



ST HELENS
BOROUGH COUNCIL

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

① - LPA05
② - Para 1.7.2 DTC

PA0383

419



St. Helens
Council

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

Ref: LPSD

12 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

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

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)				ALL WITH SPECIFIC POINTS RELATING TO HAS (ROOKERY LANE)			

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

Please tick as appropriate

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

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

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

1. I DON'T THINK THERE ARE EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY NOT USING THE STANDARD METHOD TO CALCULATE HOUSING NEED.
 2. THE OVER OPTIMISTIC ~~ANALYSIS~~ ASSUMPTIONS IN THE ANALYSIS MEANS THAT THE LEVEL OF LAND REQUIRED IS NOT AS HIGH AS IS SET OUT IN THE LOCAL PLAN.
 3. I DON'T THINK THERE ARE EXCEPTIONAL CIRCUMSTANCES TO CHANGE GREEN BELT BOUNDARIES
 4. OTHER REASONABLE ALTERNATIVES HAVE NOT BEEN EXPLORED FULLY INCLUDING LOWER TARGET FIGURES AND USING MORE PREVIOUSLY DEVELOPED LAND
- (PLEASE SEE ADDITIONAL SHEET)

Please continue on a separate sheet if necessary

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

THE ECONOMIC DEVELOPMENT INCLUDED IN
THE LOCAL PLAN IS TOO FOCUSSED ON
WAREHOUSING AND NEEDS MORE DIVERSIFICATION
THE DEVELOPMENT OF ROOKERY LANE, 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.

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

X

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

Yes, I wish to participate at the oral examination

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

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

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

5. ST HELENS 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 TRAFFIC
7. ROOKERY LANE (HAS) IS A FLOODING RISK AND REGULARLY FLOODS NOW. THIS WOULD BE MUCH WORSE IF IT WERE CHANGED TO A HOUSING ESTATE
8. ROOKERY LANE (HAS) IS GRADE 1 AGRICULTURAL LAND WHICH IS CURRENTLY FARMED. THERE HASN'T BEEN ANY CONSULTATION WITH NATURAL ENGLAND OVER THE LOSS OF GRADE 1 AGRICULTURAL (BMV) LAND. IF THE FARMER COULDN'T FARM THIS LAND IT WOULD HAVE A NEGATIVE IMPACT ON THEIR BUSINESS
9. ROOKERY LANE (HAS) IS NEXT TO AN INDUSTRIAL AREA WITH THE RISKS ASSOCIATED WITH POLLUTION AND AS RECORDED RECENTLY, EXPLOSION
10. ONLY 4 SITES SCORE 4 NEGATIVES ON THE SUSTAINABILITY 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 ~~ALLOCATED~~ ALLOCATED FOR HOUSING IN PHASE 1

PO0402



St. Helens
Council

①-LPA05 ②Statement of Common Ground 434
③-LPA06 ④Statement of Common Ground

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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: <i>Mr</i>	Title:
First Name: <i>Richard</i>	First name:
Last Name: <i>Mitten.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>131 Rectory Road, Ashton in Makerfield</i>	Address:
Postcode: <i>WN4 0AF</i>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: <i>[Redacted]</i>	Date: <i>11/3/19.</i>

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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St.Helens Council
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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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NEXT STEPS

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DATA PROTECTION

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

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

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

Smock Lane

PART B – YOUR REPRESENTATION

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

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

Policy LPA05 Site IHA.	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified - The Council should be put to strict proof of its population estimates. The St Helens population has been in decline since 1981. Where will the extra people come from? One of the purposes of Green belt is to assist in urban regeneration by encouraging use of derelict and other urban land - Using Green belt fails to encourage this. The release of Greenbelt will cause significant harm to the purpose of Greenbelt housing in this area, is not sustainable due to lack of school places, GP surgeries, bus routes/buses + other services. This will encourage overuse of cars. The access to the site on either Birlings Rd or Carwardine Rd would be inadequate. Any highway works should be funded by the developer (see sheet)

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from
the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

Housing 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.

3. To which part of the Local Plan does this representation relate?							
Policy LPA09 Site 1HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

Not justified - The Council should be put to strict proof of it's population estimates. St Helens population has been in decline since 1981. Where are the extra people coming from? One of the purposes of Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of Greenbelt (see extra sheet)

Please continue on a separate sheet if necessary

(3)

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

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

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--

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

Please keep a copy for future reference.

LPA09 - Site 1HA extra sheet. Revised Witten.

Box 6 continued -

① Housing in this area isn't sustainable because of the lack of school places, GP surgeries, bus routes and buses and other services. The use of cars is being encouraged due to a lack of services + facilities.

The access to the site on Bulwage Rd or Carwood Rd would be inadequate. Any necessary highways works must be funded by the developer and not council tax payers. There is no statement of common ground with neighbouring authorities. ②

Revised letter

LPA05 - Site IHA. extras back

Box 6 continued -

and not council tax payers. There is no statement
of common ground with neighbouring authorities. (4)

PO0403



St. Helens
Council

①-LPA05 ②Statement of Common Ground 434
③-LPA06 ④Statement of Common Ground

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>Richard</i>	First name:
Last Name: <i>Mitten.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>131 Rectory Road, Ashton in Makerfield</i>	Address:
Postcode: <i>WN4 0AF</i>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: <i>11/3/19.</i>

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Yes ☒ (Via Email)

No ☐

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

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

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

Smock Lane

PART B – YOUR REPRESENTATION

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

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

Policy LPA05 Site IHA.	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified - The Council should be put to strict proof of its population estimates. The St Helens population has been in decline since 1981. Where will the extra people come from? One of the purposes of Green belt is to assist in urban regeneration by encouraging use of derelict and other urban land - Using Green belt fails to encourage this. The release of Greenbelt will cause significant harm to the purpose of Greenbelt housing in this area, is not sustainable due to lack of school places, GP surgeries, bus routes/buses + other services. This will encourage overuse of cars. The access to the site on either Birlings Rd or Carward Rd would be inadequate. Any highway works should be funded by the developer (see sheet)

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from
the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

☐ **Yes**, I wish to participate at the oral examination

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

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.

Housing 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.

3. To which part of the Local Plan does this representation relate?							
Policy LPA09 Site 1HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

Not justified - The Council should be put to strict proof of it's population estimates. St Helens population has been in decline since 1981. Where are the extra people coming from? One of the purposes of Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of Greenbelt (see extra sheet)

Please continue on a separate sheet if necessary

(3)

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

Delete this land from the proposed removal from
the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

--

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

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

Please keep a copy for future reference.

LPA09 - Site 1HA extra sheet. Revised Witten.

Box 6 continued -

① Housing in this area isn't sustainable because of the lack of school places, GP surgeries, bus routes and buses and other services. The use of cars is being encouraged due to a lack of services + facilities.

The access to the site on Bulwage Rd or Carwood Rd would be inadequate. Any necessary highways works must be funded by the developer and not council tax payers. There is no statement of common ground with neighbouring authorities. ②

Revised letter

LPA05 - Site IHA. extras back

Box 6 continued -

and not council tax payers. There is no statement
of common ground with neighbouring authorities. (4)

PO0404

① - LPA06

② - Statement of Common Ground

508

12 MAR 2019

St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>GLENNIS</u>	First name: _____
Last Name: <u>PARKINSON</u>	Last Name: _____
Organisation/company: <u>Resident.</u>	Organisation/company: _____
Address: <u>37 SPRINGFIELD PARK</u> <u>HAYDOCK</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA11 0XP</u>	Postcode: _____
<div style="background-color: black; width: 100%; height: 40px;"></div>	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: <div style="background-color: black; width: 250px; height: 40px; display: inline-block;"></div>	Date: <u>10/3/19</u>
--	----------------------

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

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

☐ Yes (~~via email~~) postal address please ☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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setting out your representation/comment.**

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 06	SITE 2ES	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

- 1) Not justified — the Council should be put to strict proof of the need for this type of development, in this position and on this scale.
- 2) As this site is allocated as Safeguarded until after 2035 and given the lifespan of this type of warehouse development, the site should remain in the Greenbelt so that the whole question of need can be re-evaluated at the end of the Local Plan Period.
- 3) One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.
- 3) The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Please continue on a separate sheet if necessary

See next sheet

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

Delete 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)

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

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

--

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

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

Please keep a copy for future reference.

Continuation sheet — Glennis Parkinson
Policy LPA. OK Site 2ES

4) The Council has already granted planning permission in the Greenbelt in respect of site 2EA — Florida Farm North — a massive development of 2 gigantic warehouses, which are less than two miles from this site and has received applications for similar developments at SEA, land to the west of Haydock Lane and SEA, Parkside West, Newton-le-Willows. Why should this area be the Warehouse Capital of St. Helens?

5) High volumes of predicted traffic will add to the already over capacity on Junction 23 of the M6.

6) There is no statement of common ground with neighbouring authorities

PO0405

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JULIE

Last Name: COLLINS

Organisation/company: _____

Address: 57 THORNHILL
GARSWOOD
WIGAN

Postcode: WN4 0SR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 4-3-19

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

planningpolicy@sthelens.gov.uk

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

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

PART B - YOUR REPRESENTATION

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
1/ Population figures incorrect 2/ Regard urban derelict AND NOT Green belt 3/ No infrastructure - DOCTORS full - School full No shops dentur 4/ Roads NOT SUITABLE 5/ No statement of common ground with other council	

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

Delete LAND from
proposed removal
of Greenbelt

Please continue on a separate sheet if necessary

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

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

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

PO0406



St. Helens
Council

① - LPA05
② - LPA06

③ Statement of Common Ground
516

PFO469

12 MAR 2019

Ref: LPSD

(For official use only)

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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title:
First Name: <u>Florence</u>	First name:
Last Name: <u>Warrington Pearce</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>4 Fernlea Grove</u> <u>Garswood</u>	Address:
Postcode: <u>WN4 0RF</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

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

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHS LP A06		Billiger					
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Urban sprawl.</p> <p>Does not encourage regular or deliberate</p> <p>No statement of economic growth</p> <p>with other concerns.</p>	

⑦ Delete low four proposed
remove x gear belt

PO0407

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens
Council

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: PHILIP

Last Name: TOPPING

Organisation/company:

Address: 33 Apinax Road
Garswood Ashton-in-
Mablefield. WIGAN

Postcode: WN4 0RN

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 05/03/2019

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

☒ Yes (via email)

☐ No

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

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

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA 06</i>	Paragraph/ diagram table <i>Site 1HS</i>		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Council population estimates are not credible; St Helens population in decline. House of Greenbelt preservation ideal when 'brown' site & urban derelict sites exist - just too 'greedy' to spend money on cleaning up these sites which would environmentally intelligent! A great increase in housing will necessitate major infrastructure (schools, medical facilities, bus route etc. which although expedient won't be provided. Car access via Billing, Heyland Green & Garswood roads - horrendous congestion. No statement of common ground with neighbouring authorities

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

Remove this piece of land from the
proposal of its removal from Greenbelt.

Please continue on a separate sheet if necessary

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



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

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.

PO0408

PF0471

① - LPA05
③ - LPA06

518 ② - Statement of
Common Ground
12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title:
First Name: <u>Caroline</u>	First name:
Last Name: <u>Birchall.</u>	Last Name:
Org. <u>nation/company:</u>	Organisation/company:
Address: <u>32 Glain Ave</u>	Address:
<u>Garswood.</u>
Postcode: <u>WN4 0RH.</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:	Date: <u>5/3/19.</u>
------------------	----------------------

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

☐ Yes (via email)

☒ No

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St Helens
WA10 1HP

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p><i>Release of Greenbelt in case significant harm to the purpose of the greenbelt] ①</i></p> <p><i>No statement of common ground with neighbouring authorities] ②</i></p>

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

Delete 1.2 for proposed removal
for greenbelt

Please continue on a separate sheet if necessary

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

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

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

--

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

Please keep a copy for future reference.

PO0409

12 MAR 2019

Ref: LPSD

(For official use only)

St. Helens
Council

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: CHERYL

Last Name: SKINNER

Organisation/company:

Address: 428 DOWNHILL GREEN RD

GARNSWOOD

Postcode: WN4 0NA

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 05.03.19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
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☐ Yes (via email)

☒ No

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

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

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3. To which part of the Local Plan does this representation relate?									
Policy <i>1 HA LPA 5 Smock Lane</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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<p><i>Release of Greenbelt will cause significant harm to purpose of greenbelt.</i></p> <p><i>No statement of common ground with other councils</i></p>	

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Remove proposed L2 for release from Green belt

Please continue on a separate sheet if necessary

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PO0410

12 MAR 2019

Ref: LPSD

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Date: 05.03.19

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Policy <i>IHS</i> <i>LPA06</i> <i>Billage B</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>No urban regeneration</i> (3)</p> <p><i>No statement of common ground</i> with <i>neighbouring</i> <i>authorities</i> (4)</p>	

⑦ Delete 1a from the project
remove from green belt

PO0411

FF0476

①-LPA05

523

②- Statement of Common Ground

12 MAR 2019



St. Helens
Council

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Title: <u>MRS</u>	Title:
First Name: <u>GLENNIS</u>	First name:
Last Name: <u>PARKINSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>37 SPRINGFIELD PARK</u>	Address:
<u>HAYDOCK</u>
<u>ST. HELENS</u>
Postcode: <u>WA11 0XP</u>	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <u>5/3/19</u>
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3. To which part of the Local Plan does this representation relate?									
Policy LPA -05	SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

- 1) There are no exceptional circumstances for the release of Greenbelt in St Helens. The population of St Helens has been in decline since 1981. Housing in St Helens is comparatively cheap and in low demand.
- 2) One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and urban land. Using Greenbelt facts to encourage this.
- 3) The population of St Helens has significant health problems — high rates of heart and lung disease, childhood obesity. It is a heavily polluted area. To destroy the greenbelt is a step in the wrong direction.

Please continue on a separate sheet if necessary

See separate sheet

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

Delete this land from the proposed removal
from the Greenbelt.

Please continue on a separate sheet if necessary

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X

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

Yes, I wish to participate at the oral examination

9. 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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Re LPA 05 Site 2HA. Continued

- 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.
- 5) The proposal for a left-in/left-out from the East Lancashire Road to this site just isn't safe and would cause major problems. Another junction at Liverpool Road and Vicarage Road would totally overburden the roads nearby. The infrastructure just isn't there to cope with so ~~many~~ many added vehicles.
- 6) There are existing flooding problems on this site. During wet weather large ponds appear. Remedies to prevent this would place even greater problems for the Clipsey Brook.
- 7) The Council's own register shows there is enough brownfield land in St Helens for 5,818 houses. Use Brownfield and derelict land before Greenbelt is released.
- 8) The reasons for release of Greenbelt is not justified and St Helens Council should prove how the population will increase.
- 9) There is no statement of common ground with neighbouring authorities.
- 10) As proved recently with worries 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 many residents send their children to schools in the neighbouring Borough of Wigan. This also applies to the Catholic School (Secondary)

12) Use of Greenbelt for development should not be used as a "quick fix" to ~~manage~~ cover the financial problems of the Council.

PO0412

① - LPA04

② - Statement of Common Ground ⁵²⁵

12 MAR 2019

PF0478



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: LESLIE

Last Name: CLANCY

Organisation/company: _____

Address: 97 TAYLOR ROAD

HAYDOCK

ST HELENS

Postcode: WA11 9YG

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5/3/2019

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1/ THIS WILL CAUSE SIGNIFICANT HARM IF THE LAND IS RELEASED FROM THE GREENBELT</p> <p>2/ THE COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION FOR SITE 2EA - FLOTTA FARM NORTH</p> <p>3/ LOCAL ROADS ARE ALREADY CONGESTED SO THIS PROPOSAL WILL ADD TO THE PROBLEMS.</p> <p>4/ THE COUNCIL SHOULD PRODUCE JUSTIFIABLE PROOF FOR THE NEED FOR THIS TYPE OF DEVELOPMENT IN THIS LOCATION AND ON THIS SCALE</p> <p>5/ WHERE IS THE COUNCIL'S STATEMENT OF COMMON GROUND WITH NEIGHBOURING LOCAL AUTHORITIES</p>	

Please continue on a separate sheet if necessary

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

THIS LAND MUST BE DELETED
FROM THE PROPOSED REMOVAL FROM
THE GREENBELT

Please continue on a separate sheet if necessary

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

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

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

NO

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PO0413



St Helens
Council

①-LPA05 ②-Statement of Common Ground

③-LPA04 ④-Statement of Common Ground ⁵³⁸ 12 MAR 2019

PF0491

Ref: LPSD

(For official use only)

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

Representation (i.e. Comment) Form

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: MARJORIE

Last Name: KLEINHANS

Organisation/company: LOCAL RESIDENT

Address: 101 SPRINGFIELD PARK

HAYDOCK

Postcode: WA11 0XP

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: 

Date: 7.3.19

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

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

☒ Yes (via email)

☐ No

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

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

RETURN DETAILS

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

or by hand delivery to:

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA05	LPA 05 - SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?

☐ Yes

☐ No

Don't think so - had no notification to my address.

Sound?

☐ Yes

☒ No

Complies with the Duty to Cooperate

☐ Yes

☒ No

Please tick as appropriate

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

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

Positively Prepared?

☒

Justified?

☒

Effective?

☒

Consistent with National Policy?

☒

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

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

- This should not be released from the greenbelt as more than enough greenbelt has been build on locally - Florida Farm North.
- The infrastructure in Haydock and surrounding area cannot cope with extra demand on school places, doctors surgeries etc.
- Because of lack of facilities, more car use will be needed and the local roads will not cope.
- The existing problems with flooding will be exacerbated and remediation to prevent this will spill over into clipsey brook.
- There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greens belt.

Please continue on a separate sheet if necessary

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

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

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



Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

PO0414



St Helens
Council

①-LPA05 ②-Statement of Common Ground

③-LPA04 ④-Statement of Common Ground ⁵³⁸ 12 MAR 2019

PF0491

Ref: LPSD

(For official use only)

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

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(we will correspond via your agent)

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Last Name: KLEINHANS

Organisation/company: LOCAL RESIDENT

Address: 101 SPRINGFIELD PARK

HAYDOCK

Postcode: WA11 0XP

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: 

Date: 7.3.19.

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

☒ Yes (via email)

☐ No

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPA 04 SHE SEA SEA SEA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<ul style="list-style-type: none"> Not justified. The council should be put to strict proof of the need for this type of development, in this position, on this scale. Using greenbelt fails to encourage the recycling of derelict and other urban land. Release of greenbelt will cause significant harm to the reasons for Greenbelt. The council has already granted Planning Permission in the Greenbelt in respect of Site SEA - Florida Farm North. The risk of flooding further down the Clipsey Brook will be exacerbated by future development at this location. High volumes of traffic will add to the already over capacity on the highways in the vicinity. There is no statement of common ground with neighbouring authorities. 	

Please continue on a separate sheet if necessary

3

4

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

Delete this land from the proposed removal from the greenselt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

PO0415

①-LPA05 ②-Statement of Common Ground
543
③-LPA06

PFO496

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>ELIZABETH</u>	First name:
Last Name: <u>SHUFFLEBOTHAM</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>31. LANGHOLM ROAD</u>	Address:
<u>GARSWOOD</u>
<u>ASHTON IN MAKERFIELD. WIGAN</u>
Postcode: <u>WN4 0SC</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>5th MARCH 2018</u>
-----------------------	--

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy <i>Smoch 1HA</i>		Paragraph/ diagram table <i>LPAS</i>		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>NO Statement of common ground with neighbouring authorities</i></p> <p><i>Access Billinge Rs Goswood Rs would be inadequate Access must be fully developed not Housing not sustainable lack of school places doctors use of cars encouraged because of lack of facilities</i></p>	

Remove 10 from proposed plan to
renew greenbelt

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

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

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

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

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

Please keep a copy for future reference.

PO0416

① - LPA05

② - Statement of Common Ground

PF0497

③ - LPA04

544

12 MAR 2019

④ - Statement of Common Ground

St Helens
Council

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

Ref: LPSD

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Part A - Personal Details

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PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: PAULA

Last Name: CHOVAN

Organisation/company: _____

Address: 66 ASHBURY

DRIVE

RAYDOCK

Postcode: W11 0FA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5.3.19.

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LP 05	SITE 2 HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

This site is on greenbelt land and therefore should only be released in exceptional circumstances. There are no exceptional circumstances in St. Helens which is a borough with falling population. Housing in St. Helens is comparatively cheap and in low demand. Brownfield and derelict land should be used before Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. This area in Blackbrook is already overdeveloped. There are existing flooding problems at this site and any remedial to prevent this would place even greater amounts of water into the Chapsley Brook. Not justified - the Council should be put to strict proof of its population estimates.

There is no statement of common ground with neighbouring authorities. Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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.

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

X

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PO0417

① - LPA05

② - Statement of Common Ground

PF0497

③ - LPA04

544

12 MAR 2019

④ - Statement of Common Ground

St Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: PAULA

Last Name: CHOVAN

Organisation/company: _____

Address: 66 ASHBURY

DRIVE

RAYDOCK

Postcode: W11 0FA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 5.3.19.

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

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

☐ Yes (via email)

☐ No

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 04	SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified — the Council should be put to strict proof of the need for this type of development, in this position and on this scale.</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.</p> <p>The Council has already granted permission in the Greenbelt in respect of Site 2EA — Florida Farm North — 2 massive warehouses.</p> <p>The risk of flooding further down the Clapsley Brook will be exacerbated by future development at this location.</p> <p>High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p> <p>There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

③

④

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

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)

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

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

--

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

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

Please keep a copy for future reference.

PO0418



St. Helens
Council

① - LPA05
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)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Smith	Last Name:
Organisation/company:	Organisation/company:
Address: 51 TAYLOR ROAD HAYDOCK ST. HELENS	Address:
Postcode: WA11 0NY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

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.

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

Yes ☐ (Via Email)

No ☒

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPA 05 SITE 24A	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

- ① Not Justified. Council should prove its population estimates. St Helens Population has been in decline since 1981.
- ② Flooding exists on this site and construction will cause high flood risk for the area and affect Clipsey Brook.
- ③ Housing in this area is not sustainable due to lack of school places, doctors etc. use of cars is being encouraged.
- ④ Traffic levels through Haydock will be severely increased as they are already at high levels. Risk of accidents
- ⑤ There is no statement of common ground with neighboring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal
from the Greenbelt.

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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

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Please keep a copy for future reference.

PO0419

PFO500

① - LPA04

② - Statement of Common Ground
547

12 MAR 2019

③ - LPA05

Ref: LPSD

(For official use only)

St. Helens
Council

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS Title: _____

First Name: CHRISTINE First name: _____

Last Name: NAYLOR Last Name: _____

Organisation/company: _____ Organisation/company: _____

Address: 42 NATHAN DRIVE Address: _____

HAYDOCK _____

Postcode: WA11 0GW Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Signature: _____ Date: 01/03/18

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

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

☒ Yes (via email)

☐ No

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED</p> <p>1. What is the justification for another warehouse when these already being built are speculative. The Council need to prove they are needed especially size and position. ①</p> <p>2. The predicted increase in traffic volumes will put further pressure on an already congested and over capacity highway. ②</p> <p>3. There is no statement of common ground with neighbouring authorities.</p> <p>4. Using Greenbelt land fails to encourage urban regeneration.</p> <p>5. The local authority has already granted planning permission ①</p> <p>In the greenbelt in respect of site 26A - Flander Farm NEAR -</p>	

Please continue on a separate sheet if necessary

Delete this land from the proposed removal from the greenbelt.

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

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

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

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PO0420

12 MAR 2019

Ref: LPSD

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PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: Alicia

Last Name: Bennett

Organisation/company: _____

Address: 35 HILLBECK CRESCENT
GARSWOOD

Postcode: WN4 0RP

Tel No: _____

Mobile No: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: _____

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

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

☐ Yes (via email)

☐ No

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

PART B - YOUR REPRESENTATION

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1 Not Justified - The Council should be put to strict proof of the need for this type of development in this position and on this scale. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p> <p>2 There is no statement of common ground with neighbouring authorities</p>	

Please continue on a separate sheet if necessary

Delete this land from the proposed removal from the Greenbelt.

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

Yes, I wish to participate at the oral examination

1800756M

PO0421



St.Helens
Council

567

12 MAR 2019

Ref: LPSD

(For official use only)

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

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

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

This form has two parts;

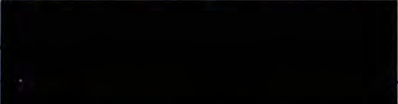
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>TERENCE</u>	First name: _____
Last Name: <u>GAUCKWIN</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>62 MILLPROOK LANE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 4QY</u>	Postcode: _____
Tel No: <u>/</u>	Tel No: _____
Mobile No: <u>/</u>	Mobile No: _____
Email: <u>/</u>	Email: _____

Signature: 	Date: <u>10.3.19</u>
--	----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>SEE ENCLOSED SHEET NO 122.</p>
--

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

Please continue on a separate sheet if necessary

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

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

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



Yes, I wish to participate at the oral examination

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

TO BE MORE INFORMED.

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.

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 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

PO0422



St. Helens
Council

579

12 MAR 2019

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.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: LISA	First name:
Last Name: MCCORMACK	Last Name:
Organisation/company:	Organisation/company:
Address: 7 DERRINGSTONE CLOSE ST. HELENS	Address:
Postcode: WA10 3QR	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
	Email:

Signature:

Date:

4/3/2019

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

Yes ☒ (Via Email)

No ☒

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPAOS Site 2HA	Paragraph / diagram / table <u>1</u>	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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

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

NOT JUSTIFIED. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. ST. HELENS POPULATION HAS BEEN IN DECLINE SINCE 1981.

GREENBELT IS DESIGNED TO ASSIST IN URBAN RE-GENERATION BY ENCOURAGING USE OF DERELICT / OTHER URBAN LAND. BY USING GREENBELT IT FAILS TO ENCOURAGE THIS.

HOUSING IS NOT SUSTAINABLE IN THIS AREA DUE TO LACK OF DOCTORS, SCHOOLS ETC. USE OF CARS IS BEING ENCOURAGED.

INADEQUATE ROAD ACCESS. UNSAFE ACCESS POINTS.

THIS SITE CURRENTLY FLOODS + IS HIGH WATER TABLE. BUILDING HERE WILL CAUSE HIGH RISK OF FLOODING IN HAYDOCK

NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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3. If your representative 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.

PO0423

RETURN DETAILS

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

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

or by hand delivery to:

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FURTHER INFORMATION

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NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA	06	SITE	2ES	(1)					
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	I AM NOT A SOLICITOR	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

1) PREDICTED TRAFFIC VOLUMES WILL ADD TO THE EXISTING PROBLEMS AT JUNCTION 23 OF THE M6

2) THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES

3) THE GREENBELT IS TO ASSIST URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT LAND FAILS TO ENCOURAGE THIS.

4) SITE 2EA IS LESS THAN TWO MILES AWAY HAS ALREADY BEEN GRANTED PLANNING PERMISSION AND APPLICATIONS FOR SIMILAR DEVELOPMENT AT SITES 5EA AND 8EA

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE
PROPOSED REMOVAL FROM THE
GREENBELT

Please continue on a separate sheet if necessary

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

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

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

--

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

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PO0424

12 MAR 2019

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First Name: <u>PATRICIA ANNE</u>	First name: _____
Last Name: <u>MOVILLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>31 BIRCH GROVE</u>	Address: _____
<u>CARSWOOD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WN4 0RZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

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☐ Yes (via email) ☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy LP 05	SITE 2 HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The release of greenbelt will cause significant harm to the purpose of Greenbelt. Traffic problems already exist in this area, development on this scale will exacerbate the problem.</p> <p>The population of St Helens has been in decline since 1981 so St Helens Council must prove their population estimates.</p> <p>The access to this site would be totally inadequate. A left on/left out from the Rost Lancashire Road isn't safe.</p> <p>Brownfield and derelict sites, of which there are many in St. Helens should be used first. Many empty properties also exist.</p> <p>This is an area which floods, development will make things worse.</p> <p>There is no statement of common ground with neighbouring authorities</p>	

Please continue on a separate sheet if necessary

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Delete this land from the proposed removal from the Greenbelt,

Please continue on a separate sheet if necessary

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X

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

Yes, I wish to participate at the oral examination

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Organisation/company: _____	Organisation/company: _____
Address: <u>31 BIRCH GROVE</u>	Address: _____
<u>CARSWOOD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WN4 0RZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email) ☐ No

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

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

Policy LPA 04	SITRS 2KA 5KA 6KA	Paragraph/ diagram table 	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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

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

- 1) - Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.
- 2) - St. Helens Council has already granted planning permission in the Greenbelt in respect of site 2KA - Florida Farm North - Huge warehouses.
- 3) - One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt facts to encourage this.
- 4) - The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.
- 5) - High volumes of predicted traffic will add to the already over capacity on the roads - some just country lanes - in this vicinity. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

--

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

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

Please keep a copy for future reference.

PO0426

12 MAR 2019

Ref: LPSD

(For official use only)



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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>PATRICIA ANNE</u>	First name: _____
Last Name: <u>MOVILLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>31 BIRCH GROVE</u>	Address: _____
<u>CARSWOOD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WN4 0RZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

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

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

☐ Yes (via email) ☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1) The access to the site on Bulving Road, Leyland Green Road would be inadequate.</p> <p>2) No statement of common ground with neighbouring authorities</p> <p>3) Housing in this area isn't sustainable because of the lack of school places, doctors surgeries (+ doctors) bus routes + other services</p> <p>4) The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>5) Brownfield and derelict land should be developed before Greenbelt</p> <p>6) Lots of Brownfield land available for development.</p>	

Please continue on a separate sheet if necessary

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X

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

Yes, I wish to participate at the oral examination

9. 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.

PO0427

12 MAR 2019



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

Ref: LPSD
(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>PATRICIA ANNE</u>	First name: _____
Last Name: <u>MOVILLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>31 BIRCH GROVE</u>	Address: _____
<u>CARSWOOD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WN4 0RZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____ Date: 10/3/19

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

☐ Yes (via email) ☐ No

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PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 05	<i>05A</i> SITE 14A	Paragraph/ diagram/ table <i>7</i>		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>7</i> The development would:-</p> <ol style="list-style-type: none"> 1) Have a detrimental effect on highway safety, for vehicles + pedestrians 2) Increase the pressure on social infrastructure eg. Doctors surgeries + dentists. 3) Exacerbate existing health problems for residents, due to increased vehicle pollution. 4) Lead to additional traffic congestion on roads. 5) Brownfield and derelict land should always be used before Greenbelt 6) Not justified - the Council should prove its population estimates 7) No statement of common ground with neighbouring authorities 	

Please continue on a separate sheet if necessary

8

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

Delete this land from the proposed
removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

Please keep a copy for future reference.

PO0428



St.Helens
Council

610

12 MAR 2019

Ref: LPSD

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Representation (i.e. Comment) Form**

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>RITA</i>	First name:
Last Name: <i>MARSH</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>5 ECCLESFIELD RD</i> <i>ST HELENS</i>	Address:
Postcode: <i>WA10 5LH</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 MARCH 2019

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

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

Yes ☒ (Via Email)No ☐

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

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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 (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	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. ² 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 continue on a separate sheet if necessary

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

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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PO0429



St. Helens
Council

613

12 MAR 2019

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.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS .	Title:
First Name: ELIZABETH	First name:
Last Name: MCGOWAN	Last Name:
Organisation/company:	Organisation/company:
Address: 64 CORONATION ROAD - WINDLE	Address:
Postcode: WA10 6BG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

8.3.19.

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

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Yes ☐ (Via Email)

No ☒

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

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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 (please name document and relevant part/section)				Green Belt Review (2018)			

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	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. ^② 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

①

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 continue on a separate sheet if necessary

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

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

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

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

--

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

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

PO0430



St. Helens
Council

618

12 MAR 2019

Ref: LPSD

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

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: TERESA	First name:
Last Name: CASH	Last Name:
Organisation/company:	Organisation/company:
Address: 15 PARK AVE ECCLESTON PARK PRESCOT	Address:
Postcode: L34 2QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 - 3 - 19

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

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

Yes ☒ (Via Email)No ☐

Please note - 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**

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	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.

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

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

PO0431

① - LPA06

② - Statement of Common Ground ⁶²⁶

12 MAR 2019

PF0574



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: ROY	First name:
Last Name: MONTROSE	Last Name:
Organisation/company: N/A.	Organisation/company:
Address: 8 BUCKTHORN GARDENS	Address:
Postcode: WA9 5UG	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 11/3/2019

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

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

Yes ☒ (Via Email)

No ☐

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RETURN DETAILS

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St.Helens Council
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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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Telephone:

01744 676190

NEXT STEPS

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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.

①

②

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.



11 March 2019.

PO0432



St. Helens
Council

629

13 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Catherine	First name:
Last Name: Greenall	Last Name:
Organisation/company: /	Organisation/company:
Address: 219b, Liverpool Rd Haydock	Address:
Postcode: HA11 9RX	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

8/3/19

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

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

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Town Hall
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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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Telephone:

01744 676190

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

PART B – YOUR REPRESENTATION

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

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

Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LPAOS Site 2HA				
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

- This development is not justified, the Council needs to prove its population estimates, as the population of St. Helens has been falling since 1981
- using Greenbelt fails to encourage the use of derelict & urban land.
- The development will cause significant harm to the purpose of the Greenbelt.
- Housing in this area isn't sustainable because of lack of school places, doctors surgeries & other services
- The access to the site is inadequate and dangerous (East Haves Road) and a junction at Liverpool Rd / Vicarage Road will add considerable traffic onto over stretched roads.
- Flooding problems - adding greater amounts of water to Clippesley Brook
- No liaison with neighbouring authorities

Please continue on a separate sheet if necessary

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

Delete this card from the proposed
removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

Yes, I wish to participate at the oral examination

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PO0433



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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>JOSHUA</u>	First name:
Last Name: <u>COLLINS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>508 GRESWOOD ROAD</u>	Address:
<u>ASHTON IN MAKERFIELD</u>
<u>WIGAN</u>
Postcode: <u>WN4 0XH</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:	Date: <u>11/3/19</u>
------------------	----------------------

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☐ Yes (via email)

☒ No

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

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED – The local population has actually been in decline for some time. More housing on Greenbelt land is NOT required. If any future potential increase arises, the council should be able to cover this using homes which are currently empty and rejuvenating current brownfield sites.</p> <p>NOT EFFECTIVE – The current infrastructure in the area is not suitable for an increase in homes. There are no planned or costed improvements to the schools, doctors surgery, road network recreation facilities or shops.</p> <p>NOT CONSISTANT WITH NATIONAL POLICY – There is no statement of common ground with neighbouring authorities. Government states "councils must prioritise development to brownfield land and bring life back to abandoned sites. These will only increase if new sites are used for homes.</p>	<div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>①</p> <p>②</p> <p>③</p> </div>

Please continue on a separate sheet if necessary

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

Please delete this land from the proposed Removal From The Greenbelt

Please continue on a separate sheet if necessary

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



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

Yes, I wish to participate at the oral examination

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

N/A

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

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

Please keep a copy for future reference.

PO0434



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>JOSHUA</u>	First name:
Last Name: <u>COLLINS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>508 GRESWOOD ROAD</u>	Address:
<u>ASHTON IN MAKERFIELD</u>
<u>WIGAN</u>
Postcode: <u>WN4 0XH</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

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

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06 Site 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

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Please keep a copy for future reference.

PO0435

①-LPA05

②- Statement of Common Ground

PF0586

③-LPA06

638

④- Statement of Common Ground 13 MAR 2019

St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: STEWART

Last Name: POSTLETHWAITE

Organisation/company:

Address: 508 GARSWOOD ROAD

ASHTON IN MAKERFIELD

WIRAN

Postcode: WN4 0XH

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date:

8/3/19

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☒ Yes (via email)

☐ No

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for each separate comment/representation.**

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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Please keep a copy for future reference.

PO0436

①-LPA05

②- Statement of Common Ground

PF0586

③-LPA06

638

④- Statement of Common Ground 13 MAR 2019

St Helens
Council

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

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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(we will correspond via your agent)

Title: MR

First Name: STEWART

Last Name: POSTLETHWAITE

Organisation/company:

Address: 508 GARSWOOD ROAD

ASHTON IN MAKERFIELD

WIRAN

Postcode: WN4 0XH

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date:

8/3/19

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

☒ Yes (via email)

☐ No

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

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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

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PO0437



St. Helens
Council

① - LPA05 ② - Statement of Common Ground P10587
③ - LPA06 ④ - Statement of Common Ground 639 13 MAR 2019

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

Ref: LPSD

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Title: MRS

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Last Name: POSTLETHWAITE

Organisation/company: _____

Address: 508 GARSWOOD RD.

ASHTON IN MAKERFIELD

WIGAN

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Title: _____

First name: _____

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Organisation/company: _____

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Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11/3/19

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Please tick as appropriate

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Please delete this land from the proposed Removal From The Greenbelt

Please continue on a separate sheet if necessary

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

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:

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.

PO0438



St. Helens
Council

① - LPA05 ② - Statement of Common Ground P10587
③ - LPA06 ④ - Statement of Common Ground 13 MAR 2019

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JO - ANNE

Last Name: POSTLETHWAITE

Organisation/company: _____

Address: 508 GARSWOOD RD.

ASHTON IN MAKERFIELD

WIGAN

Postcode: WN4 6XH

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11/3/19

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06 Site 1HS	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED – The local population has actually been in decline for some time. More housing on Greenbelt land is NOT required. If any future potential increase arises, the council should be able to cover this using homes which are currently empty and rejuvenating current brownfield sites.</p>	3
<p>NOT EFFECTIVE – The current infrastructure in the area is not suitable for an increase in homes. There are no planned or costed improvements to the schools, doctors surgery, road network recreation facilities or shops.</p>	
<p>NOT CONSISTANT WITH NATIONAL POLICY – There is no statement of common ground with neighbouring authorities. Government states "councils must prioritise development to brownfield land and bring life back to abandoned sites. These will only increase if new sites are used for homes.</p>	4
	3

Please continue on a separate sheet if necessary

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

Please delete this land from the proposed Removal From The Greenbelt

Please continue on a separate sheet if necessary

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



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

Yes, I wish to participate at the oral examination

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

N/A

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

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

Please keep a copy for future reference.

PO0439



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: IAN McFESAN	First name:
Last Name: McFESAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83 HEYES AVENUE RAINFORD	Address:
Postcode: WAL 8AP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW					

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

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

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

Please tick as appropriate

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

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

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

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

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

1. There are no exceptional circumstances to justify not using the standard method of housing need.
2. The economic analysis is flawed and based on over-optimistic assumptions
3. The amount of land needed is ^{therefore} as high as set out in the Local Plan.
4. Therefore there are no exceptional circumstances as required to change Green Belt boundaries
5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
6. The Council have failed to co-operate with other councils in any meaningful way, and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness. Please continue on a separate sheet if necessary

①

②

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

SHBC should amend 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

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

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

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

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.

PO0440



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: LUCY	First name:
Last Name: MCFEGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83 HEYES AVENUE RAINFORD	Address:
Postcode: WA11 8AP	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

10/03/19

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

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

Yes ☐ (Via Email)

No ☒

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

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

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

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

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NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

1. There are no exceptional circumstances to justify not using the standard method of housing need.
2. Economic analysis is flawed and based on over-optimistic assumptions.
3. The amount of land needed is therefore not as high as set out in the local plan.
4. Therefore there are no exceptional circumstances as required to change green belt boundaries.
5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
6. The council have failed to co-operate with other councils in any meaningful way, and have not published statements of common ground for these reasons it should fail both the legal tests and the test of soundness.

Please continue on a separate sheet if necessary

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

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.

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
--	---------------------------------------

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

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

PO0441



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: MRS	Title:
First Name: PENNY	First name:
Last Name: McFEGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83, HEYES AVE RAINFORD	Address:
Postcode: WA11 8AP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11.3.19

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

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

Yes ☐ (Via Email)

No ☒

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

1. There are no exceptional circumstances to justify not using the standard Method of housing needs.
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 5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
 6. The Council have failed to co-operate with other councils in any meaningful way and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness.
- Please continue on a separate sheet if necessary

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SHBC should amend 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 oral examination	Yes, I wish to participate at the oral examination
--	--

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

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Thank you for taking the time to complete and return this response form.
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PO0442

① - LPA05

② - LPA04

PF0651



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>Michael</i>	First name:
Last Name: <i>Forsyth</i>	Last Name:
Organisation/company: <i>n/a</i>	Organisation/company:
Address: <i>24 Lakeside Gdns Rainford</i>	Address:
Postcode: <i>W11 8TH</i>	Postcode:
	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 stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)No ☒

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

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

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

The field (BHA) floods regularly if this land is deployed for housing this might well cause local flooding - overpower the brook locally and further into St. Helens

Unwise to remove Grade 1 arable land from greenbelt protection losing food production and adversely affecting local employment.

The economic plan is flawed concentrating on warehousing with no robust plan for sustained economic growth and creation of employment

No mention of infrastructure provision for increased road traffic, School or medical facilities.

Please continue on a separate sheet if necessary

①

②

①

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

A radically more robust economic development plan realising growth across the economy rather than, as warehousing facilities securing more sustainable employment

The council should exhaust all brown field options before de-listing Grade 1 green belt sites (SHA)

Comply with Stats issued by ONS.

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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

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PO0443

① - LPAOS

② - Para 1.7.2 DTC

PROSS4



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: FRANK ALAN	First name:
Last Name: BROADBENT	Last Name:
Organisation/company: -	Organisation/company:
Address: 2, KENWAY RAINFORD	Address:
Postcode: WA11 8AX	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/3/19

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

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

Yes ☐ (Via Email)

No ☒

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

RETURN DETAILS

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

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

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

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

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

Policy	✓	Paragraph / diagram / table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulation Assessment	✓
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW.					

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

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

Please tick as appropriate

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

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

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

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

1. There are no exceptional circumstances to justify not using the standard method of housing needs
2. Economic analysis is flawed and based on over optimistic assumptions
3. The amount of land needed is therefore not as high as set out in the local plan
4. Therefore there are no exceptional circumstances as required to change green belt boundaries
5. Other reasonable alternatives have not been fully explored such as lower target figures and using more previously developed land
6. The Council have failed to co-operate with other Councils in any

Please continue on a separate sheet if necessary

meaningful way and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness.

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

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

☐ **Yes**, I wish to participate at the oral examination

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PO0444

13 MAR 2019

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St. Helens
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.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>SHAUN</u>	First name:
Last Name: <u>DUFFY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>440 LIVERPOOL ROAD</u>	Address:
<u>HAYDOCK ST HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>W11 9RP</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>25.02.2019</u>
------------	-------------------------

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☒ Yes (via email)

☐ No

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

Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Please tick as appropriate

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

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

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NO JUSTIFICATION FOR DEVELOPMENT. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM? HOW HAS THE COUNCIL FORMULATED ITS POPULATION ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE RECYCLING OF DERELICT AND OTHER URBAN LAND INC BROWNFIELD SITES.

THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT

CONTINUED ON ATTACHED SHEET

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT

Please continue on a separate sheet if necessary

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

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--

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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 [REDACTED] near to 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.

①

PO0445

748

13 MAR 2019

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Council

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: <u>Matthew</u>	First name:
Last Name: <u>Duffy</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>440 Liverpool Road</u> <u>Haydock</u>	Address:
Postcode: <u>WA11 9DD</u>	Postcode:
<div style="background-color: black; width: 100%; height: 40px;"></div>	Tel No:
	Mobile No:
	Email:

Signature: <div style="background-color: black; width: 150px; height: 30px; display: inline-block;"></div>	Date: <u>12.3.19</u>
--	----------------------

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☒ Yes (via email)

☐ No

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Town Hall
Victoria Square
St Helens
WA10 1HP**

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

Policy	LPA05 SITES 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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See attached sheet

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Remove this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

--

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.

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 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.

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



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

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

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

Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Matthew

Last Name: Dugg

Organisation/company: _____

Address: 440 Liverpool Road
Haydock

Postcode: WA11 9DD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12.3.19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPACY Sites 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

See attached sheet

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

Remove this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

13 MAR 2019

Ref: LPSD

(For official use only)



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: DOROTHY JEAN

Last Name: DUFFY

Organisation/company: _____

Address: 47 WRIGLEY ROAD

HAYDOCK ST HELENS

Postcode: WA10 0NN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13 3 2019

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

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

☒ Yes (via email)

☐ No

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

or by hand delivery to:

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

THERE IS NO JUSTIFICATION FOR THE DEVELOPMENT OF GREENBELT IN HAYDOCK. THIS COUNCIL, OFFICIALLY THE MOST COMPLAINED ABOUT COUNCIL IN THE MERSEYSIDE REGION, HAS A HISTORY OF IGNORING RESIDENTS WISHES, AND SHOULD BE ORDERED TO PROVIDE STRICT PROOF OF HOW IT OBTAINED ITS POPULATION ESTIMATES. WHAT WAS THE EXACT FORMULA USED TO FORECAST THESE ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE USE OF BROWNFIELD SITES. IT SETS AN UNWANTED PRECEDENT.

CONTINUED ON ATTACHED SHEET.

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

REMOVE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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✓	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.

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 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 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.

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.

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



St. Helens
Council

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: DOROTHY JEAN

Last Name: DUFFY

Organisation/company: _____

Address: 47 WRIGLEY ROAD

HAYDOCK ST HELENS

Postcode: WA10 0NN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13 3 2019

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

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Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

THERE IS NO JUSTIFICATION FOR THE DEVELOPMENT OF GREENBELT IN HAYDOLK. THIS COUNCIL, OFFICIALLY THE MOST COMPLAINED ABOUT COUNCIL IN THE MERSEYSIDE REGION, HAS A HISTORY OF IGNORING RESIDENTS WISHES, AND SHOULD BE ORDERED TO PROVIDE STRICT PROOF OF HOW IT OBTAINED ITS POPULATION ESTIMATES. WHAT WAS THE EXACT FORMULA USED TO FORECAST THESE ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE USE OF BROWNFIELD SITES. IT SETS AN UNWANTED PRECEDENT.

CONTINUED ON ATTACHED SHEET.

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

REMOVE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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

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

Please keep a copy for future reference.

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 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 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.

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.

PO0449



St Helens
Council

13 MAR 2019

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

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Julie

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Rd
Penfold Haydock

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

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 stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

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

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

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

Please tick as appropriate

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

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

There is no justification for any more development on any Greenbelt land in Haydock. Haydock will never recover from the recent council decision to grant planning permission for 2 enormous warehouses, that are not even in standing with the adjacent ^{small scale} industrial buildings never mind the surrounding residential area. Haydock's infrastructure cannot cope with any further development. Roads are currently unable to cope with the amount of traffic and further development will inflict ^{further} misery on both residents and all road users. ^{Further development} will result in traffic gridlock.

Continued on attached sheet. Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from Greenbelt.

Please continue on a separate sheet if necessary

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

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☒

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.

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 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.

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

① - LPA04

② - Statement of Common Ground

PF0689

753

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Julie

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Rd

Penfold Haydock
St Helens

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12.03.19

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>There is no justification for the development of Greenbelt land in Haydock. This council, officially the most complained about council in the St Helens regions, has a history of going against residents wishes. They should be made to provide proof of how it obtained its population estimates and the exact formula it used.</i></p> <p><i>Using Greenbelt for development without encouraging the use of brownfield sites sets an unwanted precedent.</i></p> <p><i>Continued on attached sheet.</i></p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

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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.

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

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 [REDACTED] 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.

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.

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.

"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*

PO0451

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Callum

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Road

Haydock, Penrith, St. Helens

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/02/19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 Sites 2EA 5EA 6EA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>There is no plausible justification for continued development on Greenbelt. The council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? How has the Council formulated its population estimates?</p> <p>Using Greenbelt for development sends out the wrong message. It fails to encourage the recycling of derelict and other urban land.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>Continued on attached sheet.</p>	

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

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 [REDACTED] near to 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

PO0452

①-LPA05

②-Statement of Common Ground

PF0691

755

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Callum

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Road
Haydock, Prescot, St. Helens

Postcode: W11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/02/19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPA05 Site 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Not Sure
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

Using Greenbelt for development fails to encourage recycling of derelict and other urban land including brownfield sites

There is no justification. The Council should be put to strict proof of its population estimates. The population of St. Helens has been in steep decline since 1981. Where are all the extra people coming from? What is the unique selling point of a borough in gridlock and a borough that pays a salary 15% below the national average? How have St. Helens Council formulated its population estimates.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Continued on attached sheet

Delete this land from the proposed removal from the Greenbelt

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.

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

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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This image shows a completely blank white page, likely a separator or endpaper from a scanned document. There are no markings, text, or illustrations present.

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 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?

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 undeniable increase in the use of HGV's whilst building the houses and private car useage 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.

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.

PO0453

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: SHAUN

Last Name: UFFY

Organisation/company:

Address: 440 LIVERPOOL ROAD

HAYDOCK ST. HELENS

MERSEYSIDE

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 25.02.2019

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

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

USING GREENBELT FOR THE PURPOSES OF DEVELOPMENT FAILS TO ENCOURAGE THE RECYCLING OF DERELICT AND OTHER URBAN LAND INC BROWNFIELD SITES.

THERE IS NO JUSTIFICATION. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM? HOW HAVE THE COUNCIL FORMULATED ITS POPULATION ESTIMATES?

THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.

CONTINUED ON ADDITIONAL SHEET

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

DELETE THIS LAND FROM THE GREENBELT REMOVAL PROPOSALS AS PER THE REVISED LOCAL PLAN.

Please continue on a separate sheet if necessary

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Thank you for taking the time to complete and return this response form.

1800756M

Shaun 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 (nowhere to build new schools) and roads are 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.

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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.

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?

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 undeniable increase in the use of HGV's whilst building the houses and private car useage 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.

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.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

①

PO0454

①-LPA05

②-Statement of Common Ground

PF0695

759

13 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: S. Lilley Mrs

First Name: Sheila

Last Name: LILLEY

Organisation/company: _____

Address: 331 Liverpool Road

Haydock

N3, St Helens

Postcode: WA11 0UN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

SHEILA LILLEY

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LP05 SITE 2 HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No I don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1) Not Justified - the Council should be put to strict proof of this population estimates. The population of St Helens has been in decline since 1981.</p> <p>2) Brownfield & derelict land should always be developed before Greenbelt.</p> <p>3) No exceptional circumstances for development on Greenbelt.</p> <p>4) The highways are already overstretched and more traffic will lead to chaos.</p> <p>5) Overdevelop in this area and who would want a house facing massive warehouses anyway?</p> <p>6) Lack of infrastructure - schools, medical centres, dentists.</p> <p>7) Excessive flooding problems on this site.</p> <p>8) No Statement of common ground with neighbouring authorities</p>	

Please continue on a separate sheet if necessary

See attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed 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)

X

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Sheila Lilley

Florida Farm 2HA

Haydock is a mess, traffic is horrendous, gridlocked, cars parked everywhere on the main road through Haydock, parked on pavements, right up to traffic lights. Buses can't get through easily, it's like being on the dodgem cars going through Haydock.

And all this even before these Huge Warehouses are even running. It's a disgrace, Haydock is being dumped on from all sides, there is disruption everywhere, there are no school places, there is not the infrastructure for any more houses, what about Medical centers Doctors Dentists etc etc.

I shudder to think what the roads around Haydock will be like when the eyesore Warehouses are operating, you won't be able to move in Haydock, or the East Lancs 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



St. Helens
Council

① - LPA05
② - LPA06
③ - IDP

④ - Para 1.7.2 OTC

13 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Neil	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address:
Postcode: WA10 6HJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 12/03/19
------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
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or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> X
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> X
Please tick as appropriate		

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> X No the plan is based on flawed methodology
Effective?	<input type="checkbox"/> X No the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> X No- it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>I believe that this version does not satisfy: • the requirement for Sustainable development • the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with higher densities. • food security by ignoring Agricultural Land Quality.</p> <p>In addition, the following fundamental elements of the Plan remain questionable - • Economic growth</p>

predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. • Adequate regional and cross border collaboration has not been undertaken. • The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. • The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. •

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. • The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. • The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. • The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. • The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) • The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. • The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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PO0456



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Clare	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address: Postcode:
Postcode: WA10 6HJ	
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.3.2019

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Yes ☒ (Via Email)

No ☐

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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No- it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I believe that this version does not satisfy: • the requirement for Sustainable development • the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with higher densities. • food security by ignoring Agricultural Land Quality. In addition, the following fundamental elements of the Plan remain questionable - • Economic growth

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X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----------	---	--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

1. The first part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0457



St. Helens
Council

775

13 MAR 2019

Ref: LPSD

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Representation (i.e. Comment) Form**

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Part B – Your Representation(s).

- ① LPA02
- ② PARA 1.7.2 DEC
- ③ LPA04
- ④ GENERAL
- ⑤ IDP
- ⑥ LPA08

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: <u>SHRENTA</u>	First name:
Last Name: <u>WORRALL</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>10, CALDERHURST DRIVE</u> <u>WINDLE</u>	Address:
Postcode: <u>WA10 6ED</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

28/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)No ☐

Please note - 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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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See attached sheet

Please continue on a separate sheet if necessary

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N/A

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Yes, I wish to participate at the oral examination

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N/A

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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 guidelines 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 (LP01 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

PO0458



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- ③ LPA04
- ④ CREWERN
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>IRENE</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK CREW</u> <u>WINDLE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA10 6DY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>13.3.2019</u>
------------------------------	------------------------

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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>

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NO DEVELOPMENT ON GREENBELT UNTIL ALL BROWNFIELD SITES ARE USED - NO DEVELOPMENT ON GREENBELT (BHS) UNTIL ROAD INFRASTRUCTURE FIXED -

SBE ATTACHING SHEET

Please continue on a separate sheet if necessary

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at the oral examination

Yes, I wish to participate at the oral examination

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Dear Sirs

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I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons: ✓

I believe that the Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meeting 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 matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities. ①

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. ②

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. ②

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere. ①

Duty to Cooperate.

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government). ③

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 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 as up to 10000 cars (6000 x 1.8 national average car per household) could be involved. WEST LANC L.P.

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. ②

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"** (2)

This is echoed in the Council's own proposed submission draft (LP01 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. (2)

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. (7)

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. *SUGGESTING NOOS!*

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

PFOG 14
SME 8HS

778

13 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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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

- ① PARA 1.7.2 DEC
- ② LPA02
- ③ LPA04
- ④ GENERAL
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK PASS</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>13-3-2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) ☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
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(open Monday-Friday 8.30am - 5.15pm)

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not Sound - SEE ATTACHED</p>
--

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO BUILDING SHOULD TAKE PLACE UNTIL
HIGHWAY INFRASTRUCTURE IS IN PLACE —
SEE ATTACHED

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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PO0460

13 MAR 2019



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.

1. Your Details

(we will correspond via your agent)

Title: MRFirst Name: ANDREWJOSEPHLast Name: GREENOrganisation/company: [REDACTED]Address: PLAS-Y-NAINT339 WALKERS LANE MICK-LE HEAD GREEN, ST. HELENSPostcode: WA9 4AQ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: [REDACTED]Date: 12-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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St Helens
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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	LP05 LP03	Paragraph/ diagram table	71, 72 8.9 A1 89.1 + 89.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				LP05, 6HS. Land East of chapel lane and South of Walsens lane Sutton Manor				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>①. Not positively prepared, not practical, not consistent with achieving sustainable development.</p> <p>②. Not justified, no effective joint working on cross boundary strategic matters has been evidenced.</p> <p>③. Not effective, no effective, does not take into account reasonable alternatives.</p> <p>④. Not consistent with National policy framework (July 2018).</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

E.B.P 080.
Housing Allocated from 2020 in
close proximity to LPSD BHS
HAGS - Not developable capacity: 569.
5 HA (22ha) Reginald Road
4 HA (133ha) Wells Road
N.D.C: 3000

Please continue on a separate sheet if necessary

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No, I do not wish to participate
at the oral examination



Yes, I wish to participate at the oral
examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TO SAVE OUR
GREENBELT

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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PO0461

① - LPA06
② - Para 172 DTC

PF0753

13 MAR 2019



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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JESSICA</u>	First name: _____
Last Name: <u>GREEN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>339 WALKERS LANE, SUTTON MANOR, ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4AQ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>12.03.19</u>
-----------------------	-----------------------

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☐ Yes (via email) ☐ No

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPC03 LP003	Paragraph/ diagram table	7.1, 7.2 8.9 ALL 8.9.1 + 8.9.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				LP003 GHS: Land East of Chapel Lane and South of Walkers' Ref: have tactical manor.			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>① Not positively prepared, Not practical, Not consistent with achieving sustainable development</p> <p>② Not Justified - does not take into account reasonable alternatives.</p> <p>③ Not Effective - No further joint working across boundary strategic matters has been evidenced.</p> <p>④ Not consistent with National policy. NOT SUSTAINABLE in accordance with the National Planning Policy Framework (July 2018)</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

E.B.P 080
 Housing Allocated from 2020
 in close proximity to LPSD 6HS
 HAS - Net developable capacity: 569
 5HA (22ha)
 4HA (133ha) - Reginald Road
 Wells Road
 N.DC-3000

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	<input checked="checked" type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TO SAVE OUR
 GREEN BELT

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.

PO0462



St. Helens
Council

① - LPA06
② - Para 17.2 OTC

819

13 MAR 2019

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Joe	First name:
Last Name: Green	Last Name:
Organisation/company:	Organisation/company:
Address: 330 walkers lane, Sutton Manor, St. Helens	Address:
Postcode: WA9 1AQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?					
Policy	LPCS LPD03	Paragraph / diagram / table	7.1, 7.2 8.9 8.9.1. - 8.97	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment
Other documents (please name document and relevant part/section)			LPD0 6 HShard Gude & Chapel Lane and South of Walsingham REF: Sutton Manor.		

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- ①. Not positively prepared, Not practical, Not consistent with achieving sustainable development
- ② Not Justified - Does not take into account reasonable alternatives.
- ③ Not Effective - No effective joint working or cross boundary strategy matters has been evidenced.
- ④ Not consistent with National policy. NOT SUSTAINABLE in accordance with the National Planning Policy Framework (July 2018)

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.

E.B.P. OSO.
Housing Allocated from 2020 in
close proximity to LPSD 6HS.
HAS - Net Developable Capacity: 569.
SHA (22ha) - Reginald Road
4HA (133ha) - Wells Road
N.D.C - 3000

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

TO SAVE OUR
GREENBELT

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



St.Helens
Council

①-LPA06
②-Para 172 DTC 820

13 MAR 2019

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>DENISE</u>	First name:
Last Name: <u>GREEN</u>	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: <u>PLAS-Y-NAUT</u> <u>339 WALKERS LANE,</u> <u>NUCKLEHEAD GREEN, ST. HELENS</u>	Address:
Postcode: <u>WA9 4AQ</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:
Signature: [REDACTED]	Date: <u>7-3-19.</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email) AND POSTAL ADDRESS ALSO No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
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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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Email: **planningpolicy@sthelens.gov.uk**
Telephone: **01744 676190**

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does the representation relate?									
Policy	LPO5 LP003	Paragraph / diagram / table	7.1, 7.2 8.9 8.9.1 - 8.9.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				LPSD 6HS - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor.					

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

--	--

- ① NOT positively prepared, NOT practical, NOT consistent with achieving sustainable development.
- ② NOT Justified - Does NOT take into account reasonable alternatives.
- ③ NOT Effective - NO effective joint working across boundary strategic matters has been evidenced.
- ④ NOT consistent with National Policy. NOT SUSTAINABLE in accordance with the National Planning Policy Framework (July 2018)

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. 230/2 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.

E.B.P 080.
Housing Allocated from 2020 in
close proximity to LPSD OHS.
HAS - Net Developable Capacity: 569.
5 HA (22ha)
4 HA (133ha) - Reginald road -
Nells road.
N.D.P - 3000

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

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



St. Helens
Council

① LPA06
② Statement of Common Ground

13 MAR 2019

PF 0756

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR
First Name: SCOTT
Last Name: WOLSTENHOLME
Organisation/company: _____

Address: 432 Garswood Rd
Garswood

Postcode: WN4 0XJ

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____

Date: 07/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA 06 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified. No statement of common ground between neighbouring authorities. St Helens has been in population decline since 1981. There is no prog of these population estimates by council to show why the St Helens population is suddenly increasing.

One purpose of green belt is to assist urban regeneration by encouraging the recycling of disused and other urban land. Using greenbelt fields to encourage this

living in the area is not sustainable due to lack of school places, doctors surgeries, bus routes and other services. Sadly, this will encourage the use of cars and further clog the road network and increase pollution.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please delete this book from the proposed removal
of GREENBERT

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0465

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>SCOTT</u>	First name:
Last Name: <u>WILSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>45 (MRS WILSON) RD</u> <u>WILSON</u>	Address:
Postcode: <u>W14 0XJ</u>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <u>07/03/2019</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA 15 11/18	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified Council should be put to proof of population estimates.
Population is declining since 1981.
Wigan, St Helens, Ormskirk all predict rises - how can this be?
No statement of common ground with neighbouring authorities.
Release of greenbelt will cause significant harm to the purposes of the Greenbelt.
Housing in this area is not sustainable due to lack of school spaces, doctors/dentists, bus routes and other services. Use of car will be encouraged due to lack of services.
Access to site on Killingall or Greenhead Rd would be inadequate.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED
REMOVAL OF GREEN BELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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X

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral
examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

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PO0466



St. Helens
Council

①-LPA06 ②-Statement of Common Ground 13 MAR 2019
③-LPA05 ④-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.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS.</u>	Title:
First Name: <u>Soozie.</u>	First name:
Last Name: <u>Willis</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>555 CARSWOOD RD</u>	Address:
Postcode: <u>WN4 0XH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

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St. Helens Council
Town Hall
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St. Helens
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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy <div style="text-align: center;">LP A06</div>	Paragraph / diagram / table		Policies Map <div style="text-align: center;">115</div>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, 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. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Danks at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is accepted for modification, do you consider it necessary to participate at the oral part of the examination (the hearings in public)?

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0467



St. Helens
Council

①-LPA06 ②-Statement of Common Ground 13 MAR 2019
③-LPA05 ④-Statement of Common Ground
St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS.</u>	Title:
First Name: <u>Soozie.</u>	First name:
Last Name: <u>Willis</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>555 CARSWOOD RD</u>	Address:
Postcode: <u>WN4 0XH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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.ssthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LP A05	Paragraph / diagram / table		Policies Map	11A	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>	
Justified?	<input checked="" type="checkbox"/>	
Effective?	<input checked="" type="checkbox"/>	
Consistent with National Policy?	<input checked="" type="checkbox"/>	

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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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.

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PO0468



St. Helens
Council

13 MAR 2019
① LPA06 ② - Statement of Common Ground
③ LPA05 ④ - Statement of Common Ground

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSPD

(For official use only)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>ALAN</u>	First name:
Last Name: <u>JONES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>6, SMOCK LANE</u>	Address:
Postcode: <u>CARSWOOD, WNG4 0SN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

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RETURN DETAILS

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**Local Plan
St. Helens Council
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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@5:

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FURTHER INFORMATION

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Email: planningpolicy@planningpolicy.co.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . Please be as precise as possible.

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

<p> <input type="checkbox"/> Yes, I wish to participate at the oral examination </p>	
<p> <input type="checkbox"/> No, I do not wish to participate at the oral examination </p>	<p> <input type="checkbox"/> Yes, I wish to participate at the oral examination </p>

oral part of the

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.**

PO0469



St. Helens
Council

13 MAR 2019
① LPA06 ② - Statement of Common Ground
③ LPA05 ④ - Statement of Common Ground

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSPD

(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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>ALAN</u>	First name:
Last Name: <u>JONES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>6, SMOCK LANE</u>	Address:
Postcode: <u>CARSWOOD, WNG4 0SN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@51

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@](mailto:planningpolicy@01744676190)
Telephone: 01744 676190

NEXT STEPS

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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N.B. The number of children with asthma is increasing due to pollution and [REDACTED]

Please continue on a separate sheet if necessary

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PO0470

①-LPA05 ②-Statement of Common Ground

PF0763

82

13 MAR 2019

③-LPA06 ④-Statement of Common Ground



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ALICE CHRISTINE	First name:
Last Name: HARRISON	Last Name:
Organisation/company: RE-	Organisation/company:
Address: 549 GARSWOOD RD ASHTON IN MAKERFIELD	Address:
Postcode: WN4 0XH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 10.03.19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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or by e-mail to: planningpolicy@sthelens.gov.uk

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPADS	Paragraph / diagram / table		Policies Map	1 HA	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for Legal Compliance and Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, please say whether it is not:

Please read the Guidance note for explanation of the tests of soundness

Positively Prepared?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Justified?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Effective?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Consistent with National Policy?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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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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 you consider necessary to make your proposal legally compliant or sound. Having regard to the matter you have identified at 6. above where it relates to soundness, please set out any non-compliance with the duty to cooperate in order to make a modification to the proposal. You will need to say why this modification will make the proposal legally compliant. It will be the responsibility of the council to put forward your suggestion in the wording of a policy or text. Please be as clear as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

PO0471

①-LPA05 ②-Statement of Common Ground

PF0763

82

13 MAR 2019

③-LPA06 ④-Statement of Common Ground



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ALICE CHRISTINE	First name:
Last Name: HARRISON	Last Name:
Organisation/company: RE-	Organisation/company:
Address: 549 GARSWOOD RD ASHTON IN MAKERFIELD	Address:
Postcode: WN4 0XH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 10.03.19
-----------------------	----------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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RETURN DETAILS

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post to: **Local Plan
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St. Helens
Merseyside
WA10 1HP**

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Telephone: 01744 676190

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
		UPA06			IHS				
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

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Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	---	--------------------------	---

This image shows a blank white page with a dark, textured horizontal band across the top edge. The rest of the page is completely empty and white.

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.**

PO0472



St. Helens
Council

① - LPA06
② - Statement of Common Ground

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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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: MRS	Title:
First Name: JOYCE	First name:
Last Name: GENT	Last Name:
Organisation/company:	Organisation/company:
Address: 33 GILVIAN CRESCENT GARSWOOD, WIGAN.	Address:
Postcode: WN4 0SS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	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 updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Justified?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Effective?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Consistent with National Policy?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is accepted as a modification, do you consider it necessary to participate at the oral part of the examination? (check answer 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.**

PO0473



St. Helens
Council

5720
① - LPAOS ② - Statement of Common Ground
③ - LPAOS ④ - 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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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CHRISTOPHER	First name:
Last Name: TULLY	Last Name:
Organisation/company:	Organisation/company:
Address: 3918 GARDWOOD A	Address:
Postcode: WN4 0TZ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 10.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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Merseyside
WA10 1HP**

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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1

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N.B. The number of children with asthma is increasing due to pollution and [REDACTED]

Please continue on a separate sheet if necessary

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PO0474



St. Helens
Council

520
① - LPAOS ② - Statement of Common Ground
③ - LPAOS ④ - Statement of Common Ground

13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CHRISTOPHER	First name:
Last Name: TULLY	Last Name:
Organisation/company:	Organisation/company:
Address: 3918 GARDWOOD A	Address:
Postcode: WN4 0TZ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 10.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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No ☐

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map	115	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
<i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
<i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representative is seeking a modification, do you consider it necessary to participate at the oral part of the evaluation? (its hearings in public)

<input checked="" type="checkbox"/>	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.

[illegible]

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0475

831

13 MAR 2019



St. Helens
Council

① - LPA05 ② - 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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Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address:	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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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**Now please complete PART B of this form, setting
out your representation/comment.**

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPSD LPA05 IHA	Paragraph / diagram / table		Policies Map	IHA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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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 and 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

AH!

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This image shows a blank page from a document. The page is mostly white with some minor scanning artifacts or dust specks visible near the top edge. There are dark, irregular borders along the top, bottom, and side edges, which appear to be the edges of the scanned paper or the scanner bed. No text, figures, or tables are present on this page.

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.

PO0476

13 MAR 2019

St. Helens
CouncilSt Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>JOSEPH</i>	First name:
Last Name: <i>BALL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>48 WILKINSON RD</i>	Address:
Postcode: <i>WNL 0XJ</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <input type="text"/>
------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than **5pm on 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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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			
LPSD LPA061HS		1 HS					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please tick as appropriate		

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . Please be as precise as possible.
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<input checked="checked" type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination

--

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**Thank you for taking the time to complete and return this response form.
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PO0477



St. Helens
Council

① - LPAOS ② - Statement of Common Ground
13 MAR 2019
③ - LPAOS ④ - 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.

1. Your Details	2. 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:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
[Redacted]	Email:

Signature: [Redacted]

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.

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 ☐

RETURN DETAILS

post to:

or by hand delivery to:

or by e-mail to:

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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3. To which part of the Local Plan does this representation relate?

Policy PA06		Paragraph / diagram / table		Policies Map	IHS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	Yes <input type="checkbox"/>	
Justified?	Yes <input checked="" type="checkbox"/>	
Effective?	Yes <input checked="" type="checkbox"/>	
Consistent with National Policy?	Yes <input checked="" type="checkbox"/>	

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

This image shows a blank, aged, cream-colored page, likely an endpaper or flyleaf of a book. The paper has a slightly textured appearance with some minor discoloration and small dark spots, possibly due to age or handling. A faint vertical crease is visible near the left edge. The top edge of the page is dark, suggesting the binding or the edge of the book cover.

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.

PO0478



St. Helens
Council

① - LPA06 ② - Statement of Common Ground
13 MAR 2019
③ - LPA06 ④ - 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 A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LOUISE	First name:
Last Name: WISWELL	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
[Redacted]	Email:

Signature: [Redacted]

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.

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 ☐

RETURN DETAILS

post to:

or by hand delivery to:

or by e-mail to:

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form: your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
29 AD5					1HA				
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

3

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

HH:

2009.9

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

PO0479



St. Helens
Council

834
①-LPA05 ②-Statement of Common Ground
③-LPA06 ④-Statement of Common Ground
13 MAR 2019
St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: DENNIS PARKINSON	First name:
Last Name: PARKINSON	Last Name:
Organisation/company:	Organisation/company:
Address: 436 GARSWOOD ROAD NORTH ASHTON NEAR WIGAN	Address:
Postcode: WN4 0XJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

5-3-19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPAS	Paragraph / diagram / table		Policies Map	HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
<i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
<i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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

1

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

Growing up I remember the coal pits, 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 mine shafts under all the fields and under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If you wish to participate at the oral part of the examination, please indicate whether you wish to participate at the oral part of the examination.

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please indicate whether you wish to participate at the oral part of the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0480



St. Helens
Council

834
①-LPA05 ②-Statement of Common Ground
③-LPA06 ④-Statement of Common Ground
13 MAR 2019
St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: DENNIS PARKINSON	First name:
Last Name: PARKINSON	Last Name:
Organisation/company:	Organisation/company:
Address: 436 GARSWOOD ROAD NORTH ASHTON NEAR WIGAN	Address:
Postcode: WN4 0XJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 5-3-19
-----------------------	--------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

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3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table		Policies Map	1 HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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[REDACTED] Growing up I remember the coal pits, 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. 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 [REDACTED]

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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PO0481

①-LPA05

②- Statement of Common Ground

PF0771

13 MAR 2019

St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: CAROLE

Last Name: WILSON

Organisation/company: _____

Address: 53 HILLBECK CRESCENT

GARSWOOD

ASHTON - IN - MAKERFIELD

Postcode: WN4 0RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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**Local Plan
St.Helens Council
Town Hall
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St Helens
WA10 1HP**

or by hand delivery to:

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setting out your representation/comment.**

**Please use a separate copy of Part B
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3. To which part of the Local Plan does this representation relate?

Policy LPA05 1HA	Paragraph/ diagram/ table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATES DATA. PREVIOUS CENSUS DATA SHOWS THE POPULATION HAS BEEN IN DECLINE SINCE 1981. EVEN ON THE PROPOSED LOCAL PLAN DATA PROVIDED, THE ESTIMATED 'INCREASE' STILL PUTS THE POPULATION DOWN ON LEVELS 20 YEARS AGO - WHERE ARE ALL THE PEOPLE COMING FROM?
2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION! BY RECYCLING URBAN/DERELICT/BROWNFIELD LAND. RELEASING GREENBELT GOES AGAINST THIS POLICY & THE COUNCIL'S OWN CURRENT CORE POLICY (CLL1) "SAFEGUARDING & ENHANCING THE QUALITY OF LIFE IN ST. HELENS."
3. HOUSING IN THIS AREA ISN'T SUSTAINABLE DUE TO THE LACK OF INFRASTRUCTURE. USE OF CARS IS BEING ENCOURAGED THEREBY NEGATIVELY AFFECTING POLLUTION LEVELS AND AIR QUALITY.
4. ACCESS ON BILLINGE ROAD / LEVING GREEN ROAD / GAKSWOOD ROAD IS / WOULD BE INADEQUATE - ANY NECESSARY HIGHWAYS WORKS, SHOULD ANY SCHEME BE APPROVED, MUST BE FUNDED BY THE DEVELOPER - NOT THE COUNCIL TAX PAYER.
5. NO STATEMENT OF COMMON GROUND WITH WIGAN MBC.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL OF THE GREEN BELT .

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0482

① - LPA06

② - Statement of Common Ground

13 MAR 2019

PF0712

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part B - Your Representation(s)

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(we will correspond via your agent)

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First Name: CAROLE

Last Name: WILSON

Organisation/company: _____

Address: 53 HILLBECK CRESCENT

GARSWOOD

KINTON-IN-MARKFIELD

Postcode: WN4 0RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPAD6 1HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATED DATA. PREVIOUS CENSUS DATA SHOWS POPULATION HAS BEEN IN DECLINE SINCE 1981. EVEN ON THE PROPOSED LOCAL PLAN DATA PROVIDED, THE ESTIMATED 'INCREASE' STILL PUTS THE POPULATION DOWN ON LEVELS 20 YEARS AGO - WHERE ARE ALL THE PEOPLE COMING FROM?</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION BY RECYCLING URBAN/DERELICT/BROWNFIELD LAND. RELEASING GREENBELT GOES AGAINST PLANNING POLICY & COUNCIL'S OWN CURRENT CORE POLICY CQ1 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF INFRASTRUCTURE - SCHOOL PLACES, DOCTORS, DENTISTS, BUS ROUTES SHOPS, OTHER SERVICES. USE OF CARS IS BEING ENCOURAGED THEREBY NEGATIVELY AFFECTING POLLUTION LEVELS /AIR QUALITY LEVELS.</p> <p>4. ACCESS ON BILLINGE ROAD /LEYLAND GREEN ROAD/GATESWOOD ROAD WOULD BE INADEQUATE - ANY NECESSARY HIGHWAYS WORKS SHOULD ANY SCHEME BE APPROVED MUST BE FUNDED BY THE DEVELOPER - NOT THE COUNCIL TAX PAYER.</p> <p>5. NO STATEMENT OF COMMON GROUND WITH WIGAN MBC.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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.

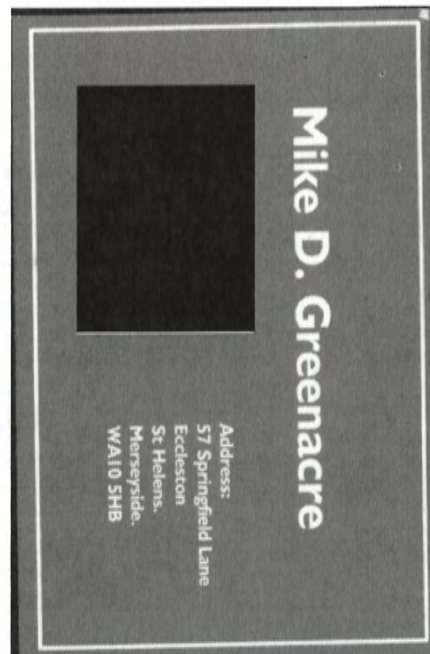
Please keep a copy for future reference.

PO0483

- ① - LPA04
- ② - LPA05
- ③ - LPA06

- ④ - Para 17.2 DFC
- ⑤ - GEN
- ⑥ - IDP

PF0773





St. Helens
Council

838 13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

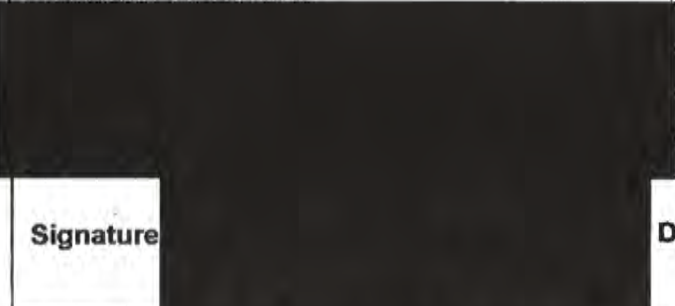
Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. 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	Address:
Postcode: WA10 5HB	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.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE SEE ATTACHED SUBMISSION

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE SEE SUBMISSION

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination

--	--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

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
2. 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. (3)
- 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. (3)
- 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
2. The plan fails to fully comply with the Duty to Cooperate - cross border collaboration. (4)
3. The plan is not justified nor will it be effective based on the current exaggerated aspirations based upon using incorrect current data (122)
4. 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. (122)
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] (1)
7. The plan's assessment of Housing Need requirements does not use Standard Methodology to arrive at its forecast and then fails to justify a (2)

PO0484



①-LPA06 ②-Statement of Common Ground 854

St Helens Borough Local Plan
2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

15 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Margaret

Last Name: Cummings

Organisation/company:

Address: 348 Garwood Rd

Garwood

NE Wigan

Postcode: WN4 0TY

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 11.3.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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☐ Yes (via email)

☐ No

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Victoria Square
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WA10 1HP**

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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LP A06 Site 1125	Paragraph/ diagram table	A	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?
- one of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the ~~re-use~~ recycling of derelict land & other urban land. Using Greenbelt fails to encourage this
- The release of Greenbelt will cause significant harm to the purposes of the Greenbelt
- There is no statement of common ground with neighbouring authorities

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO ✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---------	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0485



St. Helens
Council

① - LPA05 ② - Statement of Common Ground
③ - LPA06 ④ - Statement of Common Ground

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

24 APR 2019

(For official use only)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUE	First name:
Last Name: DINSMORE	Last Name:
Organisation/company:	Organisation/company:
Address: 2 ULLSWATER AVE ASHTON-IN-MARKFIELD	Address:
Postcode: WY4 8 AS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: 3.4.19.
--	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy PA05		Paragraph / diagram / table		Policies Map	14A	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

PO0486



St. Helens
Council

① - LPA05 ② - Statement of Common Ground
③ - LPA06 ④ - Statement of Common Ground

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

24 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUE	First name:
Last Name: DINSMORE	Last Name:
Organisation/company:	Organisation/company:
Address: 2 ULLSWATER AVE ASHTON-IN-MARKFIELD	Address:
Postcode: WY4 8 AS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: 3.4.19.
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP A06				1 HS					
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/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 1H5. 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

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0487

WF0037

① LPA01

④ LPA04

⑦ LPA05.1

② LPA02

⑤ LPA04.1

⑧ LPA06

③ LPA03

⑥ LPA05

⑨ LPA07

Representor Details

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA

1.7.2 DCL

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

②

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

1.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

7. Please set out modification(s) you consider are necessary

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPPO) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is been allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

PO0488

SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

Representor Details

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.
- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- 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

②

J) Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

K) The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

L) Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

7. Please set out modification(s) you consider are necessary

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

PO0489

①-LPA06 ②-Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0086
Type of Submission	Web submission
Full Name	Mr Marc Gill
Organisation	N/A
[Redacted]	
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 Environmental Assessment	X
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 plan to remove eccleston park golf club from green belt to potentially be built on is wrong.

- The local infrastructure 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 with 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.

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- 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 pollution 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 [REDACTED] and believe that removing the golf club from green belt will be detrimental to the local area and to my [REDACTED] 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
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PO0490

①-LPA05 ②-LPA06 ③-GEN
④-Para 1.7.2 DTC ⑤-IDP

Representor Details

Web Reference Number	WF0094
Type of Submission	Web submission
Full Name	Mr Alan Ford
Organisation	
Address	19 Fistril Drive Windle St Helens 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, Demographer's Report, Economist Report

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, 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 its 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.

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4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities. ①
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 importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit. ②
6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. ①
7. Adequate regional and cross border collaboration has not been undertaken. ④
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 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. ①
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 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). ③
15. 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. ③
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 funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ⑤
17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted.
18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered. ②
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 mention of previously developed town centre and low-level contaminated sites being brought back

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

2

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
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PO0491

①-LPA05 ②-LPA06 ③-GEN
④ Para 1.7.2 DTC ⑤-IDP

Representor Details

Web Reference Number	WF0099
Type of Submission	Web submission
Full Name	Mrs Jacqueline Ford
Organisation	
Address	19 Fistril 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.

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4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities. ①

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 importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit. ②

6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. ①

7. Adequate regional and cross border collaboration has not been undertaken. ④

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 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. ①

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 Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. ③

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). ⑤

15. 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. ③

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 funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ⑤

17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted.

18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered. ②

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 mention of previously developed town centre and low-level contaminated sites being brought back

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.

2

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
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PO0492

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 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. 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.

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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.

01

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.

04

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.

06

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.

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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.

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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.

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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 hour. The bus service stops at 6pm residents must rely on cars. 06

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 appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

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 protection 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 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. 03

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 of the plan. 01

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. 08

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 be 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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PO0493

Representor Details

Web Reference Number	WF0128
Type of Submission	Web submission
Full Name	mrs julie ireland
Organisation	
Address	105 longton lane rainhill l35 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 Environmental Assessment	X
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.

1. St Helens has a reducing population where is the additional population coming from to justify additional housing.
2. 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

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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	3/12/2019 9:43:01 PM
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PO0494

① - LPA05 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0152
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	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

①

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 Liverpool-bound 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 8:03:24 PM

PO0495

① - LPA06 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

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

①

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 Liverpool-bound 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

PO0496

① - LPA05 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0157
Type of Submission	Web submission
Full Name	Mr Andrew 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)

No

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

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enough research on the impact this plan would have on local utilities and services such as broadband access and water supply.

Garswood has a small number of access roads that are already busy, this plan would not be effective without significant investment in roads 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.

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 and will not promote the regeneration of many of St Helen's former industrial land.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt unless guarantees 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 7:53:43 PM
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PO0497

① - LPA06 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0158
Type of Submission	Web submission
Full Name	Mr Andrew 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)

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.

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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

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enough research on the impact this plan would have on local utilities and services such as broadband access and water supply.

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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 and will not promote the regeneration of many of St Helen's former industrial land.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:49:32 PM
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PO0498

① LPA05 ② LPA06,345 ③ LPA06,845 ④ - Statement of Common Ground

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?

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.

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 where 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.

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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 train stations 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

PO0499

①-LPA05 ②-LPA04 ③-Green Belt Review
 ④-LPA07 ⑤-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.

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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, 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 of growth.

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 issues.

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

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 7:39:21 PM
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PO0500

①-LPA05 ②LPA05, 1HA 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	
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:

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6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as 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.

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*The infrastructure is wholly inadequate; the doctors surgery already has long wait times and more housing would make this far worse. The local primary schools wouldn't be able to cope with a large influx of children.

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* There is no statement of common ground with neighbouring authorities.

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* Primary and high schools in Wigan would be impacted.

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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
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