

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO0401 - PO0500

SEPTEMBER 2020

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PO0401





St.Helens Council

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

Ref: LPSD

1 2 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name:	First name:
Last Name: FRODSHAM	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 8TH MARCH 2019

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

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens

Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which	part of the Local P	lan does this repr		The Party of
Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ments (please nam and relevant n)		ith specific no to has	POINTS (ROOKERY LANG
4. Do you c	onsider the St Hele	ns Borough Local	Plan 2020-2035 is:	Tarte of Saundhann
Legally Cor	npliant?	Yes	No 🗷	resis or soundness
Sound?	A similar and remaining the state of	Yes 🗆	No 🗗	The state of the s
Complies w Cooperate	rith the Duty to	Yes 🗆	No 🗹	
Please tick as	appropriate			
5. If you cor	nsider the Local Pla	n is <u>unsound,</u> is it	because it is not:	
Positively D	the Guidance note for	r explanations of the	e Tests of Soundness	
Positively Plustified?	repared			
Effective?				
	with National Policy	2 0	- managing	
Ox to set of	ut your comments NYT THINK USTIFY NOT NULATE HOW	THERE AI USING TH		DAL CIRCUMSTA METHOD TO
ANA	iyer meno	S THAT TH	IE LEVEL OF I	AND REQUIRE E LOCAL PLAN
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			ALTERNATIVE	
			LY incubine	
TAG	reet fier	RES AND	o using mor	re Previously
(PI COS	SE SEE A	DOLTIONAL	SHEET) Please continue on a	

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 DEVELOPMENT INCLUDED IN
THE LOCAL PLAN IS TOO FOCUSSED ON
WARRHOUSING AND NEEDS MORE DIVERSIFICATION
THE DEVELOPMENT OF ROOKERY LANG, HAS
IS NOT JUSTIFIED AT ALL DUE TO THE
FLOODING RISK AND THAT IT IS SITUATED
NEXT TO AN INDUSTRIAL AREA

Please continue on a separate sheet if necessary

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

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

our representation is seeking a modification rail part of the examination? (the hearings	on; do you consider it necessary to participate at in public)	1
 No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination	

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

- 5. ST HELEND COUNCIL HAVE NOT PUBLISHED ANY STATEMENT OF COMMON GROUND AND CO-OPERATED WITH OTHER COUNCILS _
- 6. 286 HOUSES PUTS PRESSURE ON INFRASTRUCTURE
 INCLUDING SCHOOLS, DOCTORS SURGERIES
 INCREASED ROAD TRAFAC
- 7. RODICERY LANG (HAB) IS A FLOODING RISK AND REGULARLY FLOODS NOW. THIS WOULD BE MUCH WORSE IF IT WERE CHANGED TO A HOUSING ESTATE
- 8. RODICERY LANG (HAB) IS GRADE I AGRICULTURAL LAND WHICH IS WERENTLY FARMED.

 THERE HABNIT BEEN ANY CONSULTATION WITH NATURAL ENGLAND OVER THE LOSS OF GRADE!

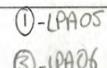
 AGRICULTURAL (BMV) LAND IF THE FARMER

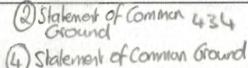
 COULDNIT FARM THIS LAND IT WOULD HAVE

 A NEGATIVE IMPACT ON THEIR SUSINESS
- 9. ROOKERY LANG (HAS) IS NEXT TO AN INDUSTRIAL AREA WITH THE RISKS ASSOCIATED WITH POLLUTION AND AS RECORDED RECENTLY, EXPLOSIONS
- 10. ONLY 4 SITES SCORE 4 NECHTIVES ON THE SUSTAIN ABILITY APPRAISAL AND THE OTHER 3 SITES HAVE BEEN DISCARDED ST HELENS COUNCIL'S OWN ASSESSMENT IS THAT HAS IS THE LEAST APPROPRIATE GREEN BELT SITE AMBROCATED FOR HOUSING IN PHASE!

PO0402







Ref: LPSD

Council

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Part B - Your Representation(s).

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

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

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

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St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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

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

Smoch have

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.

	part of the Local F	Plan does this repr	esentation relate?	
Policy LPACT Site 14A.	Paragraph Policies AG / diagram Map / table		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other docun document a part/section)		ne		da da
4. Do you co	onsider the St Held	ens Borough Local	Plan 2020-2035 is:	Tests of Soundness
Legally Com		Yes 🗆	No □	Pontkrow.
Sound?		Yes 🗆	No 🗗	
Complies wi Cooperate	th the Duty to	Yes D	No 🗗	
Please tick as	appropriate		de Cumunitation de	
Please read t Positively Pr	he Guidance note f	an is <u>unsound</u> , is it or explanations of th	because it is not: e Tests of Soundness	
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6. Please giv	ve details of why y mply with the duty	ou consider the Lo	ocal Plan is <u>not legally c</u> ase be as precise as po	ompliant or is unsound ssible.
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

Mousing South of Billinge Rd.

PART B - YOUR REPRESENTATION

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

Policy PAO9 Site LHA	Paragraph/ diagram table	Policies Map	j-	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/section	on)			
4. Do you co	onsider the St Helens ad the Guidance note	Borough Lo	cal Plan	2020-2035 is: gal Compliance and th	e Tests of Soundness
Legally Com	pliant?		Yes	□ No .	
Sound?			Yes	□ NO	
Complies wi	th the Duty to Coopera	ate	Yes Yes	□ No	
Please tick a	as appropriate	- Indiana - Company			MAII S
	nsider the Local Plan ad the Guidance note				
Positively Pro	epared?				
Justified?			9		
Effective?	vith National Policy?		-	-	
OONSISTEM V					
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pase note: your representation should cover ormation necessary to support/justify the representation at the publication stage. The stage, further submissions will be dissues he/she identifies for examination. If your representation is seeking a modification part of the examination? (the he	resentation o make fur only at the ication; de	all the information and suggested rether representation request of the leading you consider it	, evidence and su nodification, as the ns based on the o nspector, based o	pporting ere riginal on matter
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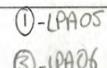
Please keep a copy for future reference.

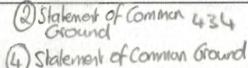
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PO0403







Ref: LPSD

Council

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

1 2 MAR 2019 (For official use only)

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Part B - Your Representation(s).

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Title:
First name:
Last Name:
Organisation/company.
Address: Postcode: Tel No:
Mobile No:
Emaîl:
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.

	ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes ☑ (Via Email)	No 🗌
Please note - e-mail is the Councaddress is provided, we will conta	cil's preferred method of communication. If no e-mail act you by your postal address.

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

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Telephone:

01744 676190

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

Smoch have

PART B - YOUR REPRESENTATION

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

3. To which	part of the Local F	Plan does this repr	esentation relate?	
Policy LPAOJ Site 14A.	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other docur document a part/section		ne		
4. Do you co	onsider the St Held	ens Borough Local	Plan 2020-2035 is:	Tests of Soundness
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Sound?	THE STANDARD CONTRACTOR OF THE STANDARD CONTRACT	Yes 🗆	No 🗗	
Complies wi Cooperate	th the Duty to	Yes D	No 🗗	
Please tick as	appropriate			·
5. If you con Please read to Positively Properties of the properti	he Guidance note f	an is <u>unsound</u> , is it or explanations of th	because it is not: le Tests of Soundness	
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Mousing South of Billinge Rd.

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Policy PAO9 Site LHA	Paragraph/ diagram table	Policies	ŀ	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/section	on)			
4. Do you co	onsider the St Helens ad the Guidance note	Borough Lo	cal Plan	2020-2035 is: gal Compliance and th	e Tests of Soundness
Legally Com	pliant?		Yes	□ No .	
Sound?			Yes	□ NO	
Complies wi	th the Duty to Coopera	ate	Yes Yes	□ No	
Please tick a	as appropriate	- Indiana - Company			MAII S
	nsider the Local Plan ad the Guidance note				
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Justified?			9		
Effective?	vith National Policy?		-	-	
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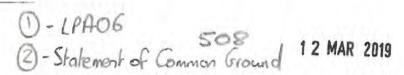
Please keep a copy for future reference.

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PO0404





Ref: LPSD

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

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: GLENNIS	First name:
Last Name: PARKINSON	Last Name:
Organisation/company:	Organisation/company:
Address: 37 SPRINGFIED PARK	Address:
STHILLENS	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 10/3/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future star namely submission of the Plan for examination, paradoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email) postal address please	□ No
	hod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

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

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LPA SITE	table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/sec	tion)		
4. Do you cor Please reac	nsider the St Hele I the Guidance not	ns Borough Local I	Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Comp	liant?		Yes No	
Sound?			Yes No	
Complies with	the Duty to Coope	erate	Yes No	
Please tick as	appropriate			
Justified? Effective? Consistent wit	h National Policy?	a d) !	. ×
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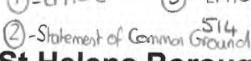
Please keep a copy for future reference.

· Continuation sheet - Glennis Parkinson Policy LPA. 06 Site 2ES

- The Councit has already granted planning permission in the Greenbelt in respect of lete 2EA Thorida Farm North a massive development of 2 gigantic wavehomes, which are less than two nicles from this site and has received applications for similar developments at SEA, land to the west of Hoeyelook Lane and SEA, Parkside west. Newton-le-Willows. Why should this area be the wavehouse Capital of Str Helens?
- 5) High volumes of predicted troffic will add to the dready over capacity on Junetion 23 of the Mb.
- 6) There is no statemed of common ground with neighbourn authorities [3]

PO0405





Ref: LPSD

PF0467

(For official use only)

(2)-Statement of Common Ground 12 MAR 2019 St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1100	Title:
	Title: First name:
Last Name: COLLINS	Last Name:
Organiation/company:	Organisation/company:
Address: 57 THORNHILL GARSWOOD	Address:
MIGHN	Postcode:
	Tel No:
	Mobile No:
Signature:	Date: 4-3-19.
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	accepted and that in order for your comments to be
ould you like to be kept updated of future sta	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferred met	hod of communication. If no email address is provided,

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Policy PASHE OSIHA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other document document and r	s (please name elevant part/section	on)	7	111111111111111111111111111111111111111
4. Do you consi Please read th	der the St Helens ne Guidance note t	Borough Local F	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
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Sound?			res No	
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or fails to com If you wish to use this box to	ply with the duty support the legal set out your co	to cooperate. Ple compliance or so mments.	al Plan is not legally comease be as precise as popundness of the Local Plan Incorrect	ssible. lan, please also
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incapable of modification at examination). Ye the Local Plan legally compliant or sound. It suggested revised wording of any policy or	fou will need to say why this modification will make to will be helpful if you are able to put forward your text. Please be as precise as possible.
	Please continue on a separate sheet if necessar
ormation necessary to support/justify the repres not normally be a subsequent opportunity to make presentation at the publication stage.	sentation and suggested modification, as there nake further representations based on the original
d issues he/she identifies for examination.	ation; do you consider it necessary to participate at
d issues he/she identifies for examination. If your representation is seeking a modifica	ly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ngs in public) Yes, I wish to participate at the oral examination

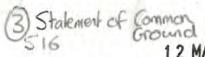
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1 - LPAOS 2 - LPAO6



1 2 MAR 2019

Ref: LPSD

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Accepted	First name:
Mar makes Cocco	Last Name:
Last Name:	Organisation/company:
Organisation/company:	. Organisation/company.
Address: 4 Femea Gove	Address:
Postcode: WNU ORF	Postcode:
1 0300000.	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? Dication of the Inspector's recommendations and
Yes (via email)	☑ No
Please note - email is the Council's preferred method	od of communication. If no email address is provided,

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Policy Paragraph/ diagram table LP ADG Billige R	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note			the Tests of Soundness
Legally Compliant?	ПУ	es No	
Sound?	_ Y	es No	
Complies with the Duty to Coopera	ate Y	es No	
Please tick as appropriate			
Please read the Guidance note the Positively Prepared? Justified? Effective? Consistent with National Policy?	Q Q Q Q Q Q		
6. Please give details of why you or fails to comply with the duty	/ to cooperate. <u>Ple</u> I compliance or so	ease be as precise as	possible.
If you wish to support the lega use this box to set out your co	illinetits.		

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1 2 MAR 2019 St Helens Borough Local Plan

2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
KID	Title
Title: /7/(.	Title:
First Name: PHILIP	First name:
Last Name: 70 PPING	Last Name:
Organisation/company:	Organisation/company/
Address: 33 April 1 Ro	ad Address:
Makefield. Wis	AN _
Postcode: WN4 ORN	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 05/03/2019
Please be aware that anonymous forms considered you MUST include your deta	cannot be accepted and that in order for your comments to be
	future stages of the St Helens Borough Local Plan 2020-2035? nination, publication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's pref ve will contact you by your postal addre view at http:/www.legislation.gov.uk/ukp	ferred method of communication. If no email address is provided, ess.

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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Telephone: 01744 676190

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Policy	S	Paragraph/	Policies	Sustainability	Habitats
90 HJ7	Site IHS	diagram table	Мар	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
		nts (please name relevant part/section	on)		
		sider the St Helens the Guidance note		Legal Compliance and th	
egally	Compli	ant?		res No Da	ont know
Sound?				∕es ✓ No	
Complie	s with t	he Duty to Coopera	ate 🔲	es No	
Please t	ick as a	appropriate	SHIP OF THE SHIP O		
Please Positivel	e read t	100km	for explanations of	the Tests of Soundness	
ustified	Value of the	ned;	V.	,	
Effective					
	Landin.	National Policy?			
or fail If you use th	s to co wish to is box	support the legal to set out your co	to cooperate. Ple compliance or so mments. estimates lune. Hous site v u	al Plan is not legally comease be as precise as postundness of the Local Plan are mot area of Green Reit room alerelic to any on clear ty intelligent	esible. an, please also while; st Helans preservation siles exist.
ust t	whi	a would.	environmen	7000	
ules tou	sey	will nece	us roulo a	to enjour storic k which although a Billing harland emat of common of	rule expedient

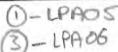
Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider	
relates to soundness (NB please note that any incapable of modification at examination). You	non-compliance with the duty to cooperate is will need to say why this modification will make ill be helpful if you are able to put forward your
Remove this piece of to proposal of its remo	land from the var from Eveenbeet.
	Please continue on a separate sheet if necessary
and traction be take identified for automination	at the request of the Inspector, based on matters
8. If your representation is seeking a modification	n; do you consider it necessary to participate at
	n; do you consider it necessary to participate at
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination.) 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
8. If your representation is seeking a modification the oral part of the examination? (the hearings No, I do not wish to participate at the oral examination.) 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination
No, I do not wish to participate at the oral examination 9. If you wish to participate at the oral part of the	yes, I wish to participate at examination

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Please keep a copy for future reference.





PF0471

Ref: LPSD

(For official use only)

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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: OR S	Title:
First Name: Co Solans	First name:
First Name.	Last Name:
Org. ation/company:	Organisation/company.
Aller 32 Clain C	Que Address:
Carswo	001
Postcode: WN4 OR	H. Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/19
considered you MUST include your o	rms cannot be accepted and that in order for your comments to be details above.
	of future stages of the St Helens Borough Local Plan 2020-2035 examination, publication of the Inspector's recommendations and
Yes (via email)	No No
Please note - email is the Council's we will contact you by your postal ac	preferred method of communication. If no email address is provided ddress.

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3. 10 which p	part of the Local Pla	an does this repre	sentation relate?	W
Policy HA LAAS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)		
4. Do you co	nsider the St Helen d the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Comp	oliant?		Yes No	
Sound?			Yes No	
Complies with	h the Duty to Cooper	rate 🔲	Yes 🔲 No	
Please tick as	s appropriate			- Annual Control of the Control of t
Please read Positively Pre Justified? Effective?		for explanations of	the Tests of Soundness	
or fails to	comply with the du to support the leg ox to set out your c	ty to cooperate. Pal al compliance or somments.	cal Plan is not legally cor lease be as precise as po soundness of the Local F	ossible. Plan, please also
			un coure Su	

		114		• •
relates to soundnes incapable of modifi the Local Plan lega	l, having regard to the ss (NB please note the cation at examinatio lly compliant or sour	e matter you ha nat any non-con n). You will nee nd. It will be help	ssary to make the Lowe identified at 6. about the dute of the dute of the say why this mount of the say why this mount of the say precise as possible to th	ove where this y to cooperate is dification will make o put forward your
Delo	te 12	form	proposed	removal

Please continue on a separate sheet if necessary

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

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

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

 No, I do not wish to participate

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.

at the oral examination



(4) - Statement of Common Ground

Ref: LPSD

(For official use only)

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

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: OHERYL	First name:
Last Name: Skinner	Last Name:
	Organisation/company:
	Address:
Postcode: WV4 &VA	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 05:03.19
lease be aware that anonymous forms cannot be aconsidered you MUST include your details above.	ecepted and that in order for your comments to be
fould you like to be kept updated of future stages namely submission of the Plan for examination, public doption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	No
lease note - email is the Council's preferred methode will contact you by your postal address.	d of communication. If no email address is provided,

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HAS LPAS Snocula	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other docume	nts (please name relevant part/section	on)		
		s Borough Local P for explanations of	lan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Compli	ant?		es No	
Sound? Complies with t	the Duty to Coopera		es No	
Please tick as a			5 5 10	
Positively Prepa Justified? Effective? Consistent with	ared? National Policy?	499		
or fails to co	mply with the duty	to cooperate. <u>Ple</u> compliance or so	al Plan is not legally com ase be as precise as pos undness of the Local Pl	ssible.
to pu	you of	eerbeit i Green b	nul cana syr	with other

(Penore	boloso	100	for	green	belt
				Please	continue on a separ	sile sheet if neces
esentation this stag issues he	at the publication e, further submis she identifies fo	ssions will be on r examination.	ly at the requ	est of the I	nspector, bas	sed on matte
esentation this stag issues he	at the publication e, further submis /she identifies fo resentation is se	stage. ssions will be on	ly at the requ	est of the l	nspector, bas	sed on matte
this stag issues he f your rep he oral pa	at the publication e, further submis /she identifies fo resentation is se	stage. ssions will be one examination. eking a modification? (the hearinarticipate	ly at the requition; do youngs in public	consider it	nspector, bas	ed on matte
f your rep No, I at the	at the publication e, further submis she identifies for resentation is secured of the examination do not wish to page oral examination	stage. ssions will be one examination. eking a modification? (the hearinarticipate	ly at the requition; do you ngs in public Yes, exa	consider it) I wish to pa	nspector, bas	participate a

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(4) - Statement of Common Ground

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: OHERYL	First name:
Last Name: Skinner	Last Name:
	Organisation/company:
	Address:
Postcode: WV4 &VA	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 05:03.19
lease be aware that anonymous forms cannot be aconsidered you MUST include your details above.	ecepted and that in order for your comments to be
fould you like to be kept updated of future stages namely submission of the Plan for examination, public doption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	No
lease note - email is the Council's preferred methode will contact you by your postal address.	d of communication. If no email address is provided,

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o, to minon p	art of the Local Pl	an does this repre	Sentation relate:	
Policy IHS LP AOB	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)		
	sider the St Helen the Guidance note		Plan 2020-2035 is: Legal Compliance and the	he Tests of Soundness
Legally Compl	iant?		res No	
Sound?			∕es ⊠ No	
Complies with	the Duty to Cooper	ate 🔲 Y	res No	
	der the Local Plan			
S. If you consi Please read Positively Prepared Justified? Effective?	der the Local Plan the Guidance note		pecause it is not: the Tests of Soundness	
E. If you consing Please read Positively Prepared Propositively Prepared Propositively Prepared Proposition Propo	der the Local Plan the Guidance note ared? National Policy? details of why you omply with the duty	consider the Local to cooperate. Ple		ssible.

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1 - CPAOS 523 2 - Statement of Common Ground

1 2 MAR 2019



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

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1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title
Title: PKS	Title:
First Name: GLENNIS	First name:
Last Name: PARKINSON	Last Name:
	Organisation/company:
Address: 37 SPRINGFIRD PARK	Address:
KAYDOCK	
ST. HELENS	
Postcode: WAII OXP	Postcode:
rostoode.	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/19
Discourse that apparements forms connect ha	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 stage (namely submission of the Plan for examination, puradoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred meti we will contact you by your postal address.	nod of communication. If no email address is provided, se postal address please,

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3. To which p	part of the Local Pla	n does this repre	sentation relate?	
Policy LPA S11 -05 2H4	table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name ad relevant part/secti	on)		
4. Do you co Please rea	nsider the St Helen d the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
Legally Comp	oliant?	Jonit Know [Yes No	
Sound?			Yes No	
Complies wit	h the Duty to Cooper	rate 🔲	Yes No	
Please tick as	s appropriate			
5. If you con Please rea	sider the Local Plar d the Guidance note	n is <u>unsound,</u> is it for explanations of	because it is not: the Tests of Soundness	
Positively Pre	pared?	d		
Justified?				
Effective?				
Consistent w	ith National Policy?			
or fails to If you wish	comply with the du	ty to cooperate. <u>P</u> al compliance or s	cal Plan is <u>not legally co</u> lease be as precise as p soundness of the Local I	ossible.
in S	St. Helens, The Housing in St.	population of Helens is comp	. Stillelent has been saratively chaap a	rehease of Greenbelton in decline Since and in low demans it in urban actict and urban

	Delete	Kris	land	from	He	proposed	removal
	from	the	Green	ibelt.		proposed	
						Please contin	ue on a separate sheet if neces
mation	necessary to	support	justify the	representa	ation and	suggested modi	idence and supporting ification, as there
mation not nor esenta r this : issues	necessary to mally be a su tion at the pul stage, furthe he/she iden representati	support bsequent blication r submis ntifies for	/justify the t opportur stage. sions will examina eking a m	representatity to make be only attion.	ation and further re t the requ ; do you	suggested modi epresentations b uest of the Insp consider it nec	
mation not nor resenta er this s issues If your the ora	necessary to mally be a su tion at the pul stage, furthe he/she iden	support bsequent blication: r submis rtifies for ion is see examina	/justify the topportur stage. sions will examina eking a mation? (the	representatity to make be only attion.	t the requirements of the	suggested modi epresentations b uest of the Insp consider it nec	ification, as there ased on the original ector, based on matte essary to participate

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- 4) Housing in the area Isn't sustainable because of the lack of school places, medical centres, bus and train services and other services. The use of cars is being encouraged because of the lack of facilities.
- Read to this site just writ safe and would cause major problems. Another junction out birerpool Road and Vicarage Road would totally overburden the roads nearby. The infrastructure just whit there to cope with so made many added vehicles.
 - b) There are existing flooding problems on Meis site. During wet weather large ponds appear. Remedies to prevent this would place even greater problems for the Clipsley Book.
 - 7) The Council's own register stons there is enough biometical land in St-Helens for 5,818 houses. Use Brownfield and develot land before Greenbelt is released.
 - 8) The reasons for release of Greenbelf is not justified and St Helens Conneil should prove how the population will increase.
 - anthorities.
 - ro). As proved recently with marries about imported produce, BREXIT) we need all the Greenbelt so we can grow our own crops. Once Greenbelt is gone this would be impossible.

11) Because Haydock High School is a poor performing school money residents send their diddren to schools in the neighbourned Boreigh of Wigan. This also applies to the Catholic School Secondary) [C]

12) Use of Greenbelt for development should not be used as a [72] Use of Greenbelt for development should not be used as a [73] Use of Greenbelt for development should not be used as a [74] Use of Greenbelt for development should not be used as a [75] Use of Greenbelt for development should not be used as a [76] Use of Greenbelt for development should not be used as a [76] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as a [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenbelt for development should not be used as [78] Use of Greenb

-Statement of Common Ground





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

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[1] 이 아이를 가고 있다면 하고 있다면 하는 사람들이 되었다면 하는데	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 97 TAYLOR ROAD	Address:
Postcode: WAU 976	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/2019
considered you MUST include your details above.	
Would you like to be kept updated of future sta (namely submission of the Plan for examination, p adoption of the Plan)	iges of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

RETURN DETAILS

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

PART B - YOUR REPRESENTATION

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

3. To which pa	art of the Local Pla	n does this repres	sentation relate?	
Policy	Paragraph/ diagram table SITES 2	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please name relevant part/section	on)		
	sider the St Helens the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Compl	ant? 3 M A	00T 10°	Yes No	
Sound?	N 30L2	_ , _ , _ ,	Yes No	
Complies with	the Duty to Cooper	ate 🔲 `	Yes No	
Please tick as	appropriate			
	der the Local Plan the Guidance note		because it is not: the Tests of Soundness	
Positively Prep	ared?	0	*	
Justified?				
Effective?				
Consistent with	National Policy?			
or fails to co	omply with the dut to support the lega	y to cooperate. <u>Pl</u> Il compliance or s	cal Plan is not legally collease be as precise as postoundness of the Local F	ossible.
use this box	to set out your co	omments.		
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Please continue on a separate sheet if necessary

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

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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

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.

PO0413



O-LPAOS Q-Statement of Common Ground

3-LPAO4 (9-Statement of Common Ground 12 MAR 2019

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

PF0491

Ref: LPSD

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1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent) Fitle: URS	Title:
	First name:
	Last Name:
Organisation/company: Local RESIDENT	
Address: 101 SPRINGFIELS PARK	
модинан	
Postcode: WAIL OXP	
Maria and the second second second	Tel No:
	Mobile No:
	Email:
	Date: 7.3.19.
Signature:	Date.

Please be aware that anonymous forms cannot be accepted and that in order for your common that it is not a source of the common that it is not a source of the common that it is not a source of the common that it is not a source of the common that it is not accepted and that in order for your common that it is not accepted and that in order for your common that it is not accepted and the common that is not accepted and the common that it is not accepted and the common that is not accepted and the common that it is not accepted and the common that is not accepted and the common that it is n considered you MUST include your details above.

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

Yes (via email)

No

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

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3. To w	hich par	t of the Loca	l Plan o	loes this r	epresen	tation relate?	
Policy PA 05	LPA 05 - SITE QHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please nar relevant part/s			70		
4. Do y	ou cons	ider the St He	elens B	orough Lo explanatio	ocal Plan		the Tests of Soundness
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Sound	?				☐ Yes	No	9
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9. If you wish to participate at the oral partition to be necessary:	t of the ex	aminati	on, please outli	ne why yo	ou consider

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PO0414



O-LPAOS Q-Statement of Common Ground

3-LPAO4 (9-Statement of Common Ground 12 MAR 2019

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PF0491

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(we will correspond via your agent) Fitle: URS	Title:
	First name:
	Last Name:
Organisation/company: Local RESIDENT	
Address: 101 SPRINGFIELS PARK	
модинан	
Postcode: WAIL OXP	
Maria and the second second second	Tel No:
	Mobile No:
	Email:
	Date: 7.3.19.
Signature:	Date.

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Policy LP 04 Site 3E 5E	diagram table	Policies Map	A St Er	ustainability opraisal/ rategic ovironmental ssessment	Habitats Regulations Assessment
	ments (please name nd relevant part/sec				
	onsider the St Hele ad the Guidance no				e Tests of Soundness
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

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PO0415

1 2 MAR 2019

Ref: LPSD

PF0496

(For official use only)



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	Title:
	First name:
	Last Name:
	Organisation/company:
	Address:
GARSWOOD	
ASHTON IN MAKERPIELD . WIGAN	
Postcode: WNH 65G	Postcode:
	Tel No:
	Mobile No:
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Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	☐ No
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Policy Smoch 1HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nents (please name and relevant part/section	on)		
	nsider the St Helen d the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Comp	oliant?		Yes No	
Sound?			Yes No	
Complies with	h the Duty to Cooper	ate :	Yes No	
Please tick as	s appropriate		granden	
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PO0416



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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Last Name: Chouoil	Last Name:
Organisation/company:	Organisation/company:
Address: 66 ASHBURY	Address:
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	Mobile No:
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ease note - email is the Council's preferred met	hod of communication. If no email address is provided,

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Policy SITE Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)			
4. Do you consider the St Helens B Please read the Guidance note for			e Tests of Soundness
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Complies with the Duty to Cooperate		es 🗹 No	
Please tick as appropriate			
5. If you consider the Local Plan is Please read the Guidance note for Positively Prepared?			
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal 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.

PO0417



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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First Name: PAULA	First name:
Last Name: Chouoil	Last Name:
Organisation/company:	Organisation/company:
Address: 66 ASHBURY	Address:
Postcode: WAII COFA	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5 · 3 · 1 ° .
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	accepted and that in order for your comments to be
ould you like to be kept updated of future sta	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No
ease note - email is the Council's preferred met	hod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	10 20 70 7 1 T 1 Ly	t or the Book i i	n does this repre	esentation relate?	
LPA 04	SITES 2EA SEA 6EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please name relevant part/section	on)		
				Plan 2020-2035 is: f Legal Compliance and th	e Tests of Soundness
Legally	Complia	int? .		Yes Don't know \ No	
Sound?				Yes Vo	
Compli	es with th	ne Duty to Cooper	ate 🗆	Yes No	
Please	tick as a	opropriate			
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

PO0418



Council

O-LPAOS 546 2)-Statement of Common Ground 12 MAR 2019

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address: Postcode: Tel No:
Mobile No:
Email:
Date: 4/3/19

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

	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the d adoption of the Plan)
Yes [(Via Email)	No 🗹
	cil's preferred method of communication. If no e-mail act 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.

To which part of the Lo			
Policy LPA Paragrap 05 / diagran / table 24A	n Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please ocument and relevant art/section)	e name		
	note for explanations of L	egal Compliance and the	Tests of Soundness
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Sound?	Yes 🗆	No ☑ No ☑	
Complies with the Duty to Cooperate	Yes 🗆	NO	minutes of the second s
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of School Place	s. Joctors etc	. use of cors is	being encourage
as the are	through Hayde	be will be so	fish of acciden
Med is as al	teres (s) con	men ground we	4
neighborry o	cultorities.	a.	(2)
		Please continue on	a separate sheet if necessary

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

Delete this land from the proposed renoval

Please continue on a separate sheet if necessary

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

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the oral part of the examination? (the hearings in public)	8. If your representation is seeking a modification; do you	ou consider i	t necessary	to participate at
	the oral part of the examination? (the hearings in public		医与中国外面	建工作的 基本

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

Yes, I wish to participate at the oral examination

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

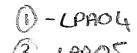
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0419







Ref: LPSD

PF0500

(For official use only)

(1) - LPAOL4 (2) - Stolenest of Common Ground 547 12 MAR 2019 St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title
Title: MA	Title:
First Name: ChCISTNE	First name:
Last Name: NAYLOR	Last Name:
	Organisation/company:
Address: 42 NATHAN DRIVE HAYDOCU	Address:
Postcode: WAIL OGW	Postcode
	Tel No
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Would you like to be kept updated of future and (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred rew will contact you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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

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

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

Policy LPAOU Paragraph/ diagram table Policies Map Strategic Strategic Strategic Environmental Assessment Assessment Assessment Sea of Soundness Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant?	3. To w	hich par	t of the Local	Plan do	es this rep	resent	ation relate?			
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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

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

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

Please keep a copy for future reference.

PO0420

PF0506

1 2 MAR 2019



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

Ref: LPSD

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Part B - Your Representation(s)

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[] - 주인 전, 보고, 보고, 10 10 10 10 10 10 10 10 10 10 10 10 10	Title
First Name: Alicia	Title:
First Name. Tittee	First name:
	Last Name:
Organisation/company:	Organisation/company:
	Address:
Postcode: WNU ORP	Postcode:
	Tel No:
Mobile No:	
	Email:
Signature:	Date:
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pube adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035 olication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methors we will contact you by your postal address.	od of communication. If no email address is provided

RETURN DETAILS

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

post to:

Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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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.

3. To which part of the Local	Policies		7,000	
Policy Paragraph/ diagram table	Map	App Strat Envi	ainability raisal/ egic ronmental essment	Habitats Regulations Assessment
Other documents (please name document and relevant part/sec			Marin	
4. Do you consider the St Hele Please read the Guidance no				e Tests of Soundness
egally Compliant?	v	Yes	□ No	
Sound?] Yes	₩ No	
Complies with the Duty to Coop	erate [] Yes	No	
Please tick as appropriate				
Positively Prepared? lustified? Effective?	\ \ \	-		
Consistent with National Policy?				
6. Please give details of why your fails to comply with the definition of the least this box to set out your	uty to cooperate. gal compliance or	Please be as	precise as pos	ssible.
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7. Please set out what modification(s) you consider necessary to make the compliant or sound, having regard to the matter you have identified at 6. relates to soundness (NB please note that any non-compliance with the incapable of modification at examination). You will need to say why this the Local Plan legally compliant or sound. It will be helpful if you are able suggested revised wording of any policy or text. Please be as precise as	above where this duty to cooperate is modification will make e to put forward your
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Please continue on a separate sheet if necessary

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

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



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

Yes, I wish to participate at the oral examination

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

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

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Please keep a copy for future reference.

PO0421



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

Ref: LPSD

(For official use only)

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PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)				
	Title:				
First Name: TERENCE	First name:				
Last Name: GAUC KWIN	Last Name:				
Organisation/company: RETIRED .	Organisation/company:				
Address: 62 MIWOROOK LANE	Address:				
Postcode: WAIO4QY.	Postcode:				
Tol No.	Tel Ne.				
Mobile No:	Mobile No:				
Email:	Enail:				
The state of the s	and the second				
Signature:	Date: 10.3.19.				
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be				
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and				
Yes (via email)	☐ No				
Please note - email is the Council's preferred method we will contact you by your postal address.	hod of communication. If no email address is provided,				

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

Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/sect	ion)		
4. Do you o	consider the St Heler ead the Guidance note	ns Borough Local e for explanations o	Plan 2020-2035 is: f Legal Compliance and	the Tests of Soundness
Legally Co	mpliant?		Yes No	
Sound?			Yes No	
Complies v	with the Duty to Coope	erate	Yes No	
Please tick	as appropriate			
Positively F Justified? Effective? Consistent	Prepared? with National Policy?	D D D		
or fails	to comply with the di	uty to cooperate. F	cal Plan is not legally or Please be as precise as soundness of the Loca	
use this			NO 12Z.	-1 -1 -1
	ENCLOSED	SHEET		

e Local Plan legally compliant or sou	the matter you have identified at 6. above where this that any non-compliance with the duty to cooperate is on). You will need to say why this modification will maind. It will be helpful if you are able to put forward you cry or text. Please be as precise as possible.
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

SHEET No 1. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

Adequate regional and cross border collaboration has not been undertaken.

The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

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

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

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unsuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15year plan period or the 25-year safeguarded period being considered.

 The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

 The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

The IDP fails to explain the impact on Healthcare and Education. The
current situation is touched on broadly, but how this will be managed and
funded is missing or vague. There is no indication or reference to
collaboration with the Hospital Trust, local CCGs or education authorities.

PO0422



579

1 2 MAR 2019

Ref: LPSD

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: LIS A	First name:
Last Name: McCoRMACK	Last Name:
Organisation/company:	Organisation/company:
Address: 7 DERRINGSTONE CLOSE ST. HELENS	Address:
Postcode: WAIO 3 R	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
	Émail:

Signature:	ь			
oignature.	Date:	4/3	2019	

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

Would you like to be kept upd Plan 2020-2035? (namely subm	ated of future stages of the St Helens Borough Local hission of the Plan for examination, publication of the
Inspector's recommendations ar	nd adoption of the Plan)
Yes (Via Email)	No IV

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

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Policy Paragraph LPAos / diagram / table Site AHA Other documents please not document and relevant part/section)	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
4. Do you consider the St H Please read the Guidance note Legally Compliant? Sound? Complies with the Duty to Cooperate Please tick as appropriate	e for explanations of Le	Plan 2020-2035 is: egal Compliance and the 7 know No No No No No No No No No No	ests of Soundness
5 If you consider the Local Please read the Guidance note Positively Prepared? Justified? Effective? Consistent with National Pol	Professional of the Profes	because it is not. Tests of Soundness	
6. Please give details of why or fails to comply with the du If you wish to support the leg box to set out your comment	ly to gooperate, Flea lai compliance or sel	se <u>de as precise as pos</u>	sible.
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DELETE THE LAUD FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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/

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

Yes, I wish to participate at the oral examination

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PO0423





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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
1 0	Title:
First Name: LESLZE	First name:
ast Name: ChANCY	Last Name:
	Organisation/company:
	Address:
ST HELENS	Postcode:
	el No:
	obile No:
Emai	mail:
Signature:	Date: 5/3/2019

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

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SS

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PELETE THIS NAND FROM THE
PROPOSED REMOVAL FROM THE
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40

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

Yes, I wish to participate at the oral examination

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

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PO0424



1 2 MAR 2019

Ref: LPSD

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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: PATRICIA ANNE	Title:First name:
Last Nama: MOVILLES	Last Name:
Organisation/company:	Organisation/company:
Address: 31 BIRCH GROVE	Address:
CARSWOOD	
37. HIZEUS	
Postcode: WN4 0QZ.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10/3/19
considered you MUST include your details above	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-20357 publication of the Inspector's recommendations and
Yes (via email)	☐ No
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3. To which part of the Local Pla	n does this repre	sentation relate?	
Policy LP OS 2 HA: Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helen Please read the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Compliant?		Yes Don't Know No	
Sound?		Yes 🗹 No	
Complies with the Duty to Cooper	ate	Yes 📝 No	
Please tick as appropriate			
5. If you consider the Local Plar Please read the Guidance note Positively Prepared?			
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Effective?	\square	<i>ŧ</i>	
Consistent with National Policy?	ব		
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	u wish to be n			e at the	oral pa	art of the	examination	, please o	utline v	why you consider
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indicated that they wish to participate at the oral part of the examination

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PO0425



1 2 MAR 2019

Ref: LPSD

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

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Last Nama: MOVILLES	Last Name:
Organisation/company:	Organisation/company:
Address: 31 BIRCH GROVE	Address:
CARSWOOD	
37. HIZEUS	
Postcode: WN4 0QZ.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10/3/19
considered you MUST include your details above	e accepted and that in order for your comments to be
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Yes (via email)	☐ No
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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

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

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3. To which part of the Local Pla	n does this repre	sentation relate?	
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Other documents (please name document and relevant part/section	on)		
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Legally Compliant?		Yes Dowt Know No	
Sound?		Yes No	
Complies with the Duty to Cooper	ate 🔲	Yes No	
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use this box to set out your c	omments.		
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PO0426



1 2 MAR 2019

Ref: LPSD

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

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

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	Title:
First Name: PATRICIA ANNE	Title:First name:
Last Nama: MOVILLES	Last Name:
Organisation/company:	Organisation/company:
Address: 31 BIRCH GROVE	Address:
CARSWOOD	
37. HIZEUS	
Postcode: WN4 0QZ.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10/3/19
considered you MUST include your details above	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-20357 publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me	ethod of communication. If no email address is provided

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St Helens WA10 1HP

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Policy Paragraph/ Polici diagram table	ies	Sustainability Appraisal/ Strategic Environmental	Habitats Regulations Assessment
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4. Do you consider the St Helens Borough	h Local Plan	2020-2035 is:	the Tests of Coundness
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally

1800756M

PO0427



1 2 MAR 2019

Ref: LPSD

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

(For official use only)

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	Title:
First Name: PATRICIA ANNE	Title:First name:
Last Nama: MOVILLES	Last Name:
Organisation/company:	Organisation/company:
Address: 31 BIRCH GROVE	Address:
CARSWOOD	
37. HIZEUS	
Postcode: WN4 0QZ.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10/3/19
considered you MUST include your details above	e accepted and that in order for your comments to be
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7. 10 Willow part of the Book	es uns repres	entation relate?	
0,10)	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)			
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Sound?	Y	∕es ⊡ -No	
Complies with the Duty to Cooperate	□ Y	′es ☑/No	
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indicated that they wish to participate at the oral part of the examination

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PO0428

1 2 MAR 2019

610



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

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name:	First name:
Last Name: MARSH	Last Name:
Organisation/company:	Organisation/company:
Address: SECCLESFIELD RO ST HEZENS	Address:
Postcode: ware stru	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11 MARCH 2019
ease be aware that anonymous forms o	cannot be accepted and that in order for your
Plan 2020-2035? (namely submission of Inspector's recommendations and adoptions and plants of the p	
Yes (Via Email)	No 🗌
Places note a mail is the Councilla ne	oferred method of communication. If no e-mail

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St. Helens Council

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Policy	LPA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ent and re	s (please name elevant	Green Belt I	Review (2018)	

4. Do you consider the St He Please read the Guidance note		lan 2020-2035 is: al Compliance and the Tests of Soundness
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

	is unsound, is it because it is not: explanations of the Tests of Soundness
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	

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

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

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

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

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

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

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing.

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

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

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

The Plan is not effective.

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.

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please 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.

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

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.

PO0429



613

1 2 MAR 2019

Ref: LPSD

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

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Mobile No:
Email:

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

RETURN DETAILS

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post to:

Local Plan

St.Helens Council

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Policy	LPA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ent and re	(please name levant	Green Belt I	Review (2018)	

4. Do you consider the St He Please read the Guidance note	lens Borough Local Pl	an 2020-2035 is: al Compliance and the Tests of Soundness
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

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

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

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

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

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

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

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The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

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

The Plan is not effective.

Please continue on a separate sheet if necessary

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8. If the	your representation is seeking a modification oral part of the examination? (the hearings in	; do you consider it necessary to participate at 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	f the	examination,	please	outline	why y	ou o	consider
this to be necessary:						1000		(Silverine)
		-			-		-	

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PO0430



618

1 2 MAR 2019

Ref: LPSD

(For official use only)

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable (we will correspond via your agent)	
Title: hes	Title:	
First Name: TERESA	First name:	
Last Name: CASH	Last Name:	
Organisation/company:	Organisation/company:	
Address: 15 PARK AVE ECCLESTON PARK PRESCOT Postcode: L34 204	Address: Postcode:	
THE WAY AND A STREET OF THE PARTY OF THE PAR	Tel No:	
	Mobile No:	
	Email:	

Signature: Date: 11-3-19

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

	d of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗀
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. If no e-mail

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Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

	is <u>unsound</u> , is it because it is not: explanations of the Tests of Soundness	
Positively Prepared?	X	
Justified?	X	11
Effective?	X	
Consistent with National Policy?		

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	your representation is seeking a modification oral part of the examination? (the hearings in	
X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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

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Please keep a copy for future reference.

PO0431



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

Ref: LPSD

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: Roy	First name:
Last Name: MONTROSE	Last Name:
Organisation/company:	Organisation/company:
Address: 8 BUCKTHORN	Address:
Postcode: WA9 546	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 1/3/2019

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

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

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Roy and Pam Montrose's Representation and Comments

- Generally, the population of the UK has been in decline since the early 1980's so, where are all these people coming from that need housing and is not a factor in the impact of Brexit.
- According to St Helen's brownfield register there is a possibility of 5808 houses that can be built on brownfield sites.
- Table 4.6 indicates there is an additional 1,437 houses required which equates to 57 hectares of land. However, table 4.5 quotes 288 hectares, a difference of 231 Hectares?
- Currently the volume of traffic in and around the 3HS area (Eccleston Park Golf Club) is horrendous. Rainhill Road, Portico Road and Elton Head Roads are quite simply unable to absorb anymore traffic as it stands,
- Warrington Road (A57) is the only 'A' road which services the above roads, plus additional developments in Knowsley i.e. Scotchbarn Lane plus Halsnead Garden Village which comes under the umbrella of Liverpool City Regional Plan. In addition, the A57 also feeds the M62 plus traffic exiting the M62, which is very heavy at certain times of the day and night.
- The inevitable increase in traffic would also have a major impact on some of the smaller estates in the area such as: Foxwood, Kendal Drive Estate, Royal Oak Estate (Whiston) Stoney Lane, Holt Road, Mill Lane, Longton Lane and View Road.
- The Warrington Road/Rainhill junction (Skew Bridge) is listed as being a conservation area and an area of special Architecture and historic interest. So, how will this be developed to accept the huge amount of extra traffic that would be generated with the construction of more houses and a significant increase in population? There is absolutely no way that the bridge could be expanded.
- The substantial increase in traffic will have a major impact on the quality of the air and undoubtedly impact on pollution and in addition pedestrian's safety will be compromised.
- Figures taken from 2013/2015 show that the UK as a whole has an average 33.1 deaths per 100,00 people from respiratory disease in the over 75's, the North West has an average of 33.3 deaths per 100,000 while St Helens has a substantially higher average of 51.9 deaths per 100,000 people and Thatto Heath has the second highest average in the borough of St Helens. This problem will almost certainly increase with the increase volume of traffic, plus of course the extra strain on hospitals and G.P's.
- The 3HS area is a beautiful, natural cushion separating Whiston, Portico, Eccleston Park, Nutgove, Thatto Heath and Rainhill. Building and developing on these green areas would simply create on massive, sprawling area of urban dwelling. The areas affected have significant historic interest and would take away the culture and personality of the people who live there. So, the whole purpose of having a green belt would be totally invalid.
- Currently it is extremely difficult to register with a G.P. or Dentist in the area, more housing would only compound this serious and growing problem. Doctors, Dentists, Chemists and Schools would be seriously compromised.
- Sport England are still waiting for a response to their objection at Plan 1 stage to Eccleston Park Golf Club having it's status changed from that of a Golf Club. St Helens Council have neither upheld this objection nor resolve it which they are obliged to do.
- The parcel of land within the 3HS area supports many species of fauna and flora and there
 are more than 13 species that are deemed 'protected'
- There is no statement of common ground with any of the neighbouring authorities.





I give my explicit permission for my name to be included in this response document having worked together and agreeing with the response.

Mrs Pamela Montrose, 8 Buckthorn Gardens, St Helens, WA9 5UG.



P106 22011

PO0432

D-LPAOS Q-Para 172 DTC



629

1 3 MAR 2019

Ref: LPSD

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Title: Mrs	Title:	
First Name:	First name:	
Last Name:	Last Name:	
Organisation/company:	Organisation/company:	
Address: 219b, Liverpool Rd Haydoch Postcode: WALL 9KX	Address: Postcode:	
AND DESCRIPTION OF THE PARTY OF	Tel No:	
	Mobile No:	
	Email:	
Signature:	Date: 8/3/19	

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	ted of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗆
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Policy	Paragraph	Plan does this repre	Sustainability	Habitats
LPAOS	/ diagram	Map	Appraisal/ Strategic	Regulation Assessment
SitezHA	, table		Environmental Assessment	Addition
Other docume document and part/section)	ents (please nam d relevant	ne		*
			DI 0000 0005	
 Do you con Please read the 	sider the St Hele	ens Borough Local or explanations of Le	Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Comp		Yes D	No □	Don't know
Sound?		Yes D	No 🗗	
Complies with Cooperate	the Duty to	Yes 🗆	No 🗗	
Please tick as ap	propriate			
5. If you consi	der the Local Pla	an is <u>unsound</u> , is it	because it is not: e Tests of Soundness	
Positively Pre			o rests or countrios	
Justified?	:			- A
Effective?		D.		
Consistent wit	th National Polic	The state of the s		
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Delake this land from the proposed removal from the Granbult

Please continue on a separate sheet if necessary

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

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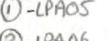
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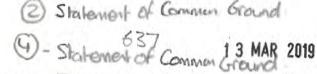
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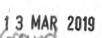
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PO0433









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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: JOSHUA	First name:
Last Name: CouchS.	Last Name:
	Organisation/company:
ASHTON IN MANCAPICID.	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11/3/19.
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Yes (via email)	Q No
ease note - email is the Council's preferred met	thod of communication. If no email address is provided,

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Local Plan

St. Helens Council

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St Helens WA10 1HP

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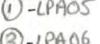
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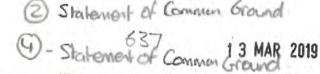
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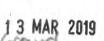
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PO0434







Ref: LPSD



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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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First Name: JOSHUA	First name:
Last Name: CouchS.	Last Name:
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PO0435

(2)- Statement of Common Ground
(4)- Statement of Common Ground
13 MAR 2019



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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title. MR	Title:
First Name: STEWART	First name:
Last Name POSTCE THWAITE	Last Namo:
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ASHTON IN MAKERFIELD	Address
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Please he aware that anenymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

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PO0436

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Title. MR	Title:
First Name: STEWART	
Last Name POSTCE THWAITE	Last Namo:
Organisation/company:	Organisation/company
ASHTON IN MAKERFIELD	Address
the state of the s	Postcode:
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7. Please set ou: what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6, above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Please delete this land from the proposed Removal From The Greenbelt Please continue on a separate street it recessary Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) Yes. I wish to participate at the oral No. I do not wish to participate examination at the oral examination 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: N/A Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

PO0437



Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: TO - ANNE	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 508 GARSWOOD RD	Address:
ASHTON IN MAKERFIELD.	
WIGAN	
Postcode: $\omega \kappa \varphi = \varphi \times \kappa$	Postcode:
	el No:
	Mobile No:
	Email:
	1
Signature:	Date: 11/3/19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's preferred meth we will contact you by your postal address.	od of communication. If no email address is provided,

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

3. To w	hich pa	rt of the Local Pla	an does this repre	y a compression of the second	
Patrcy	LPA 05 Site 1HA	Paragraph/ ciagram table	Policies Map	Sustainability Appraisal? Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/secti	on)	and the second s	
4. Do y	ou cons	sider the St Helen	s Borough Local F	Plan 2020-2035 is: Legal Compliance and t	he Tests of Soundness
-	Compli	· · · · · · · · · · · · · · · · · · ·	N.	and the second s	
Sound	>			Yes 📝 No	
Compli	es with	the Duty to Coope	rate 🔲	Yes 🔽 No	
Please	tick as a	appropriate	er er en	ner ere er	And the second s
5. If yo	u consi se read	der the Local Plai the Guidance note	n is <u>unsound</u> , is it for explanations of	because it is not: the Tests of Soundness	
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Justifie	d?				
Effectiv	e?		✓		
Consis	lent with	National Policy?	Z		
6. Plea or fa	se give	details of why yo	u consider the Loc ty to cooperate. P	cal Plan is not legally co lease be as precise as p	mpliant or is unsound ossible.
		to support the leg		soundness of the Local	Plan, please also
Green	belt land	d is NOT required. If	any future potential i	en in decline for some time. ncrease arises, the council s g current brownfield sites.	More housing on should be able to cover this
NOT no pla shops	anned or	IVE – The current in costed improvemen	frastructure in the are	ea is not suitable for an incre ctors surgery, road network r	ease in homes. There are recreation facilities or
autho	rities. G	overnment states "c	NAL POLICY – There ouncils must prioritise ncrease if new sites a	e is no statement of commor de development to brownfield are used for homes.	n ground with neighbouring land and bring life back to

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

Please keep a copy for future reference.

PO0438



Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

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

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post to:

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St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

PART B - YOUR REPRESENTATION

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

3. To w	hich pa	rt of the Local Pla	an does this repre	sentation relate?	
Policy	LPA 06 Site 1HS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/secti	on)		
				Plan 2020-2035 is: I Legal Compliance and ti	ne Tests of Soundness
Legally	Campli	ant?	V	Yes No	11 Marie Carlotte (April 1997)
Sound	>			Yes No	
Compli	es with	the Duty to Cooper	rate 🖂	Yes 🔽 No	
Please	tick as a	appropriate	-10	and a single frequency of the same the substitute of the same state of the same stat	(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)
				because it is not: the Tests of Soundness	
Positive	ly Prepa	ared?			
Justifie	d?		∇		
Effectiv	re?		V		
Consist	ent with	National Policy?	~		
6. Pleas or fa	se give ils to co	details of why you omply with the du	consider the Locaty to cooperate. P	cal Plan is not legally co lease be as precise as p soundness of the Local I	ossible.
use t	his box	to set out your c	omments.		A Security of Administration of the Control of the
Green	belt land	is NOT required. If	any future potential is	en in decline for some time. ncrease arises, the council s g current brownfield sites.	
	nned or			ea is not suitable for an incre tors surgery, road network r	
author	rities. Go	overnment states "co		e is no statement of common e development to brownfield are used for homes.	

reta inc the	mpliant or sound, having regard to the mates to soundness (NB please note that apable of modification at examination). Local Plan legally compliant or sound.	nsider necessary to make the Local Plan legally natter you have identified at 6, above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make it will be helpful if you are able to put forward your rext. Please be as precise as possible.
Pleas	e delete this land from the proposed Rem	oval From The Greenbelt
		Planse continue on a separate sheet if necessor
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8. If y the	entation at the publication stage. nis stage, further submissions will be on sues he/she identifies for examination. our representation is seeking a modificational part of the examination? (the hear! No, I do not wish to participate at the oral examination.	ation; do you consider it necessary to participate at ings in public) Yes, I wish to participate at the oral examination
8. If y the	entation at the publication stage. nis stage, further submissions will be on sues he/she identifies for examination. our representation is seeking a modificational part of the examination? (the hear! No, I do not wish to participate at the oral examination.	ation; do you consider it necessary to participate at ings in public) Yes, I wish to participate at the oral examination
8. If y the	entation at the publication stage. nis stage, further submissions will be on sues he/she identifies for examination. our representation is seeking a modificational part of the examination? (the hear! No, I do not wish to participate at the oral examination.	ation; do you consider it necessary to participate at ings in public) Yes, I wish to participate at the oral examination

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.

PO0439



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

Ref: LPSD

1 3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details		2. Your Agent's Details (if applicable) (we will correspond via your agent)		
Title:		Title:		
First Name	HAN MAN PERSON	First name:		
Last Name	MC FESAN	Last Name:		
Organisati	on/company:	Organisation/company:		
Address:	RAINFEND WALL SAP	Address: Postcode:		
		Tel No:		
		Mobile No:		
		Email:		

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

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

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens

Merseyside WA10 1HP

or by hand delivery to:

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

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or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

PART B - YOUR REPRESENTATION

developed land.

Please use a separate form Part B for each representation, and supply together with Part A so

J. IU WI	nich pa	rt of the Local	Plan	does this r	enrese	entation relate?	位 18 色。10		
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Other do docume part/sec	nt and	nts (please na relevant	me	5ACC	on so	at Neview			
4. Do yo Please re	u cons	ider the St He	lens B	orough Lo	cal Pla	an 2020-2035 i	s:	s of Soundness	
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Sound?				es 🗆			lo 🗹		
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Effective Consiste		National Police	cy?	<u> </u>					
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in any meaningful way, and have not published statement there reasons it should (ail both the tent of Soundress 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.

SHBC should amend the Plan by retaining the Green Belt, reducing the housing and employment torgets and 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)

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

Yes, I wish to participate at the oral examination

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

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

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

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PO0440



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

Ref: LPSD

1 3 MAR 2019

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title: MISS	Title:		
First Name: Lucy	First name:		
Last Name: MCFEGAN	Last Name:		
Organisation/company:	Organisation/company:		
Address: 83 HEYES AVENUE RAINFORD	Address:		
Postcode: WALL SAP	Postcode:		
Tel No:	Tel No:		
Mobile No	Mobile No:		
Email:	Email:		
Signature:	Date: 10/03/19		

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

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

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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PART B - YOUR REPRESENTATION

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

3. To wh	nich pa	rt of the Loca	I Plan	does this re-	prese	ntation relate	62	400000000		V-, 2) 87 LY 600	
Folicy		/ diagram / table	/	Policies Map	/	Sustainabil Appraisal/ Strategic Environment Assessment	lity ntal	~	Habitats Regulation Assessme		
Other do documer part/sect	nt and	its (please na relevant	ime	GRE	EN	BELT	S. N.	WE	W		
4. Do yo	u consi	der the St He	elens B	orough Loca	al Pla	n 2020-2035	is:				
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Sound?				s 🛘			No L				
Complies	s with th	he Duty to		s 🛘			No L				
Cooperat	te		1.0			7	No 🗷	1			
Please tick	as appr	opriate					-				
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SHBC should amend the plan by retaining the green belt, reducing the housing and employment the housing and allocating more targets and 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 medification; 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.

PO0441



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

Ref: LPSD

1 3 MAR 2019 (For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: PENNY	First name:
Last Name: MCFEGAN	Last Name:
Organisation/company:	Organisation/company:
RANFORD Postcode: WALL ZAP	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11.3.19

comments to be considered you MUST include your details above.

Would you like to be kept upon Plan 2020-2035? (namely submissector's recommendations at	dated of future stages of the St Helens Borough Local mission of the Plan for examination, publication of the and adoption of the Plan)
Yes (Via Email)	No No
Please note - e-mail is the Couladdress is provided, we will con	ncil's preferred method of communication. If no e-mail stact you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens

Merseyside WA10 1HP

or by hand delivery to:

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or by e-mail to:

planningpolicy@sthelens.gov.uk

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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

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

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

PART B - YOUR REPRESENTATION

Paragraph

Policy

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

Sustainability

Habitats

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

Policies

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

SHBC should amened the plan by retaining the green belt, reducing the housing and employment targets and allocating more previously developed land.

Please continue on a separate sheet if necessary

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

No. I do not wish to participate at the

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

PO0442





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

Ref: LPSD

3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M/	Title:
First Name: Michael	First name:
Last Name: Forsyth	Last Name:
Organisation/company: n/h,	Organisation/company:
Address: e4 Lakeside gdns Rainforch Postcode: Wall 8414	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: (2 05 19

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

Would you like to be kept upda Plan 2020-2035? (namely submi Inspector's recommendations an	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the date adoption of the Plan)
Yes (Via Email)	No 💢
Please note - e-mail is the Councaddress is provided, we will conta	cil's preferred method of communication. If no e-mail act you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone:

01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

A radically more robust ecconsider development plan realising growth across the economy rather than, not warehousing facilities fecuring more subvariable employment

The council should exhaust all brown field options before de-listing trade I green belt sices (8HA)

Comply with State issued by ONS.

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.

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

Yes, I wish to participate at the oral examination

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

PO0443



Ref: LPSD

3 MAR 2019

(For official use only)

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

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

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: FRANK ALAN	First name:
Last Name: BROAD BENT	Last Name:
Organisation/company:	Organisation/company:
Address: 2. KENWAY RAINFORD Postcode: WALL 8AX	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: (1/3/19

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 update Plan 2020-2035? (namely submiss Inspector's recommendations and	od of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan)
Yes [(Via Email)	No D
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. If no e-mail tyou by your postal address.

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Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

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Telephone:

01744 676190

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

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

PART B - YOUR REPRESENTATION

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Please use a separate form Part B for each representation, and supply together with Part A so

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PO0444

- Green Best Review 2018 744

1 3 MAR 2019



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
	Address:
Postcode: WALL ARP	Postcode:
	Tel No:
	Mobile No:
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Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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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.

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

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

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue the light of the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

PO0445

1 3 MAR 2019





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

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: NO. SECV	Last Name:
	Organisation/company:
Address: 440 Liver Decl. Road	Address:
Postcode: WALL GRD	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12-2-19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
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Yes (via email)	☐ No
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RETURN DETAILS

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

post to:

Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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

PART B - YOUR REPRESENTATION

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

Policy	LPAOS SITES 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

Matthew Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of this development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota.

2)

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by developers. It is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to

move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

PO0446

1 3 MAR 2019





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

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Last Name:
	Organisation/company:
Address: 440 Liverpool Road Haydock	Address:
Postcode: WALL GDD	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12.3.19
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be
Would you like to be kept updated of future so (namely submission of the Plan for examination, adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and
☑ Yes (via email)	□ No
Please note - email is the Council's preferred m	nethod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	LPACY SITES ZEA SEA GEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Please	tick as ap	opropriate			
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

Matthew Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

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

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue the light is the problem of the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

PO0447



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

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: DOROTHY JEAN	First name:
Last Name: OUFF	Last Name:
Organisation/company:	Organisation/company:
	Address:
Postcode: WAIL ONN 1	Postcode:
osicode. WAII 5210	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13 3 2019.
lease be aware that anonymous forms cann onsidered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

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post to:

Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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

PART B - YOUR REPRESENTATION

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

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Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 0NN

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

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are a frequently gridlocked, often putting extra unpaid hours on the working week.

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It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

PO0448

PF0687



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: DOROTHY JEAN	First name:
Last Name: Ouce	Last Name:
Organisation/company:	Organisation/company:
HAYDOCK STHELENS	Address:
Postcode: WAII ONN 1	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13 3 2019.
Please be aware that anonymous forms canno considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
✓ Yes (via email)	☐ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	1 DA	Paragraph/	Policies	Sustainability	Habitats
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Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 ONN

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

Continued from part B box 6

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PO0449





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Part B - Your Representation(s)

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Yes (via email)	□ No
Please note - email is the Council's preferred met	hod of communication. If no email address is provided,

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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

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7.	Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
1	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

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.

Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of this development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever — the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by developers. It is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to

move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Planning Failure - "Air pollution is the grossest manifestation of a failure of UK transport planning to take the environmental impacts of transport choices sufficiently into account."

"Air pollution-related morbidity and mortality are at epidemic levels - and, although less obvious, are more significant than road transport collisions as a cause of death and injury.

"There needs to be a strong political and societal commitment to protecting public health, particularly the health of children, whose life chances can be seriously compromised by exposure to air pollution."

"Currently, air pollution is a shared priority between Defra and the Department for Transport, but shared priority does not mean equal priority. Transport policy and planning has instead prioritised safety and economic growth."

That pollution is estimated to shorten the lives of more than 50,000 people a year.

This is far higher than the number of deaths caused by traffic accidents (1,713 in 2013) - yet road safety is a much higher priority for planners than pollution, the researchers say.

Dr Tim Chatterton and Professor Graham Parkhurst - 30 August 2016

The estimate for the UK is that 50,000 people die every year with conditions linked to polluted air and earlier this year the World Health Organisation warned that air pollution was leading to as many as three million premature deaths every year.

Air pollution was linked to a significant increase in the risk of Alzheimer's disease by a major study published in 2015, while other research showed brain damage related to Alzheimer's disease in children and young adults exposed to air pollution. Air pollution has also been linked to dementia in older men and women.

Air pollution is a global health crisis that kills more people than malaria and HIV/Aids combined and it has long been linked to lung and heart disease and strokes. But research is uncovering new impacts on health, including degenerative brain diseases such as Alzheimer's, mental illness and reduced intelligence.

Toxic nanoparticles from air pollution have been discovered in human brains in "abundant" quantities, a newly published study reveals.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

PO0450



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mus	Title:
	First name:
	Last Name:
	Organisation/company:
Address: 440 hiverpool Rd Pentall Haydock	Address:
Postcode: WAII 9RP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12 · C 3 · 19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Nould you like to be kept updated of future stage namely submission of the Plan for examination, pube adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? olication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred methore will contact you by your postal address.	od of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To w	hich part of the Local Pla	an does this repres	sentation relate?	1 1 1 X X
Policy	LPA04 Paragraph/ SITES diagram table 5EA 6EA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	documents (please name nent and relevant part/secti	on)		
4. Do y	rou consider the St Helen se read the Guidance note	s Borough Local P for explanations of	lan 2020-2035 is: Legal Compliance and	d the Tests of Soundness
Legally	Compliant?	Y	es No	Don't know
Sound'	?	□ Y	es No	
Compli	ies with the Duty to Cooper	rate Y	es No	
Please	tick as appropriate			X
Positive Justifie Effectiv		년 (국		
	tent with National Policy?			
or fa	se give details of why you ils to comply with the du u wish to support the lega this box to set out your c	ty to cooperate. <u>Plea</u> al compliance or se	ease be as precise as	possible.
the sof	the Of Hele anst reside provide production e	nost con us region its wishes to ho	s, has a h They sh with obt	utory of going outd be mad ained its

7. Please set out what modification(s) you consider a compliant or sound, having regard to the matter you relates to soundness (NB please note that any not incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text.	ou have identified at 6. above n-compliance with the duty to ll need to say why this modified he helpful if you are able to pe Please be as precise as poss	where this o cooperate is ication will make ut forward your ible.
Relete this land from from the Greenbelt.	the proposed	remx va

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 a	t the oral part of the	examination, pleas	se outline why yo	u 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.

Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

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

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in constant gridlock, often putting unpaid extra hours on the working week.

Additional warehouse development will vastly increase traffic volume to unprecedented levels on an already congested, over-stretched highways system that still has to account for an additional (under) estimated 6700 vehicle movements a day, generated by the opening of the newly built inappropriate warehouse development adjacent to the proposed removal of Greenbelt for warehouse development.

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

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such significant additional development is highly likely to generate.

The visual impact from Liverpool Road/Garswood Road will be severe. Current protected countryside views to be replaced by sizeable warehousing and will take many years for proposed landscaping works to shield. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in the future.

The development would be an additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest

(5)

impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. This development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is a big issue for me I need to wear ear plugs to enhance my chances of undisturbed sleep from traffic noise during the early hours. And entering and exiting my access road (see paragraph below) is very difficult and extremely dangerous as it is.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

(1)

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Development of this Green Belt will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the

environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

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"Air pollution-related morbidity and mortality are at epidemic levels - and, although less obvious, are more significant than road transport collisions as a cause of death and injury.

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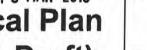
"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

PO0451

1 3 MAR 2019

Ref: LPSD

PF0690





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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: Duffy	Last Name:
	Organisation/company:
Address: 440 Liverpool Road Haydock, Penifull St. Helens	Address:
Postcode: WAII GRP	Postcode:
CHILD AND AND AND AND AND AND AND AND AND AN	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 02 19.
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred method we will contact you by your postal address.	od of communication. If no email address is provided,

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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

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

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

PART B - YOUR REPRESENTATION

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		ACTA TO CONTROL OF SHELL SHELL SHAND	r does time repre	sentation	relater		
Policy	LPAOY Sites ZEA SEA GEA	Paragraph/ diagram table	Policies Map	App Stra Envi	tainability raisal/ tegic ronmental essment		Habitats Regulations Assessment
		ts (please name elevant part/sectio	n)				
		der the St Helens ne Guidance note f				d the Tes	ats of Soundness
Legally	Complia	nt?		Yes	☐ No	Don't	Know
Sound	•			Yes	☑ No		
Compli	es with th	e Duty to Coopera	te 🔲	Yes	☑ No		
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	gested revised wording of any policy of the this land from the propo	sed removal from the Greenbelt
		Please continue on a separate sheet if necess
d ISS	ues he/she identifies for examination.	
B. If yo		ation; do you consider it necessary to participate a ings in public)
8. If yo	our representation is seeking a modifica	ation; do you consider it necessary to participate a ings in public) Yes, I wish to participate at the oral examination
8. If you the	our representation is seeking a modification or all part of the examination? (the hear No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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8. If yo the	our representation is seeking a modificational part of the examination? (the hearing No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
3. If you the	our representation is seeking a modificational part of the examination? (the hearing No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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.

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

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

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue the light of the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

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If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*



PO0452

()-LPAOS (2)- Statement of Common Ground

1 3 MAR 2019

Ref: LPSD

PF0691



Council

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

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at:

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Part A - Personal Details

www.sthelens.gov.uk/localplan

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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	First name:
	Last Name:
	Organisation/company:
	Address:
Haydock, Penifull, St. Helens	
Postcode: WAIIGRP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/02/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	iges of the St Helens Borough Local Plan 2020-2035? Sublication of the Inspector's recommendations and
✓ Yes (via email)	☐ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

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3. To w	hich par	t of the Local Pla	an does this repre	sentation relate?	
Policy	LPAOS Site 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		s (please name elevant part/secti	on)		
				Plan 2020-2035 is: Legal Compliance a	nd the Tests of Soundness
Legally	Complia	nt?		Yes 🔲 No	Not Sure
Sound	?			Yes 💟 No	
Compli	es with th	e Duty to Cooper	rate 🔲	Yes ☑ No	
Please	tick as ap	propriate			
Justified Effectiv	e?				
Consist	ent with r	National Policy?			
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he r	elease	the great	belt will can	use significant	han to the

- CAT	gested revised wording of any policy of the this land from the proposition	ed removed from the Greenbelt
		Please continue on a separate sheet if necess
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ormat I not r orese ter th id iss 3. If yo the	ion necessary to support/justify the repre- normally be a subsequent opportunity to re- normally be a subseque	ccinctly all the information, evidence and supporting sentation and suggested modification, as there make further representations based on the original ally at the request of the Inspector, based on matter ation; do you consider it necessary to participate angs in public) Yes, I wish to participate at the oral examination

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

Please keep a copy for future reference.

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

1800756M

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

Should this land be released from the Greenbelt, the proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unmanageable levels on an already congested, over-stretched highways system.

The proposal to remove this land from the Greenbelt for development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed contentious warehouse development on Florida Farm North (opposite the greenbelt site set aside for 522 houses), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of releasing this greenbelt for development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota. There is no need to release this land from the Greenbelt.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

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PO0453

1 3 MAR 2019



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

Ref: LPSD

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PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ablication of the Inspector's recommendations and
Yes (via email)	□ No

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St. Helens Council

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Policy	10	Paragraph/	Policies	Sustainability.	Hebitete
Policy	LPAOS SITE 2HA	Paragraph/ diagram table	Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please name elevant part/section	on)		
				Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally	Complia	nt?		Yes No Do	ON'T KNOW
Sound?				Yes ☑ No	
Compli	es with th	e Duty to Coopera	ate .	Yes 🔽 No	
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relations the sug	npliant or sound, having regard to the nates to soundness (NB please note that apable of modification at examination). Local Plan legally compliant or sound. gested revised wording of any policy o	onsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.
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		Please continue on a separate sheet if necessary
eprese After th and iss 8. If ye	ntation at the publication stage. is stage, further submissions will be or ues he/she identifies for examination.	make further representations based on the original nly at the request of the Inspector, based on matters sation; do you consider it necessary to participate at rings in public)
✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
	ou wish to participate at the oral part o s to be necessary:	f the examination, please outline why you consider
Please	note the Inspector will determine the mosed that they wish to participate at the oral	st appropriate procedure to adopt to hear those who hav part of the examination

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Shaun Duffy

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Continued from part B box 6

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St Helens does not need so many houses, the growth in the borough does not justify the extra house building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from Council Tax). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

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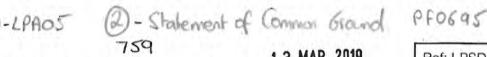
The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.



PO0454



Council



1 3 MAR 2019

Ref: LPSD

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PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Vould you like to be kept updated of future st	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (□ No

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SHEILA LILLEY

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Policy LPOS SITE 24A	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section)			
	consider the St Helens B ad the Guidance note for		lan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
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Sound?	To with the		es No	
Complies w	ith the Duty to Cooperate	□ Y	es 🗆 No	
Please tick	as appropriate			×
Please re	nsider the Local Plan is ad the Guidance note for			
Positively Pr	repared?			
Justified?		4		,
Effective?	with National Policy?	14		
or fails to	comply with the duty to	o cooperate. Ple	al Plan is not legally com ase be as precise as po	ssible.
use this b	box to set out your com	ments.	to Africt pred	
	. The population of	St Melens ho	to diffict proof of section	eince 1981.
estimates.		Al Ad alua	ys be developed be	ifere Greenbelt.
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

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Sheila dilley

· Monda Farm 2HA

Haydock is a mess, traffic is horrendows, gridlocked, Can parked everywhere on the main road through Haydocal, partled on pavements, right up to to affichights Busses can't get through easily, it's like being on the

I odgen cars going through Haydockand all this even before these Huge Warehouses are

even running. It's a disgrace, Haydock is being dumped on from see Sides, there is disruption

everywhere, there are No School places, there is not

the infrastructure for any more houses, what about

Medical centres Joeton Jentists etcetc.

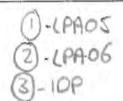
I shudder to think what the roads around Hay dock where he like when the eyesore wasehouses are operating, you won't be able to move in Haydock, or the East Lanes road, or Liverpool Rd, Millfield Lane etc etc etc

Everyone I speak to Shake their heads and say Not more Houses that means more cars!!!!

ENOUGH is ENOUGH

PO0455





(4)-Para 1-7-2 OTC

1 3 MAR 2019

Ref: LPSD

(For official use only)

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Neil	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address: Postcode:
Postcode:WA10 6HJ	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12/03/19

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

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

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Telephone:

01744 676190

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

PART B - YOUR REPRESENTATION

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

Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	entation relate? Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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Please continue on a separate sheet if necessary

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	your representation is seeking a modification oral part of the examination? (the hearings in	
X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

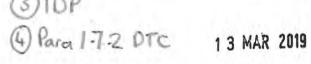
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PO0456





Ref: LPSD

Council

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Title: Mrs	Title:
First Name: Clare	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside Postcode:WA10 6HJ	Address: Postcode:
OSICOGE. VATO OTO	Tel No:
	Mobile No:
	Email:

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

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Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with

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

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

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	our representation is seeking a modification ral part of the examination? (the hearings in	n; do you consider it necessary to participate at public)
X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

9.	f you wish to pa	rticipate at the ora	part of the	examination, I	please outlin	e why you	consider
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PO0457

775

1 3 MAR 2019

Ref: LPSD



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3. 10 Which	part of the Local F	lan does this rep	resentation relate?	1	
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4. Do you o	consider the St Hel	ens Borough Loca or explanations of	al Plan 2020-2035 is: Legal Compliance and	the Tes	ts of Soundness
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Complies with the Duty to Cooperate		Yes □	NO	No.A	
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NA

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

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Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidlines and are extremely aspirational, ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

The Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meetings stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the following matters:

Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

Traffic Issues and Duty to Cooperate

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. The plans also show a planned route for walkers and cyclist along Calderhurst Road to Bleak Hill road where there is a traffic problem with school parking. I fear that these plans will be altered to allow access/egress for the new home residents.

Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

This is echoed in the Council's own proposed submission draft (LPO1 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity and to visit local supermarkets.

Taking into account these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure.

Yours sincerely

Mrs B Worrall

10 Calderhurst Drive

St Helens WA10 6ED

(5)

LP?





PO0458

1 3 MAR 2019





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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)			
Title: 112.5	Title:			
First Name: 1RENZ	First name:			
Last Name: 0 X Foro	Last Name:			
Organisation/company:	Organisation/company:			
MINDLE	Address:			
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considered you MUST include your details above.				
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Yes (via email)	☐ No			
	thod of communication. If no email address is provided,			

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

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I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy.

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

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Employment Land

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. For this reason I believe that the plan has not been positively prepared.

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

Brownfield sites

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

Traffic Issues

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

6

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines — (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"



This is echoed in the Council's own proposed submission draft (LPO1 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.



Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.



I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

SUCACIONO.

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours Sincerely

Mrs I M Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

PO0459

778

1 3 MAR 2019

Ref: LPSD



www.sthelens.gov.uk/localplan

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SEE ATTACHED

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PO0460

PF0752



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Title: MR	
First Name: ANOREW TOTEPH	First name:
Last Name: GREEN	Last Name:
Organisation/company	Organisation/company:
Address: PLAS-Y- NAIST 339 WALLERS LANE MIC	Address:
LELLEAD EREEN ST HELE	20
Postcode: WA9 4AQ	
	Tel No:
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PO0461

1. LPA06 2. Para 172 DTC

1 3 MAR 2019



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W15

Ref: LPSD

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First Name: UESSICA	First name:
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Organisation/company:	Organisation/company:
Address: 339 WALKERS LANE,	Address:
Postcode: WA9 4AQ	Postcode:
	Tel No:
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Please note - email is the Council's preferred me we will contact you by your postal address.	thod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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FURTHER INFORMATION

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PART B - YOUR REPRESENTATION

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

Other documents (please name	
document and relevant part/section)	
	الحدود (
4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Sound Output Description:	dness
Legally Compliant? Yes No	
Sound?	
Complies with the Duty to Cooperate	
Please tick as appropriate	
If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	
Justified?	
Effective?	
Consistent with National Policy?	

the Local Plan leg	ally compliant or sou	nd. It will be	I need to say why this modification will make e helpful if you are able to put forward your lease be as precise as possible.
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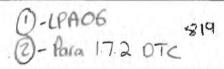
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0462



Council



1 3 MAR 2019

Ref: LPSD

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MC	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 330 walkers (one, sutan manor, st. helens	Address:
Postcode: Was 1812	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12.3.19
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Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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

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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.

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

Yes, I wish to participate at the oral examination

GOLLNBELT

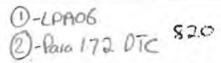
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

PO0463





1 3 MAR 2019

Ref: LPSD

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: LARS	Title:
First Name:	First name:
Last Name: GREEN	Last Name:
Organisation/company:	Organisation/company:
Address: PLAS-Y-NANT 339 WALKERS LANE, MCKLEHEAD, GREEN, ST. HELENS Postcode: WA9 4AQ	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature	Date: 7-3-19.

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

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

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Please note your representation should cover :	Please continue on a separate sheet if necessary
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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

TO SAVE OUR
GREEN BELT.
FOR FUTURE
GENERATIONS

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.

PO0464



OLPA06

Ref: LPSD

PF 0756

Statement of Common Ground 13 MAR 2019 St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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PART A - YOUR DETAILS

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title
	Title:
First Name: SC TEVAR AS E	First name:
Last Name: V3E3 · EAVESCACE	Last Name:
Organisation/company:	Organisation/company:
(TN851500)	Address:
Postcode: いいち コメブ	Postcode:
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Yes (via email)	□ No
lease note - email is the Council's preferred e will contact you by your postal address. view at http://www.legislation.gov.uk/ukpga/20	method of communication. If no email address is provided 004/5/contents

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

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PO0465

1 3 MAR 2019

Ref: LPSD



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2. Your Agent's Details (if applicable)
Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Date: コリョューフック

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

Yes (via email)

No

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Appraisal/ Strategic Environmental Assessment	3. To w	vhich pa	rt of the Local F	Plan does this	representation	relate?	
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Sound? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	Policy	کرن	diagram		Ap Stra Env	oraisal/ ategic vironmental	Regulations
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Sound? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	4. Do y	you cons	sider the St Hele the Guidance no	ens Borough Lote for explanation	ocal Plan 2020 ons of Legal Co	-2035 is: ompliance and th	e Tests of Soundness
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use this box to set out your comments.	or fa	ails to co ou wish t	omply with the c to support the le	duty to coopera egal complianc	ite. Please be	as precise as po	ossible.
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ou wish to parti	cipate at the	oral part of th	e examination,	please outline why you consider	
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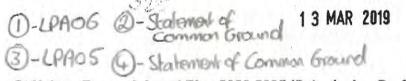
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0466





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

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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
ritle: MRS.	Title:
First Name: Soozie.	First name:
ast Name: Wulls	Last Name:
Organisation/company:	Organisation/company:
Address: 556 CARSUGGO	D Rol Address:
Postcode: WNU OXH	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
ease be aware that anonymous forms ca	annot be accepted and that in order for your

No 🗌

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RETURN DETAILS

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St.Helens Council

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or by hand delivery to:

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

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FURTHER INFORMATION

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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DATA PROTECTION

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

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Pla Policy Paragraph / diagram / table	Policies Map	1145	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				
4. Do you consider the St Helen Please read the Guidance note for	explanations	ocal Pla of Legal	Compliance and the	Tests of Soundness
Legally Compliant?	Yes 🔀	7 11 12 1	No C	THE STATE OF THE SEC.
Sound?	Yes 🗆		No 🕿	
Complies with the Duty to Cooperate	Yes 🗆		No &	
Please tick as appropriate				
5. If you consider the Local Plan				
Please read the Guidance note for			·	
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Please read the Guidance note for	D 28:			
Please read the Guidance note for Positively Prepared?	D 23.			

or fails to comply with the duty to cooperate. Please be as precise as possible.

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

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

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

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6, above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down.

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incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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

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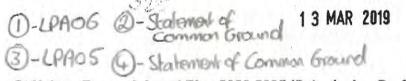
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PO0467





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

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PART A - YOUR DETAILS

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

Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
ritle: MRS.	Title:
First Name: Soozie.	First name:
ast Name: Wulls	Last Name:
Organisation/company:	Organisation/company:
Address: 556 CARSUGGO	D Rol Address:
Postcode: WNU OXH	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
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Please use a separate copy of Part B for each separate comment/representation.

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Policy Paragra / diagra LPAOS / table		es 	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (pleas document and relevant part/section)	se name		4 10	
4. Do you consider the				realized to the second
Please read the Guidance Legally Compliant?	Yes 🗷	is of Lega	No -	ests of Soundness
Sound?	Yes 🗆		No.	
Complies with the Duty Cooperate	1,00		No 🕏	
5. If you consider the Lo Please read the Guidance Positively Prepared?	note for explanation	nd, is it be ns of the T	cause it is not: ests of Soundness	
Justified?	Bar			
Effective?	- X			
Consistent with Nationa				
6. Please give details or or fails to comply with the lift you wish to support the box to set out your com	e duty to cooperat	e. Please	be as precise as po	
Not justified-the council population of St Helens One of the purposes of	has declined since	1981. W	here are all the extra	a people coming from?

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school —

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

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Please continue on a separate sheet if necessary

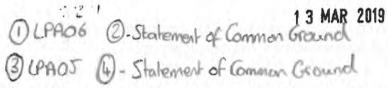
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PO0468





Ref: LPSD

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: AR	Title:
First Name: ALAN	First name:
ast Name: JONES	Last Name:
Organisation/company:	Organisation/company:
Address: 6. SMOCK LANE. Postcode: GARSWOOD, WN4	Address: Postcode:
ollows.	Tel No:
	Mobile No:
	Email:
Signature	Date:
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Plan 2020-2035? (namely submission of the Plan for examination, publication of the

No 17

Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

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Policy	Part of the Local F Paragraph / diagram / table	Policies Map	Sustainal Appraisa Strategic Environm Assessm	bility l/ nental	Habitats Regulation Assessment
	ments (please nam and relevant b)	ie	11		
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No, I do not wish oral examination	to participate at the	Yes, I wish to participate at the oral examination

oral part of the

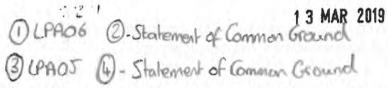
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PO0469





Ref: LPSD

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Title: AR	Title:
First Name: ALAN	First name:
ast Name: JONES	Last Name:
Organisation/company:	Organisation/company:
Address: 6 SMOCK LANE. Postcode: GARSWOOD, WN4	Address: Postcode:
ollows.	Tel No:
	Mobile No:
	Email:
Signature	Date:
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Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@s:

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FURTHER INFORMATION

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planningpolicy@

Telephone:

01744 676190

NEXT STEPS

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PART B - YOUR REPRESENTATION

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3. To which	part of the Local	Plain does this rep	resentation rel	ate?	
Policy	Paragraph / diagram / table	Policies Map	Sustaina Appraisa Strategic Environn Assessm	bility l/ nental	Habitats Regulation Assessment
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will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school —

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

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 pit forward your suggested revised wording at any policy or text. Please be as precise as per lible.

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PO0470



3-LPAOS Q-Statement of Common Ground.

3-LPAO6 Q-Statement of Common Ground.

Ref: LPSD

Council

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

PART A - YOUR DETAILS

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

Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address: Postcode:
Tel No:
Mobile No:
Email:
Date: 10.03.19

comments to be considered you MUST include your details above.

Would you like to be kept upda Plan 2020-2035? (namely submit Inspector's recommendations and	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the data adoption of the Plan)
Yes (Via Email)	No 🗌

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PO0471



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

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Plan 2020-2035? (namely submis Inspector's recommendations and	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the data adoption of the Plan)
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Policy UP A O	Paragraph / diagram / table	Policies Map	1 HS	Sustainability	Habitats Regulation Assessment
Other docume document and part/section)	ents (please nam i relevant	ne			
4. Do you con Please read the	sider the St Hele Guidance note:	ens Borough L for explanations	ocal Pla of Lega	an 2020-2035 is: I Compliance and the	Tests of Soundness
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		V		No S	
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Please continue on a separate sheet if necessary

7

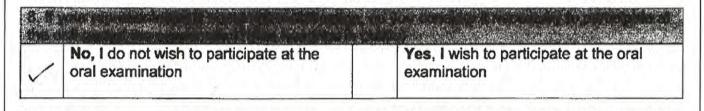
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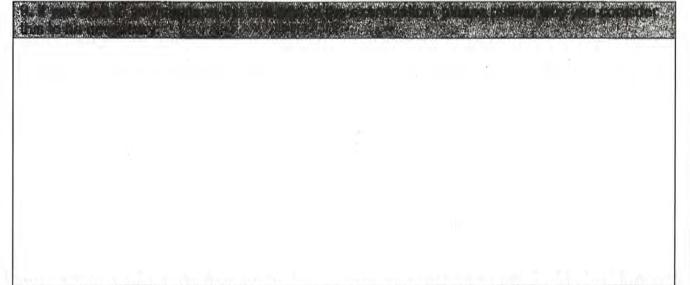
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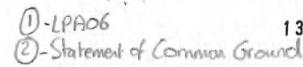
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PO0472





1 3 MAR 2019

Ref: LPSD

Council

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mRS	Title:
First Name: Free Last Name: GENT	First name:
Last Name: GENT	Last Name:
Organisation/company:	Organisation/company:
Address: 33 GIRVAN CRESCENT GARSNOOD, WIGAN.	Address:
Postcode: WN4 035	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 7/3/2019

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

Would you like to be kept update	ed of future stages of the St Helens Borough Local
Plan 2020-2035? (namely submiss	sion of the Plan for examination, publication of the
Inspector's recommendations and	adoption of the Plan)
Yes (Via Email)	No 🗌

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Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
	uments (please nam and relevant n)	е			
Please read	the Guidance note fo	or explanations of L	Plan 2020-2035 is: egal Compliance and the	Tests of Soundness	
Legally Co	mpliant?	Yes 🗗		No C	
Sound?		Yes 🗆		No S	
Complies v	with the Duty to	Yes 🗆	No 🕿	No 🕿	
Cooperate					
	s appropriate				
Please tick a 5. If you co Please read	s appropriate ensider the Local Pla I the Guidance note fo	in is <u>unsound,</u> is it	because it is not: e Tests of Soundness		
Please tick a 5. If you co Please read Positively I	s appropriate ensider the Local Pla I the Guidance note fo	in is <u>unsound,</u> is it or explanations of th	because it is not: e Tests of Soundness		
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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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	() o you conside it hecoesery to participate at public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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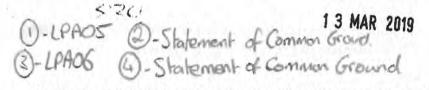
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PO0473





Ref: LPSD

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Title: MR	Title:
First Name: CLICISTOPHER	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 398 GARSWOOD R	Address:
Postcode: WN 4 OTZ	Postcode:
Charles and Charles	Tel No:
	Mobile No:
	Email:
Signature:	Date: 10 3.19

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Plan 2020-2035? (namely submiss Inspector's recommendations and a	d of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the idoption of the Plan)
Yes 🛛 (Via Email)	No 🗌

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Policy Paragraph / diagram / table	Policies Map	IHA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)	9				
4. Do you consider the St Hele Please read the Guidance note fo	r explanations o		Compliance and the	Tests of Soundness	
Legally Compliant?	Yes 🔀		No 🗆	COLUMN TO THE OWNER OF THE PARTY OF THE PART	
Sound?	Yes 🗆		No 🕏		
Complies with the Duty to Cooperate	Yes 🗆	Yes 🛘		No 🔄	
E Myou consider the Level Die	n is <u>unsound,</u> i	is it bed	cause it is not:		
Please read the Guidance note for Positively Prepared?	r explanations o	n the re	idea or occurrence		
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5. If you consider the Local Planing Planse read the Guidance note for Positively Prepared? Justified? Effective? Consistent with National Policy	□ 85 85	a tho se	and of Sourialious		

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

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

Please continue on a separate sheet if necessary

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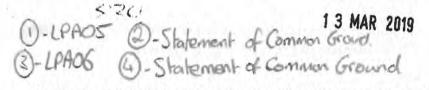
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PO0474





Ref: LPSD

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

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CLICISTOPHER	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 398 GARSWOOD R	Address:
Postcode: WN 4 OTZ	Postcode:
Charles and Charles	Tel No:
	Mobile No:
	Email:
Signature:	Date: 10 3.19

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

Plan 2020-2035? (namely submiss Inspector's recommendations and a	d of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the idoption of the Plan)
Yes 🛛 (Via Email)	No 🗌

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

RETURN DETAILS

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Local Plan

St. Helens Council

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01744 676190

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

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

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

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Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests Legally Compliant? Yes No Complies with the Duty to Yes No Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy?	Assessment
Please read the Guidance note for explanations of Legal Compliance and the Tests Legally Compliant? Sound? Yes No Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? Sound Plan is not legally complete.	
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Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally complete.	
6. Please give details of why you consider the Local Plan is not legally compl	
6. Please give details of why you consider the Local Plan is not legally complete fails to comply with the duty to consider the Local Plan is not legally complete.	
or fails to comply with the duty to cooperate. Please be as precise as possible	e.
If you wish to support the legal compliance or soundness of the Local Plan, p box to set out your comments	lease also use u

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Please continue on a separate sheet if necessary

7:

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

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Please keep a copy for future reference.

PO0475



Council

D-LPAOS Q- Skatement of Common Ground

Ref: LPSD

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Title:	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Postcode: WNLEXS	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:

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Inspector's recommendations and a	of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption of the Plan)
Yes 🔀 (Via Email)	No 🗌

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3. To which part of the Loca Policy Paragraph	Policies	Sustainability	Habitats
LPACE I HA / table	Map I HIA	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
Other documents (please na document and relevant part/section)	ame		
4. Do you consider the St He Please read the Guidance note	elens Borough Local	Plan 2020-2035 is:	Tests of Soundness
Legally Compliant?	Yes 🖊	No C	
Sound?	Yes 🗆	No K	
Complies with the Duty to Cooperate	Yes 🗆	No &	
5. If you consider the Local I			
Please read the Guidance nets	for explanations of th	ne Tests of Soundness	CONTRACTORS STATE
Positively Prepared? Justified?	13		
Effective?	5		
Consistent with National Pol	icy?		
6. Please give details of why or fails to comply with the du	ty to cooperate. Ple	ase be as precise as po	ssible.
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sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

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Please continue on a separate sheet if necessary

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8. If	Your representation is seeking a producation rail can of the examination? (the healings in	do you consider it necessary to participate at outbio)
×	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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Please keep a copy for future reference.

PO0476

(1)-LPAO6 (2)-Statement of Common Ground





7772

Ref: LPSD

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Title: MA	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 48 % KARI WOOD RO	Address:
Postcode: WN4 OXX	Postcode:
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	Mobile No:
	Email:
Signature:	Date:
Signature:	Date:
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Plan 2020-2035? (namely submission of Inspector's recommendations and adoptic	uture stages of the St Helens Borough Local the Plan for examination, publication of the on of the Plan)
Yes 📈 (Via Email)	No

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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 Please read the Guidance note for	explanations of Le	egal Compliance and the	Fests of Soundness
Legally Compliant?	Yes 🔏	No C	
Sound?	Yes 🗆	No	
Complies with the Duty to Cooperate	Yes 🗆	No 🗷	
Please tick as appropriate			
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5. If you consider the Local Plan Please read the Guidance note for Positively Prepared?	explanations of th	because it is not: e Teste of Soundhess	and the second s
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Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

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Please continue on a separate sheet if necessary

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1	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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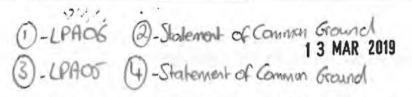
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PO0477





Ref: LPSD

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First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
Date: 0203 2019

comments to be considered you MUST include your details above.

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

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PAO6	Paragraph / diagram / table	Policies Map	IHS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other document a part/section					
Please read t	onsider the St Helen he Guidance note for	explanations of	ocal Pla of Legal	Compliance and the	Tests of Soundness
Legally Com	pliant?	Yes 🗷		No C	
Sound?		Yes 🗆	7 1	No 🗠	
Complies wi Cooperate	th the Duty to	Yes 🗆		No 🗷	
Please tick as					
	sider the Local Plan			cause it is not:	
Please read t					
Please read to Positively Pr					
Please read to Positively Projection Justified?		8			***
Please read to Positively Pr					

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

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

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9040

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other prots as we need the Green Belt for farming. There is a wide road from Billinge to the East-Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

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

10 11 (31)		
×	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

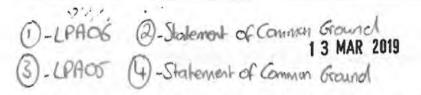
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0478





Ref: LPSD

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

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)	
Title: MRS	Title:	
First Name: LOUISE	First name:	
Last Name: WISWELL	Last Name:	
Organisation/company:	Organisation/company:	
	Address:	
	Postcode:	
	Tel No:	
	Mobile No:	
	Email:	
Signature:	Date: 02/03/2019	

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

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

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

RETURN DETAILS

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St.Helens Council

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or by hand delivery to:

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01744 676190

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Other docum document an part/section)	ents (please name d relevant					
	nsider the St Hele ne Guidance note fo	r explanatio		Compliance and the	Tests of Soundness	
Legally Com	oliant?	Yes 🗷	HAR RANGE	No C	The state of the s	
Sound?		Yes 🗆		No 🕏		
Complies with the Duty to Cooperate		Yes 🗆	∕es □		No 客	
5. If you cons	sider the Local Pla	n is <u>unsou</u>	nd, is it be	cause it is not:		
Please read 11	ne Guidance note fo	rexplanatio	ns or the T	ests or Souridness		
- A					Tak - Control to	
Positively Pro	oparou :	Det				
Positively Pro Justified?	sparou.	25				
Positively Pro Justified? Effective?	ith National Policy	23				

Not justified-the council should be put to strict proof of it's population estimates, as the

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

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

AH!

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2.9 ADS

Please continue on a separate sheet if necessary

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PO0479

ART
C. Shannan
St.Helens
Council

1-LPAOS	@-Statement of council	1 3 MAR 2	019
(3)-LPHO8	(G) - Statement of Common	Ground	Droft

Ref: LPSD

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Part A - Personal Details

Part B - Your Representation(s).

93L

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)	
Title:	Title:	
First Name: DENNIS PARTIES	First name:	
Last Name: PARKINSON	Last Name:	
Organisation/company:	Organisation/company:	
Address: 436 GARSWOOD ROAD NORTH AS 470N NEAR WIGAN Postcode: WNH OXJ	Address: Postcode:	
	Tel No:	
	Mobile No:	
	Email:	

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

Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of the Inspector's recommendations.	Plan for examination, publication of the
Yes 🔼 (Via Email)	No 🗌

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Policy Paragraph / diagram / table	Policies Map	I HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				
4. Do you consider the St Helen: Please read the Guidance note for				Tests of Soundness
Legally Compliant?	Yes 🔼		No □	
Sound?	Yes 🗆		No K	
Complies with the Duty to Cooperate	Yes 🗆		No 🗷	
Please tick as appropriate		a.U.o.		
5. If you consider the Local Plan Please read the Guidance note for				
				, p
Please read the Guidance note for				
Please read the Guidance note for Positively Prepared?	explanations o			

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

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	September 1995 and the	
×	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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PO0480

ART
C. Shannan
St.Helens
Council

1-LPAOS	@-Statement of council	1 3 MAR 2	019
(3)-LPHO8	(G) - Statement of Common	Ground	Droft

Ref: LPSD

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Last Name: PARKINSON	Last Name:		
Organisation/company:	Organisation/company:		
Address: 436 GARSWOOD ROAD NORTH AS 470N NEAR WIGAN Postcode: WNH OXJ	Address: Postcode:		
	Tel No:		
	Mobile No:		
	Email:		

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Policy Parage / diage / table		Policies Map	1 HS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (ple document and releval part/section)						
4. Do you consider the Please read the Guidan	ce note for	explanations of		Compliance and the		
Legally Compliant?	142075	Yes Xd			No 🗆	
Sound?	Tall to 1 and	Yes 🗆			No ₹	
Complies with the Duty to Y Cooperate		Yes 🗆	′es □		No 🖾	
5. If you consider the Please read the Guidan						
Positively Prepared?						
Justified? Effective?		N N				
		N N				
or fails to comply with	the duty to	cooperate.	Please	be as precise as r	compliant or is unsound possible. Plan, please also use thi	

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Please continue on a separate sheet if necessary

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PO0481

- Statement of Common Ground 13 MAR 2019



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

Ref: LPSD

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1. Your Det	ails respond via your agent)	2. Your Agent's Details (if applicable)
	Mes ·	Title:
First Name:	CAROLE	First name:
Last Name:	WILSOM	Last Name:
Organisation	n/company:	Organisation/company:
		Address:
	CAR SWOOD	
Postcode:	WN4 ORP	Postcode:
		Tel No: Mobile No: Email:
Signature:		Date: 12/3/19
	are that anonymous forms cannot bu MUST include your details abo	t be accepted and that in order for your comments to be ove.
fould you like namely submedoption of the	ission of the Plan for examination	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
] Yes (via en	nail)	□ No
ease note -	email is the Council's preferred r	method of communication. If no email address is provided,

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3. To which	part of the Local Plan	does this repre	esentation relate?		1
Policy PAO5	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
	ments (please name and relevant part/section	1)			
	<i>L</i>				1
	onsider the St Helens ad the Guidance note for		Plan 2020-2035 is: f Legal Compliance and th	e Tests of Soundness	
Legally Con	and the second			N'T KNOW	
Sound?	114020.11		Yes No		
Complies w	ith the Duty to Cooperat	e 🗆	Yes No		
Please tick	as appropriate				
Please re- Positively Pr Justified? Effective?	repared?		because it is not: f the Tests of Soundness		
Consistent v	with National Policy?	<u> </u>			
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. DELETE THIS LAND FROM THE PROPOSED REMOVAL 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) Yes, I wish to participate at the oral No, I do not wish to participate examination at the oral examination 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

Please keep a copy for future reference.

1 3 MAR 2019

PFOT72



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your De	tails respond via your agent)	2. Your Agent's Details (if applicable)
	MRS	Title:
Last Name:	WILSON	First name:Last Name:
Organisatio	on/company:	Organisation/company:
Address:		Address:
	GARCIANTA N	
	WN4 ORP.	
		Tel No:
		Mobile No:
		Email:
Signature:		Date: 12[3]19
lease be aw onsidered yo	are that anonymous forms cannot ou MUST include your details abo	t be accepted and that in order for your comments to be ve.
	nission of the Plan for examination	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via e	mail)	□ No
lease note -	email is the Council's preferred ret you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

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

post to:

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

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

5. NO STATEMENT OF COMMON GROUND WITH WIGHT ABC.

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

3. To which	part of the Local Pla	an does this rep	resentatio	relate?		
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. DELETE THIS LAND FROM THE PROPERTED 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 Yes, I wish to participate at the oral at the oral examination examination 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have

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

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

Please keep a copy for future reference.

1) - LPAO4 2) - LPAO5 3) - LPAO6

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838 13 MAR 2019



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

Ref: LPSD

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Michael	First name:
Last Name: Greenacre	Last Name:
Organisation/company:	Organisation/company:
Address: 57, Springfield Lane, Eccleston, St Helens. Merseyside Postcode: WA10 5HB	Address: Postcode:
	Tel No.
	Mobile No:
	Email:
Signature	Date: 12 th March 2019

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

	d of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan)	
Yes XX (Via Email)	No 🗔	

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

PART B - YOUR REPRESENTATION

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

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

There are a number of key fundamental factors that make the LPSD a flawed plan. In the following pages I have tried to focus on these key factors but with brief mention on other elements that support the case against the LSPD. Again it is important to emphasise that I support the need for a development plan but this revised plan has taken little or no account of residents views and is not based on genuine need that is sustainable nor justified because of the use of biased and exaggerated data that has been used to create this plan in its current format rather than have data that informs the plan

DEFENDING OUR GREEN BELT

- From the original plan and following consultation over 5500 residents submitted their views of which over 90% were against the plans strategy.
- A number of campaign Groups were formed to campaign against the plan where significant tranches of Green Belt {GB} land were being proposed for mainly housing development.
- ECRA alone has over 1000 members as defined on its Facebook site which is by invitation only
- ECRA has an active website that was set up to keep local residents informed about progress, actions and outcomes – ecra.org. The site also highlights ECRA's professional approach by the appointment of highly qualified Planning, Demographic and Economic specialist's in support of its opposition against the LPSD.
- I am strongly opposed to Industrial and Housing Development on GB land where it can be clearly demonstrated that the need doesn't exist and where to remove such GB land even to a "Safeguarded" status at this time is completely unnecessary.

KEY OBJECTIONS TO SHLPSD

- 1. The need to co-operate fully with other local councils appears not to have been followed and no statement showing common ground is in evidence -
- There is a standard method for calculations that can only be varied by the
 justification of "exceptional circumstances". I do not believe this plan has
 demonstrated there are any.
- 3. The fundamental Economic strategy is based on significantly over optimistic assumptions, using out of date forecasts to justify the Councils assertion that there is a clear need to include Green Belt land in its longer term plan both now and beyond 2035. The main ECRA submission deals with this in detail and concludes there is no justification for changing GB boundaries.

- There is little indication as to how the new plan will deal with the demand for additional school places – trying to cope with thousands more children.
- Flooding has also been identified as a potential hazard on the 8HS site although I would believe that this could be overcome. Again this is covered in more detail in the ECRA submission.
- Then there is the impact on wildlife if Green Belt land is allowed to be developed. Again this is covered in the ECRA documents

SUMMARY OF KEY ISSUES WITH THE REVISED SHLPSD

There are a significant number of key issues that have not been answered by the new LPSD. It is all very fine to have the aspirations that form the core of this new plan for growth but the devil lies in the detail and there is not enough detail to provide any certainty that this plan will deliver over the 15 year period.

A far more realistic approach must be taken – yes to positively grow the town and re-develop its economy – but with goals that are achievable, meets the aspirations of residents already living here, creates an environment that feels like a good place to live and one that retains and respects the green spaces around the town without restricting a realistic growth and development strategy.

These are my summary considerations that support my view that the current revised LPSD should not be approved in its current form.

- 1. There is clear evidence that the plan is not Legally Compliant
- The plan fails to fully comply with the Duty to Cooperate cross border collaboration.
- The plan is not justified nor will it be effective based on the current exaggerated aspirations based upon using incorrect current data
- Significantly there are a number of areas where the plan is not consistent with NPPF 2018 guidelines
- 5. The whole question of Sustainability whether it be transport or houses is conflicted and somewhat vague as well as being based on highly aspirational goals for employment thus population growth and hence the need for very significant housing development.
- 6. The plan has economic growth predictions job increases based on unachievable targets driven again by using historical data. There is undoubtedly room for growth in employment resulting in increased population but nowhere near the predicated targets. The current population of the town has remained almost static for at least 8 years. [1981 population 191'000; 2011 population 176'000]
- The plan's assessment of Housing Need requirements does not use Standard Methodology to arrive at its forecast and then fails to justify a





PF0788





St Helens Borough Local Plan 1 5 MAR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Mangaret	First name:
Last Name: Commings	Last Name:
Organisation/company:	Organisation/company:
Address: 348 Carswood Pd Carswood	Address: .
Postcode: WN4 077 -	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11-3 2019
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	e accepted and that in order for your comments to be
ould you like to be kept updated of future sta	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferrame	thod of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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PART B - YOUR REPRESENTATION

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3. To w	hich par	rt of the Local	Plan d	loes this repre	sentation relate?	
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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Please also rea	nd the Representations the lens.gov.uk/lo	ation Form Guidance Note that is available v	with this form, or
Please ensure	the form is returne	ed to us by no later than 5pm on Wednesda	y 13th March
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1. Your Deta	ails	2. Your Agent's Details (
Title: MRS		(we will correspond via your a	gent)
First Name:		First name:	
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Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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01744 676190

NEXT STEPS

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DATA PROTECTION

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

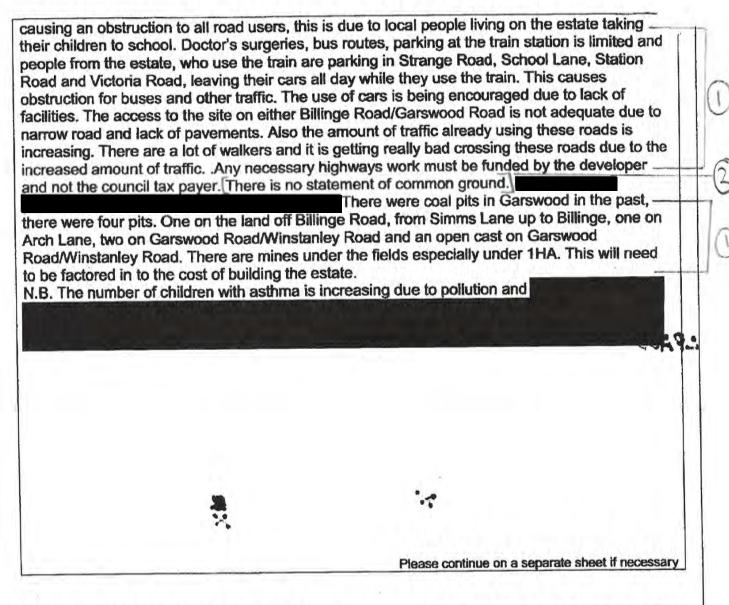
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PART B - YOUR REPRESENTATION

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

-PADS	/ diagram / table	Policies Map	1HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other docur document a part/section		ie				
4. Do you co	onsider the St Hele	ens Borough L	ocal Pla	n 2020-2035 is:		_
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estate as the school run on the estate is very chaotic, with cars parked around the school



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 they this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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	-Statement of Co	ommon Ground	2 4 APR 2019
St.Helens		Local Plan 2020-2035 (Submission Draft)	/F
Council	Repres	entation (i.e. Comment) Form	(For official use only)
Please also read online at <u>www.st</u> l	I the Representation helens.gov.uk/localpl	Form Guidance Note that is available w	rith this form, or
Please ensure th	e form is returned to ments received afte	us by no later than <u>5pm on Wednesday</u> r this deadline <u>cannot</u> be accepted.	13th March
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Policy LP AO6	Paragraph / diagram / table	Policies Map	145	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
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Please read t		or explanations	ocal Pla	in 2020-2035 is: Compliance and the	Tests of Soundness	
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One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school —



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. There were coal pits in Garswood in the past. there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1H/S This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and Please continue on a separate sheet if necessary

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	Please continue on a separate sheet if neces d cover succinctly all the information, evidence and
nodification, as there will not normally b	oport / justify the representation and suggested be a subsequent opportunity to make further
epresentations based on the original re	presentation at the publication stage.
n matters and issues he/she identifi	will be only at the request of the Inspector, based ies for examination.
df your representation is seeking a more oral part of the sexamination? (the he	odification; do you consider it necessary to participate
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7 17115 8 111-177 3-13-17	art of the examination please outline why you consid
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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Yes (via e-mail)

Representor Details

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

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

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

Is locally as well and	Jean 1 Iun 2020-2033.
Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared In fact too positive, leading to over-planning for jobs and housing.
- b) Justified jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances;
- c) Effective the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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

The economic analysis is flawed and based on over-optimistic assumptions

2

The level of land needed for housing and employment is therefore not as high as set out in the Plan

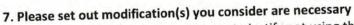
There are therefore no exceptional circumstances to change Green belt boundaries Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

10

(10)

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

Traffic & congestion are already a serious issue for Rainford residents, with the village 1.7 situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.



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Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

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The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPPO) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is been allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

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

Representor Details

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

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Yes (via e-mail)

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

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

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

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

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

2

Other reasonable alternatives have not been fully explored, including lower target figures J) and using more previously developed land and remedial work to bring back into use land currently classified as contaminated



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

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

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes. In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

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





O-LPAOS Q-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0086	
Type of Submission	Web submission	
ull Name	Mr Marc Gill	
Organisation	N/A	

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Yes (via e-mail)

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

LPA06	
3HS	
X	
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Is sound?	No
Complies with the duty to cooperate?	No

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The plan to remove eccleston park golf club from green belt to potentially be built on is wrong.

- The local infastructure is already at breaking point. I live in rainhill which borders eccleston park golf club and the traffic is already terrible, especially in the mornings and evenings so even more homes will cause even greater chaos. Two butt lane and holt lane are often congested. Warrington road going over the bridge, through rainhill village and connecting to the M62 is always congested.
- Trying to get an appointment at the doctors is already impossible so even more people would make it worse.
- The local schools are already at capacity so I don't know where the children would go?
- 2 Housing developments are already being built on scotchbarn lane in knowsley just down the road—from the golf club. Also 2/3 more on carr lane in knowsley in prescot is being built. Also halsnead village is being proposed in knowsley in whiston which is a huge housing development. All this housing in such a small area is a huge strain on the local area and I doubt st helens council and knowsley council have communicated with each other about all their planned developments/green belt removing. Surely if they had they would agree the area is becoming saturated will housing.
- The golf course acts as an area that splits rainhill/whiston/eccleston/thatto heath, removing it from green belt and building on it would make it one large urban sprawl causing so much strain as already mentioned.

- Mulberry homes have already purchased the site even though it is in greenbelt and there have been many meetings between st helens council and mulberry homes alot of which were unminuted. I find this highly suspicious and I am uneasy with these meetings and the fact thay a housing company has bought a large piece of greenbelt land which they are unable to build on and suddenly the council propose to remove the land from greenbelt staus in there local plan
- st helens population has actually decreased over the decades so i believe their is no need to build more housing in the area as their is sufficent housing stock already.
- The leader of st helens council has stated building on brownfield sites is a priority, and their is brownfield sites available which should be used first before even considering releasing greenbelt land.
- old housing on gilbert road by the new housing on scotchbarn lane have seen flooding. More housing will cause more flooding risks.
- I walk on the golf course and think it is a great recreational area that shouldnt be lost. It has a great variety of flora and fauna. I have seen bats flying over the area in the evenings and they may potentially roost in the area.
- more housing will mean more cars and more polluition causing more health problems and straining the nhs system further. Furthermore the golf course is a great green area helping against pollution and improve air quality.
- I moved from liverpool to rainhill just over 1 year ago as traffic where i lived was terrible and more homes were getting built. I moved here to provide a better quality of life for and believe that removing the golf club from green belt will be detrimental to the local area and to my future.
- I think it is irresponsible to put this plan forward with the current situation regarding brexit. You cant make a long term plan on such an important issue when we dont know the long term plan for the country. After brexit the housing situation may change, rules regarding greenbelt plans may change and to continue down a path set out in the local plan is poor planning when the actual rules for the plan may change

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

The council should not consider removing the land from greenbelt to place in safeguard. The council should delete this land from the proposed removal from greenbelt land so abiding by national planning policy framework 2019.

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

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

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

Response Date	3/13/2019 12:29:59 PM

O-LPAOS	2) LPA	06	3-GEN
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Dan	resentor	Dataile
Kep	resentor	Details

Web Reference Number	WF0094	
Type of Submission	Web submission	
Full Name	Mr Alan Ford	
Organisation		
Address	19 Fistral Drive Windle St Helens WA10 6EF	*
Agent Details	A - A - A - A - A - A - A - A - A - A -	

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Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic Environmental Assessment		
Habitats Regulation Assessment	and the other papers are been also as in the con-	
Other documents	Green Belt Review 2018, Demographer's Report, Economist Report	

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It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from it's protected status into the "safeguard" category.

- 1. It does not satisfy the requirement for Sustainable development
- 2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.
- The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.









4. It is not effective land use as it concentrates on Green Space development over town centre —	70
development with higher densities.	10
5. 8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed $ _$	
providing food security for the increased population. It should remain in Green Belt. The important	
of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial give	n (2)
the import restrictions that may be imposed following Brexit.	
6. Economic growth predictions for St Helens are based on flawed historical	7/0
data that does not justify the aspirational targets included in the plan.	
7. Adequate regional and cross border collaboration has not been undertaken.	- 1/E
8. The Housing Need assessment does not use Standard Methodology, and no	
case for exceptional circumstances has been made.	
9. The latest estimate produced by the ONS (2016) predicts that 383 houses	
per year will be required to meet housing need in St Helens. The Council	
are using an older forecast (2014) of 486.	
10. The Plan makes no mention of Brownfield and Previously Developed Land	
(PDL) that is not (yet) available or included on the Brownfield Register.	
11. The St Helens Council statement of "Contaminated Land (CL) sites" (2015)	
indicates that 3,170 ha of the lowest priority contaminated land exists in	
St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being	$ \rangle \rangle \rangle$
reclassified as safeguarded land sites and included to fulfil the housing	1
need, much less than 7% of the 3,170-ha available, if it were to be	(1)
remediated.	
12. The council in conjunction with Liverpool City Region Combined Authority	
(LCRCA) and neighbouring authorities have no policy for bringing	
'unsuitable' sites outside the Brownfield Register back into use. It is not	
reasonable to assume that sites cannot be made available within the 15-	
year plan period or the 25-year safeguarded period being considered.	
13. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated	
and Safeguarded sites is not mentioned. The negative impact on farming	
and distribution jobs is not considered.	~
14. The Borough has significant long term and intractable problems at Windle -	769
Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.	13
The Infrastructure Delivery Plan (IDP) refers to current road	1/21
improvements but does not outline how local and borough wide road	(5)
improvements are to be made and funded. The Plan promotes unsustainable	Г
traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).	2
15. The increase in traffic proposed in the Plan will have a significant impact	(3)
on air-quality, noise, tranquillity and general health. It does not promote	0
less vehicle dependency with its proposals for edge of town developments.	
16. The IDP fails to explain the impact on Healthcare and Education. The	_
current situation is touched on broadly, but how this will be managed and	3)
funded is missing or vague. There is no indication or reference to	
collaboration with the Hospital Trust, local CCGs or education authorities.	
17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the	e —
A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already	
noisy and polluted.	. 11
18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that	t /
these 1000 houses will generate. Pedestrian safety has not been considered.	San A
19. The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is	not
necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no	10
mention of previously developed town centre and low-level contaminated sites being brought ba	ck

into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough

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

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site and identify further small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

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

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

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

Response Date	3/13/2019 12:09:37 PM
Response Date	3/13/2019 12:09:37 PIVI

1-LPAOS	2)-LPA06	3-GEN
4 Para 1.7.2	OTC (S)-1	OP

Representor Details

Web Reference Number	WF0099	
Type of Submission	Web submission	
Full Name	Mrs Jacqueline Ford	
Organisation		
Address	19 Fistral Drive Windle St Helens WA10 6EF WA10 6EF	
Agent Details		

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

Yes (via e-mail)

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

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

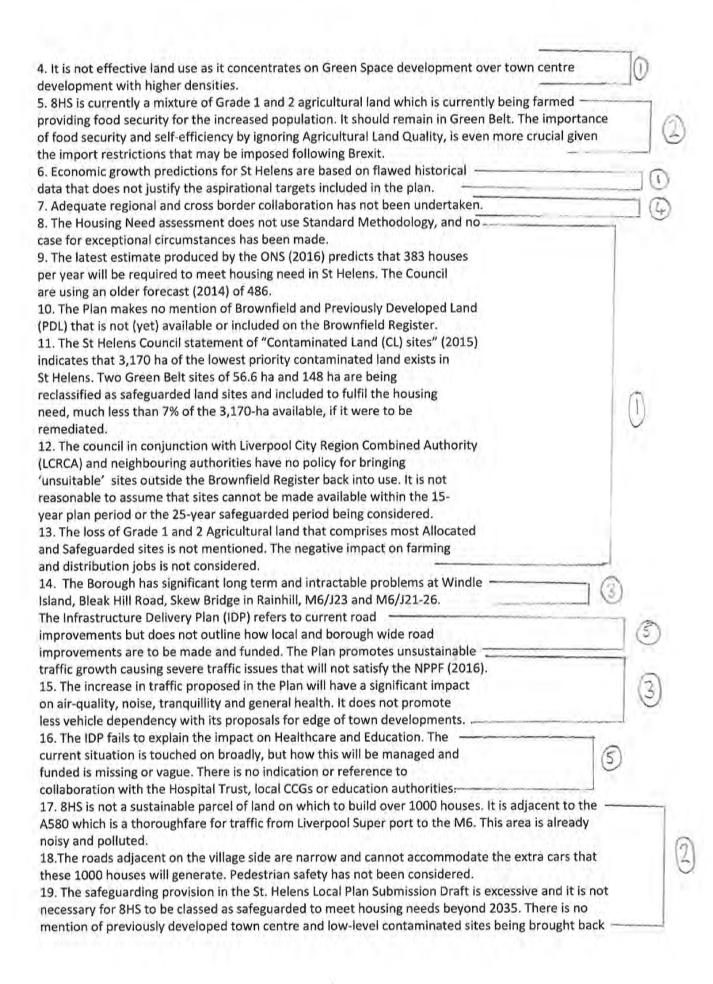
It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from it's protected status into the "safeguard" category.

- 1. It does not satisfy the requirement for Sustainable development
- 2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.
- 3. The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.



into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough.

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

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site or small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

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

There is greater need to retain all Green Belt areas for the future of our communities. There is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, if this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst the beautiful, green belt land is lost along with the health benefits it brings and we lose the most important asset that St Helens can offer - it's green spaces and natural beauty - in favour of a concrete town.

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

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

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

Response Date	3/13/2019 12:02:38 PM	
	 7. 7	

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Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	
Agent Details	

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

No

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

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is n 204.6 hectors. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

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So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car. The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an 05 hour. The bus service stops at 6pm residents must rely on cars. The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to apricate the current value that land has, in terms of crop production, employment and biodiversity. I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the projection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of 03 land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

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

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

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

Response Date	3/13/2019 8:53:31 AM	

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04

Representor Details

Web Reference Number	WF0128	
Type of Submission	Web submission	
Full Name	mrs julie ireland	
Organisation		*===
Address	105 longton lane rainhill I35 8nu	
Agent Details		

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

Yes (via e-mail)

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

Policy	LPA06	
Paragraph / diagram / table	3HS	
Policies Map		
Sustainability Appraisal / Strategic	X	
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- ${f 1}$.St Helens has a reducing population where is the additional population coming from to justify additional housing.
- St Helens own brownfield register suggests land availability for 5808 houses
- 3. The councils plan means another 57 hectors land over the Brownfield land to build 1437 houses not the 288 hectors in table 4.5
- 4. 3HS has a declining industrial base, meaning its population rely s for their employment outside St Helen's boundary.
- 5. The road infrastructure around 3HS isn't capable to cope with existing levels of traffic, increases in traffic will divert more cars into the small roads of the existing estates. namely Longton lane, Two Butt lane, Holt Lane, Mill Lane, View rd, Stoney lane, Blundells lane.
- 6. Warrington Rd and Rainhill Rd junction at Skewed Bridge is at capacity with the councils own figures, similarly the junction at Portico lane and Prescot Rd at capacity.
- 7. Increased traffic increases risk to pedestrians and increases air pollution.
- 8. The release of greenbelt will cause significant harm to the reason having green belt
- 9. 3HS infrastructure can't sustain increases with dentist, doctor, school places
- 10. 3HS is a designated flood zone, to loose the land draining leaves existing properties at risk.
- 11. Sport England objected stage 1 plan, this objection hasn't been answered.
- 12. 3HS incudes more than 13 flora and fauna species protected

13. There is no statement of common ground with neighboring authorities

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

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

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

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

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

Response Date		
Response Date	3/12/2019 9:43:01 PM	1
	3/12/2019 9:43:01 PM	

(1-LPAOS (2)-GEN (3)- Statement of Common Ground

Representor Details

Web Reference Number	WF0152
Type of Submission	Web submission
Full Name	Mrs. Hannah Miller
Organisation	Transfer to the second of the
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	CWARE TO BUSY STORY

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

Yes (via e-mail)

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The St Helens local plan is not justified for many reasons. One main reason is that they have based their housing needs on old population projections from the Office of National Statistics and not the most recent (and significantly lower) Office of National Statistics projections which are almost 25% lower than the figures they have used in this local plan. The population of St Helens has been in constant decline since 1981 so this substantial increase in housing is not required as can be proven by the figures released at the end of 2018 by the Office of National Statistics and also by looking at the census records.

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. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. I also know that there are some sites that are currently owned by housing developers, and have been for a few years, yet no house building has yet taken place. These areas have also NOT been included in the local plan for housing, despite the fact the land has already been sold in the past and has approval for housing (an example would be the land next to Tesco in Haydock). This is a classic example of land grabbing. If the borough has a need for housing, surely these brownfield areas should be included in the local plan before any other areas (especially Greenbelt areas) and developers that —

are holding on to this land should be forced to develop it. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

There is also a complete lack of infrastructure in this area for the existing population. There is already a shortage of school places and there are no plans to build new schools or extend the current ones we have. There is one doctors surgery with long waiting times for appointments - the last time I needed one I had to wait over three weeks. The public transport in Garswood would also need significant improvements if the council proposes building additional homes in the area. According to figures calculated by website On Time Trains, services arrived on time just 7% on average from Garswood to Liverpool Lime Street. In addition, there is no access to the Liverpoolbound platform for people with mobility issues or people with pushchairs since there is only a stepped footbridge to the far platform. Users that need access and who wish to travel to Liverpool would have to make their way to Bryn station which is a ten minute drive away and cannot be accessed from Garswood on other methods of public transport like buses. There are very few access roads in and out of this area and they are already extremely busy. Since public transport in the local area is not sufficient for the existing housing numbers, a substantial increase in housing would result in considerably more cars on local roads - this cannot be supported with the current infrastructure and would require additional funding. I do not feel that St Helens Council have sought sufficient evidence on how population growth in the Garswood area would impact on any of the local infrastructure. I also do not feel that they have conducted enough research on the impact this plan would have on local utilities and services such as broadband access and water supply, which there are already numerous issues with for the existing residents in the area.

There is a long history of flooding on Birch Grove due to water running off the fields that are proposed to be built on. By removing these fields from the Greenbelt for future development, there is a risk of increased flooding when they are eventually built on since the water will have nowhere to soak and will result in even more water flooding into Birch Grove.

Access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate — there would need to be highways improvements in order to give access to any future developments. These works must be funded by developers and not Council Tax payers.

The current local plan is not legal. A statutory requirement is that letters must be sent to residents who are due to have their properties removed from the Greenbelt. Several properties that are affected in this way have not been notified.

There is no statement of common ground with neighbouring authorities and shows a clear lack of communication and joint working. This is of particular importance to Garswood as it is an area that borders with Wigan Council. The lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

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

This local plan should not go ahead without the guarantee of significant investment to improve local services and infrastructure which are already strained with the existing population. Any increase in population without funding would render local services and infrastructure unserviceable.

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

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

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

Response Date 3/12/2019 8:03:24 PM







1 - LPAO6 (2)-GEN (3)-Statement of Common Ground

Representor Details

Web Reference Number	WF0154
Type of Submission	Web submission
Full Name	Mrs Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	1HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The St Helens local plan is not justified for many reasons. One main reason is that they have based their housing needs on old population projections from the Office of National Statistics and not the most recent (and significantly lower) Office of National Statistics projections which are almost 25% lower than the figures they have used in this local plan. The population of St Helens has been in constant decline since 1981 so this substantial increase in housing is not required as can be proven by the figures released at the end of 2018 by the Office of National Statistics and also by looking at the census records.

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. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. I also know that there are some sites that are currently owned by housing developers, and have been for a few years, yet no house building has yet taken place. These areas have also NOT been included in the local plan for housing, despite the fact the land has already been sold in the past and has approval for housing (an example would be the land next to Tesco in Haydock). This is a classic example of land grabbing. If the borough has a need for housing, surely these brownfield areas should be included in the local plan before any other areas (especially Greenbelt areas) and developers that ——

are holding on to this land should be forced to develop it. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

There is also a complete lack of infrastructure in this area for the existing population. There is already a shortage of school places and there are no plans to build new schools or extend the current ones we have. There is one doctors surgery with long waiting times for appointments - the last time I needed one I had to wait over three weeks. The public transport in Garswood would also need significant improvements if the council proposes building additional homes in the area. According to figures calculated by website On Time Trains, services arrived on time just 7% on average from Garswood to Liverpool Lime Street. In addition, there is no access to the Liverpoolbound platform for people with mobility issues or people with pushchairs since there is only a stepped footbridge to the far platform. Users that need access and who wish to travel to Liverpool would have to make their way to Bryn station which is a ten minute drive away and cannot be accessed from Garswood on other methods of public transport like buses. There are very few access roads in and out of this area and they are already extremely busy. Since public transport in the local area is not sufficient for the existing housing numbers, a substantial increase in housing would result in considerably more cars on local roads – this cannot be supported with the current infrastructure and would require additional funding. I do not feel that St Helens Council have sought sufficient evidence on how population growth in the Garswood area would impact on any of the local infrastructure. I also do not feel that they have conducted enough research on the impact this plan would have on local utilities and services such as broadband access and water supply, which there are already numerous issues with for the existing residents in the area.

There is a long history of flooding on Birch Grove due to water running off the fields that are proposed to be built on. By removing these fields from the Greenbelt for future development, there is a risk of increased flooding when they are eventually built on since the water will have nowhere to soak and will result in even more water flooding into Birch Grove.

Access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate – there would need to be highways improvements in order to give access to any future developments. These works must be funded by developers and not Council Tax payers.

The current local plan is not legal. A statutory requirement is that letters must be sent to residents who are due to have their properties removed from the Greenbelt. Several properties that are affected in this way have not been notified.

There is no statement of common ground with neighbouring authorities and shows a clear lack of communication and joint working. This is of particular importance to Garswood as it is an area that borders with Wigan Council. The lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

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

This local plan should not go ahead without the guarantee of significant investment to improve local services and infrastructure which are already strained with the existing population. Any increase in population without funding would render local services and infrastructure unserviceable.

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

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

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

Response Date	3/12/2019 7:58:18 PM

1-LPAOS (2)-GEN (3)-Statement of Common Ground

Representor Details

Web Reference Number	WF0157
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	Contract to the contract of th
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I feel this local plan is not justified as I don't feel it is positively prepared. It doesn't meet the area's needs as the need for extra housing has been greatly exaggerated. The area of St Helens has shown to have a declining population since 1981 and I feel the local council should have clear and obvious proof of population growth to justify theses plans. The council have used old population projections from the office of national statistics and not the most recent statistics which show population growth to be significantly lower than those put forward by the council.

I don't feel this plan is effective as there is no statement of common ground with neighbouring — authorities and shows a clear lack of joint working, which is of particular importance to Garswood, an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The local schools, doctors and bus routes are very limited and a surge in housing would require significant investment in this area. This would further impact local roads as people would be forced to use cars, as local transport options wouldn't be able to support the larger numbers. I do not feel that St Helens council have sought sufficient evidence on how population growth in the Garswood area will impact the local infrastructure and I don't feel St Helens council has conducted

enough research on the impact this pla access and water supply.	an would have on local utilities and services such as broadband
without significant investment in roads	ss roads that are already busy, this plan would not be effective s by any developer, which is unrealistic.
The current plan is also not legal. A statutory requirement is that letters must be sent to people in —situations in which their houses are removed from Greenbelt, this has not been done in all situations.	
encouraging the recycling of other urba	eenbelt holds a purpose in assisting urban regeneration by an land. Using Greenbelt fails to encourage such building and nany of St Helen's former industrial land.
7. Please set out modification(s) you c	onsider are necessary noval from the Greenbelt unless guarantees can be made to
fund significant improvements in local	services and infrastructure.
8. If your representation is seeking a n the oral part of the examination? No, I do not wish to participate at the o	nodification, do you consider it necessary to participate at
	part of the examination, please outline why you consider
Response Date	3/12/2019 7:53:43 PM

1. LPAO6 2-GEN 3-Stalement of Common Ground

Representor Details

WF0158	
Web submission	
Mr Andrew Miller	
47 Birch Grove Garswood Wigan WN4 0QZ	
WILLOW DE THE THE	
	Web submission Mr Andrew Miller 47 Birch Grove Garswood

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

No

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

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I feel this local plan is not justified as I don't feel it is positively prepared. It doesn't meet the area's needs as the need for extra housing has been greatly exaggerated. The area of St Helens has shown to have a declining population since 1981 and I feel the local council should have clear and obvious proof of population growth to justify theses plans. The council have used old population projections from the office of national statistics and not the most recent statistics which show population growth to be significantly lower than those put forward by the council.

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to Garswood, an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The local schools, doctors and bus routes are very limited and a surge in housing would require significant investment in this area. This would further impact local roads as people would be forced to use cars, as local transport options wouldn't be able to support the larger numbers.

I do not feel that St Helens council have sought sufficient evidence on how population growth in the Garswood area will impact the local infrastructure and I don't feel St Helens council has conducted

enough research on the impact this plan would have on local utilities and services such as broadly access and water supply.	oand (
Garswood has a small number of access roads that are already busy, this plan would not be effect without significant investment in roads by any developer, which is unrealistic.	tive
The current plan is also not legal. A statutory requirement is that letters must be sent to people i situations in which their houses are removed from Greenbelt, this has not been done in all situations.	n
National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building a will not promote the regeneration of many of St Helen's former industrial land.	1 / 3

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

Delete this land from the proposed removal from the Greenbelt unless a guarantee can be made to fund significant improvements in local services and infrastructure.

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

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

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

Response Date	3/12/2019 7:49:32 PM
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Representor Details

Web Reference Number	WF0160
Type of Submission	Web submission
Full Name	Mrs Brenda Muskett
Organisation	
Address	10 Stafford Road WA10 3JH
Agent Details	

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

No

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

LPA05	
Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

St Helens has thousands of hectares of Brownfield/PDL land, why are the council even beginning to look at green belt before that has been re-used?

Releasing green belt to developers for quick and massive profits does not appear to be a sustainable development process.

The council and local councillors who approved the plan justify this by stating that the town would STILL have 60% green belt after they have decimated areas of it with their plans. They should be looking on in horror at the 5% of green areas they have destroyed.

It should be celebrated that St Helens has 65% green belt, not that it's okay to kill some of it just because we have so much!

It should be no surprise the council are allocating and safeguarding land in

Eccleston/Windle/Rainford/Rainhill as these are probably some of the most prosperous areas were they know they can demand the highest council tax.

They don't care about sustainable development, just how much tax revenue they can raise to be wasted on pet projects, excessive numbers of councillors and highly overpaid council officers! The houses in these areas are more likely to be executive dwellings and hardly the type that low paid logistics and warehouse operatives might find affordable.

It would not surprise me in the slightest to find out the sites in those areas had been pre-determined sites and all evidence and justification was devised to produce the desired results.

Affordable housing will not be delivered in those areas.

Developers will want to build big dwellings for big money and maximise profits. They will conjure up excuses as to why they need to reduce affordable units (unforeseen circumstances, not economically viable, etc) and 'sell' this to the council to approve planning by pointing out how much extra council tax revenue will be raised. If the government got its act together on which numbers to use, green belt might not be needed at all. The Brownfield register alone has land for over 5000 units. Small/windfall sites will continue to produce areas for more dwellings. All of these areas can provide housing for this 15 year plan, meaning that the once in a lifetime green belt review is not required at this time, so meaning that an additional 15-25 year supply of housing land does not need to be safeguarded at this time. NPPF-108 points to opportunities to promote sustainable transport modes - 8HS is miles from trainstations and not currently on a main bus route network. 108 also mentions safe and suitable access to the site for all users - 8HS could not be accessed safely without significant new infrastructure and even then, safety would be questionable. It then refers to it being cost effectively mitigated to an acceptable degree - 8HS would require a major new junction constructing on A580 and given the improvement works at Windle Island are costing £7m, surely a new junction would be more and therefore not cost effective. Additional to that, noise and air pollution problems would also need to be mitigated creating further costs. NPPF-109 states development should only be prevented if the residual cumulative impacts on the road network or safety would be severe - this is most definitely applicable to 8HS and most probably also 3HS given that site would be restricted until plans can be found. Given the scale of developments in all areas of the Liverpool City Region, it seems there has been an absence of any statement of common ground or duty to cooperate. NPPF-170 is there to protect against air and noise pollution for new developments and that they should improve local environmental conditions. Hard to see how this can be true of 8HS with over 1000 homes, 2000 cars and the plan already recognising the problem by including buffer zones and as such reducing development capacity. Same for 3HS with noise and air pollution and potentially destroying and disturbing wildlife habits during and following construction. 7. Please set out modification(s) you consider are necessary The plan should be changed to avoid green belt land, there is more than enough other land in St Helens. The infrastructure planning should be better laid out rather than just a list of what will be needed. Use the standard method for calculating and the most up to date figures instead of old numbers 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary: Response Date 3/12/2019 7:42:59 PM

1-LPAOS	2-LPAO4 3- Green Bell Review	w
(4)-LPAOT	3-Para 172 DTC	

Representor Details

Web Reference Number	WF0162
Type of Submission	Web submission
Full Name	Mrs Vicky Riley
Organisation	Mr
Address	35 Kiln Lane WA10 6AD
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

As I understand the whole of the North West are creating these local plans but there doesn't seem to be much mentioned about discussions with other authorities. I think it is known as Duty to Cooperate and Statement of Common ground, but they appear to be absent.

With all regional authorities following a similar growth trajectory, they must surely be competing for the jobs and new residents.

This surely cannot be deemed sustainable.

Current government policy is not to be encouraging international immigration, in fact the opposite. That must mean that the migration for these jobs and houses must be UK internal.

If one borough gains though, another must lose. So they cannot all grow by these ludicrous and aspirational figures that are being suggested.

The St Helens growth figures are far in excess of any previous actual growth and looking extremely optimistic to say the least.

The employment growth seems to be completely centred and focused on logistics and warehousing. That growth though appears to be reliant on land being released.

I think someone at the council must have recently watched "Field of Dreams" and adopted an 'if you build it, they will come' attitude.

This must lead to a situation of questioning the entire strategic decision process that this local plan is built upon.

The construction industry themselves have questioned whether they even have the ability and capacity to deliver such astronomical growth predictions. The standard method calculation shows 468 houses per annum and the plan does not demonstrate any exceptional need to deviate from this and shift to 486. A minimal increase of 18pa is not exceptional. The table in the plan (4.6) details all the housing numbers. I can't follow the trail of the figures and some appear to be wrong and there must be a transparency question raised in regard to this table. It is almost a self-fulfilling problem given that of the 1695 capacity that is required to be found on green belt, 794 of them are for non-delivery (15% of SHLAA). Instead of performing the huge green belt review, it would have been better to figure out how to ensure delivery of everything in the SHLAA and then find a relatively small amount of contaminated land to make up the balance of approx. 700 dwellings. Using the smaller figure of 468 (342 fewer houses) plus ensuring delivery of those 794 means only a shortage of 559 dwellings. Such a low number surely cannot lead to exceptional circumstances for a once in a lifetime green belt review. There must also be a transparency question raised in regard to the green belt review process. The parcels of land apparently undergo a developability assessment with the result being good, 3) medium or limited, but the process and findings to arrive at the results are missing from the documents and therefore cannot be scrutinised in this consultation process. A massive concern of mine would be the delivery of infrastructure needed for growth of this scale. All around Windle and Eccleston there are massive congestion issues. It is the same at Haydock and around the M6. St Helens Council will quite simply be incapable of delivering the requirements to manage this scale They cannot maintain the roads today, never mind with thousands more cars on them. More congestion will be inevitable leading to more noise and air pollution leading to greater health 7. Please set out modification(s) you consider are necessary Reduce the growth projection. Do not use green belt. Utilise more brownfield land. 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination If you wish to participate in the oral part of the examination, please outline why you consider

3/12/2019 7:39:21 PM

this to be necessary:

Response Date

(1)-LPAOS (2) LPAOS, IHA (3)-Statement of Common Ground

Representor Details

Web Reference Number	WF0163
Type of Submission	Web submission
Full Name	Miss Emily Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan Lancs WN4 0SP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05 - Site 1HA
Paragraph / diagram / table	The state of the s
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

*The area is unsuitable for housing: the roads are narrow country lanes, the access from either Smock Lane or Billinge Road is inadequate and safety is a real concern, both during building works and once the houses are occupied. Public transport is poor, bus routes are limited and the railway station is wholly inadequate. There is no disabled access to the Liverpool bound line, no parking and nowhere to build a car park.

*The Greenbelt should be used as a last resort. One of the purposes of Greenbelt is to encourage recycling of derelict land and the council haven't taken into account the derelict and brownfield land in the borough that will enable building but protect precious Greenbelt.

*The wildlife in Garswood must be protected. We have bats, small animals, ducks and wild birds that will lose their habitat and disappear, never to return.

*The council must prove where the estimates of growth in population have come from. As the population has steadily decreased since 1981, it is highly unlikely that there will suddenly be a rise and the evidence must be shown. There is too much at stake for Greenbelt to be lost to speculation — and lies.

	quate; the doctors surgery already has long wait times and more. The local primary schools wouldn't be able to cope with a large
nflux of children.	- The least primary salies to date to cope with a large
* There is no statement of common	ground with neighbouring authorities.
* Primary and high schools in Wigar	n would be impacted.

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

 No, I do not wish to participate at the oral examination
- 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:37:39 PM	X
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