



**ST HELENS**  
BOROUGH COUNCIL

**ST HELENS BOROUGH  
LOCAL PLAN 2020-2035**

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

**PLAN ORDER**

**PO0301 – PO0400**

**SEPTEMBER 2020**

# Plan Order Index

Policy	PO numbers	Plan Order Document
<b>Local Plan</b>		
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
<b>Economic Viability Assessment</b>		
	PO3755 to PO3772	SD007.32
<b>Green Belt Review 2018</b>		
	PO3773 to PO3883	SD007.32, SD007.33

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

PO0301

Site 8HA ELO154

- ① LPA05
- ② PARA 1-7-2
- ③ S.A.



Representation on the Local Plan Submission Draft

Andrew Shaun Mellors

to: planningpolicy@sthelens.gov.uk  
13/03/2019 08:31

Hide Details

From: Andrew Shaun Mellors [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St. Helens. ✓

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. St. Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land. ✓

Specific points on site <sup>8HA</sup> HA8 (Rookery Lane)

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

} ③

} ①

Yours faithfully

Mrs Andrew Mellors  
1 Springvale Reeds Brow  
Rainford  
St. Helens  
WA11 8PB

Kind Regards

**Andrew Mellors**



PO0302

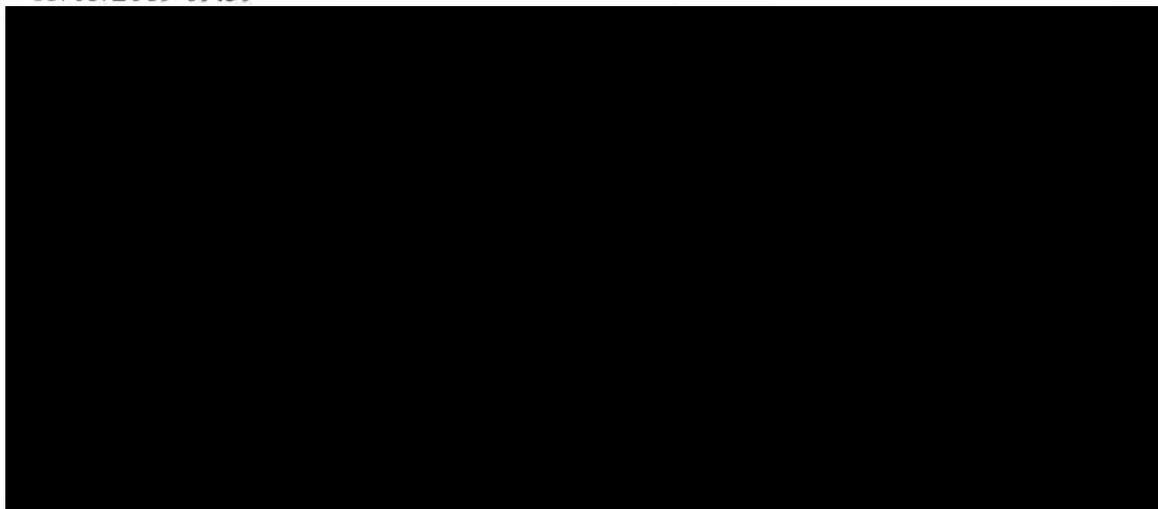
①-LPA02    ②-Para 17.2 DTC

③-LPA07    ④-LPA05



RAG Submission

[Redacted]  
to:  
planningpolicy  
13/03/2019 09:59



1 Attachment



RAG Submission Final.docx

Dear Sirs,

Please find attached the representation from Rainford Action Group re the St Helens Plan 2020-2035 proposed Submission Draft

Kind Regards,

**Ian McFegan**



Virus-free. [www.avast.com](http://www.avast.com)

# Rainford Action Group (RAG) Representation; St. Helens Local Plan 2020-2035 Proposed Submission Draft

**March 2018**

1. Purpose
2. Introduction
3. Overall Plan
4. Comments on site 8HA (Land South of Higher Lane and East of Rookery Lane, Rainford)
5. Appendix 1

Key	
Abbreviation	Full Title
SHLP	St. Helens Local Plan 2020 -2035 Proposed Submission Draft
SHBC	St Helens Borough Council ("The Council")
RAG	Rainford Action Group



## 1. Purpose

- 1.1 This submission is made on behalf of Rainford Action Group (RAG) in consultation with the concerns raised by the local residents and complements the SHGBA submission by Kirkwells.

## 2. Introduction

- 2.1 RAG was formed in Dec 2016, initially to help Rainford residents to understand what was being proposed by St. Helens Council in the SHLPP, and to help them through the somewhat complicated submission process.
- 2.2 Many residents were deeply concerned by the scale of development in Rainford proposed by that document. A committee was formed to represent the views of the community and encourage participation in the process.
- 2.3 Public meetings were held with over 400 attendees, and a Facebook Group was set up which currently has 1,500 members, as well as a Twitter account with over 1,000 followers.
- 2.4 RAG welcomes the reduction in the number of sites and housing numbers proposed for Rainford in the St.Helens Local Plan 2020-2035 Proposed Submission Draft.
- 2.5 RAG is not against development *per se*, and accepts the need for new housing in the right amount and location and where there is a proven need.
- 2.6 We would also like to see the early adoption of a local Plan. However, we do not believe that this Proposed Submission Draft passes the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF ) and there are number of issues we feel need to be addressed which are set out below.

### 3. Overall Plan

In summary our issues with the overall plan are;

- 
- 3.1 There are no exceptional circumstances to justify not using the standard method to calculate housing need
  - 3.2 The economic analysis is flawed and based on over-optimistic assumptions
  - 3.3 The level of land needed for housing and employment is therefore not as high as set out in the Plan 01
  - 3.4 There are therefore no exceptional circumstances to change Green belt boundaries
  - 3.5 Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

---

3.6 The Council have failed to co-operate with other councils and have not published any statement(s) of common ground. 02

---

3.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth. 03

---

*[Note: Points 3.1 to 3.6 are covered in detail in the Kirkwell's submission on behalf of St Helens Green Belt Association, and by Dr Athey's submission.]*

### 4. Comments on Site 8HA

(Land South of Higher Lane and East of Rookery Lane, Rainford)

- 
- 4.1 Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1. It is therefore logical that this should be the first site Green Belt site released from development if the housing need is reduced. We are arguing (3.1 above) that the Council should use the Standard method of 468 rather than the uplifted 486, which over 19 years equates to 342 fewer houses. This comfortably exceeds the 259 houses planned for site 8HA 04

PO0303

ELO171/A

ELO171

ELO171/B

Site 8HA

ELO171/C

① LPA05

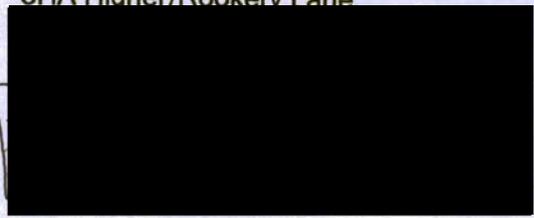
ELO171/D

② DEC

③ S.A.

8HA Higher/Rookery Lane

13/03/2019 11:58



From:

To:

Cc:

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

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 does not

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

Specific points on site HA8 (Rookery Lane)

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

③

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

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

①

• 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.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Sarah Wright  
Hannah Wright  
Lucas Wright  
Hermione Wright

149 Church Road  
Rainford  
WA11 8QB

PO0304

ELO171/A

ELO171

ELO171/B

Site 8HA

ELO171/C

① LPA05

ELO171/D

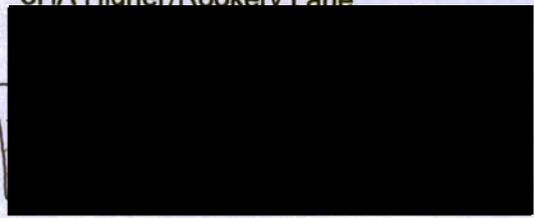
② DEC

③ S.A.

13/03/2019 11:58



8HA Higher/Rookery Lane



From:

To:

Cc:

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

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 does not

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

Specific points on site HA8 (Rookery Lane)

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

③

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

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

①

• 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.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Sarah Wright  
Hannah Wright  
Lucas Wright  
Hermione Wright

149 Church Road  
Rainford  
WA11 8QB

PO0305

ELO171/A

ELO171

ELO171/B

Site 8HA

ELO171/C

① LPA05

ELO171/D

② DEC

③ S.A.

13/03/2019 11:58



8HA Higher/Rookery Lane



From:  
To:  
Cc:

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

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 does not

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

Specific points on site HA8 (Rookery Lane)

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

③

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

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

①

• 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.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Sarah Wright  
Hannah Wright  
Lucas Wright  
Hermione Wright

149 Church Road  
Rainford  
WA11 8QB

PO0306

ELO171/A

ELO171

ELO171/B

Site 8HA

ELO171/C

① LPA05

ELO171/D

② DEC

③ S.A.

13/03/2019 11:58



8HA Higher/Rookery Lane



From:

To:

Cc:

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

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 does not

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

Specific points on site HA8 (Rookery Lane)

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

③

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

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

①

• 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.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Sarah Wright  
Hannah Wright  
Lucas Wright  
Hermione Wright

149 Church Road  
Rainford  
WA11 8QB

PO0307



Site 8HA

ELO181

- ① - LPAOS
- ② - Para 1.7.2
- ③ - SA

13/03/2019 13:05



Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

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.

Specific points on site HA8 (Rookery Lane)

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

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142

①

- 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.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Jane Turton





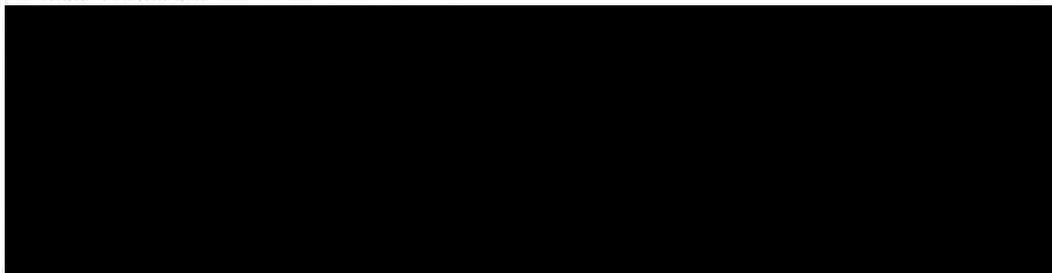
27 Cartwright Close  
Rainford  
St. Helens  
Merseyside  
WA11 8DG

PO0308

Le 2017/5

3/1/5

Fwd: Local Plan Objection  
Cllr J Tasker



① - LPA 06

② LPA 02

③ LPA 05

1 Attachment



Local Plan Objection.docx

④ PARA 1.7.2

Good afternoon,

Please find attached my response to the Local Plan. Can you please confirm that it has been received?

Thanks,

James

I am responding to the St Helens Council Local Plan 2020 – 2035 ‘Submission Draft’ (LPSD) as a Rainhill Ward Councillor on St Helens Metropolitan Borough Council.

## Rainhill

Myself and many residents in Rainhill are concerned about the releasing of the former Eccleston Park Golf Course (3HS) site from the green belt. I believe that there isn't an exceptional circumstance to justify the releasing of this land from the green belt for future development. I don't believe that St Helens Council have taken into account the developments that are happening in nearby Knowsley. In Whiston a brand new garden village is being built that will eventually hold up to 2000 homes, shops and a number of warehouses. There are also hundreds of homes being built along Scotch Barn Lane which is just around the corner from the 3HS site. Rainhill is located right next to Whiston so these developments are having a direct impact on our community.

I have been engaging with residents and the local community group Rainhill Save Our Green Belt (RSOGB) for the last two and a half years. In this time RSOGB have organised events such as walks, public meetings and petitions. A recent RSOGB 2 day meeting attracted hundreds of residents. The feedback from Rainhill residents is clear that they don't want to lose green belt land when other options are available. Because of this I strongly object to the releasing of site 3HS from the green belt for future development.

In Rainhill we are concerned about the added traffic and the pollution this will bring. We are also concerned that by building on site 3HS this will add further strain to local services such as hospitals, schools and doctors.

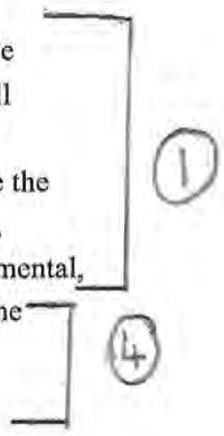
## My Objections

### **Policy LPA02**

I object to the releasing of land from the Green Belt after 2035, also known as ‘safeguarding’ Section 13: Protecting Green Belt Land of the National Planning Policy Framework (NPPF, 2019) states that green belt land should only be released in exceptional circumstances. St Helens Council have not identified an exceptional circumstance that could justify this land being released from green belt. 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.

### **Policy LPA05 & Appendix 7**

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.



### Conclusion

I am not against development and I support the need for a local plan. But as you will see when looking through this plan St Helens Council have more than satisfied the Governments requirement for a 5 year supply of housing. St Helens Council have a 15 year plan that details how they will meet their housing targets for the next 15 years. We have no idea what situation we will be in in 15 years time, nor do we know what development sites will become available in this time that aren't available now. It is because of this that I strongly object to the former Eccleston Park Golf Course being released from green belt and 'safeguarded' for future development.



PO0309

SITE 8HA

- ① - LPA05
- ② - PLC
- ③ - S.M.

13/03/2019 15:05



**Local plan for St Helens**  
 Sarah Heath to: planningpolicy

From: [Redacted]  
 To: planningpolicy@sthelens.gov.uk

Dear Sirs

I refer to the Local Plan proposed for St Helens.

I wish to make the following points in relation to the plan overall:

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

①

②

With regard to the areas specific to Rainford (8HA Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

④

Yours faithfully  
 Sarah Heath  
 12 Walmesley Drive  
 Rainford  
 St. Helens  
 WA11 8EN

Sent from my iPad

PO0310

660202



Local plan for St Helens  
Margaret Heath  
to:  
planningpolicy  
13/03/2019 15:10  
Hide Details



SIN 8HA  
① - LPA05  
② - DEC 1-7-2  
③ - S.A.

Dear Sirs

I refer to the Local Plan proposed for St Helens.

I wish to make the following points in relation to the plan overall:

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

} ①  
} ②

With regard to the areas specific to Rainford (8HA Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

} ③  
} ①

Yours faithfully

Margaret Heath  
21 Finchley Drive  
St. Helens  
WA11 9EW

Sent from my iPad

PO0311

ELO214

SITE 8HA

① - LPAOK

② - DEC

13/03/2019 15:44

③ - S.A.



Local Plan Submission

to: planningpolicy



To whom it may concern

We are writing to object to the local plan as it stands and particularly to the building on grade 1 agricultural land in Rainford, site 8HA.

Our reasons are as follows:

The standard method for housing need has not been used and there are no exceptional circumstances to justify not using them, the economic analysis is flawed as it is over optimistic, and as such the level of housing required is smaller hence no exceptional circumstances and no need alter Greenbelt boundaries.

①

Also other options have not been fully explored along with figures such as previously developed land. These alternatives will have less impact on the environment and will reduce need for new infrastructure.

There has been no collaboration between councils and no common ground agreed.

②

Therefore it is not legally sound and should be significantly modified to retain Greenbelt by reducing housing and employment targets and allocate more previously used land.

Turning to our issues with the Rookery Lane site, HAB.

Four sites score four negatives on the Sustainability Appraisal, and only one remains which is this site, therefore SHBC have themselves assessed that this site is the least appropriate Green Belt site which is allocated for housing in the first phase. In addition other sites close to industrial developments have been removed and this poses a risk of pollution and explosions, both of which have been experienced here. (See SHLAA 2016 site assessment ref 16M and 142). It is also Grade 1 agricultural land which is actively farmed thus not only needed more due to potential Brexit but also losing jobs which is contradicting the purpose of development. This is also intended without consultation with Natural England.

③

①

Thank you for your time in reading this and I hope myself and my children's concerns and issues are fully taken on board and acted upon.

Warmest regards

Rebecca Leche, William Jones [redacted] and Louisa Jones [redacted]

7 Damson Grove Court  
Damson Grove  
Rainford  
WA11 8GL

PO0312

ELO224

SITE 8HA

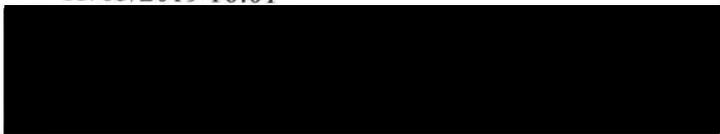
① - LPA05

② - Para 1.7.2

③ - SA



Rainford planning objection  
David Jones  
to:  
planningpolicy  
13/03/2019 16:01



To whom it may concern

We are writing to object to the local plan as it stands and particularly to the building on grade 1 agricultural land in Rainford, site 8HA.

Our reasons are as follows:

The standard method for housing need has not been used and there are no exceptional circumstances to justify not using them, the economic analysis is flawed as it is over optimistic, and as such the level of housing required is smaller hence no exceptional circumstances and no need alter Greenbelt boundaries.

Also other options have not been fully explored along with figures such as previously developed land. These alternatives will have less impact on the environment and will reduce need for new infrastructure.

There has been no collaboration between councils and no common ground agreed.

①

②

Therefore it is not legally sound and should be significantly modified to retain Greenbelt by reducing housing and employment targets and allocate more previously used land.

Turning to our issues with the Rookery Lane site, HA8.

Four sites score four negatives on the Sustainability Appraisal, and only one remains which is this site, therefore SHBC have themselves assessed that this site is the least appropriate Green Belt site which is allocated for housing in the first phase. In addition other sites close to industrial developments have been removed and this poses a risk of pollution and explosions, both of which have been experienced here. (See SHLAA 2016 site assessment ref 16M and 142). It is also Grade 1 agricultural land which is actively farmed thus not only needed more due to potential Brexit but also losing jobs which is contradicting the purpose of development. This is also intended without consultation with Natural England.

③

①

Thank you for your time in reading this and I hope myself and my children's concerns and issues are fully taken on board and acted upon.

Mr D Jones  
56 Rookery Drive  
Rainford  
WA11 8ba

PO0313

E10233



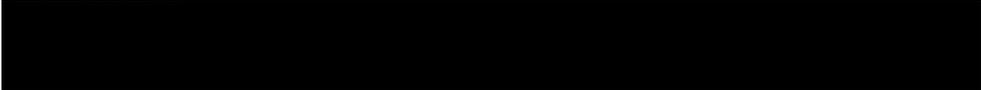
Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane  
McKenna, Simon

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:17  
Hide Details

Site 8HA

- ① - L.Pros
- ② - Dec
- ③ - S.A.

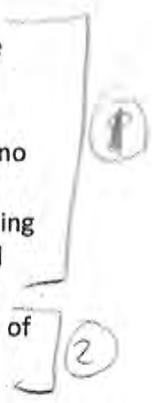
Hello,



I would like to raise my objection to the planned work in Rainford. My name is Simon McKenna and I live at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH.

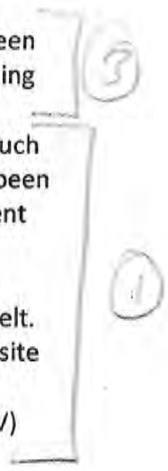
The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.



Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the 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.



In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna



PO0314

U10234



FW: Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane  
McKenna, Simon

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:18  
Hide Details

Sims 8HA  
① - LPA05  
② - DEC - 1-1-2  
③ - S.A.



Hello,

I have been asked to raise this on behalf of my son, Jack McKenna, who lives at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

①  
②

Rainford Specific points (8HA Rookery Lane).

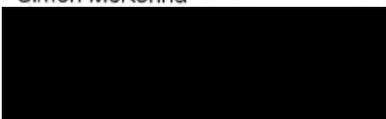
- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the 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.

②  
①

In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna



PO0315

440235



FW: Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane

McKenna, Simon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:19

Hide Details

SHC 8/11

①-LP05

②-DLC

③-S.A.

Hello,



I have been asked to raise this on behalf of my daughter, Rose McKenna, who lives at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH. 

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

} ①  
} ②

Rainford Specific points (8HA Rookery Lane).

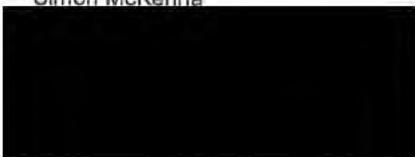
- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the 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.

} ③  
} ④

In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna



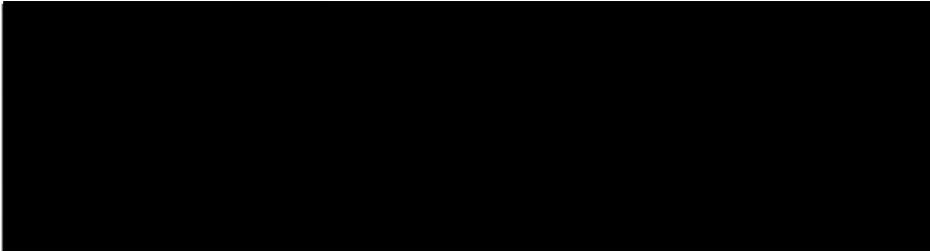
PO0316

ELO243

SITES - 8HA, 3HS, 8HS, 6HS, 7HS



St Helens Local Plan 2020-2035 Submission  
Michael Wellock  
to:  
planningpolicy  
13/03/2019 16:37



- ① - LPA02
- ② - GEN
- ③ - LPA04
- ④ - LPA04 (PARA 4.12.1  
↓  
4.12.1)
- ⑤ - LPA05
- 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

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.

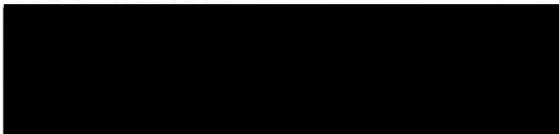
Yours faithfully,

Michael

--

**Michael Wellock**  
**Managing Director**

**Kirkwells**  
**Lancashire Digital Technology Centre**  
**Bancroft Road**  
**Burnley**  
**Lancashire**  
**BB10 2TP**



ELO243

St. Helens Borough Local Plan 2020-2035 Submission Draft – SHGBA Response, March 2019

**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**

## 7.0 Duty to cooperate

117. No statement on how the Council has fulfilled the “Duty to Co-operate” or evidential Statement of Common Ground has been produced. ] (14)

118. National planning policy sets out that:

“24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

119. 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. ✓
120. No statement on how the Council has fulfilled the “Duty to Co-operate” or evidential Statement of Common Ground has been produced.
121. Planning across the region is disjointed and unco-ordinated. There are a number of local authorities pursuing growth agendas. In the Liverpool City Region, there is an opportunity to address this through the Spatial Development Framework to be prepared by the Combined Authority. ] (14)
122. In the Submission Draft St Helens set out (paragraphs 4.6.2, 4.6.9 and 4.18.9) that no neighbouring authorities can meet St Helens unmet needs. This conclusion is at odds with the *West Lancashire Preferred Options Draft Local Plan Review* (August 2018). This document (page 22) contradicts such statements, Table 1, row D states that 152 dwellings per annum, a housing requirement of 3,496 dwellings, to meet “remaining unmet housing need from the Liverpool City Region for 2027-2050”. St Helens is, of course, in the Liverpool City Region, this failure to address the potential for West Lancashire to address some of St Helen’s needs raises a significant failure to meet the duty to cooperate. ] (14)
123. In this Local Plan, St Helens are seeking a significant proportion of economic development being forecast for the Liverpool City Region, with no evidence to show that this is, or is not impacting elsewhere. Or to show that such discussions have taken place. As we have set out in paragraph 39 of this submission in relation to B1 uses: ✓

“39. If St Helens were to maintain a 16% share of such uses, which it currently has, this would equate to 51 hectares of land for B8 uses by 2033. with a two-year difference in time period (2033 as opposed to 2035). The Local Plan seeks to significantly exceed these Liverpool City Region figures, based on Table 4.2 of the Submission Draft by in ✓

*the region of 100-200%. Whilst part of the Council's aspirational strategy there is no evidence that this approach has been discussed or agreed at a City Region level."*

124. We have already referenced one area where there is an apparent failure to co-operate, on a small scale, with the issue over Green Belt in Knowsley. Without information being placed in the public domain it is impossible to know whether this issue is being repeated at the large-scale in terms of Green Belt. Despite the Council's Core Strategy policy CSS1, Green Belt is being reviewed piecemeal by local planning authorities, such as St Helens, rather than on a sub-regional or regional basis.

PO0317

E10248

Site 843

① - LPA05

② - para 1.7.2

③ - SA



St. Helens Borough Local Plan 2020-2035/Local Plan Submission Draft (HA8)  
Emma Cutler  
to:  
planningpolicy  
13/03/2019 16:44



I write to give my comments in the above plan with regards to building new houses in Rainford Village.

The main points are as follows:-

- \* There are no exceptional circumstances to justify not using the standard method to calculate housing need.
- \* The economic analysis is based on over-optimistic assumptions and is therefore flawed.
- \* The level of land needed is not as high as set out in the Local Plan.
- \* No exceptional circumstances to change Greenbelt boundaries.
- \* Other reasonable alternatives have not been fully explored, eg using more previously developed land. These 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

Rainford Specic Points for HA8 (8HA) Rookery Lane:-

- \* Only 4 sites score 4 negatives (red) on the Sustainability Appraisal and the other 3 have all been discarded. So St. Helens Borough Council's own assessment is that HA8 (8HA) is the least appropriate Greenbelt site for housing in Phase 1.
- \* This site is right next to an industrial estate and subject to risks associated with industrial activity, such as pollution and explosives (both of which have been recorded recently). Other sites have been excluded during assessments due to bei next to similar industrial employment land, eg SHLAA 3016 site assessment ref 16m & 142.
- \* The site is Grade 1 Agricultural Land and is actively farmed. This provides employment in the agricultural sector which are threatened by the removal of this site for the Greenbelt.

} ②  
} ①

Me and my family accept the need for housing development in Rainford and are in principal are not opposed to it. However, we are deeply concerned firstly regarding the amount of new homes that are proposed to be built and also building on Greenbelt land rather than utilising previously developed/Brownfield sites.

We hope St. Helens Council reconsiders this Plan for all the reasons stated above.

Emma Cutler  
4 Croxteth Drive  
Rainford  
St. Helens  
WA11 8JZ

PO0318

ELO259

- ① - LPA 05
- ② - Para 1.7.2
- ③ - S.A



Mckenna,Nicola  
 to:  
 planningpolicy@sthelens.gov.uk  
 13/03/2019 17:07



Hello,

I would like to raise my objection to the planned work in Rainford. My name is Nicola McKenna and I live at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH.

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need. ①
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground. ②

Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1. ③
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142. ①
- 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.

Nicola McKenna



If you are not the intended recipient or have received this message in error, please notify the sender and permanently delete this message and any attachments. Gartner UK Limited is a company registered in England and Wales with the registration number 2266016. The Registered Office is Tamesis, The Glantly, Egham, Surrey, TW20 9AH.

PO0319

Site 8HA

ELO278



Local Plan  
Anthony Webster  
to:  
planningpolicy@sthelens.gov.uk  
09/05/2019 11:07

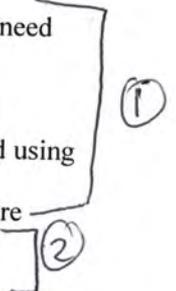
- ① - LPA05
- ② - PAR 1-7-2
- ③ - S.A.



Anthony Webster  
14 Rookery Drive  
Rainford  
St Helens  
Merseyside  
WA11 8BB

Rainford Specific points (8HA Rookery Lane)

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



Rainford Specific points (8HA Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.



Sent from Mail for Windows 10

PO0320

ELO280



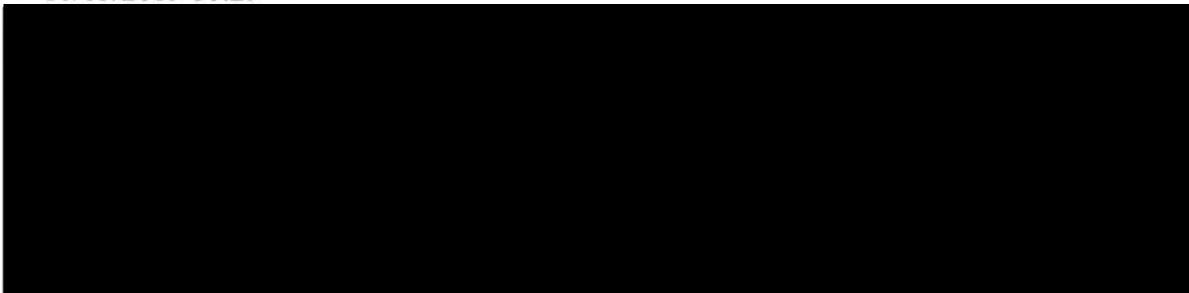
ECRA Response to SHLPSD(2018)

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 (SHLPSD)  
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.

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.

### Windfall sites (SHLAA)

In just over 3 months, since the SHLPSD was published, land availability has come about for 222 units.

In real terms, that equates to 13% of the "Required capacity to be found on Green Belt land" detailed in Row-n of SHLPSD Table 4.6, 1695 units.

It is the view of ECRA that opportunities such as those listed in the table below exist across the borough and demonstrates that not all other options have been explored prior to release of Green Belt.

At the very least it highlights that the decision not to include a windfall allowance in the SHLAA for large sites should be revisited. (Appendix 2)

Plan Ref	Site Reference	Location	Category	Site Size (Ha)	Dwellings	Status	Comments
P/2019/0186/O2DPA	Crown Buildings	College Street	Town Centre	0.35	66	Plans Submitted	Area >0.25ha - Large Site Development >10 - Large Site
P/2018/0502/FUL	Our Mother of God Parish Centre	Fleet Lane	Parr	1.34	33	Under Construction	Area >0.25ha - Large Site Development >10 - Large Site Our Lady's Primary School was included in SHLAA and is part of this development (21 units) An additional 33 units are not counted in SHLAA
P/2019/0192/FUL	Listed building conversion	Newton Park Drive	Newton Le Willows	Unknown	35	Plans Submitted	Development >10 - Large Site
P/2019/0225/FUL	Fort Knox	Dentons Green Lane	Town Centre	0.15	20	Plans Submitted	Development >10 - Large Site
	Barrow House	Barrow Street	Town Centre	Unknown	28	Plans Submitted	Development >10 - Large Site
P/2018/0848/FUL	Thatto Heath Royal British Legion Club	Scholes Lane	Thatto Heath	Unknown	30	Plans Submitted	Development >10 - Large Site
P/2019/0215/FUL	Former 21-51 Pennine Close	Pennine Close	Parr	Unknown	10	Plans Submitted	Development >10 - Large Site
					222		

### Duty to Co-operate

The council have a statutory duty to collaborate on cross-border issues with neighbouring and regional authorities.

ECRA question whether strategic decisions have been made by the Council in consultation with neighbouring authorities in accordance with the statutory *Duty to Co-operate* [and the *Statements of Common Ground* with neighbouring authorities] in developing the LPSD.

ECRA has concerns in relation to the following

1. Agricultural policy –the population increase being planned in St Helens and the region, ignores the need for food security in the SHLPSD and other Local Plans. However, the SHLPSD includes the permanent removal of high-quality farmland from food production.
2. Economic strategy - Local Planning Authorities in the North West all appear to be relying on large increases in population to justify the need for removing land from Green Belt in their local plans. The North West will only receive a proportion of the net increase of immigration into the UK. Local Authorities relying on figures for increases in population well above the national average can only achieve them by net migration into the Borough from other Local Authority areas.
3. Transport and travel – the North West road system is heavily congested, yet the respective local authorities are relying on large increases in population and industrial growth which are not commensurate with collective plans for developing transport infrastructure to deal with their projections.
4. Healthcare services – there is no evidence of any method for forecasting future healthcare demand for significant population growth with an increasing aged population. A robust regional forecasting system is needed to ensure healthcare services match demand in a manner similar to the housing delivery tests, between authorities and CCGs.

The above issues may impact on whether the Duty to Co-operate has been fully complied with in this respect.

PO0321



**Fw: Warrington Response to St Helens Local Plan NTLS**

20/01/2020 10:55

██████████  
Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council

-----  
**A:** Town Hall Annexe, Victoria Square, St. Helens, WA10 1HP  
**T:** ██████████  
**E:** ██████████  
**W:** [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

----- Forwarded by ██████████ on 20/01/2020 10:54 -----

From: ██████████  
To: ██████████  
Cc: ██████████  
Date: 16/04/2019 11:41  
Subject: Fw: Warrington Response to St Helens Local Plan NTLS

---

██████████  
I attach Warrington's comments.

They had sent them previously but only to ██████████ and my in box and it was not clear at that stage if they were the final comments.

I have confirmed to them that we will log their letter as a formal response .

Best Regards,  
██████████  
Development Plans Manager,  
St Helens Council,  
Town Hall Annexe  
Corporation Street ,  
St Helens  
WA10 1HF

██████████  
----- Forwarded by ██████████ on 16/04/2019 11:38 -----

From: "Bell, Michael" ██████████  
To: ██████████  
Date: 16/04/2019 11:25  
Subject: FW: Warrington Response to St Helens Local Plan NTLS

---

██████████  
I understand you wanted me to send our comments again.

Michael

**From:** Bell, Michael

**Sent:** 13 March 2019 11:37

**To:** [REDACTED]  
[REDACTED]

**Subject:** Warrington Response to St Helens Local Plan NTLS

[REDACTED]

I have attached our response in the form of a letter. It identifies the site allocations we are providing comments on and includes some suggested wording to ensure the plan is sound.

In order to get lead Member sign off I have had to prepare a letter rather than use your on-line form.

Can you confirm this is an acceptable format for our response.

regards

**Michael Bell**

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

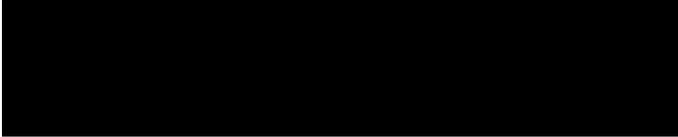
Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH



\*\*\*\*\*  
\*\*\*\*\*

**DISCLAIMER**

The views expressed by the author of this e-mail do not necessarily reflect the views or policies of Warrington Borough Council. Warrington Borough Council employees and Elected Members are expressly requested, to not make any defamatory, threatening or obscene statements and to not infringe any legal right (including copyright) by e-mail communication.

**WARNING:** e-Mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or may contain viruses. Warrington Borough Council therefore does not accept liability for any errors or omissions in the content of this message, which arise as a result of e-mail transmission.

**CONFIDENTIALITY:** This e-mail contains proprietary information, some or all of which may be confidential and/or legally privileged. It is for the intended recipient(s) only. If an addressing or transmission error has misdirected this e-mail, please notify the sender; and then delete the original. If you are not the intended recipient you should not use, disclose, distribute, copy, print or rely on any information contained in this e-mail.

**ACCESS TO INFORMATION:** As a public sector organisation, Warrington Borough Council may be required to disclose this e-mail (or any response to it) under the Freedom of Information Act 2000. All information is handled in line with the Data Protection Act 2018.

**MONITORING:** Warrington Borough Council undertakes monitoring of both incoming and outgoing e-mail. You should therefore be aware that the content of any e-mail may be examined if deemed appropriate.

**VIRUSES:** The recipient should check this e-mail and any attachments for the presence of viruses. Warrington Borough Council accepts no liability for any damage caused by any virus transmitted by this e-mail. Although precautions have been taken to ensure that no viruses are present within this e-mail, Warrington Borough Council cannot accept responsibility for any loss or damage arising from the use of this e-mail or any attachments.

\*\*\*\*\*  
\*\*\*\*\*



- Warrington Response to St Helens Local Plan Draft Submission Version .pdf

- ① - LPA04
- ② - LPA05
- ③ - DEC
- ④ - LPA06
- ⑤ - APPENDIX 5
- ⑥ - APPENDIX 7
- ⑦ - LPA10



# WARRINGTON

Borough Council

Andy Farrall  
Executive Director  
Economic Regeneration, Growth and Environment

⑧ - LPA04  
- 8EA

Town Hall  
Sankey Street  
Warrington  
WA1 1UH

[Redacted]  
St Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

13 March 2019

Dear [Redacted]

**RE: St. Helens Local Plan 2020-2035 Submission Draft**

Scale of housing and employment growth

Warrington is supportive of St. Helens' overall growth ambitions and its commitment to meet its own housing and employment needs.

} ① ②

Warrington and St Helens, together with Halton, form the mid-Mersey Housing Market Area. All three Councils have worked closely around housing need and supply issues as part of our respective 'duty to cooperate' obligations.

} ③

Site 1EA - Omega South Western Extension

Warrington agrees that the site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington, although it will continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does.

} ④

As stated in Warrington Borough Council's response to the Preferred Development Option consultation, Warrington does therefore agree to Site 1EA1: Omega South Western Extension forming part of Warrington Borough Council's employment land supply. This will be confirmed in the forthcoming Proposed Submission Version of the Warrington Local Plan.

It is noted that the intention is for the extension to use the existing access arrangements for the wider Omega site. It should also be noted that working closely with Omega Warrington Limited, the Council has developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega as a strategic employment and housing location. This work has highlighted that both the local and strategic road

} ⑤

PO0322

30 SIGNATURES

LPO005

BHS

13 MAR 2019

① - LPA06

② - PARA 1.7.2

5

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](http://www.sthelens.gov.uk/localplan).

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Fairclough	Last Name:
Organisation/company: Rainhill – S.O.G.B.	Organisation/company:
Address: 146 Two Butt Lane, Rainhill St Helens	Address:
Postcode: L35 8PT	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	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  (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 13<sup>th</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan).

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

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

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

### PART B – YOUR REPRESENTATION

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

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

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	X
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?	No	No
Sound?	No	No
Complies with the Duty to Cooperate	No	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	No
Justified?	X	No
Effective?	X	No
Consistent with National Policy?	X	No

#### 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

Having viewed the "St Helens Local Plan 2020/2035", especially with reference to plot ref LPA06 3HS, my findings and opinions are as follow;

1). **Brownfield Registers.** There was no "Brownfield Register" available until the government's instruction in 2017 to create such a register by no later than December 2017.

2). **Rainhill Village.** Rainhill which sits directly on the boarder of plot 3HS. Rainhill has quite an historic background including; Cromwell, George Stephenson's Rocket Steam Engine Trials, The first ever "Skew Bridge". The largest mental hospital in Europe, two brass foundries – one

producing port-holes, and the other making ships bells, both for the original "Queen" series of liners.

3). **Section 3.2.1** of the "Strategic Aims & Objectives" plan under item 6.2 & 6.3 discuss the protection of the environment and enhancement of green space to be promoted. Paragraph 4.24.1 offers no real justification against this aim, rendering the proposal not justified or sound.

4). **Section 4.5** of the plan states that all strategic aims have been met, however, item 4 of Policy LPA02 releases green belt. This does not meet Strategic Aim item 6 'Safeguarding and Enhancing Quality of Life'.

5). There are no constructive and functional proposals to accommodate the present congestion of all the present "infrastructures" surrounding plot 3HS. There are also no proposals concerning how plot 3HS could or would accommodate any additional development on the 3HS site.

The area surrounding 3HS is already significantly developed, hence the reason why if site "3HS" were to be developed it would complete a total urban sprawl of private developments, connecting the following areas; Portico, Thatto Heath, Nutgrove, Rainhill, Whiston and Prescot.

6). **Collaboration**; There is no evidence of collaboration with neighbouring authorities regarding any 'join up' proposals, especially with specific consideration to traffic congestion. All the local residents envisage significant increase in congestion on the roads surrounding 3HS, access to the M62, M57 and the hospital etc. Through the current development of the whole of Scotchbarn Lane, KBC and the proposed Halsnead Garden Village (min 1500 dwellings), which will inevitably and dramatically increase the services and traffic in and around Rainhill; specifically, A57 and M62 Junction 7. This will have a severe knock on effect around the already congested 3HS site. All the roads around plot 3HS are "B&C" roads. The concerns regarding further loss of green belt land in both KBC and the Cheshire authorities reinforces the need to retain the 3HS site as green belt and decrease the current urban sprawl across the Liverpool City Region and into neighbouring Cheshire. In effect, by seeing the development of Halsnead Garden Village and allowing 3HS to be 'safeguarded' is allowing Liverpool City to sprawl into a larger conurbation.

This plan does not identify specific measures to deal with the delivery of a new Infrastructure, which could be incorporated, with the use of the 3HS site, nor is anything specific referred to in the Infrastructure Delivery Plan. The area surrounding 3HS suffers significant congestion on all weekdays, specifically between 07.30-09.30am, 14.30-16.00pm and 17.00-18.30pm. The arterial route of Warrington Road (A57) is always busy being a main route between M62. During the times mentioned above, Warrington Road (A57) is averaging in excess of 1000 vehicles per hour.

In addition there is no mention/explanations of how the boroughs population increase of; health care, emergency services, education and community services (leisure, libraries, etc.) would or could be accepted within the "Local Plan". Again there appears to be no specific plans which can be added to the "Local Plan", and we know that SHMBC support for community services has declined over the past decade.

7). **Conservation & Preservation Area's** This is something that the SHBC publicises a great deal in their own literature as well as to organise a number of special one-off events for this years "Year Of The Environment". As a council they don't basically practice what they are preaching. They should aim to conserve and protect Plot 3HS and all its species, which has

PO0323



SITE 3HS: COPY OF REPRESENTATION CONCERNING ST HELENS LOCAL  
PLAN LPA06  
Teracina Taylor  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:36



1 Attachment



Final Green Belt response March 13th 2019.rtf

Attached is a copy of a representation concerning:

Policy LPA06, Paragraph/diagram/table 3HS.

It has been delivered by hand at St. Helens Town Hall today, 13 March 2019, but I am sending this as a back-up.

15 members of the community have worked together on this and their names and contact details are included in the document.

Yours faithfully

Teracina B. Taylor

18

LP0018

13 MAR 2019 (ELO195 IS A  
DUPLICATE OF  
THIS REP)

STE 3MS

① = LPA06

② = PARA 1-7-2 DLG

- **HAND DELIVERED TO:**

**LOCAL PLAN**

**ST. HELENS COUNCIL**

**TOWN HALL**

**VICTORIA SQUARE**

**ST. HELENS**

**MERSEYSIDE**

**WA10 1HP**

- **DATE: WEDNESDAY 13TH MARCH 2019**
- **THIS REPRESENTATION IS MADE BY 15 PEOPLE FROM THIS COMMUNITY WHOSE NAMES, ADDRESSES, SIGNATURES AND CONTACT DETAILS APPEAR AT THE END OF THE 11 PAGE SUBMISSION.**
- **THEY HAVE WORKED TOGETHER ON THIS AND ALL WISH TO BE KEPT UPDATED ABOUT FUTURE STAGES OF THE ST. HELENS BOROUGH LOCAL PLAN 2020-2035.**

APPENDIX

point in time, these roads are not able to support the current level of traffic at peak times. The area of Rainhill has only one A road (A57 Warrington Road) with which these B and C roads are connected. These roads are already becoming even more congested because of new developments in Knowsley, such as Scotchbarn Lane. There are major problems now in minor B and C roads and small estates. Examples of these are Stoney Lane, Blundells Lane, Mill Lane, Holt Lane, View Road, Longton Lane, the Royal Oak estate in Whiston, and the Kendal Drive estate in Rainhill.

Widening has recently been undertaken at the Old Lane/A57 Warrington Road crossroads, just before the A57 Warrington Road/B5413 Rainhill Road (Skew Bridge) junction. Unfortunately, there has been limited improvement to the existing problems here. There is very little, if any, further scope at Skew Bridge for the facilitation of extra traffic. Increases in traffic would not only seriously affect air pollution but would also endanger pedestrians, with drivers mounting the pavement in an attempt to avoid traffic queuing to turn right at Skew Bridge. On the other side of 3HS, the Portico Lane/A58 Prescott Road junction is also extremely congested at peak times.

9. If 3HS is taken out of the Green Belt, leisure facilities for the area will be lost. "Sport England", which is a statutory government consultant, objected at Local Plan stage 1 to the status of "Eccleston Park Golf Club" being changed. There has, as yet, been no answer to this objection. St. Helens Council is required to provide convincing evidence that there is an oversubscription of golf within the local area. They have not done so. In fact, more local golf courses, for example "Blundells Hill", are being downsized.

10. Perhaps one of the most fundamental failings of St. Helens Council is the lack of consultation with other local authorities. *National Planning Policy Framework*, section 13: "Protecting Green Belt Land", states in Paragraph 137 that the policy-making authority needs to demonstrate "that it has examined fully all other reasonable options for meeting its identified need for development ..... and whether the strategy: (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." ②

St. Helens Council has failed to do this. No statement of common ground with neighbouring authorities exists.

To sum up, *National Planning Policy Framework*, section 13: "Protecting Green Belt Land", subsection "Proposals affecting the Green Belt", paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

Our belief is that no such special circumstances exist and that St. Helens Council has no right to remove 3HS from the Green Belt.

With reference to:

- Policy LPA06
- Paragraph/diagram/table 3HS
- Sustainability

Our representation is that the Local Plan is not "Sound" because it is not positively prepared, justified, effective, or consistent with National Policy.

It does not comply with the "Duty to Co-operate" with neighbouring authorities.

We consider it necessary that:

1. St. Helens Council should delete this land (3HS) from the proposed removal from the Green Belt, therefore abiding with the *National Planning Policy Framework (2019)*.
2. The council should not consider removing this land from Green Belt to designate it as "safeguarded".

We have worked together on this representation and give explicit

permission for our names to be included in this submission.

- NAME TERACINA B. TAYLOR  
ADDRESS 45, HONEYBOURNE DRIVE, WHISTON, PRESCOT,  
L35 7NA.
- 

- NAME Mr PETER (CRANFORD)
- 

- NAME MR. SEAN CRANFORD
- 

PO0324

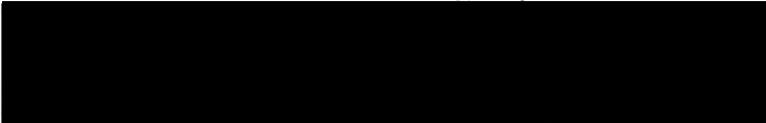
LPO040

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](http://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:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:
Signature: [Redacted]	Date: 13 <sup>th</sup> May 2019

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

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

Yes  (Via Email)                      No

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



**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		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
<b>LPA01 02</b>									
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"/> <b>X Unsure</b>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>

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

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

**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 13<sup>th</sup> March 2019. ✓

SHGBA comprises Eccleston Community and Residents Association (ECRA ) with Windle residents , Rainford Action Group(RAG) & Rainhill Save Our Green Belt (RSOGB).

**DUTY TO CO-OPERATE (DtC)**

4. The Council have a statutory Duty to Co-operate (DtC) on cross border issues with neighbouring and regional authorities. The Planning Inspector will use Statement of Common Ground (SoCG) and Authority Monitoring Reports (AMRs) in order to assess whether this duty has been complied with.
5. It is questionable what strategic decisions have been made and how they have been arrived at under the statutory Duty to Co-operate and the Statements of Common Ground with neighbouring authorities in developing the LPSD. The LPSD notes the SoCG is still being produced and there are no references to AMR's or meeting minutes.
6. There are DtC concerns in relation to the following
  - Economic strategy – how can the whole region propose the same accelerated growth strategy that is not sustainable, sound, justified, effective or consistent with National Policy.
  - Transport and Traffic – how can it be sound, justified and consistent with national policy with the whole North West Region proposing flawed aspirational jobs and housing forecasts leading to a massive traffic growth and cumulative severe impact on the already congested highways network system that will ultimately lead to grid lock.
  - Agricultural policy – how can the huge population increase being proposed in St Helens and the region as a whole by Regional and Local Authorities completely ignore the need for food security and the needs of the farming community and industry in their Strategic and Local plans. This cannot be sound, justified or effective.
  - Healthcare services. – here again there is apparently no method for forecasting future healthcare demand for significant population increase with an increasing aged population. It is not good enough, for casual exchanges with local hospital trusts to satisfy Local Plan requirements. A robust regional forecasting system is needed to ensure healthcare services match demand between authorities and CCGs in a manner similar to the housing delivery tests. The current system fails to address this issue properly and is unsound.
  - Unsuitable sites – there is no local or strategic policy to bring back unsuitable Previously Developed Land back into use, allowing, disused sites in the poorer run-down central areas to be left whilst lucrative edge of town sites are developed on valuable green belt land. A more robust and effective policy is required Regionally and nationally to protect valuable green space and farming land. The current proposals are not sound, justified effective and not consistent with National Policy.
7. The above issues may impact on whether the Statutory Duty to Co-operate has been fully satisfied in this respect in the LPSD.

**Presumption in Favour of Sustainable Development (LPA01)**

8. The LPSD does not appear to comply with National Policy under NPPF Section as large-scale Employment and Housing development is directed to rural fringe sites rather than central urban sites. It fails to meet the economic, social and environmental elements of the para 8 of the NPPF.
9. This policy is neither sound, justified, effective nor consistent with National Policy. Moreover, agriculture, farming and food security are nor considered in any way.

Economy (LPA04)

5. The Local Plan Submission Draft (LPSD) economic proposals are set out in LPA04. ✓
6. The following observations have been made with reference to with the following reports
  - *St Helens Borough Local Plan 2020-2035 Proposed Submission Draft December 2018*. Economic Appraisal Paper – evidence prepared by Dr Glenn Athey of My Local Economy – Athey Consulting Ltd dated – 1<sup>st</sup> March 2019
  - St Helens Local Plan Submission Draft and update of St Helens Strategic Housing Market Assessment (SHMA) – Demographic Appraisal – prepared by Piers Elias an Independent demographer of Demographer Support.
7. These reports were submitted separately as part of the St Helens Green Bel Association ( SHGBA) submission on the 13<sup>th</sup> March 2019 by Kirkwells Planning Consultants of Burnley.
8. It should be noted that Dr Glenn Athey economic evidence is compromised as he was unable, despite requests to SHMBC Planning to gain access to the input made by St Helens Council to the Liverpool City Region Combined Authority (LCRCA) Strategic Housing & Employment Land Market Assessment (SHELMA). This SHMBC input is viewed to be material to the St Helens Local Plan. It should be publicly available. A lack of transparency is perceived on this issue. ] ?
9. A review of the St Helens LPSD suggests that the St Helens growth trends are significantly higher than historic annual growth trends and indicate employment growth is highly aspirational and optimistic. Employment Growth is almost entirely dependent on significant growth of logistic warehousing. ] (II)
10. The policy is considered 'supply side'- acquire sites and build the B8 warehouse units in the hope the units are let and employment generated. It is based on a subjective land requirement scenario that bucks the trend where the take up of logistics warehousing is sluggish. As such it is argued that it is not an objectively assessed need. There is a clear impression that the outcome has been prejudged with data presented to justify this outcome. ] (II)
11. The Liverpool City Region growth is also acknowledged to be considered as highly aspirational relying on a continuation of the strongest periods of growth over the next 25 years assuming no major downturns or recessions. This must be considered optimistic. ✓
12. There is no obvious evidence to support dynamic growth trend in value added or productivity as regards employment across the Liverpool City Region nor is there evidence to suggest a trend for higher paid jobs. Analysis suggests higher paid jobs are being lost and lower paid jobs have gained. ] (II)
13. There is also a concern that the region has a declining working age population and much lower level of immigration into the area than in other areas of the country. The growth assumes that mass UK immigration will need to occur to meet the employment growth predictions of the LPSD. ✓
14. Moreover, this trend is repeated across the whole of the Northwest with Greater Manchester Combined Authority (GMCA), Chester & Cheshire West (C&CW), Warrington and West Lancashire all having similar aspirational accelerated employment growth scenarios. All are reliant on UK or International immigration to meet employment growth forecasts. ] (II)
15. The resident population of across England is finite, so if St Helens gains one resident it has to be offset by a resident loss in another authority. All Regional combined and local authorities are therefore competing for residents to supplement their workforce in order to implement their aspirational accelerated employment growth scenarios. ✓
16. This is barely credible and not achievable nor sustainable. The LPSD does not indicate where the increase in population is to come from. Simultaneous above-trend growth can only be achieved by international immigration and that is currently not government policy. This situation calls ] (II)

- into question what strategic decisions have been made under the statutory Duty to Co-operate and the Statements of Common Ground with neighbouring authorities in developing the LPSD. ✓
17. The economic scenarios for most authorities and St Helens are wholly dependent on the growth of B8 logistics warehousing. The employment land need is driven by this policy, particularly in St Helens. This is viewed as very highly aspirational even in the LCRCA SHELMA draft executive summary para 5.3. The Employment Land need assessment is viewed to be excessive. ✓
18. An Employment Land Need assessment based on such flawed economic data is questionable and cannot be considered as prepared as objectively assessed need. Aspirational growth cannot also be used to inflate housing need or the need to inflate Housing Land supply. Although, now governed by the Standard Method, it is argued that the real housing need for St Helens is around 383 indicated by the ONS 2016 Household figures (or 360 from Piers Elias report). It is hoped, the decision by Ministry of Housing Communities and Local Government (MHCLG) to use their 2014 figures household figures for the Standard Method is overturned before this Local Plan process is completed. ✓
19. The LPDS has been based on data prepared before the Brexit referendum and is overly optimistic given the uncertainty generated by negotiations. The economic evidence fails therefore to factor in the uncertainty resulting from Brexit. The government's own impact assessment indicating economic impact of 2, 5 or 8% downturn dependent on the success of negotiations. More recently the economic assessment has predicted a 3.9% downturn over 15 years for the agreed withdrawal deal and a 9.3 % reduction for a no deal. ] (1) ✓
20. A recent report by the Centre for Cities report in September 2018 has indicated that automation is predicted to impact heavily on national and regional jobs. This report estimated that up a fifth of jobs in the Northwest could be at risk because of automation over the coming 30 years due the technological advances particularly in respect logistic warehousing. There is clearly a trend by large organisations to reduce workforce numbers in the coming years that is contrary to the LPSD predications and not justified of achievable. ✓
21. Adding to the uncertainty, a government inquiry in 2017 raised concerns about whether the Construction Industry had sufficient capacity to deliver the homes required particularly where there is no incentive for volume housebuilders to increase supply that may impact on profits or their share of the market. ✓
22. The LPSD does not pay sufficient attention to the Farming community. The Local farming industry is considered successful in the region and should be supported. With the huge increases in population proposed in St Helens, food security must part of regional strategy influencing Local Plans. (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 economic data is not sound or justified and requires review to reflect up to date information particularly on Aspirational Accelerated Growth Employment Scenarios.**
  - **Employment Land Needs Assessment appears excessive and requires review as a result.**
  - **Housing Need should not be inflated as a result of flawed accelerated growth scenarios.**
  - **A more robust Agricultural policy at Regional and local level is needed to ensure Food Security for the significant population increases predicted.**
- Suggested  
✓ (11) Mon

PO0325

ELOOKO



Representation Regarding St Helens Local Plan

Emma Crook

to:

planningpolicy@sthelens.gov.uk

11/03/2019 10:33

Hide Details

① CONTACT & ② FURTHER SIGNATURE



1 Attachment



New Letter.docx

↓  
2 ARE BELOW THE 13 AGE LINE

To whom it may concern,

① - LPA05 - BHA

② - PARA 1.7.2

Please see attached a group representation on the St Helens Local Plan.

③ - S.A.

Please also see a copy of this representation below.

We look forward to your reply.

Dear Sir/Madam,

On behalf of a number of Rainford residents, I wish to provide a group representation to the most recent St Helens Local Plan. This is a plan that proposes to release and develop significant areas of Green Belt land and we wish to express our concerns relating to this.

There issues relate to the entire plan but with particular reference to policies LPA02, LPA05 and LPA06 regarding the need for housing and the circumstances surrounding the justification for release of Green Belt Land.



The official government and council policy states that Green Belt land should only be released in exceptional circumstances - this remains a central part of planning law in this country. St Helens is a borough with a falling population with house prices both below the national and regional average. Evidence shows that housing in St Helens is comparatively cheap and in low demand. The council want to build 486 houses per year, however, the figures from the Office of National Statistics show St Helens only needs 383 houses a year.

①

Taking these into account, the economic analysis used to create the plan is flawed and based on over-optimistic assumptions that the need for housing is far greater than is actually required. Therefore, there are no exceptional circumstances to justify not using the standard method to calculate housing need in St Helens. If the council took these into consideration and created the plan appropriately with reasonable housing numbers, there would be no need to release any Green Belt land at all.

A secondary concern is the lack of consideration given to exploring more reasonable alternate options that would be more beneficial to developing St Helens effectively. The council's own register shows there's enough brown field land in St Helens for 5, 818 houses. That would support the council's housing supply - even on its inflated figures - for 12 years. Why is this not being utilised? If the council were to lower target figures to the level that is genuinely required and ensured development is placed on previously used or Brown Field sites it would help to expand the town and effectively 'clean up' the areas that actually need to be developed. There alternatives would have less impact on the environment and lead to less need for new infrastructure - infrastructure that could require the release of further land. To add, the council have failed to co-operate with other councils and have failed to published any statement of common ground.

Relating our comments specifically to plot <sup>SWA</sup> HA8 (Higher Lane/Rookery Lane, Rainford) I believe the repercussions of development on this land could be catastrophic. A concern is the reasoning behind the release of this particular piece of land - reasoning that is flawed. The site is next to an industrial area and subject to risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - see SHLAA 2016 site assessment ref 16m and 142. Why is this land still be considered when almost identical plots have been classified as inappropriate? Only 4 sites score 4 negatives on the Sustainability Appraisal. The other 3 have been discarded, however, the council's assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

Most worryingly is that the majority of these Green Belt sites (in particular HA8) are Grade 1 Agricultural Land which is actively used and regularly farmed. HA8 is arguably one of the most fertile lands in the region. This land provides not only food but employment in the agricultural sector which is threatened by the proposed removal of this site from Green Belt protection. The local plan

is intended to promote employment and economical growth yet this will have the opposite effect. Surely, when Britain is facing uncertain financial and economic times (which is the prospect of a no-deal Brexit) we should be striving to maintain thriving local business and employment, particularly those areas that provide food supply. To implement a plan that could potentially damage this is very concerning. Surely we should be pushing to preserve farming land in order to be self-sufficient rather than reducing these means leading to a potentially devastating effect.

The new Local Plan allocated 259 homes to be build on HA8. The original plan allocated just 174 homes for this land. The council have offered no reasoning for such a significant increase in housing or how this would logistically fit. The plot is on a rural road which is struggling to carry the weight of traffic it holds at present. Accident figures (with particular reference to the junction at Higher Lane/Mill Lane neighbouring the plot) support the danger that the road currently possesses. However, the influx of such a large estate has the capacity to bring 1000+ extra vehicles to these lanes. It would cause higher levels of carbon emissions and toxicity putting health care at risk. This, alongside the issues regarding the potential for an increase traffic accidents, would deem the area unsafe and put residents in significant danger.

As it stands, if the plan is not significantly modified it will not be legally sound and should, therefore, not be allowed to go ahead. The evidence does not support the current plan and certainly does not support the need for loss of Green Belt land. The council should be reducing the housing and employment targets and allocating more previously developed land. If they were to do this, these precious Green Belt areas could remain protected.

We hope that you take our concerns with the strongest consideration.

Yours faithfully,

[REDACTED]

Mrs Emma Crook  
15 Beech Gardens  
Rainford  
St. Helens  
Merseyside  
WA11 8DJ

[REDACTED]

Mr. Paul Crook

PO0326

EFO061

SITE  
3HS



St.Helens Borough Local Plan 2020-2035 - Group Representation  
Adam Onyett

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:35



2 Attachments



St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards  
Adam Onyett

- ① - LPA05 - TABLE 4.5
- ② - LPA05 - GEN
- ③ - LPA05 - 6HA
- ④ - LPA06
- ⑤ - LPA02
- ⑥ - LPA06 - 3HS
- ⑦ - TIA
- ⑧ - IDP
- ⑨ - para 1.7.2 - DEC.



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](http://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: Adam	First name:
Last Name: Onyett	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 37 Wedgewood Gardens St Helens	Address:
Postcode: WA9 5GA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

<b>Signature:</b> [Redacted]	<b>Date:</b> <input type="text" value="10/03/19"/>
------------------------------	--

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

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (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	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Unsure	
Sound?		No
Complies with the Duty to Cooperate		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
Effective?	X
Consistent with National Policy?	X

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

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

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the

①

②

The Infrastructure Delivery Plan also identifies the need for increased capacity for health care, emergency services, education and community services (leisure, libraries, etc.). Again, there appear to be no specific plans and we know that SHMBC support for community services has declined over the past decade. There does not appear to be any capacity within the local schools to support an increase in the magnitude of likely school places required by the development of the proposed 3HS site. The Infrastructure Delivery Plan **must** identify potential solutions to these issues before the 'safeguarding' of 3HS should be proposed. We cannot accept the confirmation of future development without a feasible plan in place to deal with the effects of such a population increase.

8  
109

The healthcare system in the Borough is stretched and, again, there is deep concern regarding this especially coupled with the aspiration of increased life expectancy and the need to support an ageing population. We are fully aware of the NHS plans to commence a phased closing of the Accident & Emergency department at Whiston Hospital and are gravely concerned about the emergency healthcare, not only to the immediate area of 3HS, but also the entire borough. Sharing an A&E which is over 10miles (Liverpool Royal) is not feasible.

The current situation with doctors and dental surgeries is not sustainable with no registration available within a 5 miles radius of the 3HS site. Should development of this area be permitted, then the situation will worsen. School places are also currently over subscribed, with the local Primary and Secondary Schools have little chance of accommodating any further residents brought about by proposed new development. 'Bulge' classrooms, as referred in the Infrastructure Delivery Plan, will not offer a long term solution to this issue and are temporarily offering respite to over an already over subscribed area. These are primary concerns of all local residents, with the Infrastructure Delivery Plan offering no solution whatsoever. For this reason, the Plan is not justified.

6

The area surrounding 3HS is significantly developed and, should there be development on this site, there would be a continuation of urban development without any significant green space separation; joining the areas of Whiston, Portico, Thatto Heath, Rainhill and Nutgrove into one continuous sprawl.

6

There is no evidence of collaboration with neighbouring authorities to 'join up' proposals and, with specific consideration of traffic congestion, we envisage significant increase in congestion on the roads surrounding 3HS and access to M62 through the current development at Scotchbarn Lane and the proposed Halsnead Garden Village, which will inevitably increase the traffic around Rainhill; specifically, A57 and M62 Junction 7, which will have a knock on effect around the already congested 3HS site. The concerns regarding further loss of green belt land in the neighbouring authorities reinforces the need to retain the 3HS site as green belt and decrease the current urban sprawl across the Liverpool City Region and into neighbouring Cheshire. In effect, by seeing the development of Halsnead Garden Village and allowing 3HS to be 'safeguarded' is allowing Liverpool City to sprawl into a larger conurbation.

-9  
Dec  
para  
1-72

There does not appear to be an ecological report/survey to support the Local Plan, specifically identifying protected species. Having lived, walked and spent time around the 3HS site, we believe that there are protected species present. Owls can often be heard tooting at night, newts have been seen by some and it has been suggested that even Peregrine Falcons have previously nested on this site. The site has a variety of flora and fauna, offering precious habitat to support wildlife. LPC06 makes suggestions regarding mitigation should the benefits of development outweigh any harm to nature conservation. We do not believe that, should development be permitted following the 'safeguarding' of site 3HS, there is any potential to mitigate the wide open spaces that these precious species require. In the absence of a

6

supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

6

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.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

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

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

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

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

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

[Empty rectangular box for 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.**

PO0327



St. Helens Council

① - LPAOS PFOOSI

② - Statement of Common Ground

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

Ref: LPSD

01 MAR 2018

(For official use only)

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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Edward</u>	First name: _____
Last Name: <u>Studley</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 St Aidans Close</u>	Address: _____
<u>Billinge</u>	_____
<u>St Helens</u>	_____
Postcode: <u>WN5 7HU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 24/2/2019

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA OS IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities.</p>	<div style="border-left: 1px solid black; border-right: 1px solid black; border-bottom: 1px solid black; width: 50px; height: 100px; margin: 0 auto;"></div> <p style="text-align: center; margin-top: 10px;">②</p>

(if necessary)

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

No	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.**

PO0328

① - LPA06 PFO052

② - Statement of Common Ground

64

Ref: LPSD  
01 MAR 2018  
(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](http://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.

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Edward</u>	First name: _____
Last Name: <u>Stodley</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 ST Aidans Close</u>	Address: _____
<u>Billinge</u>	_____
<u>St Helens</u>	_____
Postcode: <u>WNS 7HU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: \_\_\_\_\_ Date: 24/2/2019

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. 1 2</p>	

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

**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.**

PO0329



St. Helens Council

① - LPAOS PFO053  
② - Statement of Common Ground

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

Ref: LPSD  
01 MAR 2018  
(For official use only)

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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>Nichola</u>	First name: _____
Last Name: <u>Miller</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 Hamilton Road</u>	Address: _____
<u>Garswood</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0SU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 25-2-19

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA OS IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isnt sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] (2)</p>	

1 if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

NO	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.**

PO0330

① - LPA06 PFO054  
② - Statement of Common Ground 66

Ref: LPSD  
01 MAR 2018  
(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](http://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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Nichola</u>	First name: _____
Last Name: <u>Miller</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>34 Hamilton Road</u>	Address: _____
<u>Garswood</u>	_____
<u>Wigan</u>	_____
Postcode: <u>WN4 0SU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 25-2-19

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isnt sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities.</p>	<p>①</p> <p>②</p>

sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

No	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.**

PO0331



St. Helens Council

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

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

Ref: LPSD

01 MAR 2018

(For official use only)

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

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>GARETH</u>	First name: .....
Last Name: <u>YATES</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>39 Hamilton Road</u> <u>Garswood</u> <u>Wigan</u>	Address: .....
Postcode: <u>WN4 0SU</u>	Postcode: .....
Tel No: .....	Tel No: .....
Mobile No: .....	Mobile No: .....
Email: .....	Email: .....

Signature:  Date: 25-2-19

Please be aware that your comments will only be considered you  in order for your comments to be

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

Yes (via email)

No *By post*

**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.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 06 site IHS	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] (2)</p>	<div style="border-left: 1px solid black; border-right: 1px solid black; border-bottom: 1px solid black; width: 40px; height: 100px; margin: 0 auto;"></div> <p>(1)</p>

sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

No	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:

(Empty box for response to question 9)

**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.**

PO0332

① - LPA06 PFO056  
② - Statement of Common Ground

Ref: LPSD  
01 MAR 2018  
(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](http://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;

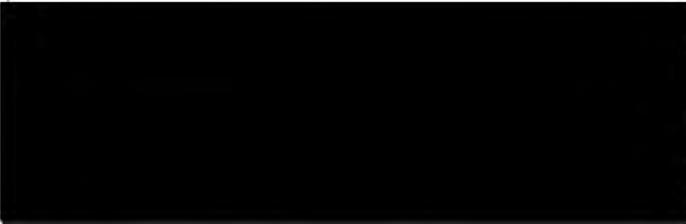
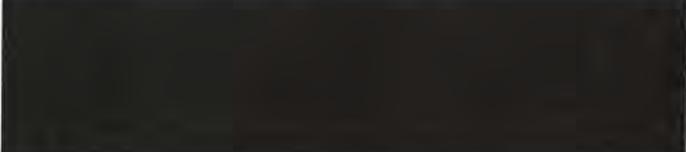
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

01 MAR 2019

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

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

Signature:  Date: 25.2.19

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to <u>set out your comments.</u>	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] (2)</p>	<p>(1)</p>

sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

No	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:

(Empty space for response to question 9)

**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.**

PO0333

① - LPAOS PFO057  
② - Statement of Common Ground

Ref: LPSD  
01 MAR 2018  
(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](http://www.sthelens.gov.uk/localplan)

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

01 MAR 2019

## PART A - YOUR DETAILS

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

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

Signature:  Date: 25.2.19

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

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

Yes (via email)  No

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA OS JHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. 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>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services. Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] ②</p>	<div style="border-left: 1px solid black; border-right: 1px solid black; border-bottom: 1px solid black; width: 20px; height: 100px; margin: 0 auto;"></div> <p>①</p>

If necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

No	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.**

PO0334

① - LPA05

PF0058

② - Statement of Common Ground

Ref: LPSD

01 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](http://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;

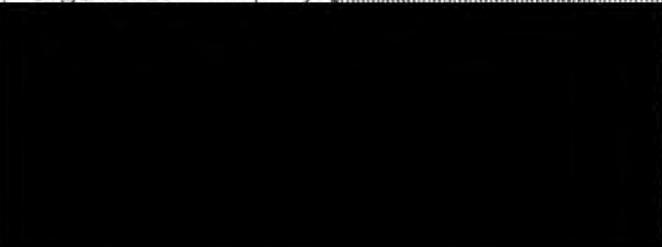
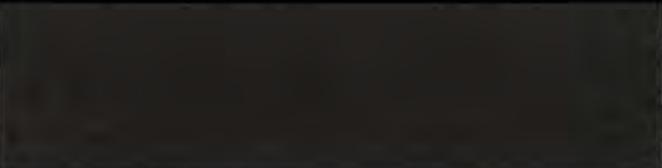
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>CHRISTINE</u>	First name: .....
Last Name: <u>YATES</u>	Last Name: .....
Organisation/company: 	Organisation/company: .....
	Address: .....
	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 25/02/2019

Please be aware that your comments will only be considered if you provide your contact details in order for your comments to be considered by the Council.

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA OS IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isnt sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] ②</p>	<div style="border-left: 1px solid black; border-right: 1px solid black; border-bottom: 1px solid black; width: 50px; height: 100px; margin: 0 auto;"></div> <p>①</p>

t if necessary

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

Delete this land from the  
proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

No	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.**

PO0335

① - LPA06

PFO039

② - Statement of Common Ground

71

Ref: LPSD

01 MAR 2018

(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](http://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;

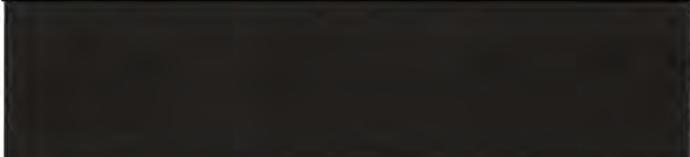
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>CHRISTINE</u>	First name: .....
Last Name: <u>YATES</u>	Last Name: .....
Organisation/company: 	Organisation/company: .....
	Address: .....
	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 25/02/2019

Please be aware 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.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isnt sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities. ] ②</p>	<div style="font-size: 4em;">}</div> <div style="border: 1px solid black; border-radius: 50%; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center; margin: 0 auto;">1</div>

sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

No	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.**

PO0336

① - LPA06

PRO063

② - Statement of Common Ground

77



St. Helens Council

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

Ref: LPSD

01 MAR 2018

(For official use only)

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

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: .....
First Name: <u>Karen</u>	First name: .....
Last Name: <u>Pollitt</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>57 Birch Grove</u> <u>Ashton in Makerfield</u>	Address: .....
Postcode: <u>WN4 0RX</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 27/2/19

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

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

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.  
! 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy LP A 0 6	Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

- Not justified - the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?
- One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict & other urban land. Using Greenbelt fails to encourage this.
- The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.
- Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes & other services. The use of cars is being encouraged because of the lack of facilities.
- there is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

①

②

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

	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.**

PO0337

①-LPA05

②-Statement of Common Ground 78

Ref: LPSD

01 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](http://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

01 MAR 2019

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

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

Signature: [Redacted] Date: 24<sup>th</sup> FEB 2019

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

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

Yes (via email)

~~No~~ By post please

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPAs Florida Farm South	Site 2-1A	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary



PO0338

① - LPA05 PFO067  
② - Statement of Common Ground 79

Ref: LPSD  
01 MAR 2018  
(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](http://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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs.	Title: .....
First Name: Sheila	First name: .....
Last Name: Pictan	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: Brocstedes Farm Brocstedes Road, Ashton Makerfield, Wigan	Address: .....
Postcode: WN4 0NR	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 24<sup>th</sup> FEB 2019

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

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

Yes (via email)  ~~No~~ By Post please

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0339

① LPA05 PFC068  
② Statement of Common Ground 80

Ref: LPSD  
01 MAR 2019  
(For official use only)



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

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

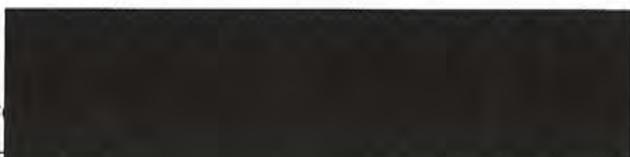
**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>DUCKWORTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 Rushy Park Cottages</u>	Address: _____
<u>Islands Brow</u>	_____
<u>St Helens</u>	_____
Postcode: <u>WA11 9PN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 23<sup>rd</sup> FEB 2016

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

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

Yes (via email)  ~~No~~ By Post please

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

## FURTHER INFORMATION

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

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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		
LPA05	SITE									
Floods	2HA									
Farm										
South										
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

Not justified - The council should provide strict proof of population estimates. The population of St. Helens has been in decline since 1981.

Building on greenbelt does not encourage use of urban land. Releasing greenbelt land cause significant harm to the purpose of the greenbelt. Housing in this area isn't sustainable because of lack of facilities. Access to the site is inadequate. There are existing flooding problems. There is no statement of common good with neighbouring authorities.

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

Delete this land from the proposed removal from greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0340

① - LPA05

PF0069

② - Statement of Common Ground

81

Ref: LPSD

01 MAR 2018

(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](http://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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: .....
First Name: <u>Wendy</u>	First name: .....
Last Name: <u>Pickin</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Low Brooks Farm Bungally</u>	Address: .....
<u>Brookside Road, Ashton-in-</u>	.....
<u>Makerfield, Wigan.</u>	.....
Postcode: <u>WN6 0JJ</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 24<sup>th</sup> FEB 2019

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

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

Yes (via email)

~~Yes~~ By Post please.

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPAs Flooding Farm Sewer	Site ZHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0341

①-LPA05 PFO070

②-Statement of Common Ground 82

Ref: LPSD  
01 MAR 2018  
(For official use only)



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

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

01 MAR 2019

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

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

Signature:  Date: 24<sup>th</sup> FEB 2019

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

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

Yes (via email)

By Post please

**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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPAS Floody Farm South	Site ZHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

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



PO0342

① - LPA06

Pf0071

② - Statement of Common Ground 83

Ref: LPSD

01 MAR 2018

(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](http://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.

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: .....
First Name: <u>Nigel</u>	First name: .....
Last Name: <u>Dye</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>1 Startan Avenue</u> <u>Billinge, St. Helens.</u>	Address: .....
Postcode: <u>WN5 7RZ</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 23rd FEB 2019

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.

As it is of prime importance to maintain this land as greenfield and greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0343



St. Helens Council

① - LPA06 PFOO 72  
② - Statement of Common Ground 84

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

Ref: LPSD  
01 MAR  
(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](http://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.

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: .....
First Name: <u>Olive</u>	First name: .....
Last Name: <u>Withington</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>12 Sunnyside Road</u> <u>Ashton-in-Makerfield</u> <u>Wigan</u>	Address: .....
Postcode: <u>WN4 0LB</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 23rd FEB 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging recycling of derelict and urban land. Using greenbelt fails to encourage this. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.</p>

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.

It is of prime importance to maintain this land as greenfields and greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0344



St. Helens Council

① - LPA06 PFO073

② - Statement of Common Ground 84

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

## Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Louise</u>	First name: .....
Last Name: <u>Dawling</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>2 Rusby Park Cottages</u>	Address: .....
<u>Island Brow</u>	.....
<u>St Helens</u>	.....
Postcode: <u>WA11 2APN</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 23<sup>rd</sup> Feb 2019

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA06 Site 1-15	North 4 Billing Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. 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>Not justified. The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981 - where are all these extra people coming from?</p> <p>One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.</p>	

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

Delete this land from the proposed removal from the greenbelt

All derelict and Brown field to be used before greenbelt can ever be considered as a last resort. Greenbelt should be maintained for agriculture and greenspace.

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.**

PO0345

① - LPA06 PFO074

② - Statement of Common Ground

Ref: LPSD

01 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](http://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>Herbert</u>	First name: .....
Last Name: <u>Pimblett</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>49 Ashton Road</u>	Address: .....
<u>Goilborne</u>	.....
<u>Warrington, Cheshire</u>	.....
Postcode: <u>WA3 3UU</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified. The Council should provide strict proof of its population estimates. The population of St Helens has declined since 1981 where are all these extra people coming from. One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of <del>derelict</del> <sup>derelict</sup> and urban land. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable due to lack of schools, doctors etc. There is no statement of common ground between St Helens &amp; neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

**Please keep a copy for future reference.**

PO0346

① - LPA06 PF0075  
② - Statement of Common Ground JB

Ref: LPSD  
01 MAR 2019  
(For official use only)



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

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Clifford</u>	First name: .....
Last Name: <u>Purton</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Brookside Farm</u>	Address: .....
<u>Brookside Road</u>	.....
<u>Ashton-in-Makerfield, Wigan</u>	.....
Postcode: <u>WN4 0NL</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)

~~Yes~~ By post please.

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified. The council should provide strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all the extra people coming from. One of the purposes of greenbelt land is to assist in urban <sup>regeneration</sup> by encouraging the recycling of derelict land and urban land (St Helens has derelict land in abundance). The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable due to brown fields, Dochas etc. There is no statement of common ground between St Helens &amp; neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

**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.**

PO0347



St. Helens Council

① - LPA06

PP0076

② - Statement of Common Ground

BA

Ref: LPSD

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

01

MAR 2019  
(For official use only)

## Representation (i.e. Comment) Form

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

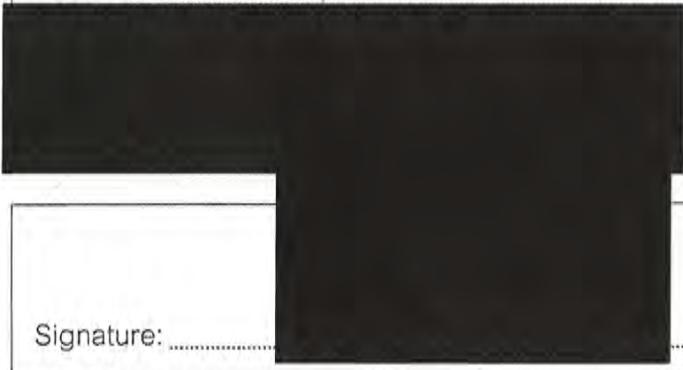
This form has two parts;

**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><del>Patricia</del> Sheila</u>	First name: .....
Last Name: <u>Peter</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Brooksteds farm</u>	Address: .....
<u>Brooksteds Road</u>	.....
<u>Ashlea-in-Marketfield, Wigan</u>	.....
Postcode: <u>WN4 0NR</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....
Signature: .....	Date: <u>23rd FEB 2019</u>

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

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

Yes (via email)

No By post

**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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPA 06 Site LHS	North of Billinge Road	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

Delete this land from the proposed removal from the greenbelt:

use all Brounfield and derelict land sites before including greenbelt in proposed sites.

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

Greenbelt should remain untouched and prime use for agriculture

Please continue on a separate sheet if necessary

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

**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.**

PO0348

① - LPA06 PFO077  
② - Statement of Common Ground 88

Ref: LPSD  
01 MAR 2019  
(For official use only)



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

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>John</u>	First name: .....
Last Name: <u>Duckworth</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>2 Rushy Park Cottages</u>	Address: .....
<u>Islands Brow</u>	.....
<u>St Helens</u>	.....
Postcode: <u>WA71 9PN</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 23rd FEB 2019

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

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

Yes (via email)  ~~No~~ by post please

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

## RETURN DETAILS

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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt:

There are many derelict brownfield sites in St Helens. Greenbelt should not even be considered until all these sites are used first. Greenbelt land will be needed to sustain food in this country in the near future production

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.**

PO0349

① - LPA06 PFO078  
② - Statement of Common Ground 201

Ref: LPSD  
01 MAR 2019  
(For official use only)



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

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

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

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

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

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

Yes (via email)

~~No~~ By Post please

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

## **RETURN DETAILS**

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0350

① - LPA06 PFO079  
② - Statement of Common Ground 10

Ref: LPSD  
01 MAR 2019  
(For official use only)



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

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Simon</u>	First name: .....
Last Name: <u>Pickton</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Bracstedes Farm</u>	Address: .....
<u>Bracstedes Road, Ashton-in-</u>	.....
<u>Makerfield, Wigan</u>	.....
Postcode: <u>WN4 0NR</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 24<sup>th</sup> Feb 2019

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

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

Yes (via email)

~~No~~ By Post please

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified. The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981 - where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of greenbelt. Housing in this area is unsustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0351



St. Helens Council

① - LPA05 PFO080  
② - Statement of Common Ground

# St Helens Borough Local Plan 2020-2035 (Submission Draft) <sup>01</sup> Representation (i.e. Comment) Form

Ref: LPSD

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](http://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. Nigel</u>	Title: _____
First Name: <u>Nigel</u>	First name: _____
Last Name: <u>Dye</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 Starton Avenue</u>	Address: _____
<u>B. Winge</u>	_____
Postcode: <u>WNS 7 2Z</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

Policy LPA05 Site IHA	Solihull or Billig Road west & connect lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
Please read the Guidance note for explanations of the Tests of Soundness

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

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

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

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

Delete this land from the proposed removal of the green belt

Please continue on a separate sheet if necessary

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

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

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

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

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

**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.**

PO0352



St. Helens Council

①-LPA05 PFO081  
②-Statement of Common Ground

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

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>O.</u>	First name: .....
Last Name: <u>Warrington</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>12 Sunnyside Road</u> <u>Ashkani - Matherfield, Wigan.</u>	Address: .....
Postcode: <u>WN4 0LB</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy LPA05 Site IHA	Sound Budget Ad. West Street Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>The council should be put to strict proof of its population estimates. The population of St. Helens has declined since 1981. Where are all these extra people coming from? one of the purposes of greenbelt is to assist with urban regeneration by encouraging the recycling of urban + derelict land. The release of greenbelt will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable as there are no schools, doctors etc. Access on these roads to the site is inadequate. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal of the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0353



St. Helens Council

① - LPA05 PF0082  
② - Statement of Common Ground

93

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

## Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

### PART A - YOUR DETAILS

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

#### 1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Stephen

Last Name: Withington

Organisation/company: \_\_\_\_\_

Address: 12 Sunnyside Road

Ashtam-Makefield, Wigan

Postcode: WN4 0LB

#### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

# PART B - YOUR REPRESENTATION

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

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

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

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
Please read the Guidance note for explanations of the Tests of Soundness

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

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

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

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

Delete this land from the proposed removal of the green belt

Please continue on a separate sheet if necessary

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

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

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

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

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

**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.**

PO0354



St. Helens Council

① - LPA05 PFO083  
② - Statement of Common Ground

914

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

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Louise</u>	First name: .....
Last Name: <u>Dowling</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>2 Rusby Park Cottages</u>	Address: .....
<u>Islands Brow</u>	.....
<u>St. Helens</u>	.....
Postcode: <u>WA11 9PN</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] Date: 23rd FEB 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 Site IHA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981, whereas all these extra people coming from. One of the purposes of the greenbelt is to assist with urban regeneration by encouraging the recycling of derelict land. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because there are no schools, doctors etc. Access to the site on the roads available would be inadequate. There is no statement of common ground with neighbouring authorities.</p>	

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

Delete this land from the removal of the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0355



① - LPA05 PFO084  
② - Statement of Common Ground 95

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

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Herbert</u>	First name: .....
Last Name: <u>Pimblett</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>49, Ashton Road</u> <u>Colborne, Warrington</u> <u>Cheshire</u>	Address: .....
Postcode: <u>WA3 3UU</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: Date: 23rd FEB 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0356



St. Helens Council

① - LPAOS PFO085  
② - Statement of Common Ground 9/6

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

Ref: LPSD

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](http://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.

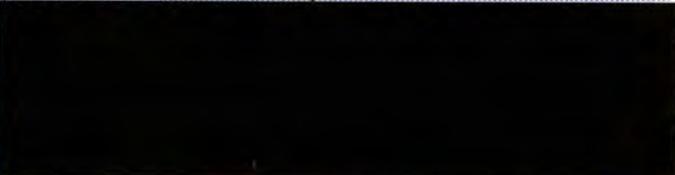
This form has two parts;

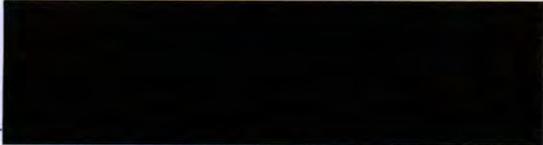
**Part A - Personal Details**

**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. E</u>	Title: _____
First Name: <u>Clifford</u>	First name: _____
Last Name: <u>Pickton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Broostedes Farm</u>	Address: _____
<u>Broostedes Road</u>	_____
<u>Ashton-in-Makerfield, Wigan</u>	_____
Postcode: <u>WN4 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 23rd FEB 2019

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

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

Yes (via email)

~~No~~

By Post please

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

## RETURN DETAILS

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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	South or Billing Road West of Smock Lane	Paragraph/diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
LPA05 site IHA										
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The Council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from. One of the purposes of the green belt is to assist with urban regeneration by encouraging the recycling of derelict land (of which there is an abundance in St Helens). The release of <sup>this</sup> green belt will cause significant harm to the purpose of the green belt. Housing in this area isn't sustainable because there are no schools, doctors etc. Access to the site on roads would be inadequate. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0357

①-LPA05 PF0086  
②-Statement of Common Ground

97

Ref: LPSD  
01 MAR 2019  
(For official use)



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](http://www.sthelens.gov.uk/localplan)

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: .....
First Name: <u>Sheila</u>	First name: .....
Last Name: <u>Pictan</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Braxstede Farm</u>	Address: .....
<u>Braxstedes Road</u>	.....
<u>Ashton in Makerfield, Wigan</u>	.....
Postcode: <u>WN4 0NR</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)  By Post please

**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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 Site 1HA	South of Billing Road West of Green Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0358



St. Helens Council

① - LPAOS PFO087  
② - Statement of Common Ground

98

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: .....
First Name: <u>Wendy</u>	First name: .....
Last Name: <u>Pickton</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Brookstades farm</u>	Address: .....
<u>Brookstades Road, Ashton-</u>	.....
<u>in-Makerfield, Wigan</u>	.....
Postcode: <u>WN4 0NR</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....
Signature: 	Date: <u>23<sup>rd</sup> FEB 2019</u>

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

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

Yes (via email)

No By Post please

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0359



St. Helens Council

①-LPA05 PFO088  
②-Statement of Common Ground

119

Ref: LPSD

01 MAR 2019  
(For official use only)

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

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

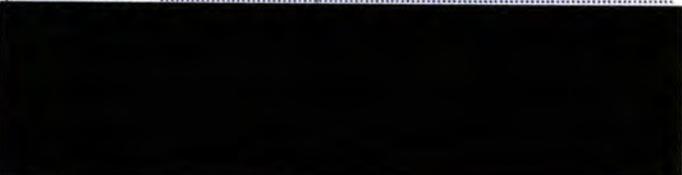
This form has two parts;

**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>Sima</u>	First name: .....
Last Name: <u>Pictou</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Brookside Farm</u> <u>Brookside Road, Ashton-</u> <u>in-Makerfield, Wigan.</u>	Address: .....
Postcode: <u>WN4 0NR</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 23<sup>rd</sup> FEB 2019

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

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

Yes (via email)

~~No~~ By Post please

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

## FURTHER INFORMATION

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

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

**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.**

PO0360

① - LPA04

PFC089

② - Statement of Common Ground 100

Ref: LPSD

01 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](http://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.

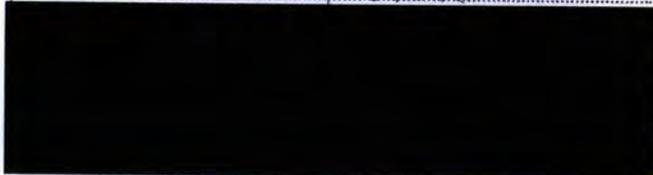
This form has two parts;

**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>Clifford</u>	First name: _____
Last Name: <u>Pieton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Brocstedes Farm</u>	Address: _____
<u>Brocstedes Road</u>	_____
<u>Ashton-in-Makerfield Wigan</u>	_____
Postcode: <u>WN4 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 23rd FEB 2019

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

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

Yes (via email)

~~No~~ By Post Please

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

## RETURN DETAILS

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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0361



St. Helens Council

①-LPA04 PFO090  
②-Statement of Common Ground

101

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Sheila</u>	First name: _____
Last Name: <u>Pickton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Barstodes Farm</u>	Address: _____
<u>Barstodes Road</u>	_____
<u>Ashton-in-Makerfield</u>	_____
Postcode: <u>WN1 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 24th FEB 2019

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

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

Yes (via email)

~~NO~~

By Post please

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

## RETURN DETAILS

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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

# PART B - YOUR REPRESENTATION

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

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

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

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
Please read the Guidance note for explanations of the Tests of Soundness

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

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

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

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

Delocate this land from the proposed removed from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0362



① - LPA04 PFO091  
② - Statement of Common Ground

Ref: LPSD  
01 MAR 2019  
(For official use only)

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

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

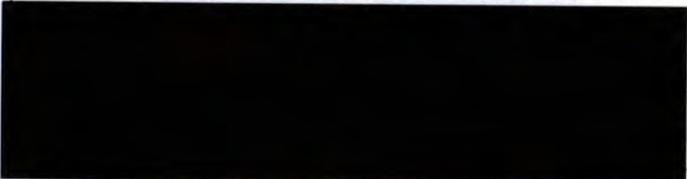
This form has two parts;

**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>JAMM</u>	First name: _____
Last Name: <u>DUCKWORTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 Rusby Park Cottages</u>	Address: _____
<u>Islands Brow</u>	_____
<u>St. Helens</u>	_____
Postcode: <u>WA71 9PN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 23rd FEB 2019

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

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

Yes (via email)

~~No~~ By Post please

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

## RETURN DETAILS

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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LIAOA <u>SITE</u> 2EA SEA		Paragraph/ diagram table Between Haydock Lane + Liverpool Road		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - the council should be put to strict prob of the need for this type of development in this position and on this scale. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in the greenbelt in respect of 2EA - Florida Farm North. Risk of Flooding further down the Clipsley Brook will be exacerbated by this development. Traffic will cause problems. There is no statement of common ground between neighbouring authorities.</p>	



PO0363



St. Helens Council

① - LPA04 PFO092  
② - Statement of Common Ground 103

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

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

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

Signature:  Date: 24<sup>th</sup> FEB 2019

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

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

Yes (via email)

~~No~~ By Post Please

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA04 SITE 2EA, SEA 6EA	Between standalone line + intercept Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound 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>Not justified - The council should be put to proof of the need for this type of development in this position and this scale. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in respect of 2EA - Florida Farm North - why do they need further land. Risk of Flooding down Dipsley Brook will be exacerbated by this development. Traffic will cause problems. There is no statement of common ground between neighbouring authorities.</p>

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0364

① - LPA04 P0093  
② - Statement of Common Ground 104

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



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

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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. Simon</u>	Title: .....
First Name: <u>Peter Simon</u>	First name: .....
Last Name: <u>Peter</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>Brookedes farm</u> <u>Brookedes Road</u> <u>Ashton-in-Makerfield, Wigan.</u>	Address: .....
Postcode: <u>WN4 0NR</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 2<sup>nd</sup> FEB 2019

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

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

Yes (via email)  ~~No~~ By Post please

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Delete This land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

**Please keep a copy for future reference.**

PO0365



St. Helens Council

① - LPA06

② - Statement of Common Ground PFO099 110

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

Ref: LPSD  
01 MAR 2019  
(For official use only)

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

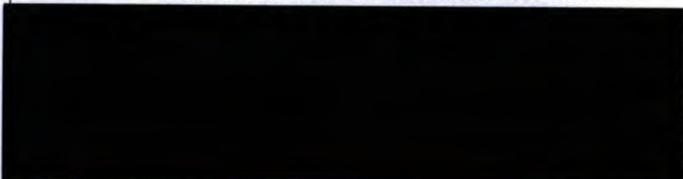
This form has two parts;

**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>GEORGINA</u>	First name: _____
Last Name: <u>ROBERTS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>389 GARSWOOD ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0TY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 20.2.19

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

## FURTHER INFORMATION

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

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

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

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

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

## PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The council need to provide proof of St. Helens population estimates. The population of St. Helens has reduced since 1981. Where will these extra people be coming from to live in these houses.</p> <p>I thought urban regeneration was encouraged so that the use of derelict and other urban land was used first. By using green belt land this fails to encourage urban regeneration. Release of green belt will cause significant harm to the purposes of green belt land. Building in this area is not sustainable because of lack of services including, lack of school places, doctors surgery, not able to accommodate the extra influx of patients, bus services. Use of cars are being encouraged due to lack of these facilities. There is NO statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

THIS Land needs to be Deleted from the Proposed removal from greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

PO0366



① - LPAOS PPO100  
② - Statement of Common Ground

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

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>Gareth</u>	First name: _____
Last Name: <u>Yates</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 Hamilton Road</u> <u>Garswood</u> <u>Wigan</u>	Address: _____
Postcode: <u>WN4 0SU</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>25-2-19</u>
--	----------------------

Please be aware that in order for your comments to be considered you must complete both parts of this form.

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

Yes (via email)  No *By post*

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

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

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

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA OS JHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using the Greenbelt fails to encourage this. The release of greenbelt is contrary to the Council's aim to encourage more residential occupation of the town centre.</p> <p>The release of greenbelt will cause significant harm to the purpose of the Greenbelt. Housing in this area isnt sustainable because of the lack of school places, doctors surgeries, shopping facilities, bus routes, a fully accessible railway station and other services.</p> <p>Currently the local secondary schools are located outside of St Helens area and the Council will have to pay for every child attending a school outside its area to the sum of £6000 per child per year.</p> <p>There is no statement of common ground with neighbouring authorities.</p>	<p>①</p> <p>②</p>

t if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	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.**

PO0367



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

① - LPA05 PFO151  
② - Statement of Common Ground 171

Ref: LPSD

01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>MARIAN</u>	First name: .....
Last Name: <u>PRESCOTT</u>	Last Name: .....
Organisation/company: <u>RAFFO</u>	Organisation/company: .....
Address: <u>209 LIVERPOOL RD</u> <u>HAYDOCK</u>	Address: .....
Postcode: <u>WA 11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] ..... Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? <b>DONT KNOW</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Not justified - The Council should be put to strict proof of its population estimates coming from the population of St. Helens has been in decline since 1981, when equal the extra people by encouraging the development of green belt is to assist in urban regeneration and encourage the development of green belt and other urban land using green belt for the purposes of the green belt. The release of green belt will cause significant harm to the school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of lack of facilities. Access to site is inadequate, a left in left hand turn from East Lancs Rd isn't safe and the proposal for a junction at Church Rd / Church Rd would put additional traffic on an already over-stretched highway system. There would be problems of re-routing through proposed developments. There are existing flooding problems at this site any remedial to prevent this would place even greater amounts of water into Clipseley Brook. There is no doubt of common ground with neighbouring authorities. ] 2</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0368

PRO152 172

① - LPA04  
② - Statement of Common Ground

Ref: LPSD  
11 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>MARIAN</u>	First name: .....
Last Name: <u>PRESOTT</u>	Last Name: .....
Organisation/company: <u>RAFFO</u>	Organisation/company: .....
Address: <u>209 LIVERPOOL RD</u> <u>HAYDOCK</u>	Address: .....
Postcode: <u>W11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 <del>SEA</del> LPA 04	SITES 2 EA, 5 EA 6 EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? <b>DONT KNOW</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Not justified - The Council should be put to strict proof of the need for this type of development, in this position and on this scale. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelts to encourage this development will cause significant harm to the purpose of the Greenbelt. The council has already granted planning permission in the Greenbelt in respect of site 2 EA - Florida Farm North. The risk of flooding further down the Clippesley Brook will be exacerbated by further developments at this location. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity. There is no statement of common ground with neighbouring authorities.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this part from the proposed removal of greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0369



St. Helens Council

① - LPA04

PFO153

② - Statement of Common Ground 173

# St Helens Borough Local Plan 2020-2035 (Submission Draft)

## Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JUNE</u>	First name: .....
Last Name: <u>THOMPSON</u>	Last Name: .....
Organisation/company: <u>RAFFD</u>	Organisation/company: .....
Address: <u>211 LIVERPOOL RD.</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	SITES	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
LPA 04	2 EA 5 EA 6 EA									
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	DON'T KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.</p> <p>One of its purposes of the GREENBELT is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using GREENBELT fails to encourage this.</p> <p>The release of GREENBELT will cause considerable harm to the purpose of GREENBELT.</p> <p>The council has already granted planning permission in the GREENBELT in respect of site 2EA - FLORIDA FARM NORTH.</p> <p>The risk of flooding further down the CRIPNEY BROOK will be exacerbated by further development at this location.</p> <p>High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p> <p>There is no common ground with neighbouring authorities. ] ②</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/> NO	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0370



St. Helens Council

① - LPAOS FFO154  
 ② - Statement of Common Ground 174

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
 01 MAR 2019  
 (For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JUNE</u>	First name: _____
Last Name: <u>THOMPSON</u>	Last Name: _____
Organisation/company: <u>RAFFA</u>	Organisation/company: _____
Address: <u>211 LIVERPOOL RD.</u>	Address: _____
<u>HAYDOCK.</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA11 9RX</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 23/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPROS SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	DON'T KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED - The council should put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the GREENBELT is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of GREENBELT will cause significant harm to the purpose of GREENBELT. Housing in this area isn't sustainable because of the lack of school places doctors surgeries bus routes & other services. The use of cars is being encouraged because of the lack of facilities. The access site is inadequate, a left and in left out from the East Lancashire Rd isn't safe and the proposal for a junction at Liverpool Rd a Vicarage Rd would put additional traffic on an already overstrained highway system. There would be problems of rat-running through the proposed development. There are existing floodplain problems at this site any remedies to prevent this would place even greater amounts of water into the CHIPSLEY BROOK. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the GREENBELT

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.**

PO0371



St. Helens Council

① - LPA04 PROISS  
② - Statement of Common Ground 175

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JOHN</u>	First name: .....
Last Name: <u>HARRISON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>41, VICARAGE DRIVE</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA10 0UG</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25-2-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPA 04		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
SITES 2EA 5EA 6EA										
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <u>Don't know</u>
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>
<b>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.</b>

I believe this local Plan is not legally compliant, unsound and fails to comply with the duty to cooperate for the following: -  
 It is not justified - the Council should be put to strict proof of the need for this type of development in this position & on this scale; using Greenbelt fails to encourage the recycling of derelict & other urban land; the release of Greenbelt will cause significant harm to the purposes of the Greenbelt; high volumes of predicted traffic will add to the already over capacity of the highways in the vicinity; the risk of flooding further down the Clipsley Brook will be exacerbated by further development at this location; there is no statement of common ground with neighbouring authorities. ] ②

Please continue on a separate sheet if necessary



PO0372



St. Helens Council

① - LPA04 PFO157  
② - Statement of Common Ground 177

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>CATHIAN</u>	First name: .....
Last Name: <u>HARRISON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>11, VICARAGE DRIVE</u> <u>HAYDOCK</u>	Address: .....
Postcode: <u>WAL OUG</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25.2.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPA 04 SITES 2EA, 5EA, 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>I believe this Plan is not legally compliant, unsound or fails to comply with the duty to cooperate for the following reasons: it is not justified; the release of Greenbelt will cause significant harm to the purposes of the Greenbelt; using Greenbelt to encourage the recycling of derelict &amp; other urban land; the risk of Clipsley Brook flooding will be exacerbated by further development in this location; high volumes of predicted traffic will add to the already over capacity of highways in the vicinity; there is no statement of common ground with neighbouring authorities.</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0373



St. Helens Council

① - LPA05    ③ - LPA05    ⑤ - LPA04    ⑥ - Statement of common ground  
② - LPA06    ④ - Statement of common ground    197 PFO162

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>DEBRA</u>	First name: .....
Last Name: <u>CLISHAM</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
[Redacted]	Address: .....
[Redacted]	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 27/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPA 05	SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Don't Know	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - the Council should be put to strict proof of its population estimates. The population has been in decline since 1981. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.</p> <p>The release of Greenbelt will cause significant harm to the purposes at the Greenbelt.</p> <p>Houses in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of fast-moving through the development. Flooding of this area is well known. There is no statement of common ground with neighbouring authorities.</p> <p>Please continue on a separate sheet if necessary</p>	

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0374



St. Helens Council

① - LPA05    ③ - LPA05    ⑤ - LPA04    ⑥ - Statement of common ground  
② - LPA06    ④ - Statement of common ground    197 PFO162

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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.

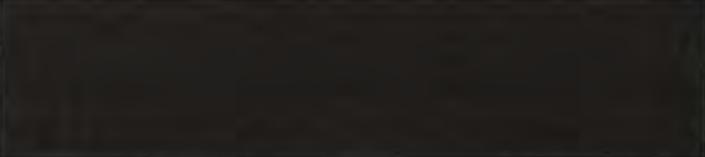
This form has two parts;

**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>DEBRA</u>	First name: .....
Last Name: <u>CLISHAM</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
	Address: .....
	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 27/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LP AO4	SITES 2 EA 5 EA 6 EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<i>Don't Know</i>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban lands. Using Greenbelt faults to encourage this.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. The Council has already granted planning permission in the Greenbelt in respect of site 2 EA - Florida Farm North. The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p>	

There is no statement of common ground with neighbouring authorities

Please continue on a separate sheet if necessary

6

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

*Delete this land from the proposed removal from the Greenbelt*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0375

① - LPA05

PFO164

② - Statement of Common Ground

174

Ref: LPSD

01 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](http://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>BRENDA</u>	First name: .....
Last Name: <u>BOWDEN</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>305 LIVERPOOL RD</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST. HELENS</u>	.....
Postcode: <u>WA11 0UB</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LP AOS  2HA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <b>DO NOT KNOW.</b>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>1) The council should be put to strict proof of its population estimates. - population of St. Helens has been in decline since 1981 where are all the extra people coming from.</p> <p>2) One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using green belt fails to encourage this.</p> <p>3) The release of greenbelt will cause significant harm to the purposes of greenbelt</p> <p>4) Housing in this area isn't sustainable - lack of school places, G. Passenger, bus routes.</p> <p>5) Access to the site is inadequate, a left viaduct from East Lanc. Rd isn't safe and the proposal for the junction of Liverpool Rd + Uxbridge Rd would put additional traffic on an already overstretched highway. There would be problems of lorry trucks running through proposed development</p> <p>6) Flooding problems at this site any remedies to prevent this could place greater amounts of wastes into Clippas Brook.</p> <p>There is no statement of common ground with neighbouring authorities ] ②</p> <p>Traffic pollution - causing chest complaints - the endless noise from lorries, cars, motor bikes ] ①</p>	<p>①</p> <p>②</p> <p>①</p>

Noise pollution. will increase

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"DELETE THIS LAND FROM PROPOSED REMOVAL FROM THE GREENBELT"

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0376

① - LPAOS

② - Statement of Common Ground AS

FF0165

Ref: LPSD  
01 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](http://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>GORDON</u>	First name: _____
Last Name: <u>BOWDEN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>305 LIVERPOOL ROAD</u>	Address: _____
<u>HAYDOCK</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA11 0UN</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 25-2-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPA 05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Don't Know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out your comments.</u>	
<p>THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES.</p> <p>ONE OF THE PURPOSES OF THE GREEN BELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS.</p> <p>HOUSING IN THIS AREA ISNT SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES BUS ROUTES AND OTHER SERVICES. THE ACCESS TO THE SITE IS INADEQUATE.</p> <p>THERE WOULD BE PROBLEMS OF RAINRUNNING THROUGH THE PROPOSED DEVELOPMENT. THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0377



St. Helens Council

① - LPA04

② - Statement of Common Ground

190 PFO170

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>SHEILA</u>	First name: .....
Last Name: <u>CREHAN</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>5, SLAG LANE</u> <u>PEWFALL, HAYDOCK</u> <u>ST. HELENS</u>	Address: .....
Postcode: <u>WA11 9RU</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 21/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPACH	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
sites 2EA, 5EA & 6EA							
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound 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>NOT JUSTIFIED THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION &amp; SCALE. ONE OF THE PURPOSES OF THE GREEN BELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECLINING OF PERILIOUS AND OUTWORN URBAN LAND, USING GREEN BELT FAILS TO ENCOURAGE THIS. THE RELEASE OF GREEN BELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREEN BELT.</p> <p>THE COUNCIL HAS A READY GRANTED PLANNING PERMISSION IN THE GREEN BELT IN RESPECT OF SITE TO EA - FLORIDAFARM. NORTH HIGH VOLUME OF PREDICTED TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY OF THE HIGHWAYS IN THE VICINITY.</p>

Please continue on a separate sheet if necessary

THERE IS NO STATUTORY OF CONCORD BOUND WITH NEIGHBOURING AUTHORITIES. ] (2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LANDS FROM THE PROPOSED REMOVAL  
FROM THE GREEN BELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0378

① - LPA06  
② - Statement of Common Ground

192

Ref: LPSD  
01 MAR 2019  
(for official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>KEITH</u>	First name: .....
Last Name: <u>LOWE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 SEVIER AVENUE</u>	Address: .....
<u>GARSWOOD</u>	.....
Postcode: <u>WN4 0UF</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LAP06 SITE IHS	Paragraph/ diagram/ table		Policies Map SITE IHS		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED the council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the green belt. Housing in this area is not suitable because of the lack of school places doctors surgeries, bus routes and other services. The use of cars being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0379

PF0173

① - LPA06  
② - Statement of Common Ground 193



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>SHIRLEY</u>	First name: .....
Last Name: <u>LOWE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 BELKIN AVE</u>	Address: .....
<u>GARSWOOD</u>	.....
Postcode: <u>WN4 0UF</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] ..... Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LAP06 SITE 1 HS	Paragraph/ diagram table		Policies Map SITE 1 HS		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:	
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness	
Legally Compliant?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>NOT JUSTIFIED</u> - the council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of developed and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't suitable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposal removed from the greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0380

PP0174

① - LPA05  
② - Statement of Common Ground 1914

Ref: LPSD  
01 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](http://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>SHIRLEY</u>	First name: .....
Last Name: <u>LOWE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 BELKIRK AVE</u>	Address: .....
<u>GARSWOOD</u>	.....
Postcode: <u>WN4 0UF</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA05 IHA	Paragraph/ diagram table		Policies Map SITE IHA		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<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>NOT JUSTIFIED</u> - The Council should be put to strict proof of its population estimates. The population of St-Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt-land to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>Housing in this area is not sustainable because of the lack of schools, doctors surgeries bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>The access to the site on either Billinge Road or Garswood Rd would be inadequate. Any necessary highway works must be funded by the developer and not the Council Tax payers.</p> <p>There is no statement of common ground with neighbouring authorities.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0381

① - LPAOS  
② - Statement of Common Ground 195

Ref: LPSD  
01 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>KEITH</u>	First name: .....
Last Name: <u>LOWE.</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 SENKAL AVENUE.</u>	Address: .....
<u>GARSWOOD.</u>	.....
Postcode: <u>WV4 0UF</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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	LPAOS IHA	Paragraph/ diagram table		Policies Map SITE IHA		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 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>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

1 NOT JUSTIFIED "the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of domestic and other urban land. Using greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area is not sustainable because of the lack of school places doctors surgeries bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to site on either Billings Road or Garwood Rd would be inadequate, any necessary highway works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities." 2

Please continue on a separate sheet if necessary



PO0382

① - LPA04 ② - Statement of Common Ground  
③ - LPA05 ④ - Statement of Common Ground

Ref: LPS  
01 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>DENNIS</u>	First name: .....
Last Name: <u>BRIERS</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>165 LIVERPOOL ROAD</u>	Address: .....
<u>POWELL</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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

1 of 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.

WAREHOUSING BETWEEN LINGRILL RD/MILLFIELD LANE/HAY-DOCK LANE

3. To which part of the Local Plan does this representation relate?							
Policy LPAD4 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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.

Additional traffic will add to the over-capacity in the locality  
 2EA at FFN has already been granted - which is in the greenbelt  
 The release of the greenbelt will cause significant harm to the intended purpose of the greenbelt.  
 The use of greenbelt is not encouraging derelict land to be recycled  
 Additional development will increase the risk of flooding downstream at Clapsley Brook  
 There is no statement of common ground with neighboring authorities

1

2

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposal to remove He land from the green belt should be deleted.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0383

① - LPA04 ② - Statement of Common Ground  
③ - LPA05 ④ - Statement of Common Ground

Ref: LPS  
01 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>DENNIS</u>	First name: .....
Last Name: <u>BRIERS</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>165 LIVERPOOL ROAD</u>	Address: .....
<u>POWELL</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <b>DON'T KNOW</b>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>

over the last 3 Census returns the population of the borough has declined, proof of population projections required. No common ground with neighboring authorities has been demonstrated. There are known existing problems re flooding at this site this would exacerbate the problem & place pressure on Clwyd Popok. Greenbelt release would cause significant harm to its purpose. Due to lack of local services eg doctors, nurseries, schools, bus routes etc this development is NOT sustainable & would be car dependent. Urban regeneration would not be achieved as land would not be recycled or reclaimed derelict land used. Inadequate site access onto A580 would be dangerous. The junction at hweepul Rd / A55 / A580 is already at capacity.

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.

This proposal should be deleted & not removed from the greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0384

① - LPA05 ② - Statement of Common Ground  
② - LPA04 1917

PF0177

Ref: LPSD  
01 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>MARLENE</u>	First name: _____
Last Name: <u>DOWNEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>261, LIVERPOOL RD</u>	Address: _____
<u>MAYDOCK, STHELENS</u>	_____
<u>M'SIDE</u>	_____
Postcode: <u>WA11 9RT</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA05 SITE LHA		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	Do it know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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.

The council should be put to strict proof of its population estimates  
 The population has been in decline since 1981. Where are all these extra people coming from?  
 The release of Greenbelt will cause significant harm to the purposes of Greenbelt. There is no common ground with neighbouring housing in this area isn't sustainable because of the lack of school places, GP's surgeries, bus routes + other services  
 The access to the site is inadequate.  
 There are existing flooding problems at this site any remedies to prevent this would place greater amounts of water to be  
 brook

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No

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:

(This area is currently blank for the respondent to provide an answer.)

**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.**

PO0385



St. Helens Council

① - LPAOS

② - Statement of Common Ground

198

PF0178

Ref: LPSD

01 MAR 2019  
(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>WILLIAM</u>	First name: .....
Last Name: <u>M'ALISTER</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>15 CHIRTON CLOSE</u> <u>HAYDOCK</u>	Address: .....
Postcode: <u>WA11 0FG</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: 	Date: <u>25 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:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA05 SITE 24A		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>NOT JUSTIFIED</u> - DECLINE OF POPULATION SINCE 1981</p> <p>DOES NOT PRESERVE GREEN BELT + RE-USE DERELICT LAND</p> <p>LACK OF BASIC INFRASTRUCTURE TO SUPPORT THE EXTRA HOUSING + POPULATION</p> <p>ACCESS IS INADEQUATE CAUSING FURTHER CONGESTION ON THE A580. "MORE TRAFFIC LIGHTS"!</p> <p>NO STATEMENT OF COMMON GROUND. ] 2</p> <p>USING THE GREENBELT HARMS IT'S PURPOSE ] 1</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED "REMOVAL FROM THE GREEN BELT"

Please continue on a separate sheet if necessary

**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	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
---	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0386

① - LPA05 ② - Statement of Common Ground ③ - LPA04

PFO188

208

Ref: LPSD  
01 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>GERALDINE</u>	First name: _____
Last Name: <u>PELOW</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>71 SPRINGFIELD PARK</u>	Address: _____
<u>HAYDOCK</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA11 0XP</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPA 05 SHA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <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.	
<ul style="list-style-type: none"> <li>• NOT JUSTIFIED - COUNCIL SHOULD HAVE STRICT PROOF OF ITS POPULATION ESTIMATES, THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?</li> <li>• ONE OF THE PURPOSES OF GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS.</li> <li>• THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF THE GREENBELT</li> <li>• HOUSING IN THE AREA IS NOT SUSTAINABLE BECAUSE OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF LACK OF FACILITIES.</li> <li>• THE ACCESS TO THE SITE IS INADEQUATE, A LEFT IN/OUT FROM A530 IS NOT SAFE AND THE PROPOSAL FOR A JUNCTION AT LIVERPOOL ROAD + VICARAGE ROAD WOULD ADD ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRESSED HIGHWAYS SYSTEM. THERE WOULD BE PROBLEMS OF RAT RUNNING THROUGH PROPOSED DEVELOPMENTS MAKING ROADS WORSE THAN THEY ARE NOW.</li> <li>• THERE ARE FLOODING PROBLEMS AT THIS SITE AS IT IS. THIS PROPOSED BUILD WOULD PUT FURTHER PRESSURE ON CLIPSELEI BEAC.</li> <li>• THERE IS NO STATEMENT OF COMMON GROUND. ] 2</li> </ul>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED  
REMOVAL OF THE GREEN BELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0387

① - LPA04 ② - Statement of Common Ground PFO198  
③ - LPA05 ④ - Statement of Common Ground 218

Ref: LPSD  
01 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](http://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>ANN</u>	First name: .....
Last Name: <u>MORRIS</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>50 AVERY RD</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 0XA</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25th Feb '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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 LPACH Sites 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>

Using Greenbelt land fails to encourage the recycling of derelict or other urban land.  
 The release of Greenbelt will cause significant harm to the quality of life for residents.  
 The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity. There is no statements of common ground with neighbouring authorities. ] ②



PO0388

① - LPA04 ② - Statement of Common Ground PFO198  
③ - LPA05 ④ - Statement of Common Ground 218

Ref: LPSD  
01 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](http://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>ANN</u>	First name: .....
Last Name: <u>MORRIS</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>50 AVERY RD</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 0XA</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25th Feb '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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 Site 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <b>Don't know</b>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified - the Council should provide strict proof of its population estimates.  
 Using Greenbelt fails to encourage the recycling of derelict and other urban land and fails to assist in urban regeneration.  
 Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services.  
 Access to the site is inadequate and would put additional traffic on an already overstretched highways system.

There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

4

3

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the ~~proposed~~ proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0389



St Helens Council

① - LPA05 ② - Statement of Common Ground PFO199  
③ - LPA04 ④ - Statement of Common Ground 219

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JULIE</u>	First name: .....
Last Name: <u>WOODWARD</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>49 SPRINGFIELD PARK</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 0XP</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] Date: 25-2-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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 <b>LPA05</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
<b>SITE</b>							
<b>2 HA</b>							
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>DONT KNOW</b>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
1	HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF THE LACK OF FACILITIES. } ①
2	THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES. } ②
3	ONE OF THE PURPOSES OF THE GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS. } ①
4	THERE ARE EXISTING PROBLEMS RE FLOODING AT THIS SITE. ANY REMEDIES TO PREVENT THIS WOULD PLACE EVEN GREATER AMOUNTS OF WATER INTO THE CLIPSLEY BROOK.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/> No	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.**

PO0390



St Helens Council

① - LPA05 ② - Statement of Common Ground PFO199  
③ - LPA04 ④ - Statement of Common Ground 219

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JULIE</u>	First name: .....
Last Name: <u>WOODWARD</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>49 SPRINGFIELD PARK</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 0XP</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... Date: 25-2-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy <i>LPA 04</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<i>DONT KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to <u>set out your comments</u> .	
1	HIGH VOLUMES OF PREDICTED TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY ON THE HIGHWAYS IN THE VICINITY.
2	NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT, IN THIS POSITION AND ON THIS SCALE.
3	THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.
4	THE RISK OF FLOODING FURTHER DOWN THE CHIPSLEY BROOK WILL BE EXACERBATED BY FUTURE DEVELOPMENT AT THIS LOCATION.
5	THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED  
REMOVAL FROM THE GREENBELT.

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.**

PO0391



St. Helens Council

① - LPA06  
② - Statement of Common Ground

LPA06 - Site 145  
PFO261

Ref: LPSD

04 MAR 2019  
(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://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>JANET</u>	First name: .....
Last Name: <u>DAVENPORT</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>50b CLAREWOOD ROAD</u>	Address: .....
<u>NORTH ASHTON</u>	.....
<u>NR WIGAN</u>	.....
Postcode: <u>W94 0XH</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA06	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - need to strictly evidence population estimator. Population has been in decline since 1981, where are the extra persons coming from.</p> <p>one of the purposes of greenbelt is to assist in urban regeneration by recycling derelict and other urban land. Using greenbelt land fails to encourage this.</p> <p>The release of greenbelt will cause significant harm to the purpose of greenbelt.</p> <p>Housing in this area isn't sustainable due to lack of school places, doctors surgeries, other community health services, bus routes and other services. Cars on the roads will increase.</p> <p>There is no statement of common ground with neighbouring authorities</p> <p>what about the wildlife.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**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.**

PO0392

① - LPA05  
② - Statement of Common Ground LPA05 - Site 1HA

Ref: LPSD  
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](http://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>JANET</u>	First name: .....
Last Name: <u>DAVENPORT</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>506 GARSWOOD ROAD</u>	Address: .....
<u>NORTH ASHTON</u>	.....
<u>NE WIGAN</u>	.....
Postcode: <u>WNA OXH.</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] ..... Date: 20/02/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens 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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP A05 SITE IMA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified - need to strictly evidence population estimates. Population has been in decline since 1981, where are the extra persons coming from.

One of the purposes of greenbelt is to assist in urban regeneration by recycling derelict and other urban land. Using greenbelt land fails to encourage this.

The release of greenbelt will cause significant harm to the purpose of greenbelt.

Housing in this area isn't sustainable due to lack of school places, doctors surgeries, other community local services, bus routes and other services. Cars on the roads will increase.

The access to the site will be either Billinge road or Garswood road and these would be inadequate. Highways works must be funded by the developer not the Council tax payer.

There is no statement of common ground with neighbouring authorities. What about the wildlife?

Please continue on a separate sheet if necessary

①  
②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	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.**

PO0393

① - LPA04

② - Statement of Common Ground

290



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
05 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](http://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>TERRY</u>	First name: .....
Last Name: <u>QUINN</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>16, Manor Road</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST. HELENS</u>	.....
Postcode: <u>WA11 0LW</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: .. [Redacted] .. Date: 25 02 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)
- No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <b>DONT KNOW</b>
Sound?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>THERE IS NO NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION OR SCALE</p> <p>THE RELEASE OF GREENBELT LAND WILL CAUSE REAL HARM TO THE PURPOSE OF GREENBELT</p> <p>THE COUNCIL HAS ALREADY RELEASE FLORIDA FARM LAND (SITE 2EA)</p> <p>HIGH VOLUME OF TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY ON LOCAL HIGHWAYS</p> <p>THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

/	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0394

① - LPA05

② - Statement of Common Ground

312

Ref: LPSD  
06 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](http://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>BRUCE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>53 HAMILTON ROAD</u>	Address: .....
<u>GARSWOOD</u>	.....
Postcode: <u>WN4 0SU</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy <i>LPA 05</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THE LAND FROM THE PROPOSED  
REMOVAL FROM GREEN BELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(This area is currently blank for providing reasons for participation.)

**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.**

D BRUCE 53 HAMILTON ROAD WN4 0SU

LPA05 QUESTION 6.

The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from.

The purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land using green belt land fails to encourage this. The release of greenbelt will cause significant harm.

Housing in this area isn't sustainable because of lack of school places, Doctors Surgeries, bus routes and other services. The use of cars is being encouraged because of lack of facilities.

There is no statement of common ground with neighbouring Authorities.

There are over 100 Brown field sites in St. Helens.

①

②

①

PO0395

① - LPAOS

PF0290

② - Statement of Common Ground

313

Ref: LPSD

06 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](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>DOROTHY</u>	First name: .....
Last Name: <u>BRUCE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>53 HAMILTON ROAD</u>	Address: .....
<u>CARSWOOD</u>	.....
<u>NR. WIGAN</u>	.....
Postcode: <u>WN1 0SH</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

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](mailto: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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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		
LPA	05									
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>
See attached sheet

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete the land from the proposed removal from Green Belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

LPA05

Question 6

D BRUCE 53 HAMILTON ROAD, GARSWOOD WILT OS4

The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from.

The purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land, using green belt land fails to encourage this.

The releases of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of lack of school places, Doctors Surgeries, bus routes and other services, the use of cars is being encouraged because of lack of facilities.

There is no statement of common ground with neighbouring Authorities

①

②

PO0396

① - LPA06  
② - Para 1.7.2 DTC

315 PFO291



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

07 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](http://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.

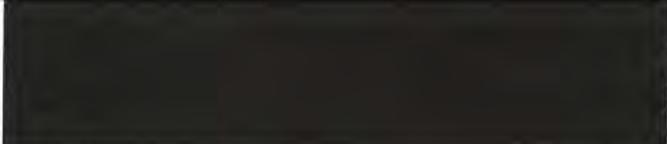
This form has two parts;

**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>NEVILLE</u>	First name: .....
Last Name: <u>HARDMAN</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
	Address: .....
	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: 	Date: <u>7 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

**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](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto: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](http://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		
8 HS				PAGES 9-10						
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DONT KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound 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>THERE ARE NO EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY ] ①            NOT USING THE STANDARD FOR HOUSING NEEDS            COUNCIL NOT COOPERATED WITH OTHER COUNCILS AND NOT ] ②            PUBLISHED ANY STATEMENTS OF COMMON GROUND            BUILDING ON AGRICULTURAL LAND IS UNACCEPTABLE ] ①</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM ANY PROPOSED DEVELOPMENT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

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.**

PO0397

① - LPA05      ② LPA05 Ste 8HA

PF0295

③ - Para 172 DTC

319

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](http://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 and Mrs	Title:
First Name: Philippa and Nick	First name:
Last Name: Burke	Last Name:
Organisation/company:	Organisation/company:
Address: 52 Heyes Avenue, Rainford, Sthelens Postcode: Wa11 8AR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (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 13<sup>th</sup> 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](mailto: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](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto: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](http://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 (site HA8)	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 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 <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

Green belt land should only be released in exceptional circumstances. That is official government and council policy and remains a central part of planning law in this country. There are no exceptional circumstances in St Helens – a borough with a falling population and house prices below the national and regional average. Housing in St Helens is comparatively cheap and in low demand.

The green belt was created to prevent urban sprawl and over-development. It has served that purpose well. The proposals in the Local Plan would undo that good work. St Helens is a borough with few other physical assets and significant health problems such as childhood obesity, high rates of heart and lung disease. Destroying protected green belt land in such circumstances would be a step in the wrong direction given the long-term health trends in St Helens.

Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

This site (HA8) is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142

①

②

The site (HA8) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which is 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.

2

St Helens Council wants 486 houses built every year in the borough. But the latest figures from the Office for National Statistics show St Helens only needs 383 houses a year. If these most recent figures from the ONS were used, the amount of building on protected land could be significantly reduced.

1

The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

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

3

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.

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's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

These alternatives will have less impact on the environment and lead to less need for new infrastructure

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

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"/> <b>No, I do not wish to participate at the oral examination</b>	<input type="checkbox"/> <b>Yes, I wish to participate at the oral examination</b>
--	--

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.**

PO0398



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  
(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](http://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: Denise	First name:
Last Name: Griffiths	Last Name:
Organisation/company:	Organisation/company:
Address: 41 Prestbury Drive Eccleston, St Helens	Address:
Postcode: WA10 5RB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens 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.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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**



PO0399

① - LPA05  
② - Para 172 OTC

417

PFO381



St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

12 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://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: MARK	First name:
Last Name: JONES	Last Name:
Organisation/company:	Organisation/company:
[REDACTED]	Address:
[REDACTED]	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: 11.3.19.
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (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.	



**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 with specific reference to HAS - Rookery Lane					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I do not think there are exceptional circumstances to justify not using the standard method to calculate housing need. I don't think that the level of land required is as high as set out in the local plan and therefore there are no exceptional circumstances to change greenbelt boundaries

The council hasn't cooperated with other councils and hasn't published any statement of common ground

The planned housing development will make HAS an increased flooding risk. The field already floods on a regular basis and this would be worse if it was concreted (see separate sheet)

Please continue on a separate sheet if necessary

The infrastructure would be unable to cope with the planned additional houses. There would be pressure on schools and doctors and increased risk of accidents due to the increased road traffic

HAS is Grade 1 agricultural land which is currently farmed. Building houses on the land would affect the farmer's business in a negative way. There hasn't been any consultation with Natural England over the loss of Grade 1 agricultural land

HAS is next to ~~an~~ an industrial area and subject to the risks associated with pollution and explosions as recently recorded other sites situated next to similar industrial employment land have been excluded during the site assessment phase, eg. see SHLAA 2016 site assessment ref 16m and 142.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The development of HAS is not justified due to the following:

- 1) It is a flooding risk
- 2) It is situated next to an industrial area

The economic development of the local plan needs to be more diversified with less focus on warehousing

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.

PO0400

① - LPA05  
② - Para 172 DTC

418



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD  
**12 MAR 2019**  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name:	First name:
Last Name: <u>ANNE</u>	Last Name:
Organisation/company: <u>FRODSHAM</u>	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted] Date: 8.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## 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 above with specific points relating to HAS (Rookney Lane)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Regarding the overall figures in the Plan, I do not think there are any exceptional circumstances to justify not using the standard method to calculate housing need. The economic analysis is flawed and based on over optimistic assumptions this means that the level of land required is not as high as set out in the Local Plan and therefore there are no exceptional circumstances to change green belt boundaries. Other reasonable alternatives have not been explored. The council have failed to co-operate with other councils and have not published any statement of common ground. I think that the Local Plan is unsound because an additional 285 houses is a big increase in the population of Rainford putting pressure on infrastructure, schools, doctors surgeries, increased road traffic. HAS (Rookney Lane) is a flooding risk. (please see separate sheet)

Please continue on a separate sheet if necessary

Rookery Lane (HAS) currently floods and the situation would be made considerably worse if the field was turned into a housing estate and covered in concrete

Rookery Lane (HAS) is Grade 1 agricultural land and is currently farmed. If this field was not used for farming, it would have an impact on the farmers business

There hasn't been any consultation with Natural England over the loss of Grade 1 Agricultural (BmV) land

HAS is next to an industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site

assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m and 142

Only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 sites have all been discarded. St Helens Council's own assessment is that HAS is the least appropriate green belt site allocated for housing in phase 1.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The development of HAS (Rookery Lane) is not justified at all due to the flooding risk and that it is situated next to an industrial area

The economic development of the local plan is not diversified enough and there is too much focus on warehousing

Please continue on a separate sheet if necessary

**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.