large volumes are trucks.

The roads are narrow and i am not sure they would even accommodate two lorries passing at the same time

Quite often lorries park at the top of Mill Lane, meaning drivers have no option but to overtake into incoming traffic directly off the bypass. this happens today and i have photo evidence, this is only going to get worse.

The estate is close to housing, there was an explosion last year on the industrial estate and its lucky nobody was injured.

The entrance to the industrial estate from Mill Lane is not sufficient, and more traffic will only increase the risk of injury to those using the road

If this part of the plan goes ahead, then the committee needs to be accountable for personal injury / fatalities as a result as this in my view is a serious risk. I actually cannot believe the council are considering this development and i warn you as a local resident [REDACTED] what is coming and whilst i hope that i am wrong, i will not shy away from making this email known if ever needed as i feel you have been warned.

Many thanks

PO0022



Local Plan
Louise Robinson
to:
planningpolicy
11/03/2019 17:36



Sarah Louise Johnston



ELO062

① - LPA05

② - LPA04

③ - DEC

④ - SA

I am writing to object to the local plan. Namely:

In respect of the overall figures in the Plan;

there are no exceptional circumstances to justify not using the standard method to calculate housing need

the economic analysis is flawed and based on over-optimistic assumptions the level of land needed is therefore not as high as set out in the Local Plan

therefore there are no exceptional circumstances to change Green belt boundaries

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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

①

②

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

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

SHBC should
amend

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Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC¹'s own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

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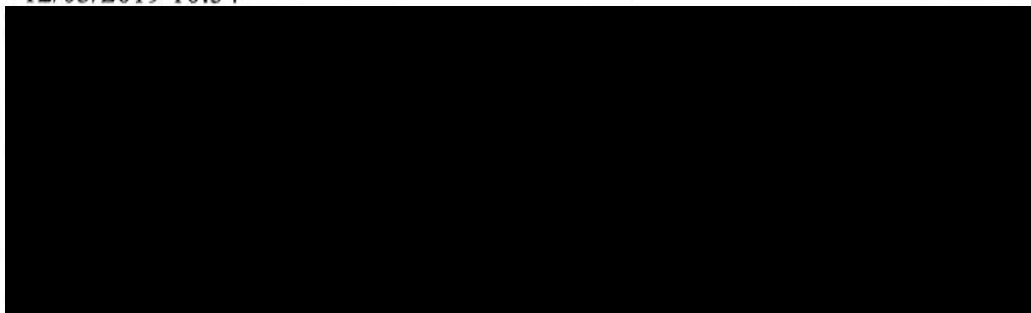
Many thanks

PO0023

E10081



St Helens Borough Local Plan 2020-2035: Submission Draft
Bannister, Edward
to:
planningpolicy@sthelens.gov.uk
12/03/2019 10:54



1 Attachment



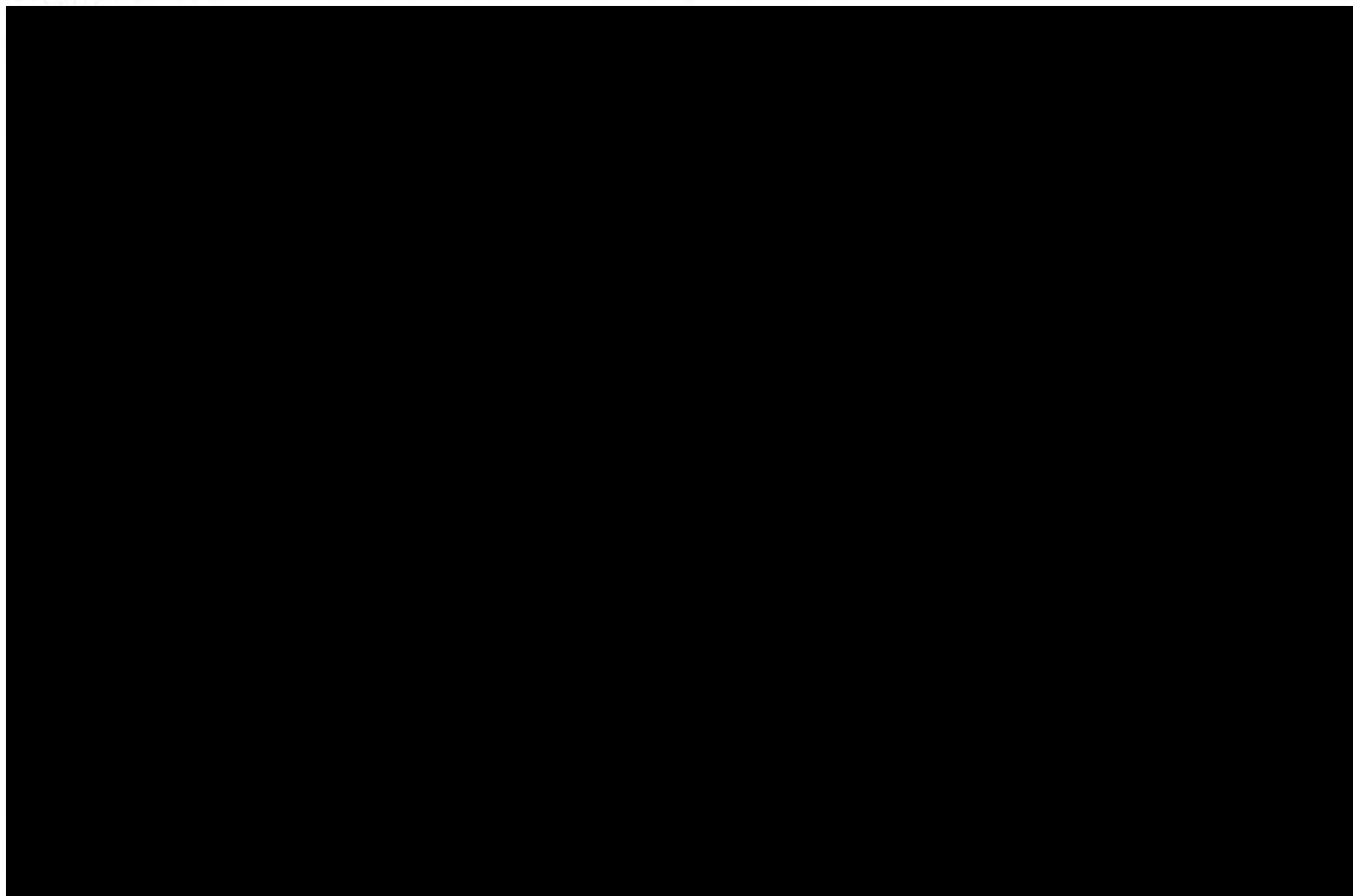
St Helens Draft Submission_KMBC_Response.Mar19.docx



Dear 

Please find attached Knowsley Council's representation to the St Helens Borough Local Plan 2020-2035 Submission Draft. I would be grateful if you could confirm safe receipt.

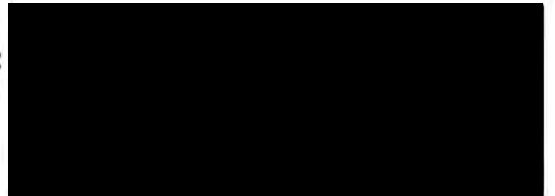
With best regards,
Edward





Knowsley Council

Please ask for:
Tel No:
Email:

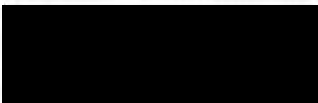


EL0081



Development Plans Manager
St Helens MBC
Town Hall
Victoria Square
St Helens
WA10 1HP

By email: planningpolicy@sthelens.gov.uk



Our Ref: n/a
Your Ref: n/a

① = LPA 04

② = LPA 06 - EMPLOY

③ = LPA 06 - HOUSING

Date: 13 March 2019

④ = LPA 05 (4HA)

⑤ = GEN

RE: St Helens Borough Local Plan 2020-2035 Submission Draft

Thank you for your email of 18 January concerning the above. We are pleased to set out our consultation response in accordance with the Duty to Cooperate.

Knowsley Council's representations on strategic elements of the Plan and other factors are set out below, our comments are mainly centred on housing and employment, since these are the two most important issues facing the production of any Local Plan.

Strategic matters

In general, we note the reduction in the overall level of growth proposed since the publication of the Local Plan Preferred Options document in 2016.

Housing

We acknowledge the fact that the status of the former Eccleston Park Golf Club site has been downgraded, having previously been proposed for allocation at the Preferred Options stage.

The proposed development of the Bold Forest site (for housing) is not of particular concern from Knowsley Council's point of view, as we believe that it is unlikely to adversely impact on Knowsley's ability to achieve our own target of delivering 450 homes per annum, and our objective of rebalancing the housing market. The implications of this growth on the strong commuting and migration links between Knowsley and St. Helens, as well as our closely aligned housing markets, will require continued cross border collaboration between the two boroughs which we very much welcome.

Employment

We would agree that the policy to exceed the residual employment land requirement identified seems reasonably necessary, owing to the relative lack of take-up in previous

] LPA 04
①

- Community infrastructure impacts (including education and health care); and
- Housing market competition.

3

Former Eccleston Park Golf Club

The scale of any development at the former Eccleston Park Golf Club (956 homes) post 2035 would undoubtedly generate a significant uplift in local traffic, and you will be aware that officers from our respective highways departments previously met (in May 2018), to discuss this issue further. At this time we simply wish to reiterate our concerns over the potential impact of developing this site around the sensitive local road network, and we would welcome discussions in due course with a view to identifying specific points of action, in order to minimise the potential impacts both on the highway network and local residents, should the site end up being safeguarded in the eventual adopted Local Plan.

3

Notwithstanding the above, we consider it unlikely that the former Golf Club site would be in direct competition with the similarly large development sites available in Knowsley given the relative disparities in the anticipated development commencement dates now that the site is no longer proposed for immediate allocation in the Submission Draft.

Bold Forest Garden Suburb

Coupled with the fact that fewer than 500 housing completions are anticipated before the end of the plan period in 2035, the site's location towards the eastern side of St.Helens borough means its allocation and development would be unlikely to have direct negative impacts on Knowsley residents. Nor would it be in direct competition with any of Knowsley's strategic housing sites, not least the Halsnead Garden Village.

4

Other sites

The other proposed residential and employment land allocations would have fewer significant impacts, either due to their distance from Knowsley or due to the time period for which they are allocated for development. Again, however, we request that the Local Plan ensures that any potential negative impacts on Knowsley are identified appropriately and suitably mitigated.

4

Overall, it is encouraging to see that many of the concerns we identified in our response to the Preferred Options consultation have been addressed in the Submission Draft, and we look forward to working with you to ensure that our remaining issues are addressed as the new Local Plan moves towards adoption in 2020. We propose to continue to do this in the positive, clear way which we have been able to do up to now, and we remain committed to supporting our neighbouring authority towards a sound Local Plan which benefits the whole Liverpool City Region, while mitigating the potentially negative impacts on our borough.

5

PO0024

E10007

8HS



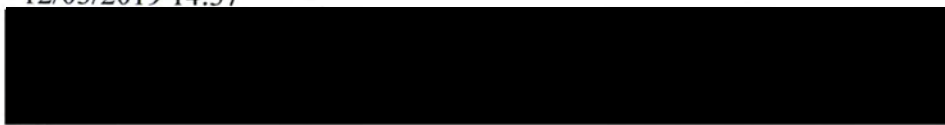
ST HELENS BOROUGH LOCAL PLAN 2020-2035

Margaret Edwards

to:

planningpolicy@sthelens.gov.uk

12/03/2019 14:37



① GEN

② LPA06

③ LPA04

1 Attachment



8HS 12.3.2019.docx

Please find attached my comments regarding the above.

Please provide confirmation that my comments have been received.

Mrs Margaret Edwards

1

planningpolicy@sthelens.gov.uk

Mrs Margaret Edwards

22 Lynton Way

Windle

St. Helens WA10 6DZ

01744 29107

12th March 2019

I would request to be informed on future stages of the Local Plan process by email. ✓

I am writing to object to, and comment on, the Preferred Options of the New St. Helens Local Plan with particular reference to policy on Green Belt. Any comments I make are as a concerned resident [REDACTED] on the edge of the land to the south of the East Lincs Road and bordered by Houghtons Lane and Crantock Grove (8HS). ✓

I consider that the Local Plan is neither justified, effective or consistent with National policy. ✓

I believe that the Local Plan is neither legally compliant or sound and does not comply with the duty to cooperate. ✓

I consider that the Local Plan is unsound as it is not justified, being based on flawed methodology. It is not effective as it is not deliverable, and is not consistent with National Policy as it does not comply with NPPF 2018. ✓

This version of the Local Plan does not satisfy:

- Effective land use by concentrating on Green Space development over town centre development with higher densities
 - Food security by ignoring Agricultural Land Quality
 - The criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs
 - The requirement for Sustainable development
 - Sustainable housing, as targets proposed are based on aspirational employment growth predictions
- ①

GREEN BELT

The area previously referred to as HA16 needs to be kept as Green Belt status and not kept as Safeguarded Land which is not protected from development. ✓

I believe in the protection of open spaces for the benefit of future generations and in the reasons they were set up initially, and value the unique character of our local area. ✓

310007

As all the local major amenities and shops are towards or in the St. Helens Town Centre area, the majority of the journeys from the site will not be towards the East Lancs Road (A580), but towards St. Helens Town Centre.

The roads which are most likely to take the strain of these additional journeys are Lynton Way [redacted] Calderhurst Drive, Bleak Hill Road/Rainford Road junction, to name but a few, and all surrounding roads in the immediate vicinity.

I see speeding traffic, and major congestion daily on Bleak Hill Road from peak time traffic, and school traffic and parking twice daily. Cars are parked all along the areas near to Bleak Hill School and inside double yellow lines on both corners of Calderhurst Drive, making it very difficult to exit that road, with possible consequences of accidents to drivers and pedestrians.

Windle does not have a food shop other than Tesco at Windle island and this facility is rarely available by car down Bleak Hill road at the above times. Journeys to the East Lancs Road and Rainford Road for any other reasons is equally difficult at the above times, requiring access by other routes.

ESSENTIAL PUBLIC SERVICES

Windle has no existing GP or health centre, no NHS dentist, and no community centres requiring Windle residents to go out of the ward to access these services.

Our Primary schools are already oversubscribed, with Bleak Hill already having been forced to become three form entry in 2016 and that is without 1,000 more homes in the immediate area.

4

Unlike neighbouring areas like Eccleston, and Rainford, (which is only being asked to take up to 300 homes in the first phase of the Local Plan), Windle has no train station, and also has a severely reduced bus service.

While the population and infrastructure are the most significant reasons for my objections for use of Green Belt land, the whole plan seems to be a 'catch up' exercise as St. Helens Council and the planning department have had many years to develop opportunities throughout the borough with little or no success and as a result has fallen so far behind other towns in the area. As St. Helens will face fierce competition from all local authorities in the area under pressure from central government to produce their plans, it would be disastrous to lose large areas of our Green Belt for all time based on short term speculation and pressures.

I hope my comments and objections will be carefully reviewed and knowledge and consideration taken of the content along with the many other responses you receive.

PLEASE PROVIDE CONFIRMATION THAT MY COMMENTS WERE RECEIVED, READ AND CONSIDERED AS PART OF THE REVIEW OF THE PLAN, SPECIFICALLY REGARDING WINDLE

Mrs Margaret Edwards

②

highway

②

main road

②

PO0025

Site 8HS

① - General

② - LPA06

③ - LPA05
12/03/2019 16:23Local plan
John Oakes to: planningpolicy

From:

To:

Mr John Oakes, 11 Padstow Drive Windle St Helens Merseyside W10 6EL tel: [REDACTED]
 [REDACTED] wish to submit my representation against the St. Helens
 Local plan particularly for the removal of the green belt and specifically
 for the land known as 8HS between the A580, Crantock grove, Ecclesfield Rd
 and houghtons lane. I consider the plan not to be sound because it is not
 justified, effective or consistent with national policy (NPPF 2018) - The ① & ②
 latter because it promotes unsustainable traffic growth causing exacerbated
 traffic issues. [REDACTED] the plan's targets are based on older forecasts for
 example of housing needs (2014) , and aspirational employment predictions ②
 [REDACTED] it ignores the need for grade 1 and 2 agricultural land in a future
 Brexit and the increasing demand for local produce ; it is not justified as
 there is sufficient brownfield sites within the borough that would satisfy
 the needs for housing in areas that are better served by public transport
 and there should be a policy by the LRCA and the council to bring
 'unsuitable ' sites outside the brownfield register back to use . It is not
 effective as it concentrates on green space development over town centre
 development with higher densities . We have already seen how out of centre
 retail developments has been the death of St. Helens town centres and again
 how this promotes car dependency . The plan is not in line with sustainable
 development or the revitalisation of brownfield sites ①

Sent from my iPhone

PO0026

①-LPA05 ③-IDP ⑤-LPA04
②-LPA06 ④-GEN

Page 1 of 2

ELO105



Local plan
Lorna Chana
to:
planningpolicy
12/03/2019 16:36

58 Springfield Lane
Eccleston
St Helens
WA105HA

11 March 2019

Reference: St Helens Local Plan

Dear Sirs,

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

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

①

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

②

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

①

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any

exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

①

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

④

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

③

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

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

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

⑤

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Lorna Chana

PO0027

①-LPA05 ③-IDP ⑤-LPA04

ELO128

②-LPA06 ④-GEN



URGENT - Representation in response to Local Plan Submission Draft (LPSD)

Sue Lea-Jones to: planningpolicy

12/03/2019 20:28

1 attachment



objections.docx

Please find attached my Representation in respect of the above local plan.
Please acknowledge safe receipt as I note the deadline is 13th March 2019.

Many thanks

Mrs Lea-Jones

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23.

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The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

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

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

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⑤

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Mrs Susan Lea-Jones

PO0028

① - LPA05 ③ - IDP ⑤ - LPA04
② - LPA06 ④ - GEN

Page 1 of 3

ELO137



Representation in response to local plan

Dave Twentyman

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:25



Please see below my representation in response to local plan. However, I would just like to express my disappointment in the presentation of the online form. The form is simply not practicable and the terminology used is a deliberate attempt to baffle, confuse and ultimately obstruct ordinary taxpayers from articulating their objections to this plan. It is quite obvious that this is an attempt to reduce the number of objections and no doubt will be quite successful in doing so.

David Lea-Jones

32 Crantock Grove

St Helens

Merseyside

WA10 6EJ

12th March 2019

Reference: St Helens Local Plan

Dear Sirs,

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

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

①

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

①

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

②

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

①

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

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has

④

significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. ④

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. ③

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

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

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs! ⑤

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

David Lea-Jones

[Sent from Yahoo Mail for iPhone](#)

PO0029

①-LPA05

③-IDP

⑤-LPA04

Page 1 of 1

②-LPA06

④-GEN

ELO141



Local Plan Objections

Brian Muskett

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:44



1 Attachment



LPSD - Brian Muskett.docx

Find attached my comments and objections to the Local Plan.

I realise you have the online form but my preference is the letter version attached.

Yours faithfully

B Muskett

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Yours Sincerely,

B Muskett

PO0030

ELO142



Objection to Rainford Local Plan

jacqui ashton

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:50

Hide Details



1 Attachment



REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD.docx

See attached Representation.

Sincerely Jacqui Ashton

SITE 8HA

① - LPA05

② - GENERAL

③ - S.A.

> ④ - DEC PARA 1.7.2

⑤ - LPA02

2. Safeguard the countryside from encroachment.
3. Preserve the setting and character of historic towns/villages (Rainford is a heritage site).
4. Assist urban regeneration by recycling derelict and Brown Land. ✓
5. To conserve visual amenity and biodiversity.

In St Helens we have a lower population than 30 years ago (Official Census years 1981 through to 2011). Despite the statistics cited by the LPA- which the census figures disprove- there is no housing crisis, as the Plans would have us believe. ✓

Why, based on the Council's own figures- when it is claimed that St Helens population will increase by 6843 in the future, are their preferred option proposals to build almost double that amount of new houses (13110)?

Why, when we are an ageing population (the Council's own figures state there will be an increase by 15000 in the 65 and over age group, and 8000 fewer people under 65) are the proposed developments in Rainford predominantly family homes. What of the elderly and their housing requirements? ①

Currently there are 3500 empty homes in and around St Helen -almost the amount required according to the local plan (4000 homes) - whilst Government policy requirement is to prioritise the refurbishment of such housing stocks, bringing them back into use, if necessary using compulsory purchase powers before consideration of other development means. ②

Having such a large number of empty (and decaying?) properties across the Borough (4.5% of the housing stock- almost double that of its neighbour Halton!) is detrimental to St Helens, whereas the re-categorisation and subsequent development on all of the Towns greenbelt not only fails to address this issue but will also destroy forever the visual and recreational amenity such areas provide. ②

What of the Brownland stocks across St Helens, I was unable to access the brownland register which the Council has not made publically available. Government policy is to develop brownsites before resorting to removal of greenbelt only under exceptional circumstances. There are no exceptional circumstances in this case, except the Council's greed for revenue that is not in the wider interest of its tax paying population. ②

Turning specifically to the Rainford at-risk greenbelt, as well as being Grade A agricultural land, that is more productive now than ever in its history, it supports the local and wider economy, local employment and wildlife biodiversity. ①

It provides a valuable visual amenity that supports sport and leisure facilities and overall offers a rich environment for rural tourism in Rainford. There are cycling groups, ramblers associations, horse riders and birdwatchers coming specifically into Rainford for its village character, and culture.

Turning specifically to HS21, HS20 and HS21 those farms that have diversified into equestrian business that will be directly reflected by the Local Preferred Options. I know that two of these local businesses are reliant on livery for horses for their livelihoods, neither are

- NOT RELEVANT

REAS TO LPAO

SITE NO LONGER BEING TAKEN FORWARD.

PO0031



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

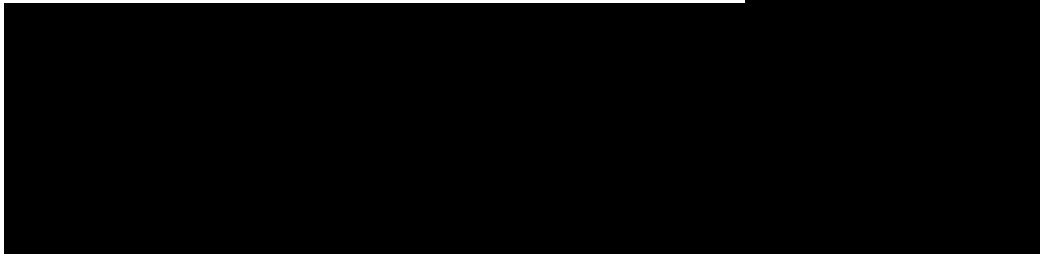
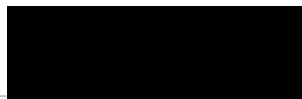
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

Would you like to be kept updated of future stages of the St Helens Borough 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	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

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, 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.

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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2. PLAN PERIOD, SPATIAL VISION AND OBJECTIVES

Plan Period

- 2.1 The Submission Draft document identifies that the plan period for the emerging Local Plan is 2020 – 2035, a 15 year time period. This approach is supported by Paragraph 157 of the NPPF which encourages Local Plans to:

"be drawn up over an appropriate timescale, preferable a 15 year time horizon, taking account of longer term requirements, and be kept up-to-date".

- 2.2 Whilst the above approach appears to meet the minimum requirement for identifying an appropriate plan period, the Local Plan is somewhat confusing in this regard as the Plan itself appears to plan for a period between 2016 to 2035. Indeed, the evidence that the Council appears to rely on, including the timeframe for identifying the Objectively Assessed Needs of the Borough, appears to commence at 2016. 01
- 2.3 As we set out in further detail later in these representations (in particular in relation to housing requirement and supply) the differences between the plan period and the evidence base risk adding complexity to the emerging Plan and may result in the potential for misunderstanding and misinterpretation and unnecessary complexity. For example, the housing requirement evidence base covers a period of 19 years between 2016 and 2035, housing supply is addressed within the SHLAA 2017 but the plan period covers the period of 2020 – 2035. This mismatch of evidence with the plan period has the potential to cause unnecessary confusion. We would suggest that the time period for the Local Plan is amended to 2016 – 2035 to reflect the evidence base period.

Vision

- 2.4 Our Client is generally supportive of the proposed Spatial Vision for St Helens. The Spatial Vision is consistent with national policy and will help to bring forward positive economic and social change. Our Client, for the reasons set out within these representations, has some concerns in relation to whether that vision can be realised and whether the Local Plan will plan fully to meet the aspirations of the Council. 02
03

PO0032



Local Plan Objection

hconley

to:

planningpolicy

13/03/2019 09:21



Mrs Hazel Conley



13 March 2019

Reference: St Helens Local Plan

Dear Sirs,

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

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 01

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. 01

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Yours Sincerely,

Mrs Hazel Conley

PO0033



Local Plan Objection

hconley

to:

planningpolicy

13/03/2019 09:26



Mr Neil Conley



13 March 2019

Reference: St Helens Local Plan

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Yours Sincerely,

Mr Neil Conley

PO0034

ELO167



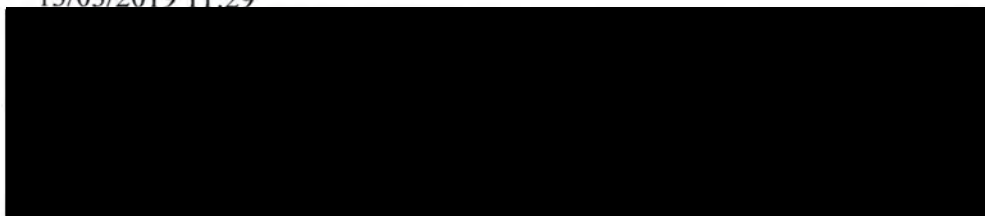
Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



1 Attachment



St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

Good morning

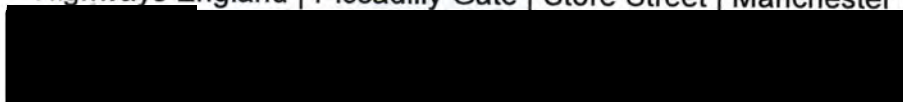
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD



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Highways England Company Limited | [Redacted] | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |



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- ① - PARA 4.27-8
- ② - LPA04-1
- ③ - LPA05
- ④ - LPA03
- ⑤ - LPA07 - Criteria
- ⑥ - TIA
- ⑦ - IDP
- ⑧ - APPENDIX 5
- ⑨ - LPA07 - Criteria
- ⑩ - Green ⑥

Our ref:
Your ref:

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

Adam Johnson
Highways England
Piccadilly Gate
Store Street
Manchester
M1 2WD

13 March 2019

Dear Sir / Madam

ST HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT)

Thank you for consulting Highways England regarding the submission draft of your Local Plan. We very much welcome the opportunity to review your plans and provide advice that I trust will be helpful to you as the plans proceed.

Highways England is responsible for the Strategic Road Network (SRN) in England. Within St Helens this includes parts of the M62 and M6 motorways and, to the north and west, the M58 and M57 motorways. The comments I make here relate to the potential impacts of your plans on that network.

On the whole, we are supportive of the methodology used and the outcomes shown within the Plan. Significant work has clearly been undertaken regarding both the Local Plan itself and the supporting transport evidence base. That notwithstanding, there are gaps in the information that has been published as part of the consultation process, and as such there are a number of points and recommendations we wish to make resulting from our review. These areas are listed below.

Major Road Network

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region.

Strategic Employment Sites

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan

cumulative development impact along the M6 corridor associated with development in Wigan.

- The IDP does not address the capacity of the existing infrastructure, nor does it set out any detail regarding the type or scale of interventions which may be required following the adoption of the Local Plan and build-out of subsequent developments. It also does not give any indicative timescales for delivery of required infrastructure. It is noted that network capacity is later set out in the Transport Impact Assessment report, however we would expect greater detail to be provided.
- Due to M62 Junction 8 falling under the jurisdiction of both Highways England and Warrington Borough Council, St Helens should liaise with both parties to assess the traffic impacts of delivering the allocated employment land at the Omega South-Western Extension.

SRN Junction Performance in Future Scenarios

Within the TIA are a number of modelling assessment scenarios for determining the impacts on SRN junctions in the future assessment year of 2033. This assessment has identified that there are a number of issues arising in this future year, which are summarised below:

- M62 Junction 7
 - This junction is already approaching absolute capacity.
 - It is more likely to be impacted by housing developments than employment allocation.
 - Overall, the TIA displays a trend that delivering the Local Plan growth in conjunction with existing planned infrastructure schemes will result in M62 Junction 7 exceeding absolute capacity.
- M62 J8
 - This junction already exceeds practical capacity and is beginning to approach absolute capacity.
 - Overall, the trends display that M62 Junction 8 is highly susceptible to significantly exceeding capacity in the Local Plan period, due to its proximity to both St Helens and Warrington, and therefore likely requiring increased capacity due to planned growth on both sides of the junction.
- M62 Junction 9
 - This junction has already reached absolute capacity.
 - Overall, the trends display that M62 Junction 9 is susceptible to exceeding capacity in the Local Plan period. However, the direct impacts from Local Plan growth appear to be lessened, possibly due to the nearby large allocations also being close to Junctions 22 and 23, which could result in trips accessing and egressing the network at different locations.

- M6 Junction 22
 - This junction performs with a fair amount of capacity to spare.
 - However, a high-level analysis using Google traffic data suggests that the southbound off-slip experiences slow moving traffic, while northbound traffic around the junction is slow in the PM peak.
 - As stated in regard to M62 Junction 9, because there are relatively few sites, and all of them are also close to M62 Junction 9 and M6 Junction 23, this increases the likelihood of trips dissipating elsewhere along the network and therefore reduces the impact of Local Plan growth at Junction 22.
- M6 Junction 23
 - This junction has already reached absolute capacity.
 - Overall, the trends display that Junction 23 is highly susceptible to significantly exceeding capacity in the Local Plan period, due to its proximity to a significant cluster of planned growth in St Helens, in addition to that fact that it's already reaching absolute capacity in the base year peak hours.
- M6 Junction 24
 - This junction currently exceeds absolute capacity in AM peak, but has a fair amount of capacity in PM peak.
 - A similarly dense cluster of proposed site allocations as at M6 Junction 23, due to the proximity of several sites to both junctions. This therefore correlates with the trends displayed from the TIA. However, further evidence in terms of anticipated development phasing, trip generation and trip distribution would be beneficial in order to allow Highways England to better understand the network need in the Local Plan period.

The Transport Impact Assessment has highlighted that the following junctions will exceed capacity by 2033:

- M62 Junction 8;
- M6 Junction 23; and
- M6 Junction 24.

The inclusion of a comprehensive site-based analysis – providing information such as trip generation, trip distribution and proposed phasing of development – would provide a more robust evidence base. This would allow Highways England to better understand the needs of the network in the Local Plan period and be a proactive planning partner rather than reactive to development.

Whilst it is noted that M6 Junction 22 is not projected to exceed capacity, further interrogation of the results is required due to the interaction with the proposed Parkside East and West development sites as well cumulative development occurring along the M6 in Wigan.

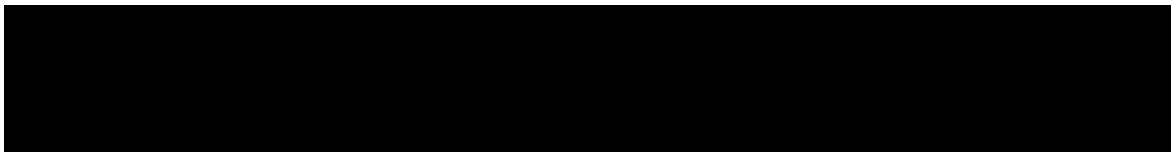
PO0035



Local plan
Fionnula Eaves
to:

planningpolicy@sthelens.gov.uk, [REDACTED]

13/03/2019 12:19



I wish to add following comments to Local Plan.

I believe that the Local Plan as proposed is excessive, and misdirected. The UK Government describes greenbelt thus... "The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." The proposed Local Plan flies directly in the face of this statement and does not address the following Government guidelines on Green Belt Policy...

- 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
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

I fear that implementation of the Local Plan in its present form will affect the residents of Newton-le-Willows, Haydock, Golborne and Winwick in a most adverse manner, with few or no benefits. Some of the reasons local residents will suffer distress, hardship and misfortune are as follows;

*Increase in traffic on local roads and increased congestion on main arterial routes (M6, M62 & A580).

*The local plan is skewed excessively, with a high proportion of the proposals in the east of the borough.

*The proposed commercial development is almost entirely warehousing and distribution, in other words low value, low density employment with high traffic, high pollution effects. The jobs provided by warehousing work is not sustainable particularly with the increase on technology, fewer people are needed to work in these environments. Low paid jobs and low skilled jobs are not needed on the borough and the council should be looking to increase skills in areas of growth such as science and engineering.

*Increased air pollution, this is particularly significant in Newton-le-Willows as the area already suffers from higher than normal levels of air pollution, the local plan does not address this. Increased air pollution will cause respiratory problems such as asthma and thus increase the demand on local health services. The council has a duty of care to the residents in this regard.

*Increased noise pollution with more cars and lorries using local roads at unsociable hours due to the 24/7 nature of the logistics industry

*Increased light pollution from cars and lorries and warehouses within the vicinity. Proving a problem for residents and nature.

*Loss of local amenities, footpaths, nature walks, and allotments. Access to Nature is important for both mental and physical wellbeing for ourselves and future generations.

*Newton High Street Conservation and Shopping area will be adversely impacted with increased traffic. It will become quite dangerous as what is already a busy area will become busier which could have implications for the pedestrians such as school children who regularly walk this

route. The local high school is very close by and there are few crossings. 1 with traffic lights and 1 staggered crossing without lights by the spar shop. The access road to Parkside is only outlined in the 2nd phase of the development.

*The local plan does not address the issues of the extra strain on local services including the provision of schools, medical services and etc.

*Loss of productive agricultural land and jobs, including land that currently houses productive honey bee hives.

*Loss of nature and natural habitats which are homes for wild birds including some species which are in decline. Particularly in the vicinity of Newton Brook.

*The Local Plan is based on the dubious proposition of increasing Town Hall revenue and ignores the adverse effects of wholesale development on a semi-rural area, the catastrophic destruction of Green Belt and the negative impact on the lives of local residents for generations to come.

I suggest the local plan is short sighted and misguided in its aims and objectives, and that it should be wholly rejected in its current form. It should be re written with objectives that satisfy ALL the residents of the borough, with a more progressive and forward thinking outlook on the type and style of economic development required to bring high grade jobs and investment to the borough, and with better regard to both the environmental and social impact in the areas where development is to take place.

yours faithfully

Fionnula Byrne

74 Wayfarers Drive newton le willows Merseyside WA12 8DG

PO0036



St Helens Local Plan 2020 - 2035, Submission Draft - Representations
Dan Ingram
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

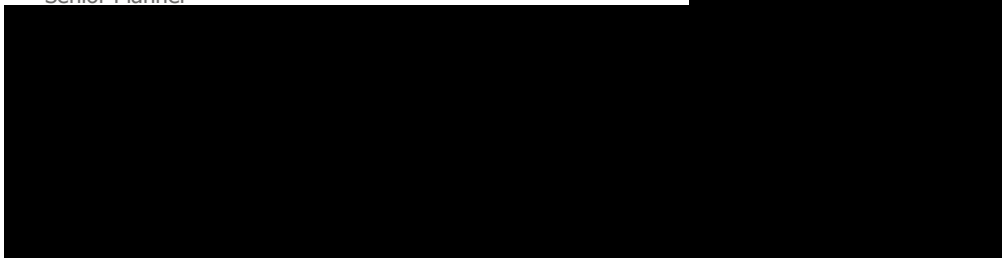
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.
Dan Ingram
Senior Planner





St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMOORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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

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

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER
SITES.

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

Representations on behalf of Miller Homes

March 2019

2.0 HOUSING AND ECONOMIC GROWTH IN ST HELENS

2.1 The New Local Plan makes provision for a minimum of 9,234 net additional dwellings between April 2016 and March 2035 (Policy LPA05) by identifying 215.4 hectares of land for development between April 2018 and March 2035 (Policy LPA04).

2.2 It is noted that the Plan period for the New Local Plan is 2020 – 2035. Despite this, much of the evidence which underpins the Plan would appear to cover differing periods. Examples of this are detailed within the table below:

Description	Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

2.3 It is somewhat unclear as to why so many differences exist; the failure to align these periods has the potential to introduce unnecessary complexity to the Plan, providing the potential for misunderstanding and misinterpretation. Clarification on this matter would be welcomed.

2.4 Notwithstanding this, our Client is supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is considered to be sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the regeneration/renewal of existing urban areas, the creation of new urban areas, diversification of the local economy, and a wider and improved choice of new housing catering for a range of local and Borough-wide needs.

2.5 Our Client is generally supportive of the objectives of the New Local Plan by which to achieve the Vision. Objectives seeking population growth, together with the allocation of sufficient land to meet local employment needs and to support the implementation of sub-regional growth strategies, are both welcomed by our Client. They also support the objectives aimed at the creation of sustainable communities and the delivery of a range

PO0037



St Helens Local Plan
Ian Leyland
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:36



1 Attachment



Green Belt Letter - Mr I Leyland.docx

Please find attached my response to the St Helens Local Plan to be considered as part of the consultation process.

Sent from [Mail](#) for Windows 10

155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 04

Given the amount of Brownfield land already available, plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. 05

Lack of Infrastructure

The plan lacks detail on the necessary future infra-structure to meet demands in terms of houses, schools and medical services. 06

The plan promotes unsustainable traffic growth in the exact areas that the Borough already has significant problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. 07

It also lacks detail on how it will deal with the additional demand for medical services and educational requirements that such a rapid proposed growth of population would require.

Given all the above I return to my first point regarding the peoples trust and confidence in their elected officials and the political system. I am sure most would recognise that this is currently at an all-time low with a number of people suggesting and feeling that they are unrepresented. The fact is that if the land is released unnecessarily it will further damage the relationship of the people and with the political class. What the Council leaders would be doing is demonstrating an arrogance that only their views matter, and that consultation with the electorate is meaningless. Not releasing the green belt land, and listening and responding to the views put forward would be a step to repair an already damaged and fragile relationship.

Taking all of the above cumulatively, the Local Plan in its current form, when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely follow that it cannot be considered sound and rejected. 08

Yours Sincerely,

I Leyland

PO0038



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

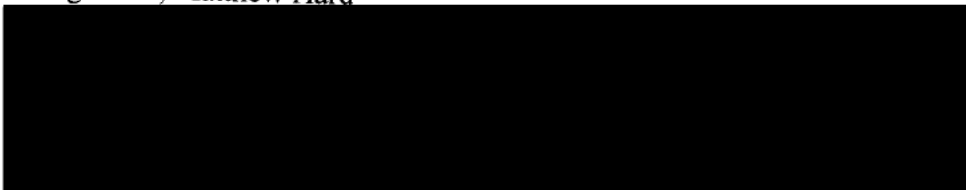
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above.
It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.
If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

NEXT STEPS

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

DATA PROTECTION

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

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

EL 0200A 2.pdf

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment			

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

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.	
<p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p>	

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

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

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

3.24. For a plan to be 'sound', it must be positively prepared, justified, effective and consistent with national policy.

3.25. The St Helens Borough Local Plan 2020-2035 Submission Draft is not 'sound' for the following reasons:

- The plan is not positively prepared as the housing land requirement and supply figures (at Table 4.6 in the local plan) are incorrect. The supply been miscalculated and a further 754 dwellings need to be allocated.
- The plan is not justified as the evidence base is miscalculated. It does not include an appropriate strategy for delivering housing and employment land. The strategy does not plan for housing or employment growth which is not commensurate with the Council's own spatial vision or the Liverpool City Region's emphasis on a commitment to jobs-led growth.
- The plan is not effective as it cannot deliver the Council's own spatial vision of employment growth, or deliver sufficient homes which are required to implement the vision and objectives of the plan.
- The plan is not consistent with national policy which supports significantly boosting the supply of homes (NPPF paragraph 59) and encouraging sustainable economic growth (NPPF paragraph 81).

04

In order for the plan to be sound, the housing figures need to be increased. Sites such as Leyland Green Farm need to be allocated for housing within the plan period to meet the evident housing shortfall.

PO0039

ELO203

RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft

to:
 planningpolicy
 13/03/2019 15:11

① - LPA07

② - LPA04

③ - General

1 Attachment



Local Plan PO Stage Comments March 2019.pdf

Dear Planning Policy

Please find my comments on the draft plan attached. Thank you.

Kind regards

Andrew Burrows MSc MCIHT MRTPI

11 Calday Grove, Pewfall, St Helens, WA11 9RS

Dear Sir or Madam,

**St.Helens Borough Local Plan 2020-2035: Submission Draft
 Town and Country Planning (Local Planning) (England) Regulations 2012**

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St.Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or

- by email to planningpolicy@sthelens.gov.uk; or
- by using our on-line form at www.sthelens.gov.uk/localplan.

All representations must be received by 5.00 pm on Wednesday 13th March 2019. Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at www.sthelens.gov.uk/localplan, and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

Data protection

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

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email planningpolicy@sthelens.gov.uk.

How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,

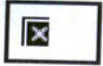
Jonathan Clarke

Development Plans Manager

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

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delete the message and all copies from your computer. "



Virus-free. www.avast.com

Dear Sir / Madam

Comments on 2020-2035 Submission Draft Local Plan

I object to allocations EA6, EA7 & HA3. My general and site-specific comments on the draft plan are provided below.

1. Inadequate Support for St Helens Central / St Helens Junction Rail Link

St Helens town centre has for many years needed a direct rail connection to Manchester. This plan will fail to deliver it yet again. The draft plan offers no clear strategy as to how this vital rail link will be delivered, how the plan will help fund it, or how the rail link will integrate with wider land use planning objectives.

①
FAILURE TO
DELIVER
RAIL CONNECTION
TO MANCHESTER

2. Inadequate Support for Carr Mill Rail Station

The draft plan offers only vague warm words regarding the proposed rail station development at Carr Mill. It contains no clear strategy detailing how the development of Carr Mill Station integrates with nearby land uses and proposed developments, or how the plan will help fund construction of the station or safeguard appropriate car parking levels to assist the station's business case. The plan will fail to deliver this new rail station yet again (as the previous local plan did).

①
FAILURE TO
DELIVER
STATION @
CARR MILL

3. Scale of Modern Warehousing Developments Out of Context Alongside Existing Residential Areas

It should be obvious from recent developments at EA2 Florida Farm that the scale of modern warehousing developments is far too large to be positioned beside existing residential areas. The plan does nothing to address this issue, particularly in relation to EA6 & EA7 developments proposed alongside the A58 Liverpool Road.

②
LANDSCAPING?
EA6, EA7

4. Extent of Land Release & Securing Infrastructure Improvements

The plan does not sufficiently prioritise brownfield land for development and is too heavily reliant on taking 'easy wins first' by promoting excessive levels of greenfield / green belt development. The plan also contains no clear transparent mechanism for securing contributions to local infrastructure improvements – despite the lower land development costs associated with greenfield land release. The potential financial benefits of adopting the Community Infrastructure Levy have not been clearly or independently assessed.

③
CGL

5. Partiality of the Council

The Council stands to make significant financial budgetary gains (in the form of increased council tax and business rates revenues) from the draft local plan. Yet the plan fails to acknowledge the scale of this financial gain and subsequently underplays the detrimental impacts of all proposed developments (excessive traffic levels, air pollution, CO2 emissions & impact on climate change).

④ - GEN
FINANCIAL
GAINS?

6. No Clear Strategy for Public Transport

Virtually all bus services have been withdrawn from the A58 Liverpool Road, and yet the draft plan proposes large scale land releases in this area (HA3, EA6 & EA7). The draft plan will permit development proposals without securing significant improvements to public transport, thus encouraging over-reliance on the private car. The plan contains no clear strategy for improving public transport, or for developing the A580 as a key public transport corridor (as planned within the Greater Manchester Spatial Framework), despite promoting extensive site releases alongside the A580.

①

Referencing
LPPD SITE DEVELOPMENTS

HA
EA6
EA7

7. Detrimental Impact on Climate Change Not Being Properly Assessed or Mitigated.

The plan does not present a clear strategy for how future developments will contribute towards minimising climate change. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on CO2 emissions.

8. Detrimental Impact on Air Pollution Not Being Adequately Assessed or Mitigated

The plan does not present a clear strategy for how the air pollution created by future developments will be managed and mitigated. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on air pollution levels, and the negative health impacts this will bring.

9. Exclusion of the Public from Decision Making on Local Transport Infrastructure

As with development at EA2 Florida Farm, the draft plan will allow the Council to approve developments whilst highway capacity issues (and any required improvements) are 'kicked down the road' for St Helens Highways Department to try and alleviate in future. Infrastructure works will then be undertaken without any consultation with the public (as with A58 Blackbrook Diversion and A580 / Haydock Lane improvement works). The draft plan should contain a clear policy to ensure the impacts of future highway improvement works are always fully assessed before planning applications are approved, and a clear mechanism to ensure consultation with the public always occurs in respect of the design of publicly funded highway improvement works.

10. A58 / A580 Junction Improvement

It is noted that details on this future junction improvement have been left empty within the Infrastructure Delivery Schedule. This suggests issues with highway infrastructure design are being deliberately 'kicked down the road', to be subsequently addressed by the Council's Highways Department. However, when the Highways Department undertakes the works, it will then avoid undertaking any consultation with residents in respect of the scheme design.

The following highway measures are needed in the vicinity of the improved A58 / A580 junction – to adequately mitigate the negative impacts of increased car and HGV traffic levels on the A58 Liverpool Road and A580 East Lancashire Road:

- Reduction in speed limit from 40mph to 30mph on A58 Liverpool Road (A580 to Millfield Lane) to improve highway safety;
- Keep Clear Markings on A58 Liverpool Road opposite Calday Grove, to address existing highway safety problem exiting Calday Grove;
- Reinstatement of pedestrian footway route across A580 (West side of junction) from A58 Liverpool Road (previously removed by the Council as part of A58 Blackbrook Diversion works - without public consultation - in 2008);
- Installation of controlled pedestrian crossing facilities on all arms of the A580 / A58 junction; and
- HGV ban on A58 Liverpool Road (between A580 and Millfield Lane) to improve highway safety and mitigate the significant increase in HGV numbers expected to use the A58 (which is too substandard in highway design terms for it to now be promoted as a main HGV route).

Yours faithfully,

Andrew Burrows MSc MCIHT MRTPI

11 Calday Grove, Pewfall, St Helens, WA11 9RS

PO0040

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

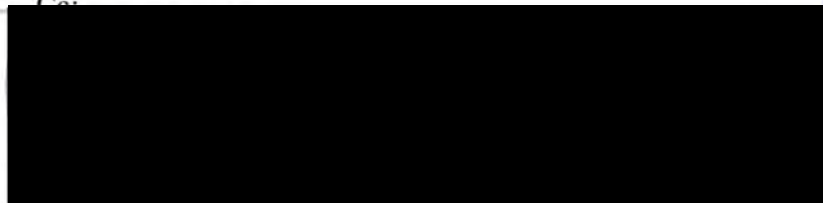
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

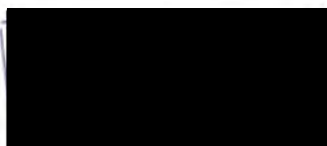
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk>

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit www.keatonemeryfoundation.com

emery
planning

Emery Planning Partnership Ltd trading as
Emery Planning

Emery Planning
2-4 South Park Court
Hobson Street
Macclesfield
SK11 8BS

Registered
office as above



Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



1. Introduction

1.1 Emery Planning is instructed by Wainhomes (North West) Ltd (hereafter referred to as 'Wainhomes') to make representations to the St Helens Local Plan: Submission Draft. Wainhomes is promoting three sites for residential development: ✓

- Land south-east of Lords Fold, Rainford (ref: HA14)
 - Land off Winwick Road, Newton-le Willows (ref: HS17)
 - Land off Camp Road & Strong Road, Garswood (ref: HS01)
- ✓

1.2 Representations specifically in relation to the above sites are submitted under separate cover.

1.3 We have very significant concerns in relation to the proposed plan period, housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also consider that insufficient allocations have been identified to meet the housing requirement. In our view a much higher flexibility allowance is required, to provide a reasonable prospect of the housing requirement being met. 4

1.4 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved. 2

1.5 The land south-east of Lords Fold, Rainford was previously proposed as an allocation for residential development in the Preferred Options consultation. The land off Winwick Road, Newton-le Willows and the land off Camp Road & Strong Road, Garswood were proposed as safeguarded land. However in the Submission Draft, only the land off Winwick Road, Newton-le Willows is proposed as safeguarded land. The other two sites would be retained as Green Belt. 2

1.6 We consider that the above sites represent logical allocations, which are capable of delivering sustainable development to meet the identified shortfall in housing land. Their sustainable credentials are reflected in the previous Preferred Options Draft, which proposed the sites for release from the Green Belt. We therefore propose that they are allocated for residential development, in order to meet the shortfall in housing land supply and flexibility that we have identified. ✓

3. Plan period

3.1 The Submission Draft proposes a plan period of 2020-2035. The base date is 1 April 2020.

3.2 Paragraph 20 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

3.3 Paragraph 22 of the Framework requires strategic policies to cover a 15 year plan period from adoption:

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."

3.4 The plan will not be adopted before 1 April 2020. The Council's Local Development Scheme (December 2018) anticipates adoption in mid-2020. Assuming this is correct the plan period would need to be extended to 2036.

3.5 However even an adoption date of mid-2020 may be optimistic, as the examination may take significantly longer than planned for in the Local Development Scheme. It is not uncommon for examinations to last for at least 2 years. For example, the Cheshire East Local Plan Strategy was submitted in May 2014. The plan was not adopted until July 2017, more than 3 years after submission. Other examples of significantly extended examinations include the Local Plans for Bath and North East Somerset, Wiltshire, Cambridge and South Cambridgeshire, all of which took much longer than 2 years between submission and adoption.

- 3.6 This is particularly relevant in the case of St Helens given the significant issues of soundness that we have identified in relation to housing provision, which necessitate main modifications and the allocation of additional sites. In that context it would be prudent to extend the plan period to at least 2037.
- 3.7 Furthermore, St Helens forms part of the Liverpool City Region. As the Council will be aware, West Lancashire is currently preparing an emerging Local Plan. That emerging plan covers a plan period to 2050, and makes provision for meeting the unmet needs from elsewhere within the City Region. In our view St Helens should take a similar approach and also plan ahead to 2050, to provide consistency for the long term planning and growth of the City Region.

4. Policy LPA05: Housing requirement

Plan period

- 4.1 We refer to our comments in Section 2 above. The housing requirement is a strategic policy which must look ahead over a minimum 15 year period from adoption. A plan period to 2035 would not provide the minimum 15 year period.

Housing requirement

- 4.2 Policy LPA05 sets a minimum housing 9,234 net additional dwellings for the period 2020-2035, at a rate of 486 dwellings per annum (dpa).

- 4.3 Paragraph 60 of the Framework provides:

"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. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

- 4.4 Local Housing Need is defined in Annex 2 of the Framework:

"The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)."

- 4.5 The application of the standard methodology for St Helens results in a minimum local housing need of 468dpa. However the Council has chosen to identify a higher figure on the basis of an alternative approach. Paragraph 4.18.5 of the Submission Draft explains that the standard method does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development, which is likely to lead to increased housing need. It is furthermore recognised that the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method.

PO0041



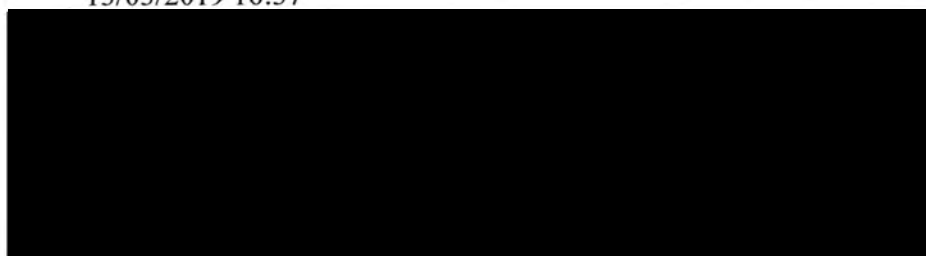
St Helens Local Plan 2020-2035 Submission

Michael Wellock

to:

planningpolicy

13/03/2019 16:37



3 Attachments



SHLP SHGBA Version 5 13.03.19.pdf PE_Report_GBP_StHelens_Final_1000319.docx



SHGBA_St_Helens_LP_Economist_Report.pdf

Dear Sir/Madam,

Please find attached submissions prepared on behalf of Saint Helens Green Belt Association.

Please could you acknowledge safe receipt of this email.

We have also been alerted to the fact that the consultation period may be extended - if so, we reserve the right to make further submissions during this period should the need arise.

The Association will be seeking to appear at any future examination.

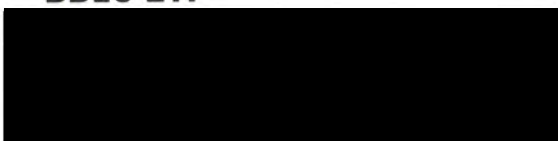
Yours faithfully,

Michael

--

Michael Wellock
Managing Director

Kirkwells
Lancashire Digital Technology Centre
Bancroft Road
Burnley
Lancashire
BB10 2TP



SITES - 8HA, 3HS, 8HS, 6HS, 7HS

① - LPA02

② - GEN

③ - LPA04

④ - LPA04 (PARA 4.12.1)

⑤ - LPA05 4.12.1

⑥ - PARA 4.6.10

⑦ - GBR

⑧ - LPA06

⑨ - GBR - SITE 8HA

⑩ - GBR - SITE 3HS

⑪ - GBR - SITE 8HS

⑫ - GBR - SITE 6HS

⑬ - GBR - SITE 7HS

⑭ - PARA 1.7.2

**St. Helens Borough Local Plan 2020-2035 Submission Draft
Response on behalf of St. Helens Green Belt Association (SHGBA)**

March 2019

Kirkwells

The Planning People

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

Introduction

11. The Submission Draft sets out an aspirational strategy for the Borough. This includes:

- Planning for an additional 215.4 hectares of land for employment development between 1st April 2018 and 31st March 2035;
- Over the period 1st April 2016 to 31st March 2035, planning for a minimum 9,234 net additional dwellings, at an average of 486 dwellings per annum;
- Releasing land from the Green Belt for 2,056 new homes¹; and
- Identifying 85.88² hectares of safeguarded land for employment and 148.34³ hectares of such land for housing.

Spatial Strategy

12. In setting out this very aspirational strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attaches to Green Belts (NPPF, paragraph 133). The “essential characteristics of Green Belts are their openness and their permanence” (*op. cit.*). NPPF also sets out the 5 purposes of Green Belt (NPPF, paragraph 134). The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the “great importance” of Green Belt, its essential characteristics or purposes. The Strategy fails to deal with the strategic elements of Green Belts, only dealing with the development management policy for Green Belt contained in NPPF paragraphs 143 to 147.

13. The Spatial Strategy, in failing to recognise the great importance Government has placed on Green Belt and its strategic nature, is not consistent with national planning policy and, therefore, not sound. The Spatial Strategy should be revised

¹ Row p, Table 4.6, Submission Draft

² Table 4.7, Submission Draft

³ Table 4.8, Submission Draft

to incorporate references to the significance of Green, the essential characteristics of Green Belt and the five purposes of Green Belt.

14. Elsewhere in this submission we conclude that the “exceptional circumstances” which must be Strategy demonstrated in order to justify the release of Green Belt land have not been stated. Based on this evidence (Section 5 of this submission) the Spatial is not positively prepared, justified, effective or consistent with national planning policy. Further revisions of the Spatial Strategy will be needed to make the plan sound. These revisions should include deletion of the following from Spatial Strategy paragraph 4:

“This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.”

15. There is an issue concerning the plan period. The front cover of the plan states the plan runs from 2020 to 2035, the employment policy LPA04 plans for the period 1st April 2018 to 31st March 2035 and the housing policy LPA05 runs from 1st April 2016 to 31st March 2035. Whilst the end dates are the same, the plan should be amended to include a consistent start date, so that it is clear what is the plan period for the Local Plan.

PO0042

Plc 8HA

ELO263




FW: ST HELENS LOCAL PLAN
Pam Astbury
to:
planningpolicy@sthelens.gov.uk
15/03/2019 12:32

① - LPAOK



From: Pam Astbury
Sent: 13 March 2019 12:05
To: planningpolicy@sthelens.gov.uk
Subject: ST HELENS LOCAL PLAN

F.A.O. THE PLANNING OFFICER

From: Pam Astbury, 77 Church Road, Rainford, St. Helens. WA11 8EZ


I would like to take this opportunity to comment on the proposals to release Green Belt Land in the St Helens Borough. ✓

I am a resident in Rainford and believe that the Grade 1 Agricultural Land in the area should be preserved, particularly with the political uncertainty the country is facing at the present time.

I understand that Green Belt Land should only be released in exceptional circumstances.

There are sufficient Brownfield Sites to support the housing need.

The 259 houses proposed on the Top Quality Farming Land in Rookery Lane/Higher Lane, Rainford would bring increased traffic problems to a Village, which already struggles with the amount of vehicles on the roads. There would be an impact on the environment, schools, 6th form technical college, doctors, dentists, wildlife and the risk of flooding.

I trust that you will consider my comments when making a decision..

COULD YOU PLEASE ACKNOWLEDGE RECEIPT.

①

PO0043

Sinc 2HS

EL0273

Fwd: Objection to Planning Policy
Cllr T Sims
to:
planningpolicy@sthelens.gov.uk
03/05/2019 16:11

① - LPA06

② - GEN

[REDACTED]

The resident below has asked me to resend her objection email for her - can you please confirm you receive it !

Cllr Teresa Sims

Sent from my iPhone using IBM Verse

On 1 May 2019, 14:37:04, [REDACTED] wrote:

From: [REDACTED]
To: planningpolicy@shelens.gov.uk
Cc: [REDACTED]
Date: 1 May 2019, 14:37:04
Subject: Objection to Planning Policy

Objection to Local Plan to use Greenbelt Land for building development.

Mary and Denis Ellison, [REDACTED] 34A Central Avenue, Eccleston Park, St Helens L34 2QP
[REDACTED]

My husband and I wish to object to the use of Greenbelt Land for housing development (or might I add any development)

Firstly may I question the use of the words Safeguarding, whether this is Central Government terminology or Local Government terminology. Surely Safeguarding is a term which would be used to protect something which a person/authority already have possession of, not one which is hoped will be gained. Or could it be that this is a foregone conclusion that the land will used for development of housing?

] ①

The second thing I would also like to state is that in my opinion the forms issued by the Council on which to register objections are complicated to complete and therefore I wish to give our objections via this e mail. I am aware that many people have been put off from objecting in writing due to the nature of the forms.

②

We object to the St Helens Council using any identified greenbelt land for housing development but in particular that which is near to where we reside on Central Avenue i.e. Eccleston Park Golf Club.

①

We have resided in St. Helens all of our lives and are therefore very aware of the local area and the fact that there are many brownfield sites which could, in our opinion, be developed before any consideration is given to the use of greenbelt land.

May we ask if the Council has made a full assessment/audit of the brownfield sites and if so how many houses could be built?

②

Also how many unoccupied dwellings are there which could be re-developed?

The basis for our particular objections are to the development of Eccleston Park Golf

Club and are as follows:-

The local roads surrounding the Golf Club are already grid-locked, (We have lived on both sides of the golf club [REDACTED] so we are well aware of the traffic implications on both sides of the land.

①

Development of the land would mean hundreds more cars brought into the area and the impact on local roads would be detrimental to everyone travelling in the area. Traffic is already congested on a daily basis and consideration should also be given to the emergency services who have to travel via these routes from the St. Helens area to Whiston Hospital, obviously any delay could be life threatening.

We regularly travel along Portico Lane and the junction from Central Avenue is already hazardous for vehicles exiting onto Portico Lane, any further traffic would make matters considerably worse. Also once onto Portico Lane towards Whiston the sharp bend leading to the traffic island again is extremely hazardous and any increase in traffic would make matters worse.

Again we would wish to emphasise the potential dangers of hundreds more cars using this road network in respect to the emergency vehicles.

We are of the opinion that the local infrastructure cannot support the development of more housing. There are insufficient local doctors surgeries and indeed doctors in the area at present [REDACTED]

[REDACTED] The impact on local surgeries would be horrendous.

This is a similar situation for schools as at the moment we are aware that parents are finding it extremely difficult to obtain places at local schools for their children. Obviously new homes mean new young families and children needing a good education.

The Developers may be able to build the houses but what impact would costs be to the Council

in supporting all the resulting provisions which would become necessary?

Short term financial gains from selling off our wonderful green spaces will no doubt result in long term costs for the Council.

Policing is a further issue which must be considered although not a direct responsibility of the Council. There are fewer and fewer officers locally and no doubt hundreds more residents will result in higher crime rates and higher policing implications to the area and in particular to the town centre where there are continual problems caused by drunken behaviour. Again more traffic travelling through the area will have more implications for the police.

We strongly object to any loss of greenbelt land which will no doubt result in the loss of wildlife and natural beauty. Once this is taken away it cannot be recovered.

Brownfield sites have already been used and could be re-developed for the housing sites required by families in the area. Also the many unoccupied houses which could be re-developed.

Please make careful consideration when making a decision.

Yours faithfully

Mary Ellison Denis Ellison

Sent from Windows Mail

PO0044

ELO280



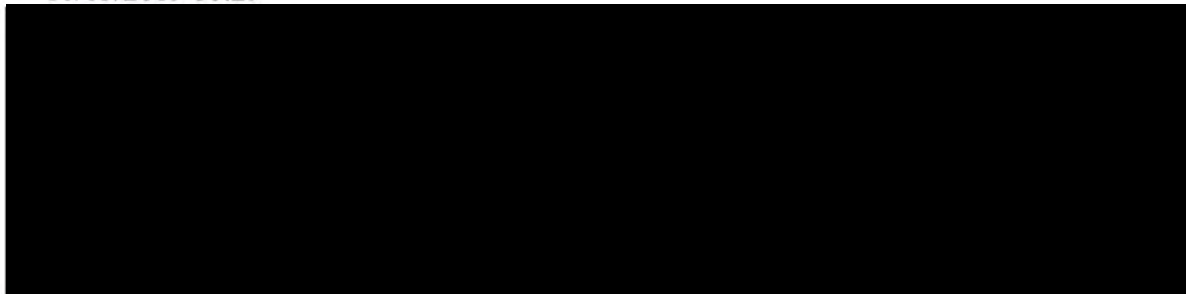
ECRA Response to SHLPSD(2018)

barton su

to:

planningpolicy

10/05/2019 10:29



1 Attachment



ECRA Final Submission_May19.docx

On behalf of Eccleston Community Residents Association, together with Windle (ECRA), I am attaching a copy of our Response to the SHLPSD (2018) for the attention of the Planning Inspectorate. ECRA have worked hard to ensure our report represents the facts as we know them.

The question was asked, during the Council Information Sessions, as to whether the SHLPSD (2018) can be changed and we were given a variety of responses. We would hope that some small changes could be made, such as reducing the aspirational number of housing units and building on more Brownfield and Contaminated land. The reasoning and support for this is detailed in our report, the consequence would be to eliminate much, if not all, of the Green Belt land required by the plan, which, I am sure you agree, would be beneficial for St. Helens Council, Councillors and Residents alike. ✓

ECRA would like to participate at the Oral Examination. We would also request an acknowledgement for the receipt of this comprehensive report. ✓

A hard copy of this response will be posted by hand later today ✓

regards

Su Barton

ECRA Communication Lead

c/o 19 Brooklands Road, WA10 5HE

① - LPA05

② - LPA07

③ - GENERAL

④ - LPA06

⑤ - PARA 1.7.2 DEC

⑥ - LPA04

⑦ - GBR

⑧ - 10P

⑨ - TABLE 4.6

⑩ - SA



**Response to
ST HELENS LOCAL PLAN
SUBMISSION DRAFT (SHLPD)
December 2018**

St Helens Green Belt Association (SHGBA)

ECRA will further develop some of the above points, taking account of its membership of the SHGBA who have commissioned three independent reports to look at economic, demographic and planning aspects of the SHLPSD. ECRA support the findings of the three reports. ✓

- ECRA, working in conjunction with Rainford Action Group (RAG) and Rainhill Save our Green Belt (RSOGB,) formed the St Helens Green Belt Association (SHGBA) to protect local Green Belt. ✓
- Due to the high level of concern and belief that the proposed building on local Green Belt was both unnecessary and unsustainable, local people have voluntarily funded experts to produce independent professional reports.
- ECRA support Local Plan led sustainable development. It is not against industrial and housing development where there is genuine need and it is justified and sustainable. However, ECRA are strongly opposed to unnecessary industrial and housing development on Green Belt land. It fully supports the view, in line with policies in the National Planning Policy Framework (NPPF) that Green Belt is essential to quality of life and the health and wellbeing of the community. ✓

Report from Kirkwells - SHGBA Response to SHLPSD

This report endorses and complements the SHGBA submission by Kirkwells Planning. The Local Plan Submission Draft (LPSD) is not consistent with national planning policy with regard to the following:

1. Exceptional circumstances do not exist for use of a method of calculating Objectively Assessed Need for Housing that departs from the Standard Method (SM). The Council should use the Standard Method.] ①
2. The Spatial Strategy fails to recognise the significance of Green Belt, the essential characteristics of Green Belt and the five purposes of Green Belt.] ②
3. The LPSD includes no conclusion to show that "exceptional circumstances" exist for review of Green Belt. ✓
4. Before concluding that "exceptional circumstances" exist to change Green Belt boundaries the Council should also be able to "demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." (NPPF 137)] ③
5. The purpose of Green Belt to support urban regeneration is inadequately addressed, and by treating all sites as equal, the cumulative impact of large-scale Green Belt releases has not been considered. This will undermine urban regeneration efforts and is a further reason to support not removing land from the Green Belt.] ③
6. The LPSD approach to safeguarded land is tantamount to an allocation, since it has been reserved for housing development. Any land intended to be safeguarded should not have been designated for a particular future use. Land should be shown as unallocated or white land on the Policies Map.] ④
7. The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, using 4.9 hectares, the baseline OAN should be a total of 93.1 hectares.] ③
8. No statements of common ground have been made available. This makes the plan-making process less than transparent and is not consistent with national planning policy.] ③
9. It is not possible to assess if cross-boundary issues have been dealt with – no statements of common ground have been produced in supporting evidence. There is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily the plan does not accord with the principles of sustainable development.] ③

10. The LPSD fails to meet the duty to co-operate. 15

Report from Dr Athey, Independent Economist

In 2018, St. Helens Green Belt Association, of which ECRA are a main partner, engaged Dr Glenn Athey to review the Economic data used by St Helens Council and the Liverpool City Region (LCR) to inform the St Helens Proposed Local Plan.

ECRA fully support the findings of Dr Athey which include

1. The forecasts for employment growth are far too optimistic, the baseline forecasts are twice the rate of growth of the most recent five-year period.
 2. In St Helens, jobs growth in Storage and Distribution has been more than offset by loss in Light Industrial jobs.
 3. The use of outdated statistics (2006) for the increase in Port Traffic from Liverpool City Region is questionable. The latest statistics (2019) indicate a lower forecast for port freight, which has significant implications for land use demand.
 4. The assumption that jobs in manufacturing will increase through the increased availability of employment land seems unjustifiable. The trend over 2011 – 2015 was a loss of 1500 jobs. The credibility of the Oxford Economic Model is questionable. Documentation would suggest that the forecasts are "policy led" and not "objectively assessed."
 5. There has been a lack of transparency in the LCR documentation base availability.
- 6

ECRA will not reproduce the discussion contained in Dr Athey's report but fully endorse his findings and recommendations. ✓

Report from Piers Elias, Independent Demographer

This report was commissioned in 2018 by SHGBA, of which ECRA is a main partner. It provides a review of the St Helens Local Plan Submission Draft (SHLPSD) and updated St Helens Strategic Housing Market Assessment (SHMA), giving full consideration to the demographic factors that have gone into calculation of housing need with a view to assessing the integrity of the inputs and the plausibility and consistency of the outputs from a demographic viewpoint.

ECRA considers that the analysis documented by Mr Elias reveals that the SHLPSD and St Helens SHMA are flawed. ECRA endorses these findings and recommendations:

1. St Helens housing need should be 360 dwellings per annum (Appendix 3)
 2. SHMBC should aim to reduce unemployment rates as a sustainable way to improve the economy without any additional infrastructure.
 3. SHMBC should develop policies to reduce commuting. Increasing local jobs for residents would reduce the number of new dwellings needed and reduce traffic emissions and congestion.
 4. SHMBC should aim to reduce housing vacancy rates as part of a sustainable housing policy.
 5. Annual Migration within the UK must balance. Local and strategic plans need to be compared to test for consistency and realistic assumptions on the use of UK migrants to satisfy dwelling and economic growth aspirations.
 6. New housing phasing is too ambitious and should be slowed down due to building industry capacity and skill shortage issues.
- 10 3 10

ECRA's comments on the Local Plan

Housing Need (Appendix 3)

Table 4.6 of the SHLPSD indicates that capacity is required to be found on Green Belt land for 2034 dwellings to meet housing needs, requiring 88ha of Green Belt to be released.

ECRA dispute the figures in this table:

1. The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468 and is applied across 19 years from 2016 to 2035; the figure is over-stated by 342 dwellings.
2. The small sites/windfall sites allowance of 93pa in the table is applied across only 15 years rather than the 19 years as per the housing requirement; the figure is under-stated by 372.
3. The 15% non-delivery figure is excessive given that there are currently only 289 of 7682 units not delivered from SHLAA 2017 (3.8%).
4. It is not acceptable to allow for a "failure to deliver" factor of 15% on the land that has been identified, is deliverable and is available for development.
5. Additionally, the 15% non-delivery reduction is being applied to the 93pa from small/windfall sites despite 93 being calculated from robust data over a 10-year period; at 15% the reduction is over-stated by 160 dwellings.
6. There is a second allowance of 20% applied to the "Required capacity to be found on Green Belt land" to allow for contingencies, one of which is "infrastructure provision". Allowance for infrastructure is already accounted for by the Net Developable Area factors as used by Keppie Massie within the EVA; typically, 100%, 90% or 75% dependent on gross site size.

Contaminated, Previously Developed and 'Brownfield' Land

ECRA calls upon the council to rigorously adopt policies to bring forward contaminated, previously-developed or 'brownfield' land, in the plan period, to ensure that both Sections 8 c) and 11 of the NPPF (February 2019) are satisfied (Appendix 1). There is a concern that the Brownfield First policy commitment of the council is weakened significantly by the addition of the wording: "as far as practicable."

ECRA calls upon the council to be proactive in the implementation of its documented strategies and joint working arrangements, as detailed in the SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS). This strategy (CLIS) highlights the fact that "contamination in St Helens is widespread, due to the area's industrial heritage and the nature of its past industries" (p.35 Contaminated Land Inspection Strategy Revised January 2017 CLIS). Furthermore, it is noted that "Tackling the historic legacy of contaminated land through the regeneration process is a sub-regional priority. Its importance is being flagged up through joint working arrangements at the sub-regional level including:

- Liverpool City Region Combined Authority and its future delivery of a Spatial Framework covering the City Region;
- The Local Enterprise Partnership (LEP);
- City Region Growth Strategy (LEP);
- EU Investment Plan 2014-2020 (LCR EU Structural and Investment Funds Strategy 2014-2020);
- Local Nature Partnership".

(p.11 & p. 12 CLIS)

Two key strategic aims within this strategy suggest that STHMBC has an appetite to protect valuable Green Belt whilst acting to remediate sites which are currently deemed unsuitable for re-development:

- "to assist regeneration, improvement of the environment and protection of the Green Belt through effective links with wider Council and regional policies;
- to encourage, where appropriate having due regard to ecological importance, the reuse and remediation of brownfield land through the planning regime in accordance with the National Planning Policy Framework (NPPF) to ensure that new developments are suitable for use."

(p.36 CLIS)

However, there is a distinct lack of cohesion between these documented intentions and the Council's own evidenced activity, particularly when viewed in the context of the SHLPSD. The Contaminated Land Inspection Strategy states that "speed and progress during implementation of this strategy continues to be dependent on the resources available".

A rolling programme of detailed inspections commenced in 2009 and is reviewed annually. Notably the progress has been reactive rather than proactive; during the last 10 years the programme has been entirely as stated in the strategy, i.e. "Much of the action taken to deal with land contamination has been development-led, through the planning and development management process." (p.33 CLIS).

SHMBC published a statement of Contaminated Land (CL) sites, 2015, shown as Table 35 (Appendix 1) – Brownfield and Contaminated Land. The table illustrates that 3,170 ha of the lowest priority contaminated land exists in St Helens, whilst the SHLPSD states that 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need. **This area equates to less than 7% of the 3,170 ha CL. Hence the need for reclassification of Green Belt to Safeguarded land could be totally eliminated if the process outlined in the Strategy (CLIS) was rigorously adopted.**

It is not surprising therefore that the slow rate of progress is of great concern to ECRA and it is entirely wrong to risk the loss of Green Belt rather than implement a robust policy and efficient process for remediation.

SHMBC suggest that funding poses a barrier and the CLIS states:

"Local authorities are required to investigate potentially contaminated sites in accordance with the Statutory Guidance and, where necessary, at their own expense. Where sufficient evidence is obtained to conclude that sites are Contaminated Land, the "polluter pays" principle will apply, ... Where no responsible person(s) can be found, the local authority may be required to undertake this work at their own expense."

(p.49 CLIS)

Presumably with this in mind, Leader of the Council (SHMBC), Cllr Derek Long on national TV (June 2018), stated that two-thirds of St Helens was made up of contaminated land and that it would cost £40m to remediate. ECRA question why would the Council leave two-thirds of the borough to languish and blame a lack of central government funding when there is a regional funding underspend?

St Helens is part of the Liverpool City Region. Liverpool City Region (LCR) hold a Strategic Investment Fund (SIF) which, in February 2019, was reported, by the Liverpool Echo, to be £80m underspent. The newspaper quoted Mark Bousfield, Director of Commercial Development and Investment for the

PO0045

Site 8HA

EL0283



Re: St Helens Local plan - Rainford Area
Melanie Wagstaff
to:
planningpolicy
12/05/2019 16:11

① - GEN

② - LPAOK

Mr & Mrs Wagstaff
187 Higher Lane
Rainford
WA11 8NF

We are writing to confirm our objection to the local plan based specifically on the following points:

The standard method for calculating the housing need has been ignored, the economic figures are flawed and there are no exceptional circumstances to justify that green belt should targeted for development.

① ②

Have all reasonable alternatives been considered, like brown field sites.

Site reference 8HA has been selected, this site constantly floods and is next to an industrial area which recently had a large fire and explosion this could pose a danger to the public living on the site.

The green belt is grade one agricultural land which once developed will affect the lively hood of the farmer which is opposite effect to boosting growth.

②

Rainford infrastructure cannot cope as it is, this development will only add to the problems at schools, doctors etc....There is no plans to address these issues.

The roads around Rainford are already to busy, regular accidents take place at the junction between Mill lane/Higher lane and more houses will mean more cars.

Yours Sincerely

Mr & Mrs Wagstaff

PO0046

Site 8HS

EL0285



Local Plan Representation
mark corrigan
to:
planningpolicy
13/05/2019 13:21

① - LPA06

② - Gen

③ - LPA05

hello

I am writing regarding the Local Plan to make my views known.

I do not believe the Plan in relation to the 8HS site is sound due to the following:

- there seems to be no reference to sustainable transport for the area. Public transport to this area is already poor. increasing the number of houses in the area by something in the region of 1100 would exacerbate this problem no end.

①

- use of existing brownfield sites. This is one of my main complaints as I feel that this has not been sufficiently addressed at all. The Council's attitude seems to be that it is easier and therefore preferable to use greenbelt land than properly use existing brownfield sites. This town is littered with existing parcels of land that could be built on before the need to use green belt sites. Just because it is easier to change a greenbelt site should not be grounds for allowing it. if we follow that route then the town will forever be littered with disused sites whilst we expand into green fields. Where is the quality of life then?

②

- the 8HS site is a productive agricultural piece of land which would be of great loss, not just for it's beauty but for it's food production; two massive negatives. Some greenbelt sites are just wasteland, but 8HS clearly is not!

①

- the growth figures used to justify the encroachment into green belt land are flawed. the Council is using growth figures based on calculations from 2014, but the ONS has produced figures from 2016 which use lower projections. These would then reduce the pressure to use green belt sites and mean that existing brownfield sites would meet a greater percentage of future demand.

③

- speaking as a local user of the roads I already see the issues of high numbers of vehicles in the area. Windle Island has just had to have months of work carried out to help traffic flow. Adding another 1100 homes to this junction would take it back to being overwhelmed. if each home had two vehicles, which I would suggest is conservative, we would be looking at possibly another 2000+ vehicles going through there. And then add those vehicles to local smaller roads as well and I do not believe the area can cope with this.

①

I already see the extra traffic issues along the East Lancashire Road (A580) due to the warehouses on Florida Farm, and I believe there are plans for some sort of super port in Liverpool. Inevitably this will also add to the A580 issues.

- adding to this the Local Plan does not address the increased demand on local infrastructure. Where are the plans for schools, transport, medical facilities? This Council seem to think these problems will sort themselves out. Their 'build it and they will come' attitude is playing with people's well being and is short sighted and unacceptable. It should not be allowed.

①

- how does building 1100+ homes on the edge of the town help reduce car use? Clearly this will only increase car use. ✓

Due to the above I do not believe that the Local Plan, in its current form, fits the criteria for sustainable development.

Nor does it seem to have examined all other reasonable options.

It does not provide plans for sustainable transport.

And it certainly does not conserve and enhance the natural environment.

If anything, it contradicts all of the requirements put down for it. ✓

Mark Corrigan
15 Oak Tree Road
Eccleston
St. Helens
WA10 5LJ

cc'd Councillor Haw to ensure these comments are recorded

PO0047



8HS site
jane corrigan
to:
planningpolicy
13/05/2019 13:28

① LPA06

② GCW

③ LPA05

ELO286

hello

I am writing regarding the Local Plan to make my views known.

I do not believe the Plan in relation to the 8HS site is sound due to the following:

- there seems to be no reference to sustainable transport for the area. Public transport to this area is already poor. increasing the number of houses in the area by something in the region of 1100 would exacerbate this problem no end.] ①

- use of existing brownfield sites. This is one of my main complaints as I feel that this has not been sufficiently addressed at all. The Council's attitude seems to be that it is easier and therefore preferable to use greenbelt land than properly use existing brownfield sites. This town is littered with existing parcels of land that could be built on before the need to use green belt sites. Just because it is easier to change a greenbelt site should not be grounds for allowing it. if we follow that route then the town will forever be littered with disused sites whilst we expand into green fields. Where is the quality of life then?] ②

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Nor does it seem to have examined all other reasonable options.

It does not provide plans for sustainable transport.

And it certainly does not conserve and enhance the natural environment.

If anything, it contradicts all of the requirements put down for it.

Thank you

Jane Corrigan
15 Oak Tree Road
Ecclestone
WA10 5LJ

I have CC'd councillor Mike Haw to ensure this email is counted

PO0048



8HS site
Izzy Ford
to:
planningpolicy
13/05/2019 16:23

① LPA06
② GEN
③ LPA05



hello

I am writing regarding the Local Plan to make my views known.

I do not believe the Plan in relation to the 8HS site is sound due to the following:

- there seems to be no reference to sustainable transport for the area. Public transport to this area is already poor. increasing the number of houses in the area by something in the region of 1100 would exacerbate this problem no end.] ①
- use of existing brownfield sites. This is one of my main complaints as I feel that this has not been sufficiently addressed at all. The Council's attitude seems to be that it is easier and therefore preferable to use greenbelt land than properly use existing brownfield sites. This town is littered with existing parcels of land that could be built on before the need to use green belt sites. Just because it is easier to change a greenbelt site should not be grounds for allowing it. if we follow that route then the town will forever be littered with disused sites whilst we expand into green fields. Where is the quality of life then?] ②
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Due to the above I do not believe that the Local Plan, in it's current form, fits the criteria for sustainable development.

Nor does it seem to have examined all other reasonable options.

It does not provide plans for sustainable transport.

And it certainly does not conserve and enhance the natural environment.

If anything, it contradicts all of the requirements put down for it.

Thank you

K a ford
5 Constance Street
St Helens
WA10 4BH

CC Councillor Mike Haw

PO0049



Fw: Barrows Farm re-designation/transparent democracy -community participation

Jonathan Clarke to: planningpolicy

13/05/2019 17:48

Dear colleague,

Could you please add the attachment as a representation, to be logged and sent to the Inspector (see [redacted] e-mail to Mr Howard) ?

Best Regards,

[redacted]
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

Tel. 01744 676198

----- Forwarded by [redacted] on 13/05/2019 17:46 -----

From: [redacted]
To: [redacted]
Date: 13/05/2019 16:39
Subject: Fw: Barrows Farm re-designation/transparent democracy-community participation

Here it is, its not clear in the email, so I would take it as a representation to be on the safe side.



[redacted] Apr 12.docx

[redacted]
Service Manager - Development & Building Control

Place Services | St Helens Council | Town Hall | Victoria Square| St Helens | Merseyside| WA10 1HP

----- Forwarded by [redacted] on 13/05/2019 16:37 -----

From: [redacted]
To: [redacted]
Date: 13/05/2019 13:29
Subject: Re: Barrows Farm re-designation/transparent democracy-community participation

Hi [redacted]

Just working through e-mails while I was off.

Could you please forward to me the attachment to Mr Howard's e-mail (it is deleted in your response). Also do you know if the attachment is intended as a representation in its own right?

Best Regards,

[REDACTED]
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

Tel. 01744 676198

Dear Mr howard, May I first apologise for the dela...

09/05/2019 16:06:32

From:
To:
Cc:

Date: 09/05/2019 16:06
Subject: Re: Barrows Farm re-designation/transparent democracy-community participation

Dear Mr howard,

May I first apologise for the delay in responding to you. I had several hundred emails during my time out of the office. You are concerned about a number of issues regarding representations in relation to the Local Plan. I can therefore comment as follows:

You have asked a number of questions that you have asked previously regarding the way in which representations to the Local Plan Submission Draft will, be treated. I therefore refer you back to those responses, specifically my emails dated 11th and 12th March 2019. You have also had an assurance from the Planning Inspectorate on this point. I cannot add anything further.

In terms of notification, for your information, there is in fact no legal requirement. The Council has notified on the basis of what is reasonable in the circumstances, including the residents in and around Barrows Farm.

In terms of the form, this is a model form issued by the Planning Inspectorate, not St Helens Council.

I hope this clarifies the position. I will also ensure that your comments here are forwarded to the relevant officers so that they are included in the Council's submission to the Planning Inspectorate later in the year

Yours sincerely,

[REDACTED]
Service Manager - Development & Building Control

Place Services | St Helens Council | Town Hall | Victoria Square| St Helens | Merseyside| WA10 1HP
[REDACTED]

john howard

Dear [REDACTED] Please find attached a word docu...

16/04/2019 09:06:43

16/4/2019

Dear [REDACTED] (Service Manager- Development)

I write in reference to the 'representations' that were submitted regarding the removal of Green Belt status of an area of land at Barrows Farm, Billinge designated Site AC06 in the St. Helens Local Plan. You have confirmed that no reference was made of this location in the 437 page document titled 'Local Plan Preferred Options – Report of Consultation – December 2018'. St. Helens Council voted to accept that plan having no knowledge of those representations and therefore 'due process' was not followed and the decision to alter the firm fixed Green Belt boundary line on the pretext of a boundary 'anomaly' and re-designate that parcel of land identified as Site AC06 I consider to be not legally valid.

The NPPF makes it very clear that 'exceptional circumstances' are required to change a Green Belt boundary and there are none. The 'Local Plan' requires modification. 02

A group of people are considering submitting a collective representation regarding Site AC06 and have noted that on page 10 of the 17 page Council advisory document dated 29/1/19 the following statement 'A summary of the key issues raised by respondents to the Preferred Options and earlier scoping consultationwill be supplied to the Inspector. However, the actual comments received during these stages will not be submitted unless the Inspector asks to see these'.

Given that there is no mention whatsoever of the Barrows Farm (Site AC06) in the Council's consultation report the group (some of whom submitted the ignored 'individual' representations) wish to request that the Inspector accesses all representations regarding Site AC06 that the public servants in the Planning Office dismissed. To quote from a recent publication 'to lose sight of the public interest is to lose sight of the very purpose of planning' (Ref 1). There is previous history of non-disclosure, my wife and I e-mailed a representation dated 26/8/11 to [REDACTED] for publication on the council website during a consultation period and yourself confirmed that this did not occur. Please access our subsequent e-mail to [REDACTED] sent at 19:28 on 5/9/2011. I retain a printed copy of that document.

The consultation period regarding the Local Plan has now been extended from its March 13th deadline into May 2019 as the officers responsible did not follow the correct notification procedures. There is irony in the fact that although Billinge residents did submit representations they were regarded as being of no significance and not presented for consideration to the Council Planning Committee, nor would they be made available for the Inspector unless he or she requested to see them which of course would not happen as there is no mention of Site AC06 in the 437 page 'Representations' document. 03

The fourth paragraph of my communication to [REDACTED] dated 27/3/17 questioned the adequacy of the notification procedures regarding the Barrows Farm site. It was only when the issue was raised by Parish Councillor [REDACTED] that a later deadline of April 12th was adopted and the consultee base extended but even then the majority of letters went to the landowner's family and his tenants. Recent publicity suggests that notification letters should be sent to households within 200 metres of a proposed change. It is my understanding that no residents of the adjacent Brownheath Avenue received such letters and only two households on Powell Drive. Two years later the deadline for the whole Borough has had to be extended in recognition of systemic failure. If the legal requirements regarding residential notification were not adhered to then that calls into question the legality of the 'Local Plan' adapted by the council in December regarding Site AC06 and other locations. 03

The form to submit 'representations' is extra-ordinarily difficult to understand. The instructions regarding how to complete it must surely deter many. What is particularly confusing is the large bold text instructing '**complete PART B of this form, setting out your representation/comment.**' Most people wanting to comment would not have a single comment/representation to make but have numerous thoughts and would wonder at the presumption of the singular. They would become more confused by the bold print instruction '**Please use a separate copy of Part B for each separate comment/representation**'. Should a collective submission be decided upon there will be a number of observations that we would wish the Inspector to read

as a whole sequence with one observation logically following on from another. It would be very difficult to compartmentalise an individual or collective representation into separate parts. Moreover, parts 3, 4 and 5 on Part B are difficult to comprehend. I suspect that a group of experienced Town Planners would have difficulty agreeing what would be the correct response regarding ticking the jargon dominated three sections. It would be much more preferable to submit an individual or group 'representation' in the traditional manner of a letter and request confirmation that this is acceptable and would be passed onto the Inspector. Given our understandable distrust of the Planning Department permitting/enabling those making decisions to be made aware of 'representations' there is much concern that the Planning Dept. will withhold (hide) submissions on procedural grounds, claiming that the form/forms have not been completed in the correct manner and so declared invalid, rather like a spoiled ballet paper. Given that our previous individual 'representations' were not presented for consideration by the 'decision makers' we hold that our concerns are valid.

David Lock, currently Vice President of the Town and Country Planning Association writing in the October 2018 edition of 'The Town and Country Planning' magazine noted in his article titled 'Trustworthy Public Engagement' (p.376) stated in his third paragraph *'The public has been smothered in a cloud of fake participation'* and later in the same article observes *'a single Preferred (by them) Option for the shape of the area for the next 15 years is flashed for six weeks' statutory consultation via a pro-forma that seeks to lead the respondent down the plan-makers' preferred lines'*.

Lock's final paragraph concludes *'Leadership in planning should be a power entrusted by the people to transparent and accountable democratic institutions. The perspective here is how to make planning processes 'legitimate'...Trust is broken. Legitimacy is achieved through collaborative planning by which the empowered institution engages deeply with those involved and is required to demonstrate it has listened as widely as possible. That seems the best way to carry the people with the plans that must be made'*.

The 2018 'Interim Report of the Raynsford Review of Planning in England' sets out nine propositions for a new planning system of which proposition 4 calls for *'A new covenant for community participation'*. David Lock and those participating in the 'Raynsford Review' will find documentation regarding the St. Helens 'Local Plan' and the planning history of the Barrows Farm Site and the final outcome following the involvement of the Inspectorate an interesting read.

Should we proceed with a 'collective' representation in the form of single letter to the Inspector accompanied by multiple Form A's to confirm identities it is requested that our document would be officially accepted as valid for presentation to the Inspector before the new deadline in May. If a number of Part B submissions are demanded I would welcome the opportunity to sit with a Planning Officer to assist me complete boxes 3-5 and then have those documents officially approved as valid for submission to the Inspector.

Please advise.

Yours sincerely

John Howard

Ref 1: B Clifford: 'Contemporary challenges in development management'. In J Ferm and J Tomaney (Eds): *Planning Practice: Critical Perspectives from the UK*. Routledge, 2018, pp.55-69

PO0053

LP0040

EF0087

SITES - 8HS - 3HS



K Marr - St Helens LPSD representation form .
Ken Marr to: planningpolicy

13/05/2019 14:20

2 attachments



Chapel Lane Petition Signatures.pdf St Helens LPSD response - final - 13 May 2019.pdf

Dear Planning Policy Unit

Attached is my response to the Local Plan Submission Draft dated today.
It is also made on behalf of other residents on Chapel Lane Eccleston WA10
5DA & 5DB.

A copy of Petition Signature schedule giving permission for this is also
attached.

Please confirm receipt.

kind regards

Ken Marr

This email has been checked for viruses by AVG.
<https://www.avg.com>

- ① - DEC - para 1.7.2
- ② - LPA01
- ③ - LPA03
- ④ - GENERAL
- ⑤ - LPA05
- ⑥ - LPA06
- ⑦ - S.A
- ⑧ - GBR - GENERAL
- ⑨ - GBR - 8HS
- ⑩ - GBR - 3HS
- ⑪ - LPA04
- ⑫ - LPA07 - 8HS
- ⑬ - IDP
- ⑭ - LPA01



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Marr	Last Name:
Organisation/company:	Organisation/company:
Address: Beech Lea 7 Chapel Lane Eccleston St Helens Merseyside Postcode: WA10 5DA	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 13 th May 2019

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

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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**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

B1 SPATIAL STRATEGY (LPA01 & 2)

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA01 02		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X
						Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (GBR) Sustainability Assessment. (SA)			

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

Please tick as appropriate

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

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

INTRODUCTION

1. We support Local Plan led sustainable development. we are not against industrial and housing development where there is genuine need and it is justified and sustainable.
2. However, we are strongly opposed to unnecessary Industrial and Housing development on Green Belt land. The CPRE view, in line policies in the National Planning Policy Framework (NPPF) that Green Belt, Greenfield and Green Space land is essential to quality of life and the health and wellbeing of the community, is fully supported.
3. This submission is made by me and on behalf of 13 other residents in Chapel Lane as the separate attached lists. This response complements the submission made by Kirkwells Planning Consultants on behalf of the St Helens Green Belt Association (SHGBA) on the 13th March 2019.

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

19. The SHLPD 2019 states the *Green Belt Review* outlines the case for exceptional circumstances, the need for developing Green Belt land for housing and the need for safeguarding land to ensure housing targets are met to satisfy the government and NPPF 2018 Housing Delivery Test (NDT) requirements. ✓

Safeguarding

20. The NPPF 2018 para 139 states

When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.* ✓

Conclusion

21. The Council's assertion that "*exceptional circumstances*" have been satisfied has not been demonstrated under section 13 of the NPPF.] 3

The Submission Draft

- does not make effective use of Unsuitable Brownfield and Underutilised land outside of the Brownfield Register.
- does not make effective use of the land nor optimises housing densities.
- accelerated Growth Scenario predictions for aspirational employment growth are not robust enough to justify the housing targets proposed and
- the Green Belt and safeguarded sites are not sustainable development.

22. There is a therefore no need to have safeguarded or Green Belt Land allocations for housing to achieve the objectives of the Plan. The plan proposal are contrary to Planning Policy and unsound.] 3

Agricultural Policy

23. The 2012 Core Strategy, SHLPPO 2016 makes no reference the local agricultural industry.

24. The SHLPPO 2016 also makes no mention

25. The government launched a 25-year Environmental Plan (25YEP) in 2017 in order to protect natural assets, but there is little cross over to the NPPF 2018. The proposals appear to have been drafted in isolation.] 4

26. The loss of productive Best and Most Versatile Grade (BMV) 1 'excellent', Grade 2 'very good' and Grade 3a 'good' Agricultural Land Classification (ALC) and local agricultural supply and industry to St Helens is to be discouraged and is not sustainable or sound. It could be considered

fully given the increased population growth estimates. The Local Plan Proposed Preferred Options (SHLPPO) 2016 planned for a 22% increase in population over 30 years; 11% over 15 years. The Local Plan Submission Draft (SHLPSD) 2019 proposes a 9.3% population increase over 15 years rising to 15.8% beyond the Plan period. ✓

Contribution of West Lancashire Agricultural Industry

27. The loss of agricultural land in St Helens is compounded by the Environmental Agency's plan to withdraw flood protection to farmland across West Lancashire, and limit protection to property only. Much of the farming land in West Lancashire is below sea level and relies on pumping stations at Alt Crossens to prevent flooding. This proposal is on hold at the moment pending updated land drainage legislation postponed due to Brexit. It will however, need to be considered and resolved over the period of the Local Plan and beyond. ✓
28. It is understood that West Lancashire agricultural industry produces 100, 000 tonnes of food annually and is important the local economy, contributing £230 million annually. It is considered a successful industry sector in the North West. ✓
29. A Local Plan proposing large population increases without proper consideration of food security for that population is folly and not sustainable. The situation is magnified as all City Regions and neighbouring authorities have similar accelerated growth scenarios without consideration of agricultural. Such a policy has no merit and is not sustainable.] 4 ✓

Soil Quality

30. A fundamental characteristic of the agricultural production is soil quality. There is a growing concern regarding the loss of topsoil across the country and Natural England, a statutory consultee has produced guidance for assessing development on agricultural land¹. ✓
31. The NPPF 2018 para 170 states
"Planning policies and decisions should contribute to and enhance the natural and local environment by:
'a) protecting and enhancing soils (in a manner commensurate with their...identified quality in the development plan)' and
b) 'recognising the economic and other benefits of best and most versatile agricultural land'. ✓
32. Footnote 53 to para 171 of the NPPF also states that
'Plans should:...allocate land with the least environmental...value, where consistent with other policies in this Framework...where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a high quality'. ✓

33. The guidance requires desktop and field studies before allowing development. It is not clear that this is to be complied with prior to removing sites from the green belt an altering the Green Belt boundaries. ✓

Brownfield sites

34. For the SHLPSD, the Strategic Housing Land Area Assessment (SHLAA) that was updated in 2017 indicates that 7,245 houses are needed over the 15-year Plan Period and indicates that 5,550 homes (77%) will be provide from Brownfield sites included on the Brownfield Register. The Brownfield Register identified that brownfield sites would provide 5,818 homes at the end of March 2017. ✓
35. The LPSD does not however consider Brownfield sites, that are not on the register and available for development, these are generally termed unsuitable sites.] 5 6 ✓

¹ <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

(out of 956) on the site until the traffic issues are resolved. It is difficult to see how this can be resolved practicably or economically in such a land locked parcel of land.

74. The site is the last piece of green space remaining that separates Knowsley, Eccleston Park, Nutgrove, Thatto Heath, and if lost to development will see all these settlement merge into one mass of urban development to perpetuate sprawl. These communities would lose a valuable asset and green space essential to health and wellbeing and contrary of National Policy.
75. The fact that site lacks visual amenity and openness beyond its boundaries is not a reason for concluding that the parcel does not possess enough greenfield value.
76. The council in order to develop this site still have to address the concerns of Sport England. The site should remain as Green Belt and be used for recreation.

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- The LPSD may not be DtC compliant in respect of economic growth, transport, agriculture and healthcare.
- The spatial strategy is based on flawed economic data that needs review.
- Housing Need assessment needs review to reflect latest information to comply with NPPF para 31 and National Audit Office guidance.
- A more robust Agricultural policy at Regional and local level is needed to ensure Food Security.
- A strategic policy directing development to central urban areas is needed to be consistent with National Policy.
- Redevelopment and recycling of Previously Developed Land (PDL) not currently on the Brownfield Register requires addressing before development of Green Belt land in order to be consistent with National Policy.
- Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.

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.

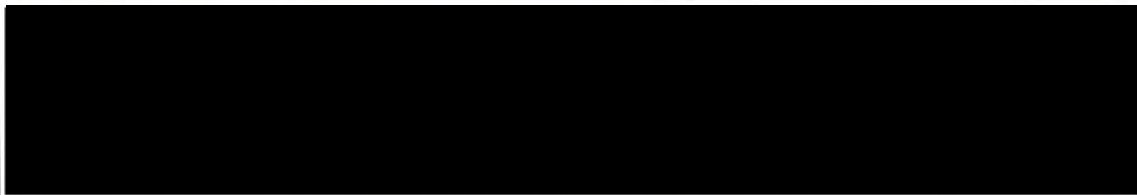
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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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

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

I wish to attend the EiP, but not necessarily to speak.



Kirkwells submission was submitted on the 13th March 2019.

I would therefore like to nominate Michael Wellock of Kirkwells, to represent the groups and speak on our behalf.

I would like to attend to support him in that capacity.

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

PO0054

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

Ref: LPSD

26 JAN 2019

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: H

Last Name: Rusik

Organisation/company: [Redacted]

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: [Redacted] Date: 29/1/19

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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Town Hall
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WA10 1HP**

or by hand delivery to:

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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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:

Other Suggestions:

That we start to receive St Helens Star as Council use this for their notices & how do we know what is going on in the borough. That money be put into Borders, parks, green spaces for maintenance & plants in our area. Consider how do we travel to St H. town centre or St H Hospital without a car. I'm afraid it does has all this accessibility issues!

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.

PO0055

3



St. Helens
Council

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

Ref: LPSD

26 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.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DENNIS</u>	First name: _____
Last Name: <u>KIRKHAM</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 SELKIRK DRIVE</u> <u>ECCELESTON</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA10 5PD</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>21-02-19</u>
-----------------------	-----------------------

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☒ Yes (via email)

☐ No

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
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Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

DOES NOT SATISFY :-

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

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PO0056

(26)

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

Ref: LPSD

26 FEB 2019
(For official use only)

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Last Name: <u>KIRKHAM</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>3 SELKIRK DRIVE</u> <u>ECCLESTON</u> <u>ST. HELENS</u>	Address:
Postcode: <u>WA10 5PD</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>21.02.19</u>
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/		/		/		/		/	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>DOES NOT SATISFY : -</p> <p>1) The requirement for sustainable development</p> <p>2) The requirement criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs</p> <p>3) Sustainable housing, targets proposed are based on aspirational employment growth predictions</p> <p>4) Effective land use by concentrating on Green Space development over town centre development with higher densities</p> <p>5) Food security by ignoring Agricultural Land Quality.</p>	

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

Please continue on a separate sheet if necessary

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

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

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

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.

PO0057

27 FEB 2019

Mrs F Waller
32 Lynton Way
Windle
St Helens
Merseyside
WA10 6EQ

Dogs Trust



Dear Sir,

I oppose the council's local plan for the following reasons.

1. It does not satisfy the requirements for sustainable development.
 2. The increased use of cars. Lynton Way would become a rat run and the road is very narrow.
 3. It is only a projection about the number of houses necessary and the employment they would need. The cost of the proposed houses would be outside the resources of many couples and families.
 4. We have more than enough brown field sites without using green belt.
 5. In these uncertain times farmland is vital so we can continue to grow our own crops.
 6. I believe that all parish councils are entitled to have a dedicated amount of green space. Windle only has the Lynton Way playground. Parish church field was once part of this space. It was built on with very expensive houses.
 7. With the increased traffic Lynton Way would become a rat run. It is a very narrow road.
- Yours faithfully,
F. M. Waller

Ref: LPSD

27 FEB 2019

(For official use only)



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>FLORENCE MARGARET</u>	First name: _____
Last Name: <u>WALLER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32 LYNTON WAY</u> <u>WINDLE ST. HELENS</u>	Address: _____
Postcode: <u>WA10 6EP</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>24th Feb '19</u>
------------------------------	---------------------------

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

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

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

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

--

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

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

Please keep a copy for future reference.

PO0058



St. Helens
Council

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

Ref: LPSD

27 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.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARGARET</u>	First name: _____
Last Name: <u>DUNN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CALDERHURST DRIVE</u> <u>WINDLE ST. HELENS</u>	Address: _____
Postcode: <u>WA10 6ED</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>21st Feb 2019</u>
-----------------------	----------------------------

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

☒ Yes (via email)

☐ No

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RETURN DETAILS

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

or by hand delivery to:

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>The analysis is based on assumption not fact. I believe more reasonable options have not been fully explored i.e the development of brownfield land closer to the town centre. This would then mean it unnecessary to put in place the additional infrastructure, which would be vital if the proposed plan was to go ahead.</p>

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

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

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

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

Please keep a copy for future reference.

PO0059

① - GEN
② - LPA06

PFO263

Ref: LPSD

04 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 B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: <u>MRS</u>
First Name: <u>CHARLES</u>	First name: <u>ALMA</u>
Last Name: <u>SISSON</u>	Last Name: <u>SISSON</u>
Organisation/company: <u>RESIDENT</u>	Organisation/company: <u>RESIDENT</u>
Address: <u>7, PENTIRE AVE</u> <u>WINDLE</u>	Address: <u>7, PENTIRE AVE</u> <u>WINDLE</u>
Postcode: <u>WA10 6EG</u>	Postcode: <u>WA10 6EG</u>

Signature: 	Date: <u>2/3/19</u>
--	---------------------

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

☐ Yes (via email)

☐ No

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St Helens
WA10 1HP**

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> Doesn't comply with NPPF 13.

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Where are the following:-</p> <ul style="list-style-type: none"> a) Flood risk report! b) Environmental Impact Assessment! c) Geological report! d) Hydro Morphological Report!
--

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.

Because of school traffic our estate is blocked with cars - morning and evening?
The playground at the end of our road has been there since the estate was built. Houses had been planned but the ground flooded and no solution could be found hence the play area.

Please continue on a separate sheet if necessary

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

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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.

IMPORTANT

— please don't
ignore
Thank you.

To whom it may concern

Regarding the flood report it isn't just Windle Brook you need to consider. When it rains the fields are full of water and if concreted over will cause flooding to surrounding properties.

If you check the flooding that has happened in other parts of the country, in nearly every case it is because the Council has ignored the advice of the experts and that is worrying.

We have no facilities in Windle. No Doctor, Pharmacy, Community Centre etc., The Primary School is having to extend=without more properties being built.- In five years time there will be over 4,000 young children in Bleak Hill School!!

The pollution from the East Lancs Road is really bad and more properties mean, more cars and more pollution.

[REDACTED]
[REDACTED] and if you were to do a survey in the area you will find a lot more sufferers, that is apart from people with [REDACTED]
[REDACTED]

Please, please LISTEN The traffic on the East Lancs Red is getting busier and with new firms opening up in Haydock [for example] the pollution will intensify as the traffic grows.

We are NOT scandal mongering, we are sincerely concerned for the future of the children and other members of the population of our town.

Yours sincerely,

Alma and Charles Sisson.

(2)

PO0060



St. Helens
Council

① LPA05 ③ GEN

PFO274

297

② LPA06 ④ IDP

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

Ref: LPSD

06 MAR 2019

(For official use only)

Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: RONALD

Last Name: NICKSON

Organisation/company: _____

Address: 40 PINFOLD DRIVE

ECCLESTON

ST HELENS

Postcode: WA10 5AT

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 2.3.2019

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

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

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

☐ Yes (via email)

☐ No

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Town Hall
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St Helens
WA10 1HP**

or by hand delivery to:

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

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The Plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The Plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

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

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

The Plan does not satisfy:

- The requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increased dependency from transport hubs. (3)
- sustainable housing targets proposed are based on aspirational employment growth predictions (1)
- Effective land use by concentrating on green space development over town centre development with higher densities (3)
- Food security by ignoring agricultural land quality. See separate sheet.

Please continue on a separate sheet if necessary

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

- the areas 845 should be removed from the safeguarded list and returned to Green Belt classification.
- the newer estimate of housing need produced by the ONS(2016) should be used instead of the outdated 2014 figure
- the Plan should ensure that development does not have an unacceptable impact on highway safety or the residual impacts on the road network which will be severe. the Plan does not do this.
- the Plan should include provision for remediating brownfield sites so that green belt land is safeguarded from future development

Please continue on a separate sheet if necessary

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

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

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

--

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

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

Please keep a copy for future reference.

Supplementary Sheet for Item 6.

- The housing need of 486 pa is aspirational and driven by economic growth forecasts which are flawed and over optimistic. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet housing needs in St Helens and not the older forecast of 486 (2014) which the council are using.
- The Plan makes no mention of Brownfield and previously developed land which is not yet available or included in the Brownfield Register. The St Helens council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. If these were to be remediated and made available it would completely eliminate the need for the 2 green belt sites of 56.6 ha and 148 ha for housing need.
- The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan or the 25 year safeguarded period being considered.
- The loss of grade 1 and 2 agricultural land is not mentioned. The negative impact on farming and distribution jobs is not considered. It is not sensible to build on productive farmland, especially since after Brexit more agricultural land may be required for food production.
- The Borough has significant and long-term traffic problems as it is, specifically at Windle Island, Bleak Hill Road, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded with the introduction of this plan. There is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm in Haydock. When the Port of Liverpool becomes fully operational with further development at Bickerstaffe and Skelmersdale, this alone will result in an increase in excess of 300 in HGV traffic. It is ludicrous to build 1000 + houses seeking access to the A580. This will create an unacceptable impact on highway safety and the cumulative impacts on the road network will be severe.
- The North West has recently been identified as the most congested area outside of London and St Helens is not meeting its air Quality objectives in several areas in the borough. The increase in traffic proposed will have a significant impact to air quality, noise, tranquillity and general health. The council is promoting less vehicle dependency and yet this plan will exacerbate the situation with edge of town developments.
- If the development of 8HS³¹⁵ were to go ahead, there would be insufficient facilities for health care, schools and public transport in the area. The population increase envisaged requires between 10-16 new GPs plus replacements but the IDP does not indicate how they will be provided and funded. The IDP also does not elaborate on how hospitals need to grow to provide a safe service. The schools in the area will be unable to cope. Although Bleak Hill School is being extended to cope with existing demand, it will be unable to cope with the children of 1000 new families. The new medical centre being built at Millfields in Eccleston is built for the existing number of residents in the area and will be inadequate for the vast influx of new residents.

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PO0061



St. Helens
Council

① - LPA05 ③ - GEN PFO275 (298)
② - LPA06 ④ - 10P

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

Ref: LPSD

06 MAR 2019

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: BRENDA

Last Name: NICKSON

Organisation/company:

Address: 40 PINFOLD DRIVE

ECCELESTON

ST HELENS

Postcode: WA10 5BT

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 2.3.2019

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

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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FURTHER INFORMATION

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

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

PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

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

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

The Plan does not satisfy . . .

- the requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increased car dependency from transport hubs.
- sustainable housing targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on green space development over town centre development with higher densities
- food security by ignoring agricultural land quality.

See separate sheet.

Please continue on a separate sheet if necessary

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

- The areas ^{S145}~~S145~~ should be removed from the safeguarded list and returned to Green Belt land.
- The newer estimate of housing need produced by the ONS(2016) should be used instead of the outdated 2014 figure.
- The Plan should ensure that development does not have an unacceptable impact on highway safety or the residual impacts on the road network which will be severe. The Plan does not do this
- The Plan should include provision for remediating brownfield sites so that green belt land is safeguarded from future development.

Please continue on a separate sheet if necessary

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PO0062

305



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

Ref: LPSD

06 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>LYONS</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>8, BRENTWOOD CLOSE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 5NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>28/2/19</u>
--	----------------------

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

☒ Yes (via email)

☐ No

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

View at <http://www.sthelens.gov.uk>

RETURN DETAILS

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St.Helens Council
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St Helens
WA10 1HP**

or by hand delivery to:

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**Please use a separate copy of Part B
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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>As set out in box 5</p>

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

Use brownfield sites before
using green belt land

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

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PO0063

(306)

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

Ref: LPSD

06 MAR 2019

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www.sthelens.gov.uk/localplan

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This form has two parts;

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SARAH</u>	First name: _____
Last Name: <u>LYONS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24, Hamilton Road</u> <u>Windle</u> <u>St. Helens</u>	Address: _____
Postcode: <u>WA10 6HG</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>28/2/19</u>
------------------	----------------------

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

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

☒ Yes (via email)

☒ No

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**Now please complete PART B of this form,
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**Please use a separate copy of Part B
for each separate comment/representation.**

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
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Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

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No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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Please keep a copy for future reference.

PO0064

307



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

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06 MAR 2019
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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>ANDREW</u>	First name: _____
Last Name: <u>LYONS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24, HAMILTON ROAD</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6HG</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>28/2/19</u>
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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>See Box 5</p>

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

Use brownfield sites before
using greenbelt land

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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.

PO0065

308



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

Ref: LPSD

06 MAR 2019

(For official use only)

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

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

This form has two parts;

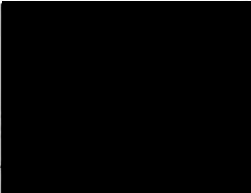
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DAVID</u>	First name:
Last Name: <u>LYONS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5, GUNNING AVE</u>	Address:
<u>ECCLESTON</u>
<u>ST. HELENS</u>
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>28/2/19</u>
--	----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

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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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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p style="text-align: center;">See Box 5</p>

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

Ensure all brownfield sites
are given priority over
greenbelt land

Please continue on a separate sheet if necessary

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

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

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

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

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.

PO0066

309



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

Ref: LPSD

06 MAR 2019

(For official use only)

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

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

This form has two parts;

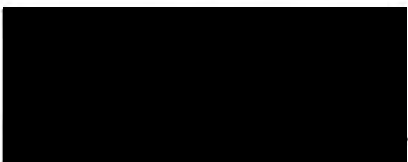
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>KATHRYN</u>	First name: _____
Last Name: <u>CONROY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>5, GUNNING AVE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>28/2/19</u>
--	----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p style="text-align: center;">See Box 5</p>

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

Use brownfield sites
before using greenbelt land

Please continue on a separate sheet if necessary

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

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

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

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

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

Please keep a copy for future reference.

PO0067

07 MAR 2019
(For official use only)St Helens
Council

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS
First Name: WENDY
Last Name: PARR
Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____

Date: 6/3/19

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> THE PLAN IS BASED ON FLAWED METHODOLOGY
Effective?	<input checked="" type="checkbox"/> THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE PLAN DOES NOT SATISFY THE FOLLOWING</p> <ol style="list-style-type: none"> 1 THE REQUIREMENT FOR SUSTAINABLE DEVELOPMENT 2 THE CRITERIA FOR SUSTAINABLE TRANSPORT AS THE PLAN PROMOTES INCREASED CAR DEPENDENCY/ REMOTE FROM TRANSPORT HUBS 3 SUSTAINABLE HOUSING, TARGETS PROPOSED ARE BASED ON ASPIRATIONAL EMPLOYMENT GROWTH PREDICTIONS. 4 EFFECTIVE LAND USE BY CONCENTRATING ON GREEN SPACE DEVELOPMENT OVER TOWN CENTRE DEVELOPMENT WITH HIGHER DENSITIES 5 FOOD SECURITY B/ IGNORING AGRICULTURAL LAND QUALITY

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.

ECONOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON
FLAWED HISTORICAL DATA THAT DOES NOT JUSTIFY THE ASPIRATIONAL
TARGETS INCLUDED IN THE PLAN.

THE INCREASE IN TRAFFIC PROPOSED IN THE PLAN WILL HAVE
A SIGNIFICANT IMPACT ON AIR QUALITY, NOISE, TRANQUILITY
AND GENERAL HEALTH IT DOES NOT PROMOTE LESS
VEHICLE DEPENDENCY WITH ITS PROPOSALS FOR EDGE
OF TOWN DEVELOPMENTS.

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.

PO0068

(317)

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

Ref: LPSD

07 MAR 2019

(For official use only)

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www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: THOMAS KEENE

Last Name: AUSTIN

Organisation/company: _____

Address: 15 FISTRAL DRIVE

WINDLE, ST. HELENS

Postcode: WA10 6EF

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 7-3-19

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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setting out your representation/comment.**

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>I consider the Local Plan to be unsound for the following reasons:</p> <ol style="list-style-type: none"> 1 Unsustainable level of increased traffic 2 Lack of schooling for an increased intake. 3 Only 1 doctor & dentist surgeries. 4 Loss of food production due to loss of farming. 5 Insufficient public transport, thereby increasing car travel. 6 Loss of wild life. 7 In conclusion, only a fool would think that the loss of GREEN BELT, this green belt, could be a good thing.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PO0069

318

Ref: LPSD

07 MAR 2019

(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARGARET</u>	First name: _____
Last Name: <u>AUSTIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>15 FISTRAL DR</u>	Address: _____
<u>WINDRE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6EF</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>1/3/2019</u>
-----------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The plan makes no mention of Brownfield & previously developed land to be used. The growth of St Helens is not justified as the SHC are using an old forecast of 2014 (486) The loss of Farm land is a negative impact. They should be growing more own produce, so much for SHC raising awareness of environment issues (SPRING FIRST ISSUE) The increase traffic will have a significant impact on air quality and safety, as anyone will know who live in this area.</p>

Please continue on a separate sheet if necessary

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

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

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

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

Please keep a copy for future reference.

PO0070



St. Helens
Council

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

Ref: LPSD

08 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Me</i>	Title:
First Name: <i>JAMES ANLAN</i>	First name:
Last Name: <i>JONES</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>30 PIMBO ROAD KINGS MESS ST HELENS MERSEYSIDE</i>	Address:
Postcode: <i>WA11 8AD</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

7th MARCH 2019

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

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

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:

NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

Please give details of why you consider the Local Plan is **unsound** or **inconsistent** or **is unsound** or **inconsistent** with the duty to cooperate. Please be as precise as possible.

If you wish to support the Local Plan, please give details of why you consider it is **sound** or **consistent** with the duty to cooperate. Please be as precise as possible.

box to set out your comments.

See attached.

Please continue on a separate sheet if necessary

Please set out what modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to the matters you have identified in 6. above where this relates to soundness. Please note that any modifications to the plan to people and is intended to be made in an examination. You will need to say why the modification will make the Local Plan legally compliant or sound. It will be up to you to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached

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.

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

I am a Councillor representing residents in Rauford. I believe that there are parts of the plan which are in contradiction to what is being suggested for Rauford.

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.



☐ OFFICIAL-SENSITIVE

To: planningpolicysthelens.gov.uk,

External:

Cc:

Bcc:

Subject: ST HELENS M. B. C. LOCAL PLAN 2018/19 COMMENTS REGARDING RAINFORD

WARD

TO WHOM IT MAY CONCERN.

Dear Sirs,

I write as a resident of the Rainford Ward and also as an elected Councillor for that Ward on St Helens M. B. C. I wish to give my reasons why I think that the St Helens Local Plan, as it affects Rainford, is unsound.

These reasons are;

1) Amongst the aims of the Local Plan are that it wishes to promote industry and create jobs. The site in question (field at the junction of Higher Lane and Rookery Lane) is in constant use by a local farmer producing at least two crops per year. This farmer has told me that if this field is lost it will damage the business and may very well cost jobs. This would be contrary to the aims of the Plan and would therefore be counter productive.

2) The Green Belt Land in question is, like the vast majority of Green Belt farming land in Rainford, Grade One agricultural land. The farmer grows vegetables for Supermarkets. We are constantly being told that post Brexit we will have to grow more of our "own" produce. Taking this land (or any farming land in Rainford) for building will mean that we will be growing less and therefore this is another reason why this Plan is unsound.

3) The land is farmed responsibly, i.e. with great care taken to offer wild life the opportunity to keep its habitat. The loss of this land would mean the loss of important wild life.

4) The Plan states that up to 259 dwellings could be built on the land. Many families now have two cars (at least) and two wage earners, so there could be 400 (plus) cars exiting the "new estate" in a morning on to a "B" road (Higher Lane/ Rookery Lane). The result of this would be traffic chaos in and around Rainford.

5) There will be more children living in the new houses but not in sufficient numbers to warrant a new primary school. There would however have to be extensions to the existing primary schools. All three of Rainford's primary schools do not have the space in their grounds for such extensions. Rainford High School is already a large school (pupil numbers) in a relatively new building and therefore an expansion of pupil numbers would not be feasible.

6) St Helens Council has a policy of "Brown field first" when it comes to building expansion. While it is acknowledged that there will be many dwellings built on "Brown Fields sites" there are still many such sites which are not being taken up.

7) The "new dwellings" figure for St Helens seems to be unrealistic when looked at against population projections and estimates and so the question has to be asked "Do we need the numbers of houses being suggested?" I would submit that we do not, so there should be no reason or need to re designate any Green Belt Land within the Borough for development.

8) Rainford is a thriving rural village with a large Farming Industry and community. To take away any of this would, I believe, damage the whole area.

The above reasons are all practical reasons why the taking of this Green Belt field or any other large Green Belt field in Rainford should not happen and therefore I would wish to submit that this part of the Local Plan is unsound and should be looked at again.

I submit this by email and will be enclosing a "hard copy" with the "comments form" which you will receive shortly.

Thank you.

A large black rectangular redaction box covers the signature area.

Councillor Allan Jones
Rainford Ward
Leader of the Conservative Group
St Helens M B C

PO0071



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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>PATRICIA</u>	First name:
Last Name: <u>LEWIS</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <u>March 10th 2019</u>

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

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

☒ Yes (via email) ☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

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

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><u>Justified</u> : It is not justified because it is based on flawed methodology.</p> <p><u>Effective</u> : It is not effective because it is not deliverable.</p> <p><u>Consistent</u> ... : It is not consistent with National Policy because it does not comply with NPPF 2018.</p>

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

- a) There are long term traffic problems at Wrindle Island / Bleak Hill Road. The current roadworks are supposed to solve current traffic flow. They are unrelated to the proposed domestic development to the west. What happens then? I understand that the land has recently been safeguarded for future rather than present development.
- b) The LOP doesn't explain the impact on Health Care & Schools. Where would extra resources come from to fund all this?

Please continue on a separate sheet if necessary

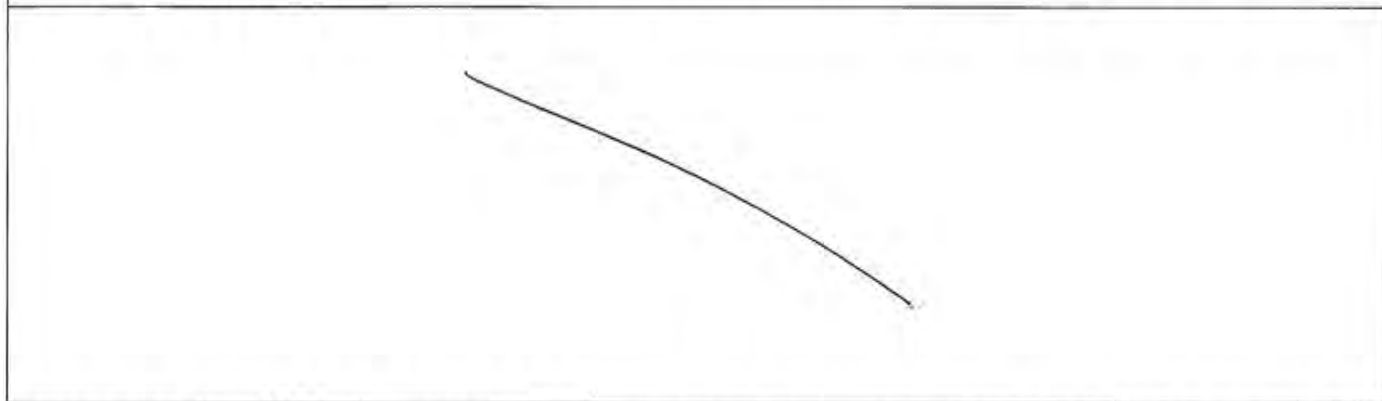
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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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

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



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Please keep a copy for future reference.

PO0072



St. Helens
Council

(361)

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

Ref: LPSD

11 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: PETER

Last Name: LEWIS

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: March 10th 2019

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

☒ Yes (via email)

☐ No

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

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

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>I think that the plan is not justified because it is based on a flawed methodology, not effective because it is not deliverable and it does not comply with NPPF 2018. It jeopardises food security by removing valuable agricultural land. When brownfield sites could be used. I also object to area SHS being 'safeguarded' for future use rather than as green belt.</p>

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

The Local Plan needs to explain how the increased need for healthcare provision and educational opportunities are to be met. It also needs to explain how the larger volume of traffic at the already very congested Winale Island is to be accommodated.

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.

PO0073

362

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

Ref: LPSD

11 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>CHARLES ROBERT</u>	First name: _____
Last Name: <u>TOWNER</u>	Last Name: _____
Organisation/company: <u>—</u>	Organisation/company: _____
Address: <u>29 FISTAL DRIVE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6EF</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Mail: _____

Signature: <u>[REDACTED]</u>	Date: <u>9-3-19</u>
------------------------------	---------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - Its based on flawed methodology
Effective?	<input checked="" type="checkbox"/> NO - Not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - Not comply with NPPF 2018

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

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

- 1/ Requirement for sustainable development has not been satisfied
- 2/ Does not satisfy the criteria for Sustainable Transport as the plan promotes increased car dependency remote from transport hubs.
- 3/ Does not satisfy sustainable housing. Targets are based on aspirational employment growth predictions.
- 4/ Does not provide effective land use as it concentrates on green space development, over town centre development with higher densities.
- 5/ Not satisfy food security by ignoring agricultural land quality.

Please continue on a separate sheet if necessary

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

- 1/ Economic growth predictions are based on flawed historical data that does not justify the aspirational targets included in the plan.
- 2/ Adequate regional and cross border collaboration has not been undertaken.
- 3/ The housing need assessment doesn't use standard methodology and no case for exceptional circumstances has been made
- 4/ The latest estimates produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing needs. The Council are using an older forecast from 2014 of 486 houses
- 5/ The plan makes no mention of brownfield and previously developed land that is not (yet) available or included on Brownfield Register

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. see over

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.

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- 6/ The council statement of 'Contaminated Land Sites 2015' indicates that 3170 ha of the lowest priority contaminated land exists in St. Helens. Two green belt sites of 56.6 + 148 ha are being reclassified as safeguarded and included to fulfil the housing need, much less than 7% of the 3170 ha available, if it were to be remediated.
- 7/ The Council in conjunction with LCRC 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 nor the 25 year safeguarded period.
- 8/ The loss of Grade 1 + Grade 2 agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and Distribution jobs is not considered.
- 9/ The Borough has significant long term and intractable problems at Windle Island, Black Hill Road SKew Bridge, M6/J23 and J21-26. The Infrastructure Delivery Plan refers to current road improvements, but does not outline how local and borough wide road improvements are to be made and funded. The plan promotes unsustainable traffic growth, causing severe traffic issues that will not satisfy the NPPF (2016).
- 10/ The increase in traffic proposed 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.
- 11/ The plan 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.

PO0074



St.Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: JEAN	First name:
Last Name: MATHER	Last Name:
Organisation/company: /	Organisation/company:
Address: 17 ARNIAN RD., RAINFORD.	Address:
Postcode: WA11 8BU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: /	Mobile No:
Email: /	Email:

Signature: [REDACTED]	Date: 9-3-2019
-----------------------	----------------

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

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

Yes ☐ (Via Email)

No ☒

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

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

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

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

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:

NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

The proposed Site is agricultural land and should be kept as such. The number of houses to be built will mean a very high increase in cars which will put a great strain on the already busy roads in Rainford Village & surrounding area. There will be a need for extra doctors & Surgeons, dentists, school places and a review of bus services.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

<p>8. Please indicate the order in which you wish to be heard at the oral examination. Please list the matters and issues you wish to raise at the oral examination in the order you wish to be heard. Please be as precise as possible.</p>
--

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

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

PO0075



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DEREK	First name:
Last Name: MATHER	Last Name:
Organisation/company:	Organisation/company:
Address: 17 ARNIAM ROAD RAINFORD	Address:
Postcode: WA11 8BU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	mail:

Signature: [REDACTED]

Date: [REDACTED]

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

The country is a big net importer of food and cannot afford to lose this high quality land to building.

The roads are already dangerous in the village due to being too narrow with insufficient parking. The footpaths by the church are too narrow for pedestrians.

The medical services are very limited now and there is no NHS clinic and it takes weeks to get a doctor's appointment. No improvements have been made for years.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

<p>By submitting this representation, you are deemed to have agreed to participate in the oral examination, if requested by the Inspector.</p>	
<input checked="checked" type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination

By submitting this representation, you are deemed to have agreed to participate in the oral examination, if requested by the Inspector.

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

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

PO0076



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>LINDA</i>	First name:
Last Name: <i>Sowler</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>13 THE AVENUE BURNFORD</i>	Address:
Postcode: <i>WA11 8DR</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>9. MARCH 2019</i>
-----------------------	----------------------------

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

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

Yes ☒ (Via Email)

No ☐

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RETURN DETAILS

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

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

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

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

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FURTHER INFORMATION

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2036 is:

Please read the Guidance note for explanations of the tests of soundness and the Tests of Soundness.

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

Please tick as appropriate

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

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

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

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

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

The land to be built on is All Agricultural and provide food to feed our community. WHEN ITS GONE ITS GONE. Each ACRE of this land supports 60,000/650/ organic food, or 24500 lbs potatoes, or 1 million carrots, or 35000 heads of lettuce. Each acre will support 10 families. The area does not support infrastructure for Public Services: doctors dentist etc. Road works will be need for 500 extra cars, & bus services. Water Course control leads to local flooding.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 3. above where it is related to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification for examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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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PO0077



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>JAMES</i>	First name:
Last Name: <i>SOWLER</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>13 THE AVENUE RAINFORD</i>	Address:
Postcode: <i>W411 8DR</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>9 MARCH 2019</i>
-----------------------	---------------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

4. Do you consider the St Helens Borough Local Plan 2015-2035 is:		
Please read the Guidance note for compliance with the Local Plan and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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

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

The land to be built on is All Agricultural and provides food to feed our community. When it's GONE it's GONE - forever.

Each ACRE of this land supports, 60,000 lbs organic food, 24,500 lbs potatoes or 1 million carrots, or 35,000 heads of lettuce.

EACH ACRE can sustain 10 Families

The area does not have provision for public Services, roadworks, water course control.

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

Please continue on a separate sheet if necessary

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

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

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

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.**

PO0078



St. Helens
Council

367

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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARGARET	First name:
Last Name: O'NEILL	Last Name:
Organisation/company: RESIDENT OF RAINFORD	Organisation/company:
Address: 10 ROSE PLACE RAINFORD STIRCHES WAL 8 9 9	Address:
Postcode: WAL 8 9 9	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: —	Mobile No:
Email: —	Email:

Signature: [REDACTED]	Date: 10.3.19
-----------------------	---------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy ✓		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulation Assessment	
-------------	--	-----------------------------	--	--------------	--	--	---	--------------------------------	--

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

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

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

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

Please tick as appropriate

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

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

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

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

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

- Building on the land would cause serious flooding to Rainford.
 - Permanent Agricultural labour would be lost.
 - (Employment used during construction would only be temporary).
- Local traffic would be increased dramatically.
Not enough parking at shops in village
Local Services could not cope with the demands of an increased population - i.e. schools, GP services, dentists, Sewers.
There are plenty of brownfield sites in St Helens that could be utilised.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make this Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (We 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.

None

Please continue on a separate sheet if necessary

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

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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PO0079



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Jeremy	First name:
Last Name: O'Neill	Last Name:
Organisation/company: Resident	Organisation/company:
Address: 10 Rose place Rainford ST. Helens, Merseyside	Address:
Postcode: WA11 8QG.	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 10.3.19
-----------------------	---------------

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

- ①
- The proposed site in Rainford at Rookery Lane, is prone to flooding, receiving run off from higher lane. The site has a high water table, is made up of made up ground i.e. soil washed in over centuries. Any development on the site would stop water from being soaked up by the ground and slowly released back into the Brook, and cause flooding at the old station house and properties at the bend at the bottom of Rookery Drive ② There are several underground water courses

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.

None.

Please continue on a separate sheet if necessary

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<input checked="checked" type="checkbox"/>	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

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making the site waterlogged at the best of times. Flooding is a problem with only recently the brook bursting its banks and flooding the ground the road at Pasture Lane causing the road to collapse. Any increase in surface water would increase the likelihood of this happening again, as ground that originally soaked up rain water etc at the top of Rockery Lane is converted over, so run off would increase.

③ local schools are already full so no spare capacity in Infant, Junior and local schools.

④ no Park facilities at this end of the village, only King George V Park, long abandoned.

⑤ not enough parking in the village for more people

⑥ G.P Practices are already full, no spare capacity

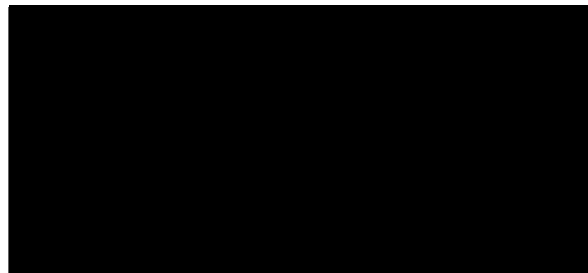
⑦ The loss of land to the farmer would impact on his viability as a business and put people out of a job not creating jobs etc. Rainford is an

agricultural village, that is its industry.
growing food for local, etc.
lossing jobs goes against the local
plans objectives.

⑧ There is plenty of Brown field land sites
that St. Helens can build on.

To attract Business
to St. Helens, the Town needs to be
landscapped, the Town Centre developed
to make it attractive to new
incoming investment. Senior Schools
need to be improved.

St. Helens as an
area to relocate ~~to~~ a business to
is simply unattractive and cannot
compete with Warrington etc. Building
on green belt land will not save
the Town.



PO0080

269



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

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JANET</u>	First name: _____
Last Name: <u>TOWNER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>29 FLITAH DRIVE</u> <u>WINDLE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA10 6EF</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____
Signature: [REDACTED]	Date: <u>6th March 2019</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email) ☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>① The requirement for Sustainable development has not been satisfied.</p> <p>② The vision does not satisfy the criteria for Sustainable Transport as the plan promotes increased car dependency remote from transport hubs.</p> <p>③ The plan does not satisfy sustainable housing targets proposed are based on aspirational employment growth predictions.</p> <p>④ The plan does not satisfy effective land space by concentrating on Green Space development over town centre development.</p> <p>⑤ The plan does not satisfy food security by ignoring Agricultural Land Quality</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1/ Economic growth predictions are based on flawed historical data that does not justify the aspirational targets included in the plan.
- 2/ A adequate regional + cross border collaboration has not been undertaken.
- 3/ The housing Need assessment doesn't use Standard Methodology + no case for exceptional circumstances has been made.
- 4/ The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be req'd to meet housing need in St. Helens. The Council are using an older forecast (2014) of 486.
- 5/ The plan makes no mention of Brownfield + Previously Developed ~~land~~ land that is not(yet) available or included on the Brownfield register.

Please continue on a separate sheet if necessary.

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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.

- 6/ The St Helens Council statement of Contaminated Land indicates that 3170ha of the lowest priority contaminated land exists in St. Helens. Two Green Belt sites of 56.6 ha + 14.8 are being reclassified as safeguarded land sites + included to fulfil the housing need, much less than 7% of the 3170ha available, if it were to be remediated.
- 7/ The council in conjunction with Liverpool City Region Combined Authority + neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- 8/ The loss of Grade 1 + 2 agricultural land that comprises most Allocated + Safeguarded sites is not mentioned. The negative impact on farming + distribution jobs is not considered.
- 9/ The Borough has significant long term + intractable problems at Windle Island, Black Hill Road. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local improvements are to be made + funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- 10/ The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquillity + general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- 11/ The LDP fails to explain the impact on Healthcare + Education. The current situation is banded on broadly, but how this will be managed + funded is missing or vague. There is no indication or reference to collaboration with the The Hospital Trust, local CCGs or education authorities.

PO0081



St. Helens
Council

① - LPA05 ④ - Para 1.7.2 DTC (382)
② - LPA06 ⑤ - IDP
③ - GEN

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

11 MAR 2019

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Denise	First name:
Last Name: Griffiths	Last Name:
Organisation/company:	Organisation/company:
Address: 41 Prestbury Drive Eccleston, St Helens	Address:
Postcode: WA10 5RB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please use a separate copy of Part B for each separate comment/representation.

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No x <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	x <input type="checkbox"/>
Effective?	x <input type="checkbox"/>
Consistent with National Policy?	x <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The economic analysis is based on over-optimistic assumptions of growth and therefore the amount of land needed is not as great as that which has been set out in the Local Plan. As such, there is therefore no exceptional circumstance to justify change to Green Belt boundaries. Other reasonable alternatives have not been fully explored ie. the use of lower target figures and using more previously developed land which would have a much lower impact on the environment. Additionally, there seems to be limited consultation and cooperation with other local councils in order to publish a statement of common ground.

①

④

The Plan makes no reference to Brownfield sites and PDL that are not yet available or included on the Brownfield Register.

The St Helens Council statement of Contaminated Land sites (2015) indicates that 3,170ha of the lowest priority contaminated land exists in St Helens yet 2 Green Belt sites of over 200ha are being reclassified as safeguarded land sites and are included to satisfy the housing need instead of redeveloping this contaminated land.

There appears to be no policy in St Helens or the Liverpool City Region to address the need to bring unsuitable sites which are outside the Brownfield Register back into use. We cannot continue to ignore such land yet destroy agricultural and green belt land to satisfy a plan which is flawed.

The Borough suffers from long term, difficult traffic issues at A580 Windle, Bleak Hill Road and M6/A580 junction 23. The Infrastructure delivery plan makes reference to current road improvements but fails to outline how local and borough wide improvements would be made and funded. Traffic growth as a result of the plan would cause severe traffic issues in an already saturated area.

The Plan bases development on the edge of town where public transport links are limited and, as such, it does not promote less vehicle dependency.

8HS is an unsuitable site for development as it is in close proximity to the increasingly busy and polluted A580, the narrow roads adjacent to the area cannot sustain the increase in traffic, it is currently agricultural land and the local schools are already over-subscribed

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Do not include Green Belt land on the edge of town as safeguarded or allocated sites for housing development in preference to town centre development or the development of contaminated land.

8HS should be changed from the safeguarding for development category and maintained as Green Belt

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

x	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----------	---	--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0082



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>PAMELA</u>	First name: _____
Last Name: <u>MITCHELL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>49 ROOKERY DRIVE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA11 8BA</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>07-03-19</u>
------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) ☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

Pamela Mitchell 49 Rookery Drive WA11 8BA

I cannot complete Part B of your documentation but I wish to make the following comments/representations with reference to the Local Plan.

The Green Belt land in question is actually GRADE 1 Agricultural land and should not be used for housing purposes. There is also a wood on this site, which is home to wildlife and the plan includes depleting this for housing.

St. Helens Borough Council states that building on this land will create jobs, but this will be short term. The land is farmed at the moment already employing many people, which, of course, is long term. The country as a whole will also need more land to farm after BREXIT.

I strongly feel other reasonable alternative should be looked at which will not have as much impact on the infrastructure and economic growth of the area.

7th March 2019

PO0083

① - LPA05
② - GEN

(388)

PF0357



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>SANDRA</u>	First name: _____
Last Name: <u>THOMPSON</u>	Last Name: _____
Organisation/company: <u>NIA</u>	Organisation/company: _____
Address: <u>8 ANSDALL DRIVE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DW</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>8th MARCH</u> <u>2019</u>
-----------------------	---------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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WA10 1HP**

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planningpolicy@sthelens.gov.uk

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No - the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No - not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No - does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

1) Loss of Grade 1 & 2 Agricultural land that comprises most Allocated & Safeguarded sites is not mentioned - negative impact on Farming, jobs is not considered - Brexit leaving all agricultural land is needed.

2) The plan provides unsustainable traffic growth which will cause
 a) Severe traffic issues that will not satisfy NPPF 2016
 b) Reduce air quality, increase traffic noise, disturb the tranquillity and general health of local residents.

3) Contaminated land / Brown field sites must be used before any green belt is built upon. Changing the classification of green belt land to Safeguarded does not guarantee that the land will be built upon before brownfield sites are used to build houses on. Just because land is contaminated - it does not exclude it from housing land eg: Shires was cleared up.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Stop the reclassification of greenbelt land to safeguarded as there are plenty of brownfield (contaminated) sites in the borough that the council could use to provide the housing need.

The extra houses in Ecclestone/Windle area will impact on health of residents and cause severe traffic congestion and those factors have not been taken into consideration. Therefore the council are not satisfying NPPF (2016) and should reconsider their plans to reclassify greenbelt land into safeguarded. The future will look very bleak for the people of St. Helens if health is not taken into consideration due to air pollution / stress.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0084

400

765



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

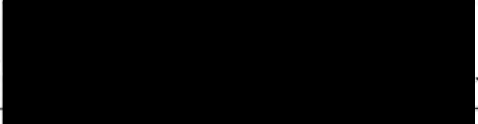
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JENNIFER</u>	First name: _____
Last Name: <u>HUDSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>31 SPRINGFIELD LANE</u>	Address: _____
<u>ECCLLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5EW</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>7th MARCH 2019</u>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Victoria Square
St Helens
WA10 1HP**

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Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

31, Springfield Lane
Eccleston
SE Helens
WA10 5EW
7th March 2019.

Dear Sir / Madam,

I cannot accept that the Local Plan is acceptable on the evidence given in the local plan. There does not seem to be any real evidence about the impact on the area in regard to traffic especially considering the whole area will be car dependent. You need to use a car to bring goods home, to get children into school and parents to get to work. Just travel along Springfield Lane now and the increase in volume caused by work at Windle Island.

There doesn't seem to much consideration to the noise levels, air pollution from the increase volume of lorries using the road now. The roads at the moment are not really suitable for heavy goods vehicles and if you are expecting people to have things delivered that will increase the traffic in the neighbourhood.

This plan does not take into consideration the impact the traffic has on this area now, so it will only get worse when the houses are built.

Sort out the brownfield sites thoroughly and let's keep the good agricultural land to grow crops which can be sold in the surrounding area.

Yours faithfully

JENNIFER HUDSON.

I would like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035

Thank you

PO0085

412



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

12 MAR 2019

(For official use only)

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>CHRISTOPHER</u>	First name: _____
Last Name: <u>MOSELEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 WOOD VALE</u>	Address: _____
<u>ST HELENS</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA9 5BQ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>10 MARCH 2019</u>
-----------------------	----------------------------

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☐ No

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RETURN DETAILS

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St Helens
WA10 1HP**

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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Our local area has experienced a sustained & unprecedented level of house building in the last few years which continues without abatement. A second phase of development adjacent to Waterside Village is underway and a further development of 82 homes in Lowfield Lane by Anwyll Homes begins within weeks, together with a further 350 planned on nearby Suttons Heath. All these properties will create a serious impact on the local public highway system where road usage has increased dramatically causing damage to roads and high volumes of traffic especially at peak times. The location of St John Vianney Primary school ~~located~~ next to the main road also presents considerable concerns for road safety & pollution in the area. (ELTON HEAD ROAD)

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.



'Regenerating and growing St Helens' does not justify unprecedented levels of housebuilding when recently built ^{large} industrial units on Mere Grange remain empty and advertised 'to let'. Add this to the office units also built within the last few years which now stand vacant ~~at~~ on the same site and one must question the need to build yet more homes without employment opportunities available

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
---	--	---	--

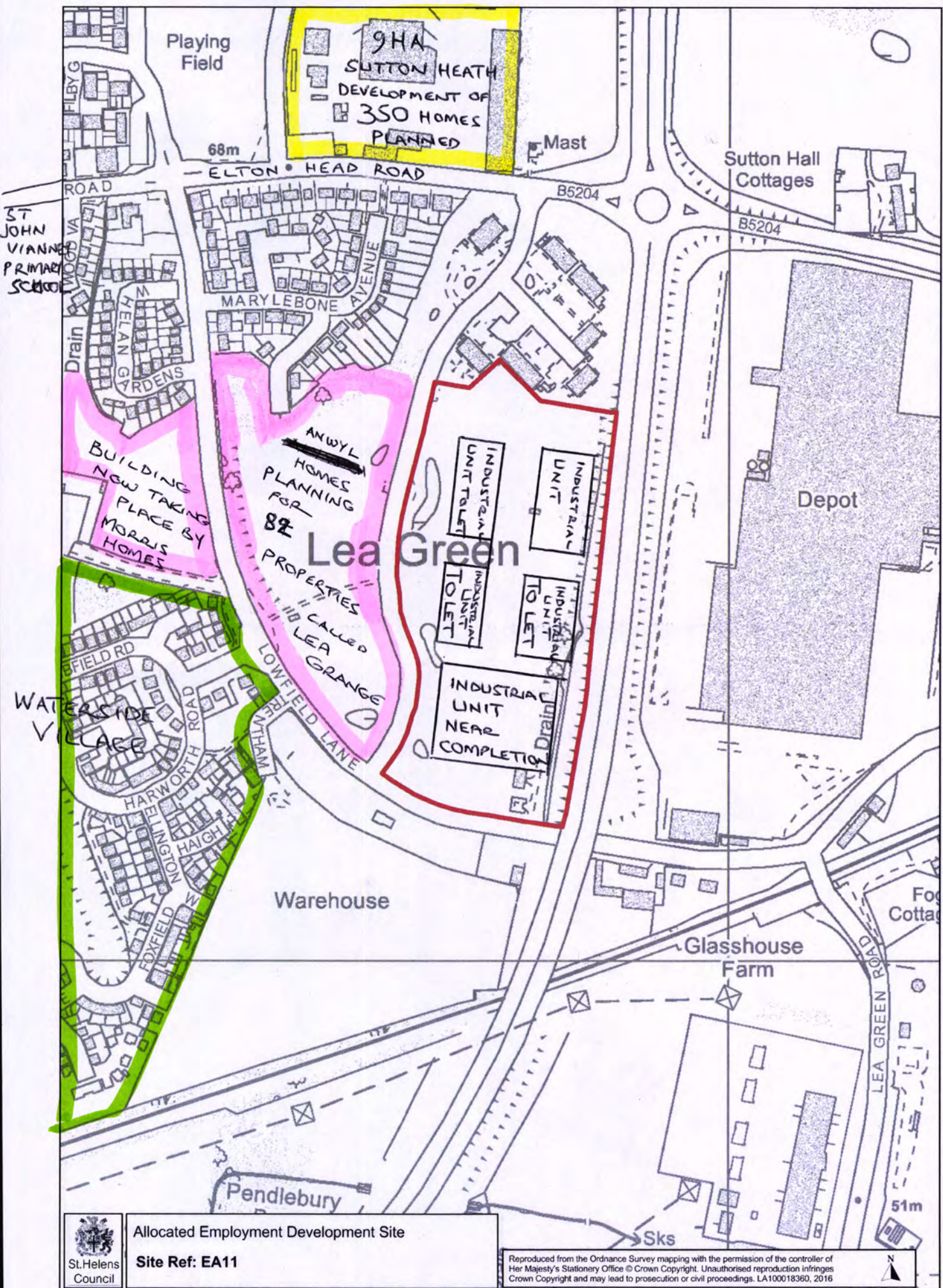
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe it important as an ordinary member of the public to engage in this process and for my voice to be heard. This is the first time I have made such a representation but feel strongly that for the Local Plan to be fair, balanced and right, it is the duty of the public to be engaged in the various stages that affect our daily lives.

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.



Allocated Employment Development Site
Site Ref: EA11

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PO0086



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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Part B – Your Representation(s).

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ALISON BRADSHAW	First name:
Last Name: CRANFORD	Last Name:
Organisation/company: /	Organisation/company:
Address: 10 LATHAM DRIVE RAINFORD, ST. HELENS	Address:
Postcode: WA11 8JP	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

09.03.19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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Town Hall
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Merseyside
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Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy <u>All</u>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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Other documents (please name document and relevant part/section)

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The local plan is unsound, building on prime agricultural land, especially in the climate of Brexit when we are likely to need to produce more of our own food.

There is no infrastructure in place or proposed to support this development eg. education, health services, leisure facilities for children + adults.

Risk of flooding.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Not to build on prime agricultural land (Rookery Lane).

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.

PO0087



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>MICHAEL</u>	First name:
Last Name: <u>HENTHORN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>1, ELM GARDENS. RAINFORD</u>	Address:
Postcode: <u>WA11 8DX</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	

Signature: [REDACTED]	Date: <u>10/3/2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Because all identified Brown field identified sites have not been recommended for development before this grade 1 site of agricultural land has been selected for housing.
The village has many problems, regarding, parking, doctors, traffic congestion, schooling, shopping, policing etc.
This development will have a serious effect on these items.

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.

To develop brown field sites before considering any sites that have grade 1 agricultural land. We are a small country & it is essential that we continue to grow as much as our own food as possible. We are constantly informed about our carbon ~~footprint~~ footprint, if we cease to grow food this will only increase it as we will have to import it more.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

☒ Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that necessary points of view have been noted.

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.

PO0088



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>THOMAS</u>	First name: _____
Last Name: <u>PIMBLETT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>147 BLEAK HILL RD</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DW</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>9/3/2019</u>
------------------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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Telephone: **01744 676190**

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - BASED ON "FLAWED METHODOLOGY"
Effective?	<input checked="" type="checkbox"/> NO - PLAN IS NOT DELIVERABLE.
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - DOES NOT COMPLY WITH NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ul style="list-style-type: none"> PROMOTES USE OF HGV'S IN RESIDENTIAL AREA'S ; ON ROADS THAT ARE NOT SUITABLE. IGNORES AGRICULTURAL LAND QUALITY. IGNORES AIR QUALITY / NOISE / GENERAL HEALTH ISSUES. MAJOR TRANSPORT ROADS AND RESIDENTIAL AREAS WILL NEVER BE WITHOUT SERIOUS PROBLEMS IF THE ROADS ARE PASSING THROUGH THE RESIDENTIAL AREAS.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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.

PO0089

556

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SUSAN</u>	First name: _____
Last Name: <u>JORDAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>36 CRANTOCK GROVE</u>	Address: _____
<u>WINDLE, ST. HELENS,</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10.3.19</u>
------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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Town Hall
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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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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map	8HS (1)	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - THE PLAN IS BASED ON FLAWED METHODOLOGY
Effective?	<input checked="" type="checkbox"/> NO - THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

I CONSIDER THE PLAN UNSOUND AS PER ATTACHED.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE SEE ATTACHED

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

SUSAN JORDAN - 36 CRANTOCK GROVE
WINDLE ST. HELENS

8HS
PART B-6
7

TRAFFIC

I CONSIDER THE PLAN UNSOUND —
THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC GROWTH, CAUSING SEVERE TRAFFIC ISSUES — THE A580 IS ONE OF THE BUSIEST MAIN ROADS IN THE COUNTRY. THE BOROUGH HAS SEVERE AND SIGNIFICANT PROBLEMS AT THE WINDLE ISLAND JUNCTION AND MANY ACCIDENTS AND PEDESTRIAN FATALITIES HAVE OCCURRED. THE CURRENT ROAD WORKS AT THE JUNCTION ARE TO IMPROVE TRAFFIC FLOW AT PRESENT AND IS TOTALLY UNRELATED TO THE LOCAL PLAN PROPOSALS. GIANT WAREHOUSES ARE CURRENTLY UNDER CONSTRUCTION AND THESE ARE TO LIE ALONG A TEN MILE STRETCH OF THE M57 AND M6 INCORPORATING THE A580 AND WINDLE ISLAND JUNCTION. THIS IS A NORTHERN POWERHOUSE INITIATIVE AND WHEN THE SUPERPORT AT LIVERPOOL BECOMES FULLY OPERATIONAL ALONG WITH OTHER WAREHOUSING DEVELOPMENTS AT BICKERSTAFFE AND SKELMERDALE, IT IS ESTIMATED THAT THERE WILL BE AN INCREASE OF HGVs OF 300%. WHY ADD AN ESTIMATED 1,800 CARS FROM THE PROPOSED HOUSING INTO THE MIX? ADDING A SIGNIFICANT IMPACT ON AN ALREADY SEVERE TRAFFIC ISSUE AT THE JUNCTION AND SURROUNDING ROADS. IT WILL ALSO IMPACT ON THE A580/M6 JUNCTION 23 AT HAYDOCK WHICH IS HEAVILY CONGESTED ON A DAILY BASIS AND WILL CAUSE MORE DELAYS AND TAILBACKS ALONG THE A580 BACK TO THE WINDLE JUNCTION.

ACCORDING TO THE NPPF 2018 PARA 109 "DEVELOPMENT SHOULD ONLY BE PREVENTED OR REFUSED ON GROUNDS IF THERE WOULD BE AN UNACCEPTABLE IMPACT ON HIGHWAY SAFETY OR RESIDUAL CUMULATIVE IMPACT ON THE ROAD NETWORK WOULD BE SEVERE." THE LOCAL PLAN FOR 8HS WOULD CAUSE A SEVERE IMPACT ON SAFETY AND THE ROAD NETWORKS AND SHOULD BE PREVENTED AS PER NPPF 2018 PARAGRAPH 109.

— CONT TO PAGE 2

SUSAN JORDAN -
36 CRAWTOCK GROVE
WINDLE ST. HELENS.

PAGE 2

SHS

PART B-6.
7.

AGRICULTURAL LAND

THE PLAN HAS IGNORED THAT SHS IS A GRADE 1 AND GRADE 2 AGRICULTURAL LAND AND BY THIS FOOD SECURITY HAS BEEN IGNORED. THIS LAND HAS BEEN CONTINUOUSLY AND CURRENTLY FARMED AND PRODUCES VEGETABLES AND WHEAT. NO THOUGHT HAS BEEN GIVEN TO THE IMPACT THIS WILL CAUSE TO FARMING JOBS LOCALLY.

HOUSING NEED

THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY, AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCE HAS BEEN MADE. THE HOUSING NEED IS ASPIRATIONAL AND DRIVEN BY ECONOMIC GROWTH FORECASTS THAT ARE FLAWED AND OVER OPTIMISTIC. THE NEW MASSIVE WAREHOUSES BEING BUILT LOCALLY ARE ALL TO BE MECHANISED AND DO NOT EMPLOY LARGE WORKFORCES AND THUS IN NO WAY JUSTIFY APPROX 1,000 HOUSES TO BE BUILT. THE LATEST ESTIMATE PRODUCED BY THE ONS (2016) PREDICTS THAT 383 HOUSES PER YEAR WILL BE REQUIRED TO MEET HOUSING NEEDS OF ST. HELENS.

COMMUNITY INFRASTRUCTURE

THERE IS NO COMMUNITY INFRASTRUCTURE REGARDING SCHOOLS, DOCTORS, DENTISTS AND PUBLIC TRANSPORT. - OUR SCHOOLS ARE OVERSUBSCRIBED ALREADY, WE HAVE NO DOCTORS OR DENTISTS IN WINDLE AND WE ALREADY HAVE A REDUCED BUS SERVICE. HOW WILL THE COMMUNITY COPE?

— CONT TO PAGE 3

SHS
PART B - 6.
7

BROWNFIELD POLICY

DUE TO ST. HELENS DECLINE IN GLASS AND OTHER MANUFACTURING THERE ARE A LARGE AMOUNT OF BROWN FIELD SITES IN VARYING DEGREES^{OF} CONTAMINATION. THE ST. HELENS MBC IN CONJUNCTION WITH LIVERPOOL CITY REGION AUTHORITY AND NEIGHBOURING AUTHORITIES HAVE NO POLICY FOR BRINGING "UNSUITABLE" SITES OUTSIDE BROWNFIELD BACK TO USE.

ST. HELENS MBC RECORDS INDICATE THAT LESS THAN 7% OF THE TOTAL AREA OF THE LOWEST LEVEL OF CONTAMINATED SITES NEED TO BE MADE AVAILABLE TO REMOVE GREEN BELT AND SAFEGUARDED LAND FROM CONSIDERATION. THEY HAVE STATED IN THEIR STATEMENT OF CONTAMINATED LAND SITES 2015 THAT 3,170 ha OF THE LOWEST PRIORITY CONTAMINATED LAND EXISTS IN ST. HELENS. IT IS REASONABLE TO EXPECT THEREFORE THAT THE LOWEST CONTAMINATED LAND SITES CAN BE MADE TO BECOME AVAILABLE WITHIN THE 15 YEAR PLAN PERIOD OR THE 25 YEAR SAFEGUARDED PERIOD. THUS TAKING THE NEED AWAY FROM USING SHS AND KEEPING IT IN THE FARMING) GREENBELT AND FREE FROM DEVELOPING FOR EVER.

PO0090



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Title: <u>MR</u>	Title: _____
First Name: <u>CARL</u>	First name: _____
Last Name: <u>CLORAIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>OVENBACIK FARM</u>	Address: _____
<u>WINWICIE LANE</u>	_____
<u>WARRINGTON.</u>	_____
Postcode: <u>W13 7EW</u>	Postcode: _____
[Redacted]	Tel No: _____
Mobile No: _____	Mobile No: _____
[Redacted]	Mail: _____

Signature: [Redacted]	Date: <u>26-2-2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table	<input checked="" type="checkbox"/>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Myself & family are totally against these plans. We purchased our farm with countryside views all around. We do not want to look at Warehouses or houses. The road outside to us Winwick Lane is busy enough. ~~The~~ Your development would create more traffic and pollution. We live in Warrington not St Helens. This Plan if to go ahead would devalue our property therefore we will be seeking legal advice for compensation.

E. DL

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X

No, I do not wish to participate at the oral examination

✓

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Your plan is right on our door step therefore I would like to express my thoughts.

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.

PO0091



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.



This form has two parts;

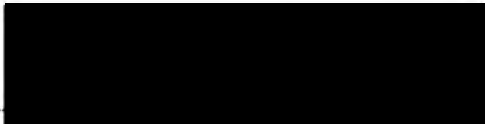
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>NORMAN</u>	First name: _____
Last Name: <u>MARTINDALE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 CUNNING CLOSE</u>	Address: _____
<u>ECCESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DP</u>	Postcode: _____
Tel No: 	Tel No: _____
Mobile: 	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>3-3-19</u>
--	---------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
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☒ Yes (via email)

☐ No

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

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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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.

PO0092

573

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JUDITH</u>	First name: _____
Last Name: <u>MARTINDALE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 GUNNING CLOSE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DP</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>2nd March '19</u>
-----------------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> Based on Flawed methodology
Effective?	<input checked="" type="checkbox"/> Plan not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> Does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>② The "plan" does <u>not</u> satisfy:- requirements for sustainable development, the criteria for sustainable transport as it promotes increased car dependancy remote from transport hubs, proposed housing targets are based on unrealistic employment growth predictions, does not satisfy effective land use by concentrating on Green Space development over town centre development, and it does not satisfy food security by ignoring Agricultural Land Quality.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1 Consider all other reasonable alternatives seriously - brown field options, ex Pilkington sites, "contaminated" sites to be cleaned up (it is shortsighted not to do this) and town centre locations (Century House?) Why are we putting up an enormous bowling alley next to Aldi??? It should have been bought and used for new housing by the council. We are already the most congested area outside of London. If we must have more housing it should not be on the outskirts of the borough where people will need more cars to sustain lifestyles there. Air quality is already shocking - improve public transport with electric buses, and cheap fares so people will use them, and leave the green belt alone.

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.

PO0093

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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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.

1. Your Details

(we will correspond via your agent)

Title: MISS
First Name: ANDREA
Last Name: SIMCOX
Organisation/company: _____
Address: 37 DARESBUARY ROAD
EGGLESTON
ST. HELENS
Postcode: WA10 5DR
Mobile No: _____
Email: _____

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____

Date: 25th February '19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
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St Helens
WA10 1HP**

or by hand delivery to:

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St.Helens Town Hall
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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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**Please use a separate copy of Part B
for each separate comment/representation.**

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓ ✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE HOUSES WILL BE BUILT ADJACENT TO PROBABLY ONE OF THE BUSIEST DUAL CARRIAGEWAY IN THE U.K (A580). ST. HELENS IS RIGHT IN THE MIDDLE OF, AGAIN, TWO OF THE BUSIEST CITIES IN THE COUNTRY (MANCHESTER & LIVERPOOL) LIVERPOOL IS INCREASING THE DOCKS AREA THE A580 WILL BECOME SO MUCH BUSIER IF ONLY BECAUSE OF NUMBER OF HGV'S NEEDED TO GET TO AND FROM THESE DOCKS TO ADD TO THIS THE NUMBER OF HOME VEHICLES WILL INCREASE THERE WILL BE DOCTORS, SCHOOLS, SHOPS, PLAY AREAS ON ROADS WHICH, IF THE CURRENT ROADS IN THIS AREA ARE ANYTHING TO GO BY WILL BE FAR TO NARROW. ALSO KNOWSLEY & HAYDOCK BOTH OF WHICH ARE BY THE A580 ARE BUILDING A NEW INDUSTRIAL ESTATES</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I CANNOT SENSEABLY THINK OF ANY GOOD REASON WHY THIS CONSIDERED BUILDING PLAN SHOULD GO AHEAD WHEN THERE ARE SO MANY AREAS WHICH ARE BROWN BELT IN THE ST. HELENS AREA WHICH MUST BE USED INSTEAD OF USING FARM LAND WHICH WILL DEFINATELY BE NEEDED ONCE BREXIT HAS GONE THROUGH

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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PO0094



St. Helens
Council

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR Title: _____
 First Name: WILLIAM First name: _____
 Last Name: WILSON Last Name: _____
 Organisation/company: _____ Organisation/company: _____
 Address: 6 Marlborough Ave Address: _____
ECCELESTON
 Postcode: WA10 5PQ Postcode: _____
 Tel No: _____ Tel No: _____
 Mobile No: _____
 Email: _____

2. Your Agent's Details (if applicable)

Signature: _____

Date: 5/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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WA10 1HP**

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Present conditions within this area are unable to be maintained, IF further development is approved it would not be viable. Road proposals being implemented now conflict with Proposal of this plan.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0095

594

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARION</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 MELROSE AVENUE</u>	Address: _____
Postcode: <u>WA10SPQ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>4/3/2019</u>
------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

Ground Floor Reception
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NEXT STEPS

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DATA PROTECTION

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**Now please complete PART B of this form,
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Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Pressure on local services will be unable to cope. Health.</p> <p>Road Structure is unsuitable for extra housing causing more traffic onto a road where it can't cope with present traffic.</p> <p>Schools traffic in now that pupils have to go earlier and arrive home later.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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PO0096

① - LPAOS ④ - GEN
② - GEN 500
③ - GEN ⑤ - GEN

PFOSS1

12 MAR 2019



St. Helens
Council

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Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SHEILA

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD.

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: ST. HELENS CC

Last Name: _____

Organisation/company: DATE

Address: RESOUR

Postcode: _____

el No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5th March 2019

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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Infrastructure will not support so many new houses. Schools + G.P. Surgeries locally are already struggling with the families already living in the area. The roads are not adequate to accomodate so many new households.

②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Just Don't build here or at
least significantly reduce the
number of houses built.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Green Belt around Bold ~~is~~ is a haven for wild life. There are Brown Hares on this land and these are becoming an endangered species. As a result of this they are PROTECTED under the Wildlife and countryside act of 1981

(3)

Please continue on a separate sheet if necessary

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Don't build as this will spoil
the habitat for these beautiful
animals.

Please continue on a separate sheet if necessary

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Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
<p>Public Transport is not sufficient to serve the number of people this project will bring to the area.</p>

④

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.

Better roads, More public transport.

Please continue on a separate sheet if necessary

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<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

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<p></p>

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						✓	
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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Potential for increased Crime +
unsocial behavior.

Since New Bold was built, Crime in
the area has gone up.

5

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Use Braunfield sites whenever possible and preserve the green belt. If this can't be done, don't build so many houses on this site as it will only bring problems.

Please continue on a separate sheet if necessary

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PO0097

① - LPAOS ④ - GEN
② - GEN 500
③ - GEN ⑤ - GEN

PFOSS1

12 MAR 2019



St. Helens
Council

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Ref: LPSD

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1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SHEILA

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD.

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: ST. HELENS CC

Last Name: _____

Organisation/company: DATE

Address: ST. HELENS CC

Postcode: _____

el No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5th March 2019

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Infrastructure will not support so many new houses. Schools + G.P. Surgeries locally are already struggling with the families already living in the area. The roads are not adequate to accomodate so many new households.

(2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Just Don't build here or at
least significantly reduce the
number of houses built.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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The Green Belt around Bold ~~is~~ is a haven for wild life. There are Brown Hares on this land and these are becoming an endangered species. As a result of this they are PROTECTED under the wildlife and countryside act of 1981

③

Please continue on a separate sheet if necessary

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Don't build as this will spoil
the habitat for these beautiful
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<p>Public Transport is not sufficient to serve the number of people this project will bring to the area.</p>

④

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Better roads, More public transport.

Please continue on a separate sheet if necessary

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No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Potential for increased Crime + unsocial behavior. Since New Bold was built, Crime in the area has gone up.</p>
--

5

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Use Braunfield sites whenever possible and preserve the green belt. If this can't be done, don't build so many houses on this site as it will only bring problems.

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
--	--

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<p></p>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0098

① - LPAOS ④ - GEN
② - GEN 500
③ - GEN ⑤ - GEN

PFOSS1

12 MAR 2019



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SHEILA

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD.

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: ST. HELENS CC

Last Name: _____

Organisation/company: DATE

Address: RESOUR

Postcode: _____

el No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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The Infrastructure will not support so many new houses. Schools + G.P. Surgeries locally are already struggling with the families already living in the area. The roads are not adequate to accomodate so many new households.

(2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Just Don't build here or at
least significantly reduce the
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(3)

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④

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Better roads, More public transport.

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Potential for increased Crime +
unsocial behaviour.

Since New Bold was built, Crime in
the area has gone up.

5

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PO0099

① - LPAOS ④ - GEN
② - GEN 500
③ - GEN ⑤ - GEN

PFOSS1

12 MAR 2019



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SHEILA

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD.

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: ST. HELENS CC

Last Name: _____

Organisation/company: DATE

Address: ST. HELENS CC

Postcode: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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If you still need assistance, you can contact us via:

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**Now please complete PART B of this form,
setting out your representation/comment.**

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Infrastructure will not support so many new houses. Schools + G.P. Surgeries locally are already struggling with the families already living in the area. The roads are not adequate to accomodate so many new households.

(2)

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Just Don't build here or at
least significantly reduce the
number of houses built.

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

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Other documents (please name document and relevant part/section)									

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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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The Green Belt around Bold ~~is~~ is a haven for wild life. There are Brown Hares on this land and these are becoming an endangered species. As a result of this they are PROTECTED under the wildlife and countryside act of 1981

(3)

Please continue on a separate sheet if necessary

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Don't build as this will spoil the habitat for these beautiful animals.

Please continue on a separate sheet if necessary

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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
<p>Public Transport is not sufficient to serve the number of people this project will bring to the area.</p>

④

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Better roads, More public transport.

Please continue on a separate sheet if necessary

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<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

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Potential for increased Crime +
unsocial behavior.

Since New Bold was built, Crime in
the area has gone up.

5

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Use Braunfield sites whenever possible and preserve the green belt. If this can't be done, don't build so many houses on this site as it will only bring problems.

Please continue on a separate sheet if necessary

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PO0100

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>Stephen</u>	First name: _____
Last Name: <u>NORTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
	Address: _____

	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>10/3/18</u>
------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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✓				✓		✓			✓
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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No The Plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No It does not comply with NPPF 2018

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It does not fulfil the requirement for sustainable development and promotes dependency on the motor vehicle without exploring public transport and congestion issues. Housing targets are not based on sound data and are aspirational based on projected employment figures. The plan targets green spaces over town centre developments with higher densities. Increase pollution from traffic. Vital Agricultural land is being wasted. Air quality and retention of already built up network of roads will be affected by increased traffic.

Please continue on a separate sheet if necessary

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Suggest that Brown land be identified and were possible used in place of Green Space Land. The plan targets an already busy congested port of St Helens around Winkfield Island. Suggest consideration be given to moving the development to a more suitable, sustainable location, to an area more suited to radical development - an area already in industrial use; perhaps Haydock where radical development would not impact so much upon residential, established areas. St Helens not enough has been done to identify these areas not only brown land but current industrial areas around St Helens

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