



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO2801 – PO2900

SEPTEMBER 2020

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PO2801

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Ref: LPSD

06 MAR 2019

(For official use only)



St. Helens
Council

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

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

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>FRANCES</u>	First name: _____
Last Name: <u>COOKSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>43 OAK TREE</u>	Address: _____
<u>RD ECCLESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 5LL</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: <u>[Redacted]</u>	Date: <u>27.2.19</u>
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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 - 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	LPA05 LPA06	Paragraph/ diagram table		Policies Map	SHS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No
Effective?	<input checked="" type="checkbox"/> No
Consistent with National Policy?	<input checked="" type="checkbox"/> No

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 <u>set out</u> your comments.	
<p>HAS THIS PLAN REALLY BEEN THOUGHT TRU. TRAFFIC ALREADY A MAJOR PROBLEM GETTING TO EAST LANCES. MORE CARS MORE HOUSES WON'T WORK. ST HELEN HAS PLenty OF SPACE FOR HOUSES. LAND LEFT EMPTY FOR YEARS TOWN COULD A NEPS MORE THOUGHT NEED TO GO INTO USING GREEN BELT AS PLenty OF EMPTY LAND AROUND ST HELEN</p>	

Please continue on a separate sheet if necessary

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

I BELIEVE NO MODIFICATIONS ARE
NEEDED AS WE NEED TO LEAVE THIS
LAND AS IT WAS ALWAYS INTENDED
GREEN BELT FOR ALL PEOPLE TO ENJOY

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.

PO2802



① - LPA06
② - Para 1.7.2 DTC

315 PFO291

Ref: LPSD

07 MAR 2019
(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: NEVILLE

Last Name: HARDMAN

Organisation/company:

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 7 March 2019

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

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

☐ Yes (via email)

☒ No

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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 8 HS		Paragraph/ diagram table		Policies Map PAGES 9-10		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 DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THERE ARE NO EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY] ① NOT USING THE STANDARD FOR HOUSING NEEDS COUNCIL NOT COOPERATED WITH OTHER COUNCILS AND NOT] ② PUBLISHED ANY STATEMENTS OF COMMON GROUND BUILDING ON AGRICULTURAL LAND IS UNACCEPTABLE] ①</p>

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 ANY PROPOSED
DEVELOPMENT

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:

--

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.

PO2803

①-LPA05 ②-LPA06
③-10P

PFO297

322



St. Helens
Council

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

Ref: LPSD

07 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>SIMON</u>	First name: _____
Last Name: <u>ROBERTS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>5 SELKIRK DRIVE</u> <u>ECCLESTON</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA10 5PD</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>28/2/19</u>
-----------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</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.
Please see enclosed letter .

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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



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

Yes, I wish to participate at the oral examination

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

[A single diagonal line is drawn across the response area.]

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

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

Please keep a copy for future reference.

St Helens Local Plan Submission Draft [LPSD]

I would like to raise my objections to plans to designate the parcel of land known as 8HS as 'safeguarded' on the following grounds:

It is abundantly clear that this plan does not satisfy the requirement for sustainable development, sustainable transport, effective land use and the need to promote food security. In addition, the housing targets are based on aspirational growth predictions. Indeed, the latest estimate produced by the ONS [2016] predicts that an additional 383 houses per year will be needed which is far less than the council's prediction of 486 which is based on an outdated 2014 forecast. In recent years, Eccleston has shared in the need to build more housing across St Helens and there are already hundreds of new homes, for instance on the previous Triplex industrial land and the old rugby ground on Knowsley Road as well as other sites on Knowsley Road, Bleak Hill Road and Houghtons Lane that are being built on currently. This has already impacted on local services and created much more traffic. In addition to this, many, many new houses have been built in the nearby City Road area and on the old Ford Ashall's site. These have also added many extra vehicles to the local roads.

It is my contention that local facilities are not able to meet the population growth that will result from the projected number 1,027 homes created by 8HS. Both the new Health Centre at Millfields and the proposed extension to Bleak Hill School are to cope with existing demand. The Infrastructure Delivery Plan does not show how medical services including number of GPs, dentists, Whiston and St Helens hospitals will provide for over a thousand additional families and the IDP also doesn't show the impact of this additional Eccleston housing on long term education. There is no mention about funding or managing the necessary additional resources and no evidence of collaboration with the Hospital Trust, local CCG's and education authorities.

Within the plan, there is no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register. There are adequate Brownfield sites on which to build additional housing. Council records show that there is brownfield land that has the lowest level of contamination and I stress that this land needs to be made available so that greenbelt and safeguarded land is protected from development now and in the future. The excuse for not making use of brownfield sites is that it is not economical for the house builders. However, only this week, house builder, Persimmon announced record profits of over ONE BILLION POUNDS!! Therefore, I cannot see justification for not using brownfield sites, even if they do cost more to develop.

The council has no policy for bringing unsuitable sites outside the Brownfield Register back into use. I believe that this will be possible within the 25 year period of the safeguarded period under consideration. SHMBC has a duty to make effective use of land and should be developing the town centre with high density housing to make use of huge, empty retail units and to house people where there is a bus and train station on hand to avoid using cars for travel. Housing plans should promote less vehicle dependency, not more. If houses are developed on 8HS how will these people travel to work and for leisure without using a car?

In addition to all of the above, I am against the loss of grade 1 and 2 agricultural land within 8HS. These fields are a valuable and needed supply of wheat and vegetables so why build on productive farmland thereby destroying a valuable asset and visual amenity forever? With the imminent departure of the EU, the reliance on home grown crops will increase.

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A further major concern of mine relates to the huge increase in traffic that would be created by 1000 extra families and the likelihood of a further 2000 plus additional residential cars on local roads. Current road improvements at Windle Island were already planned to facilitate the projected massive growth in traffic linked to the super port in Liverpool and logistics warehousing along the East Lancashire Road. The Infrastructure Delivery Plan does not show how road improvements within Windle and Eccleston will be made or funded. Indeed the plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. The increase in traffic that would result from housing on 8HS will have a significant and negative impact on air-quality, noise, tranquillity and general health. It promotes greater vehicle dependency with its proposal for edge of town housing development.

So in summary, and to be totally clear, I am completely against the plan to designate the land 8HS as safeguarded since it does not satisfy the need for sustainable development, sustainable transport and effective land use.

Yours Faithfully,

A black rectangular box redacting the signature of Simon Roberts.

Simon Roberts

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②

PO2804

① - LPA05 ② - LPA06
③ - 10P

PF0298



St Helens
Council

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

Ref: LPSD

07 MAR 2019

(For official use only)

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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>NIKKI</u>	First name:
Last Name: <u>ROBERTS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 SELKIRK DRIVE</u>	Address:
<u>ECCELESTON</u>
<u>ST. HELENS</u>
Postcode: <u>WA10 5PD</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>28.2.19</u>
-----------------------	----------------------

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No - The plan is based on flawed methodology.
Effective?	<input checked="" type="checkbox"/> No - The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No - It does not comply with NPPF2018.

<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> <p>Please see enclosed letter.</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:

[Handwritten line indicating a response area]

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

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

Please keep a copy for future reference.

St Helens Local Plan Submission Draft [LPSD]

I would like to raise my objections to plans to designate the parcel of land known as 8HS as 'safeguarded' on the following grounds:

It is abundantly clear that this plan does not satisfy the requirement for sustainable development, sustainable transport, effective land use and the need to promote food security. In addition, the housing targets are based on aspirational growth predictions. Indeed, the latest estimate produced by the ONS [2016] predicts that an additional 383 houses per year will be needed which is far less than the council's prediction of 486 which is based on an outdated 2014 forecast. In recent years, Eccleston has shared in the need to build more housing across St Helens and there are already hundreds of new homes, for instance on the previous Triplex industrial land and the old rugby ground on Knowsley Road as well as other sites on Knowsley Road, Bleak Hill Road and Houghtons Lane that are being built on currently. This has already impacted on local services and created much more traffic. In addition to this, many, many new houses have been built in the nearby City Road area and on the old Ford Ashall's site. These have also added many extra vehicles to the local roads.

It is my contention that local facilities are not able to meet the population growth that will result from the projected number 1,027 homes created by 8HS. Both the new Health Centre at Millfields and the proposed extension to Bleak Hill School are to cope with existing demand. The Infrastructure Delivery Plan does not show how medical services including number of GPs, dentists, Whiston and St Helens hospitals will provide for over a thousand additional families and the IDP also doesn't show the impact of this additional Eccleston housing on long term education. There is no mention about funding or managing the necessary additional resources and no evidence of collaboration with the Hospital Trust, local CCG's and education authorities.

Within the plan, there is no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register. There are adequate Brownfield sites on which to build additional housing. Council records show that there is brownfield land that has the lowest level of contamination and I stress that this land needs to be made available so that greenbelt and safeguarded land is protected from development now and in the future. The excuse for not making use of brownfield sites is that it is not economical for the house builders. However, only this week, house builder, Persimmon announced record profits of over ONE BILLION POUNDS!! Therefore, I cannot see justification for not using brownfield sites, even if they do cost more to develop.

The council has no policy for bringing unsuitable sites outside the Brownfield Register back into use. I believe that this will be possible within the 25 year period of the safeguarded period under consideration. SHMBC has a duty to make effective use of land and should be developing the town centre with high density housing to make use of huge, empty retail units and to house people where there is a bus and train station on hand to avoid using cars for travel. Housing plans should promote less vehicle dependency, not more. If houses are developed on 8HS how will these people travel to work and for leisure without using a car?

In addition to all of the above, I am against the loss of grade 1 and 2 agricultural land within 8HS. These fields are a valuable and needed supply of wheat and vegetables so why build on productive farmland thereby destroying a valuable asset and visual amenity forever? With the imminent departure of the EU, the reliance on home grown crops will increase.

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A further major concern of mine relates to the huge increase in traffic that would be created by 1000 extra families and the likelihood of a further 2000 plus additional residential cars on local roads. Current road improvements at Windle Island were already planned to facilitate the projected massive growth in traffic linked to the super port in Liverpool and logistics warehousing along the East Lancashire Road. The Infrastructure Delivery Plan does not show how road improvements within Windle and Eccleston will be made or funded. Indeed the plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. The increase in traffic that would result from housing on 8HS will have a significant and negative impact on air-quality, noise, tranquillity and general health. It promotes greater vehicle dependency with its proposal for edge of town housing development.

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So in summary, and to be totally clear, I am completely against the plan to designate the land 8HS as safeguarded since it does not satisfy the need for sustainable development, sustainable transport and effective land use.

Yours Faithfully,



Nicola Roberts

PO2805

331



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

Ref: LPSD

07 MAR 2019

(For official use only)

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This form has two parts;

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>BARBARA</u>	First name: _____
Last Name: <u>HEWITT</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>40 HAMILTON ROAD</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ASHTON-IN-MAKERFIELD</u>	_____
Postcode: <u>WN4 0SU</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>6.3.2019</u>
------------------------------	-----------------------

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

☒ Yes (via email)

☐ No

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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Victoria Square
St Helens
WA10 1HP**

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planningpolicy@sthelens.gov.uk

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981, DERELICT AND URBAN LAND SHOULD BE USED NOT GREEN BELT - THIS WILL CAUSE HARM TO GREENBELT IF THE PLAN GOES AHEAD. THERE ARE NOT RESOURCES TO SUSTAIN THESE DEVELOPMENTS I.E., SCHOOLS, DOCTORS SURGERIES, ENABLING ROADS ETC.,

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.

PO2806

332



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

Ref: LPSD

07 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>MR</u>	Title: _____
First Name: <u>STEPHEN</u>	First name: _____
Last Name: <u>HEWITT</u>	Last Name: _____
Organisation/company: <u>N/A.</u>	Organisation/company: _____
Address: <u>40 HAMILTON ROAD</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SU</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>6.3.2019</u>
------------------------------	-----------------------

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☒ Yes (via email)

☐ No

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LP</i> <i>A06</i> <i>STE 1HS</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<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>THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS Population estimates. The population of St Helens has been in decline since 1981. DERELICT AND URBAN LAND SHOULD BE USED NOT GREENBELT. THIS plan will cause harm to the Greenbelt if it goes ahead. There are not the resources to sustain these developments ie., schools, doctors surgeries, enabling roads etc.</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 THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT.

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.

PO2807



St. Helens
Council

(336)

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

Ref: LPSD

07 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>MR</u>	Title: _____
First Name: <u>ANDREW BRIAN</u>	First name: _____
Last Name: <u>DEAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 THE CLOISTERS</u> <u>ECCLESTON ST HELENS</u>	Address: _____
Postcode: <u>WA10 5EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>28/2/19</u>
------------------	----------------------

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

☒ Yes (via email)

☐ No

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

**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	8HS & 3HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)		for NALM HA16							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO. THE PLAN IS BASED ON FLAWED METHADOLGY
Effective?	<input checked="" type="checkbox"/> NO. THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> NO. IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
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 LAND IS "GREENBELT" LAND & SHOULD REMAIN SO. THERE IS ENOUGH BROWN BELT LAND WHICH SHOULD BE DEVELOPED FOR HOUSING IN STHELENS. THE SURROUNDING ROAD INFRASTRUCTURE CANNOT SUPPORT AN ADDITIONAL 2000+ NEW PROPERTIES & NEITHER COULD THE LOCAL INFRASTRUCTURE OF SCHOOLS, DOCTORS, DENTISTS ETC RAIL STATIONS ETC. BUILDING NEW HOUSING ON THIS LAND IS NEITHER JUSTIFIED, EFFECTIVE OR CONSISTANT WITH NATIONAL POLICY. THE PLAN DOES NOT SATISFY THE CRITERIA FOR SUSTAINABLE TRANSPORT AS IT PROMOTES INCREASED CAR DEPENDENCY ON ALREADY VERY BUSY ROADS REMOTE FROM LOCAL TRASPORT HUBS.

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.

WE BROWN BELT LAND NOT GREEN BELT 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:

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.

PO2808

344

Ref: LPSD

08 MAR 2019

(For official use only)



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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>PHILIP DAVID CHARLES</u>	First name: _____
Last Name: <u>JOHNSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>48 QUEENS DRIVE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6HF</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>06/03/19</u>
------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

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

RETURN DETAILS

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

or by hand delivery to:

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> There are flaws in the planning and in ideas for delivering the plan.
Effective?	<input checked="" type="checkbox"/> It cannot be delivered as set out.
Consistent with National Policy?	<input checked="" type="checkbox"/> NPPF 2018 shows the plan to be out of touch with the latest thinking

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Plan requires very high dependence on use of private cars - this is not sustainable. Public transport provision is poor.</p> <p>Growth predictions (in terms of employment) are not realistic.</p> <p>Too much emphasis on use of Green Space rather than development closer to Town Centre. Consequent loss of Agricultural Land (of high quality) is too risky given impact of Brexit on food availability and food costs. Need for local produce will be greater. SHS can do this.</p> <p>Local schools are already struggling to cope with demand.</p> <p>Healthcare provision is insufficient to meet increased demand.</p>	

Please continue on a separate sheet if necessary

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Plan needs to reconsider current Brownfield land (and that which may come available) and Previously Developed land.

Green Belt ~~needs~~ which has been 'safeguarded' needs to be removed from list of safeguarded land and remain as Green Belt.

Plan needs to promote less dependency on private cars (given increase in noise + air pollution from cars).

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)

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.

PO2809

348

Ref: LPSD

08 MAR 2019

(For official use only)



St. Helens
Council

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

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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>ANDREW</u>	First name: _____
Last Name: <u>COCKER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>16 SMOCK LANE, GARSWOOD,</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
Postcode: <u>WNA 0JN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20/2/2019</u>
------------------	------------------------

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

☒ Yes (via email)

☐ No

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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St Helens
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?									
Policy LPA06		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA05		SITE IHS							
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 set out your comments.	
<p>• Not justified - Council needs to put to strict proof of its population estimates. Population of St Helens MBC has been in decline since 1981. Where are all these extra people coming from who need to be housed?</p> <p>• One of the purposes of greenbelt is to assist urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.</p> <p>• HOUSING IN THIS AREA IS NOT SUSTAINABLE BECAUSE OF LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES AND OTHER SERVICES. THE GREATER USE OF CARS IS BEING ENCOURAGED IN AN AREA WHERE THERE IS A LACK OF FACILITIES. THE GREATER USE OF CARS IS BEING ENCOURAGED IN AN AREA WHERE THERE IS A LACK OF FACILITIES. THE GREATER USE OF CARS IS BEING ENCOURAGED IN AN AREA WHERE THERE IS A LACK OF FACILITIES. THE GREATER USE OF CARS IS BEING ENCOURAGED IN AN AREA WHERE THERE IS A LACK OF FACILITIES.</p>	

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

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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PO2810

356



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

Ref: LPSD

08 MAR 2019
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PART A - YOUR DETAILS

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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>KENNETH</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GROVE</u> <u>GARSWOOD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0RT</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>23 Feb 2019</u>
-----------------------	--------------------------

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

☒ Yes (via email)

☐ No

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	LPA06 SITE 145	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"/>

<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>Not justified - The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict</p>

Please continue on a separate sheet if necessary

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

Delete this land from the ^{proposed} removal of the Greenbelt

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Please keep a copy for future reference.

Section 6 continued...

and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt.

Housing in this area is not sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities

There is no statement of common ground with neighbouring authorities

Development will only accelerate the ever decreasing amount of land available to help feed an ever increasing population.

PO2811

357



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

Ref: LPSD

08 MAR 2019

(For official use only)

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PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>GILLIAN</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GROVE</u> <u>GARSWOOD</u> <u>WILGAN</u>	Address: _____
Postcode: <u>WN4 0RJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>5th March 2019</u>
------------------	-----------------------------

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☒ Yes (via email)

☐ No

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Telephone: **01744 676190**

NEXT STEPS

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setting out your representation/comment.**

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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	LPA06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<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> <ul style="list-style-type: none"> - Not justifiable on grounds of increasing population estimates. These have not been proved. In fact, the population of St. Helens has been declining since 1981. - Priority for housing should be given to derelict and brownfield sites which will regenerate the urban area, rather than robbing the Greenbelt and allowing urban sprawl to creep up on our villages + change their characteristics forever. - Once the Greenbelt is lost it cannot be recovered. We need the land for its potential to feed grow more food crops. <p style="text-align: right;">CONTINUED →</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.

This parcel of Greenbelt land should be ~~removed~~^{deleted} 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.

(CONT).

- The infrastructure in the village already struggles to sustain adequate school places, doctors/medical facilities. A big increase in population would lead to even more demand.
- Lack of facilities would mean encouraging more use of cars, as would the poor public transport the village already suffers from. Our roads are only suitable for the local traffic we already generate, we need to keep our children safe from traffic - this is a rural area.
- There is inadequate access to the proposed site from Billinge Road/Keyland Green Road & Garswood Road.
- There is no statement of common ground with neighbouring authorities.

PO2812

380

349



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
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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>JOHN</u>	First name: _____
Last Name: <u>FOSTER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 THE NOOK</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6EN</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>8.3.19</u>
------------------------------	---------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

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

☐ Yes (via email)

☐ No

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

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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3. To which part of the Local Plan does this representation relate?									
Policy	LPA 05	Paragraph/ diagram table	FIG. 6.3.1. SITE & H.S.	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>• INCREASED VOLUME OF TRAFFIC - DOES NOT MEET AIR QUALITY AND SUSTAINABLE TRANSPORT ISSUES.</p> <p>• PRIME AGRICULTURAL LAND BEING USED FOR HOUSING.</p> <p>• HOUSING REQUIREMENTS ARE BASED ON ASPIRATIONAL EMPLOYMENT GROWTH PREDICTIONS.</p> <p>• TOWN CENTRE AND URBAN DEVELOPMENTS BEFORE GREEN SPACE DEVELOPMENTS.</p> <p>• PROTECTION OF WILD LIFE.</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.

- BROWNFIELD SITES MUST BE USED AS A PRIORITY OVER NEXT 20 YRS.
- ONS (2016) PREDICTED 383 HOUSES PER YEAR AS A REQUIREMENT - COUNCIL USED OUTDATED (2014) FORECASTING OF 486 HOUSES
- GRADE 1 & 2 AGRICULTURAL LAND BEING USED FOR HOUSING RATHER THAN FOOD PRODUCTION - BREXIT IMPLICATIONS.
- A 570/580 - IMPROVEMENTS ARE CATERING FOR CURRENT AND PLANNED TRANSPORT NEEDS NOT FUTURE UNPLANNED TRAFFIC
- HEALTH AND EDUCATION - NO INCREASES BY HEALTH SERVICE PROVIDERS. HEALTH SERVICES CURRENTLY STRETCHED.
- CONTAMINATED LAND SITES WITH LOWEST PRIORITY OF CONTAMINATED LAND SHOULD BE REMEDIATED. 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.

PO2813



St. Helens
Council

① - LPA05 ④ - Para 1.7.2 DTC (382)
② - LPA06 ⑤ - IDP
③ - GEN

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

Ref: LPSD

11 MAR 2019

(For official use only)

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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: Denise	First name:
Last Name: Griffiths	Last Name:
Organisation/company:	Organisation/company:
Address: 41 Prestbury Drive Eccleston, St Helens	Address:
Postcode: WA10 5RB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
------------------------------------------------------------------------------------------------	----------------------------

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

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

Yes xx (Via Email)

No ☐

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

PART B – YOUR REPRESENTATION

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

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)							

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

Please tick as appropriate

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

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

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

The economic analysis is based on over-optimistic assumptions of growth and therefore the amount of land needed is not as great as that which has been set out in the Local Plan. As such, there is therefore no exceptional circumstance to justify change to Green Belt boundaries. Other reasonable alternatives have not been fully explored ie. the use of lower target figures and using more previously developed land which would have a much lower impact on the environment. Additionally, there seems to be limited consultation and cooperation with other local councils in order to publish a statement of common ground.

①

④

The Plan makes no reference to Brownfield sites and PDL that are not yet available or included on the Brownfield Register.

The St Helens Council statement of Contaminated Land sites (2015) indicates that 3,170ha of the lowest priority contaminated land exists in St Helens yet 2 Green Belt sites of over 200ha are being reclassified as safeguarded land sites and are included to satisfy the housing need instead of redeveloping this contaminated land.

There appears to be no policy in St Helens or the Liverpool City Region to address the need to bring unsuitable sites which are outside the Brownfield Register back into use. We cannot continue to ignore such land yet destroy agricultural and green belt land to satisfy a plan which is flawed.

The Borough suffers from long term, difficult traffic issues at A580 Windle, Bleak Hill Road and M6/A580 junction 23. The Infrastructure delivery plan makes reference to current road improvements but fails to outline how local and borough wide improvements would be made and funded. Traffic growth as a result of the plan would cause severe traffic issues in an already saturated area.

The Plan bases development on the edge of town where public transport links are limited and, as such, it does not promote less vehicle dependency.

8HS is an unsuitable site for development as it is in close proximity to the increasingly busy and polluted A580, the narrow roads adjacent to the area cannot sustain the increase in traffic, it is currently agricultural land and the local schools are already over-subscribed

Please continue on a separate sheet if necessary

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

Do not include Green Belt land on the edge of town as safeguarded or allocated sites for housing development in preference to town centre development or the development of contaminated land.

8HS should be changed from the safeguarding for development category and maintained as Green Belt

Please continue on a separate sheet if necessary

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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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PO2814



St. Helens
Council

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Ref: LPSD

11 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>SHERIDAN</u>	First name:
Last Name: <u>WEBB</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>7 STONECROSS DRIVE</u> <u>RAINHILL</u>	Address:
Postcode: <u>L35 6DD</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>07/03/19</u>
------------	-----------------------

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

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

Policy	<i>LPA 6</i>	Paragraph / diagram / table	<i>3HS</i>	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"/>
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 council is proposing new homes in excess of that recommended by the government. We do not need this many new homes.

The local infrastructure is already struggling to cope. Traffic through the village is excessive at peak times and often at a standstill. Without more/better roads, how can we cope with traffic from all these new homes? Also the impact on local services (schools, GPs, dentists etc) has not been considered.

Please continue on a separate sheet if necessary

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Reduce the number of houses it plans to build altogether and remove all plans for building on the Greenbelt. Green belt should only be considered when ALL other available options have been used, when there is real demand and only when the local infrastructure has been improved so can support it.

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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PO2815

404



St.Helens
Council

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Ref: LPSD

12 MAR 2019

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>N/A</u>
First Name: <u>BARBARA</u>	First name: _____
Last Name: <u>WOODS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
[Redacted Address]	Address: _____

	Postcode: _____

Signature: [Redacted]	Date: <u>11/3/2019</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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St Helens
WA10 1HP**

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT CONSISTANT WITH NATIONAL POLICY. ANTICIPATED GROWTH NOT BASED ON LATEST FIGURES FOR 2016 - LESS HOMES REQUIRED. FAILS TO UTILISE EXISTING BROWNFIELD SITES IN BOROUGH. 8HS SOUTH OF ASSED WINDLE ISLAND IS GRADE 1 AGRICULTURAL LAND AND REQUIRED FOR FOOD SUPPLY. TRAFFIC INCREASE WOULD GRID LOCK HOUGHTONS LANE/ BEARHILL ROAD AT PEAK TIMES HEAVILY CONGESTED AT PRESENT. EXISTING SCHOOLS, DOCTORS DENTISTS UNABLE TO TAKE IN EXTRA NUMBERS OF POP</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.

THE LAND SHS TO BE REMOVED FROM THE PROPOSED PLAN AND REMAIN AS GREENBELT. ALL EXISTING BROWNFIELD SITES TO BE USED FIRST.
THE RE-CALCULATION OF THE NUMBER OF HOMES REQUIRED BASED ON THE LATEST FIGURES. A FURTHER STUDY OF THE IMPACT OF THE ADDITIONAL CARS TO THE AREA ON INFRASTRUCTURE AND NUMBERS OF EXTRA PEOPLE ON EXISTING SCHOOLS, DOCTORS, DENTISTS, SCHOOLS ETC

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.

PO2816



St. Helens
Council

410

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;

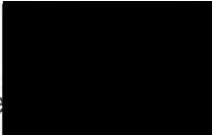
Part A - Personal Details

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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>N/A</u>
First Name: <u>JANE</u>	First name: _____
Last Name: <u>IATROU</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>43 SPRINGFIELD LANE</u> <u>ECCLESTON, ST. HELENS</u> <u>MERSEY SIDE</u>	Address: _____
Postcode: <u>WA10 5EW</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>11/3/2019</u>
------------------------------------------------------------------------------------------------	------------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

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

Please tick as appropriate

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

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

NOT CONSISTANT WITH NATIONAL POLICY. ANTICIPATED GROWTH NOT BASED ON LATEST FIGURES FOR 2016 - LESS HOMES NEEDED. FAILS TO UTILISE EXISTING BROWNFIELD SITES IN BOROUGH. THE LAND 8HS SOUTH OF A580 WINDRE ISLAND IS GRADE 4 AGRICULTURAL LAND AND URGENTLY REQUIRED FOR FOOD PRODUCE FOR THE COUNTRY. TRAFFIC INCREASE OF OVER 3000 EXTRA CARS WOULD GRID LOCK THE EXISTING ROAD SYSTEM TO BLEAKHILL/HOUGHTONS RANE. EXISTIVE SCHOOLS, DOCTORS, DENTIST CAN NOT TAKE IN THE ADDITIONAL NUMBERS OF PEOPLE. LOSS OF OPEN SPACE/FOOTPATHS IN THE AREA WHICH IS ALREADY BUILT UP.

Please continue on a separate sheet if necessary

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

THE LAND SHS TO BE REMOVED FROM THE PROPOSED PLAN AND TO REMAIN AS GREEN BELT. ALL BROWNFIELD SITES TO BE USED PRIOR TO USING GRADE 1 AGRICULTURAL LAND.

THE RE-CALCULATION OF THE NUMBER OF HOMES REQUIRED USING LATEST FIGURES.
FURTHER STUDY OF THE IMPACT OF THE ADDITIONAL 3000 CARS ON THE INFRASTRUCTURE AND THE INCREASE POPULATION ON EXISTING SCHOOLS, DOCTORS, DENTISTS, SHOPS ETC..

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.

PO2817



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

(we will correspond via your agent)

Title: MR

First Name: SIMON

Last Name: IATROU

Organisation/company: N/A

Address: 43 SPRINGFIELD LANE

ECCESTON, ST. HELENS

MERSEYSIDE

Postcode: WA10 5EW

2. Your Agent's Details (if applicable)

Title: N/A

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

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.

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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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 ✓		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>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>NOT CONSISTANT WITH NATIONAL POLICY. ANTICIPATED GROWTH NOT BASED ON LATEST FIGURES FOR 2016 - LESS HOMES REQUIRED. FAILS TO UTILISE EXISTING BROWNFIELD SITES IN BOROUGH. SHS SOUTH OF A550 WINDIAE ISLAND IS GRADE 4 AGRICULTURAL LAND AND URGENTLY REQUIRED FOR FOOD PRODUCE. TRAFFIC INCREASE OF OVER 3000 CARS WOULD GRID LOCK HOUGHTON LANE/ BLEAK HILL RD AT PEAK TIMES WHICH IS AT GRID LOCK AT PRESENT! EXISTING SCHOOLS, DOCTORS, DENTISTS CAN NOT TAKE IN THE ADDITIONAL NUMBERS OF PEOPLE. LOSS OF OPEN SPACE/ FOOTPATHS AREA ALREADY</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.

THE LAND SHS TO BE REMOVED FROM THE PROPOSED PLAN
AND REMAIN AS GREENBELT.
ALL BROWNFIELD SITES TO BE USED PRIOR TO USING GRADE 4
AGRICULTURAL LAND.
THE RECALCULATION OF THE NUMBERS OF CARS ON THE EXISTING
INFRASTRUCTURE AND INCREASE IN POPULATION ON EXISTING
SCHOOLS, DOCTORS, DENTISTS, SHOPS ETC.

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.

PO2818



St. Helens
Council

(4114)

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

Ref: LPSD

12 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>DOROTHY</u>	First name:
Last Name: <u>PIERCE</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>18 WALMESLEY RD</u>	Address:
<u>ECCLESTON</u>
<u>ST HELENS</u>
Postcode: <u>WA10 5JX</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>12-3-2019</u>
-----------------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

or by hand delivery to:

Ground Floor Reception
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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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

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

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	SHS	Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified? NOT JUSTIFIED	<input type="checkbox"/> FLAWED METHODOLOGY
Effective? NO	<input type="checkbox"/> NOT DELIVERABLE
Consistent with National Policy? NO	<input type="checkbox"/> DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ul style="list-style-type: none"> • DOES NOT SATISFY REQUIREMENT FOR SUSTAINABLE DEVELOPMENT • DOES NOT MEET CRITERIA FOR SUSTAINABLE TRANSPORT • HOUSING TARGETS BASED ON ASPIRATIONAL GROWTH PREDICTIONS • ONCE THE GREEN BELT IS SAFEGUARDED, IT WILL DISAPPEAR FOR EVER WITH CONCOMITANT LOSS OF WILDLIFE HABITATS. NO REFERENCE MADE TO ENVIRONMENTAL DEGRADATION • GREEN SPACE DEVELOPMENT HAS BEEN FAVOURED OVER TOWN CENTRE DEVELOPMENT • NO REFERENCE MADE TO THE LOSS OF HIGH QUALITY AGRICULTURAL LAND • NO REFERENCE / EFFECTIVE PROPOSAL FOR WATER SUPPLY TO PROPERTIES ON WEST OF TOWN CENTRE.

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.

- COUNCIL NEEDS TO USE STANDARD METHODOLOGY OR MAKE CASE FOR EXCEPTIONAL CIRCUMSTANCES IN RESPECT OF HOUSING NEED.
- COUNCIL NEEDS TO USE NEWONS (2016) FORECAST FOR HOUSING NEED.
- NEEDS TO MENTION BROWN FIELD + PDL NOT YET ON BROWN FIELD REGISTER
- THE TOWN HAS 3,170 HA OF CONTAMINATED LAND WHICH COULD BE REDEVELOPED. THERE IS NO NEED TO SAFEGUARD AN AREA OF GREEN BELT EQUIVALENT TO 70% OF THIS LAND. SOME OF THESE SITES COULD BE MADE AVAILABLE BY 2035-50 - COUNCILS NEED TO DRAW UP A POLICY.
- PROPER CONSIDERATION NEEDS TO BE GIVEN TO LOSS OF GRADE 1 + 2 AGRICULTURAL LAND AND EFFECTS ON WILDLIFE + PUBLIC HEALTH.
- COUNCIL NEEDS TO DRAW UP AN EFFECTIVE PLAN TO MANAGE TRAFFIC CONGESTION ALREADY OBSERVABLE AROUND PROPOSED DEVELOPMENT SITES, PARTICULARLY BHS.
- COUNCIL NEEDS TO ADDRESS IMPACT ON HEALTHCARE + EDUCATION
PRIMARY SCHOOLS ARE ALREADY OVERSUBSCRIBED

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.

PO2819

415



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

Ref: LPSD

12 MAR 2019

(For official use only)

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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>(PETER) MR</u>	Title: _____
First Name: <u>PETER</u>	First name: _____
Last Name: <u>INNES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>8 POPLAR AVE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5RD</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>11.03.2019</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

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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

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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	8HS ✓	Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:		
Please read the Guidance note for explanations of the Tests of Soundness		
Positively Prepared?		<input type="checkbox"/>
Justified?	NO	<input type="checkbox"/> FLAWED METHODOLOGY
Effective?	NO	<input type="checkbox"/> NOT DELIVERABLE
Consistent with National Policy?	NO	<input type="checkbox"/> NOT COMPLIANT WITH NPPF 2018

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

See attachment.

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="" 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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ST HELENS LOCAL PLAN (SUBMISSION DRAFT) COMMENT FORM PART B SECTION 6

I consider this plan is neither legally compliant nor sound nor consistent with national policy because :

- It does not satisfy the requirement for sustainable development
- It does not meet the criteria for sustainable transport
- Housing targets are based on aspirational growth predictions
- No consideration of loss of wildlife habitat
- No consideration to environmental degradation
- No reference made to the loss of grades 1 + 2 agricultural land
- Insufficient planning for water supply to west of town
- Green Belt development favoured over town centre development

PART B SECTION 7

- Council needs to use standard methodology or make the case for exceptional circumstances in respect of housing need
 - Council needs to use new ONS (2016) forecast for housing need
 - Council needs to include Brownfield land and PDL not yet on BF register
 - The town has 3170 ha. of contaminated land which could be redeveloped in the future. There is therefore no need to safeguard an area of precious greenbelt land equivalent to only 7% of this land. Some of these sites could be made available by 2035-50. The Council needs to draw up a policy for this redevelopment along with other councils in the area.
 - Proper consideration needs to be given to the loss of grade 1 +2 agricultural land, especially at a time when the UK's food supply security is under threat from Brexit.
 - Proper evaluation of the effects on local wildlife through loss of habitat is essential as well as degradation of the natural environment.
 - Council needs to draw up an effective plan to manage the traffic congestion which is already observable around projected developments, particularly 8HS and address issue of increased vehicle dependency.
 - Council needs to address the impact on healthcare and education in an area where primary schools are already oversubscribed.
-

PO2820

12 MAR 2019

(For official use only)



St. Helens
Council

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

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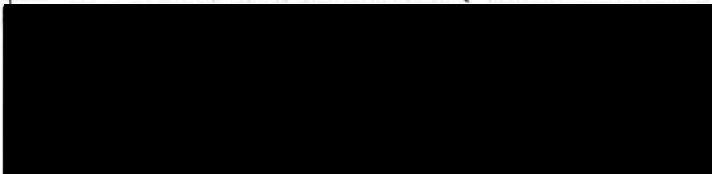
This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>DIANE</u>	First name: _____
Last Name: <u>INNBS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>8 POPLAR AVE</u>	Address: _____
<u>ECCESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5BQ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>11/3/2019</u>
------------------------------------------------------------------------------------------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
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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	<input checked="" type="checkbox"/>	Paragraph/ diagram table	<input checked="" type="checkbox"/>	Policies Map	<i>SHS</i>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p><i>It does not satisfy the requirement for sustainable development It definitely does <u>not</u> meet the criteria for sustainable transport It exaggerates the need for housing because targets proposed are based on aspirational growth predictions. Once the green belt is safeguarded, it will disappear FOREVER. GreenSpace development has been proposed over town centre development. No reference has been made to Agricultural Land Quality: with the need for self sufficiency being greater than ever, it is unthinkable that the excellent quality of our farm land has not been considered (Brexit effect!) No Reference or effective plan for water supply to properties in West of town.</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.

- Council needs to use Standard Methodology or make the case for exceptional circumstances in respect of Housing Need
- The Council needs to use the new ONS (2016) forecast for housing need.
- Needs to mention Brownfield + PDH not yet on Brownfield Register
- The town has 3,170ha of contaminated land which could be redeveloped. There is no need to safeguard an area 7% (of greenbelt) of this land. Although there is at present no policy to bring 'unsuitable' sites back into use, surely some sites could be made available by 2035-50.
- Proper consideration needs to be given to the loss of Grade II & 2 agricultural land.
- Proper consideration needs to be given to the loss of habitat for various species of birds + small mammals
- An effective plan to address the traffic congestion ALREADY observable in the areas surrounding the areas designated. This plan, moreover, increases, does not Reduce vehicle dependency.
- Council needs to address impact on Healthcare + Education. At present, NO PLAN

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:

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

Please keep a copy for future reference.

PO2821



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>MR</u>	Title: _____
First Name: <u>STUART</u>	First name: _____
Last Name: <u>GUENNIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CRANTOCK CLOSE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6ET</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>12 MAR 2019</u>
-----------------------	--------------------------

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

☐ Yes (via email)

☐ No

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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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? SHS + ALL GREEN BELT SITES									
Policy LPA 06 SHS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/> NO
Justified?	<input type="checkbox"/> NO
Effective?	<input type="checkbox"/> NO
Consistent with National Policy?	<input type="checkbox"/> NO

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>PLAN IS BASED ON FLAWED METHODOLOGY</p> <p>PLAN IS NOT DELIVERABLE</p> <p>PLAN DOES NOT COMPLY WITH NPPF 2018</p> <p>REFER TO ECRA ORGANISATION</p> <p>CORRESPONDENCE TO THE COUNCIL.</p>

Please continue on a separate sheet if necessary

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

① SEE SEPARATE LETTER

② I TOTALLY AGREE WITH ALL
THE POINTS PUT FORWARD
BY ECRA OF WHICH
YOU HAVE DETAILS

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

Please keep a copy for future reference.

REF: LPSD 8HS.

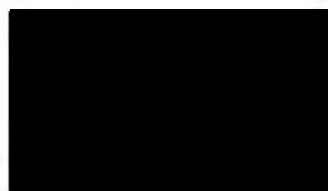
GREEN BELT PRIME ARABLE LAND AS 8HS
OR ANY OTHER GREEN BELT LAND SHOULD NOT
BE USED FOR HOUSING DEV. WHILE CONTAMINATED
LAND AND BROWNFIELD SITES ARE AVAILABLE.
AS AN OLD INDUSTRIAL TOWN ST. HELENS HAS
THESE SITES IN ABUNDANCE.

GREEN BELT IS THE "LUNGS" OF ST. HELENS.

GREEN BELT SHOULD BE LEFT FOR OUR
CHILDREN AND FUTURE GENERATIONS.

WE SHOULD NOT LEAVE THEM CONTAMINATED
LAND OR BROWNFIELD SITES. THESE SHOULD
BE CLEANED UP AND BUILT ON FIRST.

DEVELOPERS AND OUR COUNCIL SHOULD NOT
BE ALLOWED TO TAKE THE EASY OPTION
OF GREEN BELT HOUSING DEVELOPMENT



PO2822



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)

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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>VIVIENNE</u>	First name: _____
Last Name: <u>GLENNIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CRANTOCK GR.</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6ET</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>11 March 2019</u>
------------------	----------------------------

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

☐ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate? <i>SHS</i>									
Policy <i>SHS</i> <i>LPA06</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 type="checkbox"/>
Justified?	<input type="checkbox"/> <i>N/D</i>
Effective?	<input type="checkbox"/> <i>N/D</i>
Consistent with National Policy?	<input type="checkbox"/> <i>N/D</i>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>Plan is based on flawed methodology</i> <i>Plan doesn't comply with NPPF 2018</i> <i>Plan is not deliverable</i> <i>I am in total agreement with EcRA notifications to the council</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.

See separate letter

Please continue on a separate sheet if necessary

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

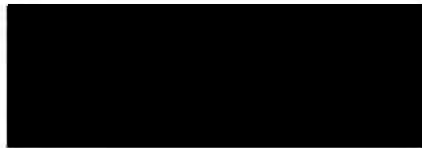
Green belt 8HS is prime agricultural farming land and should be left for future generations.

The letter (dated 25 January) from the council to occupiers addresses is TOTALLY MISLEADING.

It states safeguarded sites development before 2035 will be refused.

That statement could be overriden by a new plan.

I fully endorse all the points made by ECR in their correspondence to the council.



PO2823



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: _____

First Name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

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.

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)

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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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	LP A06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

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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.

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

2

PO2824



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

Ref: LPSD

12 MAR 2019

(For official use only)

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Part B - Your Representation(s)

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>CYRIL</u>	First name: _____
Last Name: <u>CONROY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 WINDHIEBROOK CRESCENT</u>	Address: _____
<u>WINDHIE, ST HELENS</u>	_____
<u>MERSEY C.D.E</u>	_____
Postcode: <u>W17 0 6 DY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

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

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

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3. To which part of the Local Plan does this representation relate? 8 HS									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE LOCAL PLAN DOES NOT SATISFY SUSTAINABLE DEVELOPMENT. THE PROPOSED 8 HS PLAN WOULD MASSIVELY INCREASE TRAFFIC CONGESTION CLOSE TO TWO LOCAL SCHOOLS - IT WOULD DIRECTLY IMPACT ON CHILDREN'S HEALTH & SAFETY PARTICULARLY WHEN THE ROAD WORK AT WINDLE ISHAM IS COMPLETED. THE PLAN FOR THE 8 HS SITE WOULD DESTROY PRIME AGRICULTURAL LAND. THIS CANNOT SERVE THE FUTURE OF FARMING AND FOOD SECURITY IN THE ST HELENS BOROUGH.</p>

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

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

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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PO2825



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

Ref: LPSD

12 MAR 2019

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Part B - Your Representation(s)

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARY</u>	First name: _____
Last Name: <u>CONROY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 WINDHURST CRESCENT</u>	Address: _____
<u>WINDHURST ST. HELENS</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>11.3.2018</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? <i>8 HS</i>									
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

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

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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.

PO2826



St. Helens
Council

428

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

Ref: LPSD

12 MAR 2019

(For official use only)

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Part B – Your Representation(s).

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>WILLIAM</u>	First name:
Last Name: <u>HALLSWORTH.</u>	Last Name:
Organisation/company: N/A	Organisation/company:
Address: <u>13 St. James Road,</u> <u>Rainhill, Merseyside</u>	Address:
Postcode: <u>L35 0PB</u>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <u>08.03.19.</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	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan 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?	X

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

- St. Helens Council register suggests that there are brownfield sites which would accommodate 5808 houses.
- Proposed site (3HS) is a green buffer separating Whiston, Eccleston Park, Thatto Heath and Rainhill. Removing this greenbelt will create a continuous area of urban dwelling and a road infrastructure not being able to support it.
- The increase in traffic will affect all surrounding areas, Whiston, Prescott, Eccleston Park, Thatto Heath and Rainhill which already have a road infrastructure that already struggles and could not be improved to accommodate the volume of traffic that both sites would bring.
- Rainhill village junction (junction between Warrington Road and Rainhill Road) is confirmed with by the council at being at capacity. From experience it can take over 15 minutes (at peak time traffic) to pass through the village. this offers no scope for improvement.
- Peak time traffic already affects smaller B and C roads in roads such as Blundells Lane, Mill Lane, view Road, St. James road which are used as cut through to avoid congested main roads in both Rainhill and Whiston. These roads where not made to cope with the traffic they currently receive and this will only get worse by the proposed Halshead Village Development.
- Air Pollution is already high in the area the increased traffic will only add to this. From experience we no longer walk the school run (less than 1 mile) along Warrington Road due to the smell (and taste) in the air during peak times, [REDACTED]
- The borough of St. Helens already averages 51.9 deaths per 100,000 from respiratory disease in the under 75's this compares to 44.3 for the rest of the North West.
- Further housing is not sustainable in the area due to lack of schools, doctors, dental surgeries, hospitals and A&E. It's unsure how these will cope with the increased population the proposed sites will bring.

Please continue on a separate sheet if necessary

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The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

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No , I do not wish to participate at the oral examination		
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PO2827

① - LPA05
② - LPA06

430

Pf0392

Ref: LPSD

12 MAR 2019
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Title: <u>MS</u>	Title:
First Name: <u>SARAH</u>	First name:
Last Name: <u>JONES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>15 PEBBLES CLOSE</u> <u>ASHTON IN MAKERFIELD</u> <u>WIRRAL</u>	Address:
Postcode: <u>WN4 0SP</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:	Date: <u>12/03/19</u>
------------------	-----------------------

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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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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

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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	PA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, 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"/>

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 separate sheet 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
removed from the Green Belt

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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PO2828

① - LPA05
② - LPA06

PF0393 431

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

Ref: LPSD

12 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: Beth

Last Name: Lyon

Organisation/company: _____

Address: 15 peebles close

Ashton-in-Makerfield

Wigan

Postcode: WN4 0SP

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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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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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

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Positively Prepared?	<input type="checkbox"/>
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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

1. Greenbelt land should only be released in exceptional circumstances.
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PO2829



① - LPA05
② - LPA06

432

PF0394

Ref: LPSD

12 MAR 2019
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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: <u>Stephen</u>	First name:
Last Name: <u>Lyon</u>	Last Name:
Organisation/company: <u>[REDACTED]</u>	Organisation/company:
Address: <u>15 Peebles close</u> <u>Ashton-in-Makerfield.</u> <u>Wigan</u>	Address:
Postcode: <u>WM4 0SP</u>	Postcode:
<u>[REDACTED]</u>	Tel No:
	Mobile No:
	Email:

Signature: <u>[REDACTED]</u>	Date: <u>12/03/19</u>
------------------------------	-----------------------

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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2

PO2830



St.Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

12 MAR 2019

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Part B – Your Representation(s).

① - LPA02

② - LPA06

③ - IDP

④ - LPA05

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: Ann	First name:
Last Name: Bate	Last Name:
Organisation/company: Chair, Windle Parish Council	Organisation/company:
Address: 45 Bleak Hill Road St Helens	Address:
Postcode: WA104RP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

11/3/19

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Yes ☒ (Via Email)

No ☐

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Policy LPA05 LPA06		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> X(No)- brownfield not considered
Justified?	<input type="checkbox"/> X(No)-the methodology used is unsound
Effective?	<input type="checkbox"/> X(No)-the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> X(No) – it doesn't support objectives in 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

We, Windle Parish Council believe that this Plan does not comply with **NPPF 2018**.

In particular it doesn't support;

Point 2 - Achieving Sustainable Development

- It doesn't pay enough attention to identifying and co-ordinating infrastructure
- It doesn't foster a safe built environment with accessible services and open spaces to support communities health, social and cultural well-being
- It is in direct conflict with the environment objective

Point 3 – Planning system should be plan-led

①

We suggest that these plans are landowner and developer led. Re: 8HS, there was a developer (Story Homes) and a name (Eccleston Vale) in place long before the Local Plan (LPPO2016) was produced for consultation.

Point 7 – Ensuring the vitality of town centres

There is no evidence to suggest that such a large developments on the edge of the Borough (in particular 8HS) will result in the regeneration of the town centre. Residents of a developed 8HS will, most likely, commute to Liverpool or Manchester rather than contributing to the local communities/ economy

Point 8 – Promoting healthy and safe communities

Removing green belt is in direct conflict with this aspiration.

Point 9- Promoting sustainable transport

Transport issues have not been addressed at the earliest stages of plan-making.

The plan promotes an increase in car numbers and dependency.

By their own admission (St Helens First publication), the Council state that 43,000 vehicles per day travel along the A580. If 8HS is removed from Green Belt and built on (1,000+ homes) the resulting increase in car numbers will have a catastrophic impact on already congested and dangerous junctions. This, together with the industrial units/housing (planned both in the Borough and neighbouring authorities) and the 'Super Port' in Liverpool, will result in unacceptable levels of traffic along the A580 and roads feeding into this already congested highway

Point 11 – Making effective use of land

Brownfield sites have not been fully investigated/exhausted in the Borough. Other sites that have planning permission are not developed and are allowed to stagnate indefinitely.

In addition, we believe that this plan is flawed in that;

- It ignores the fact that the land that comprises 8HS is Grade 1 & 2 agricultural land and is farmed producing vegetable and grain crops. These assets should be protected for future generations
- 8HS has many footpaths across it which are used by many groups to access and enjoy the benefits of a clean environment full of history and a varied wildlife
- 8HS has, just recently, had a major water pipeline laid across the plot, have the implications/problems of building over this been addressed?
- Across the Borough there are ongoing traffic problems, especially Windle Island and Bleak hill Road. These will most certainly be exacerbated with the development of 8HS. The Infrastructure Development Plan (IDP) does not indicate how these problems are to be resolved
- The Housing Need assessment of 486 houses per year is out of date. The latest figures from the ONS (2016) predicts that 383 is now the current estimate
- The increase in traffic will have a negative impact on air-quality, noise and general health. The location of 8HS is not served by good local bus routes (indeed this area of the borough has had a reduction in services) or rail links
- In the area surrounding 8HS the schools and medical facilities are oversubscribed. Bleak Hill School is being expanded to accommodate **existing** demand. Eccleston Mere has already been expanded. There is no way these schools could accept any further increase in population
- The economic analysis is flawed and based on over-optimistic assumptions therefore the level of land needed is not as high as suggested in the Plan. Therefore there are no exceptional circumstances requiring a change in Green Belt boundaries

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.

Green belt areas need to be protected and should not be sacrificed for the profits of landowners and developers.

They need to be protected for future generations. Brownfield sites should be exhausted before any Green belt is released.

It is not good enough to dismiss Brownfield development because of the cost to 'clean up'.

What does this plan support – the destruction and decimation of beautiful, clean open spaces and productive farm land leaving ugly, dangerous and stagnant plots of land instead.

A quote from The Local Plan:

1.2.1 St.Helens Council has worked for many years with other stakeholders to create a modern, distinctive, economically prosperous and vibrant Borough, in which key environmental assets are protected and enhanced. The Local Plan will play an important role in achieving these aims.

**We suggest this is not supported by the removal of Green Belt.
Save 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 modification, as

8/16.
MOD.

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 ✓	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:

Windle Parish Council is a statutory consultee on planning matters. We are also made up of councillors that represent the views and interests of Windle residents. Therefore, we feel it necessary for our elected members to participate in 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.

PO2831



St. Helens
Council

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

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

Ref: LPSD

12 MAR 2019

(For official use only)

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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>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

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

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

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

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

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FURTHER INFORMATION

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

NEXT STEPS

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DATA PROTECTION

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

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

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

Housing South of Billinge LD.

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

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.

PO2832

① - LPA05

③ LPA04 site 9EA

PF0397

② - LPA05 site 8HA ④ LPA06 436



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Ref: LPSD

12 MAR 2019

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: HARRY	First name:
Last Name: AVISON	Last Name:
Organisation/company:	Organisation/company:
Address: 170, HIGHER LAWE RAINFORD ST HELENS	Address:
Postcode: WA11 8BH	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 ☐

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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.

The release of green belt land should be reduced in line with the latest Strategic Housing market Assessment

Also See attached

Please continue on a separate sheet if necessary

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

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

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination Not unless required	<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.

Comments on Local Plan proposal

Planning applications for the greenfield sites should only be accepted in **exceptional circumstances** (as per government policy), whilst there is capacity on brownfield sites

The land required for future housing in the Local plan of 486 house per year is based on assumed growth of the boroughs population however the office for national statistics indicates Rainsford needs 383 houses per year

St Helens council commissioned GI Hearn to produce a Strategic Housing Market Assessment (SHMA) which has just been published in January 2019 .The results bear out the office of national statistics figures. The figures being **391** houses per annum which increased to **398** per annum when taking into account the 2017 mid year estimates of the Sub-National Population Projections

The available brownfield sites in St Helens could accommodate circa 5800 houses.

The latest SHMA report indicates a requirement for 5970 houses over the next 15 years (15*398) Only 170 more than that available on brownfield sites.

This is sufficient for the next 14.57 years at 398 units per year or just under 12 years at the local plans inflated figure of 486.

The local plan envisages 7000 potential new jobs in the next 15 years and proposes 7290 new homes, more than 1 new home for each potential new job

I appreciate that the GL Hearn's report was not available when the Local Plan was published however from the above it is clear that the Local Plan has overestimated the housing requirements.

Complies with duty to co-operate

West Lancashire one of the adjacent authorities has plans for a garden village bordering the Rainsford bypass (A570) and roughly 1 mile from the Rainsford border. When I raised the subject of cooperation between the authorities regarding housing needs with one of the St Helens planning officers he responded that those plans had nothing to do with them and that they took care of their own needs it was up to West Lancs to take care of their own requirements. Considering the size of the West Lancashire proposal plus LPSD 8HA in Rainsford this insular attitude displays a total disregard for the housing needs in the wider area and use of greenbelt to fulfil that need.

The two authorities should be cooperating to ensure best possible use of available land and avoid urban sprawl

Safeguarded land

The plan is to cover the period from 2020 to 2035 as further reviews will take place before then there is no need to assign parcels of land to be removed from the greenbelt as part of this plan. Reviews in 5 & 10 years' time will have a clearer picture of future requirements.

PO2833



St. Helens
Council

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12 MAR 2019

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID COWEN	First name:
Last Name: COWEN	Last Name:
Organisation/company:	Organisation/company:
Address: 99A HIGHER LANE RAINFORD	Address:
Postcode: WA11 8BQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 1-3-19
-----------------------	--------------

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

Would you like to be kept 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)

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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		Policies Map		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)									

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 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

There are brownfield sites available: -
eg Ravenhead site (suitable for housing)
ex. offices, car parking - industrial. (been vacant for 40 years)

①

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.

Ref 8HA. This is grade 1 farmland. This should not be used for housing. There are many other sites in St. Helens suitable for housing eg Moss Street, Sutton which was previously houses and the surrounding area
 (2) Sites now vacant which were used by the Lfess Industry eg. Ravenhead Lfess near to town centre facilities and the offices are now closed ready for housing use.
 Ref 9EA There is no necessity for this site to be used as industrial. There are several vacant units adjacent and 2 million square feet of vacant available units for warehouse/ industrial 10 minutes away on A580. 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
-------------------------------------	----------------------------------------------------------	--------------------------	----------------------------------------------------

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

PO2834



St.Helens
Council

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: CHRISTINE	First name:
Last Name: COWEN	Last Name:
Organisation/company:	Organisation/company:
Address: 99A HIGHER LANE RAINFORD	Address:
Postcode: WA11 8BQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 1-3-19.
-----------------------	---------------

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

Would you like to be kept 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)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is 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

All the other available brownfield sites have not been fully considered and these should be utilised before grade 1 agricultural greenbelt land.

Please continue on a separate sheet if necessary

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

Ref 8HA land should be retained as Green Belt land. It is Grade 1 agricultural land and the drainage and all other facilities cannot cope with a large number of additional houses in Rainford.

Ref 9EA should not be used as industrial until after all the vacant units near by are occupied and the ^{many} brownfield sites and industrial sites in St Helens are used.

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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PO2835

12 MAR 2019

(For official use only)



St. Helens
Council

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

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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>MAUREEN</u>	First name:
Last Name: <u>FERRIS</u>	Last Name:
Organisation/company: <u>[REDACTED]</u>	Organisation/company:
Address: <u>129 BROADWAY</u>	Address:
<u>ECCELESTON</u>
<u>ST HELENS</u>
Postcode: <u>WA10 5PB</u>	Postcode:
Tel No: <u>[REDACTED]</u>	Tel No:
Mobile No: <u>/</u>	Mobile No:
Email: <u>/</u>	Email:

Signature: <u>[REDACTED]</u>	Date: <u>11/3/19</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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

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**

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</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>We don't want more pollution in this area, with more cars and noise. I have been told we don't need properties due to surplus houses in it. It's over 60 flats in Giller's Green has come under demolition in the last two years. These properties had been renovated to a very good standard in the last 6 years, but the Toros group said they could not find tenants. The current IDP does not state how roads are to be improved and funded. All this will have an impact on healthcare and education. This site will take valuable farmland we need food not houses. The narrow roads of Eccleston/Windle already have great traffic flow problems. This plan will make the situation intolerable.</p>	

Please continue on a separate sheet if necessary

Please continue on a separate sheet if necessary

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

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

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

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

PO2836

40301162

442



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)

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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>MR</u>	Title: _____
First Name: <u>BERNARD</u>	First name: _____
Last Name: <u>LAZENBURY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>203, GAREWOOD ROAD</u> <u>GAREWOOD</u> <u>ASTON-IN-MAKERFIELD LANCs</u>	Address: _____
Postcode: <u>WN4 0XS</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____
Signature: _____ Date: <u>5. 3. 19</u>	

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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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WA10 1HP**

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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 LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" 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. 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>The local plan is not legally compliant and unsound. In St. Helens, there are already in excess of 3500 empty properties, in addition to brown field sites of various sizes which could be re-used and built on, helping the regeneration of town & like St. Helens which is struggling to survive. The area, overall is not attractive, but the areas of Greenbelt helps not only to soften the industrial landscape, but also mitigate and offset the large amount of redevelopment that has already occurred. There is evidence already of development 'creep' where even pockets of Greenbelt have been removed to create urban sprawl. Traffic in the past 10 years has increased beyond measure and roads are becoming inadequate. The infrastructure cannot cope with more people.</p>

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal of the Greenbelt.

Please continue on a separate sheet if necessary

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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.

PO2837



St. Helens
Council

443

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

PFO404

Ref: LPSD

12 MAR 2019

(For official use only)

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PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>LINDA</u>	First name: _____
Last Name: <u>HOWE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>203 GARSWOOD ROAD</u> <u>GARSWOOD</u> <u>WIGAN, LANCs.</u>	Address: _____
Postcode: <u>WN4 0XS</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>4/3/19</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

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
WA10 1HP**

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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 LPAC/		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
IHS							
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"/>

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>The release of Greenbelt sets a harmful precedent - the recycling of deteriorated derelict land/brown field sites should be used to improve the attractiveness of the area. There should be some proof of the Council's population estimates as there has been a decline since the 1980s. Housing in this area is not sustainable - lack of NHS facilities, bus routes, school places, more cars will be used through the village, altering the very nature of the place.</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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✓	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.

PO2838



448

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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Title: <u>MRS</u>	Title: _____
First Name: <u>RENA</u>	First name: _____
Last Name: <u>PODESTA</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 MANOR CLOSE</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SB</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 LPA06 Site IHS	Paragraph/ diagram table (2)		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"/>

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

See separate sheet attached

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Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2839



St. Helens
Council

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

12 MAR 2019

452

Ref: LPSD

(For official use only)

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID	First name:
Last Name: FORSHAW	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: 40 HOWARDS LANE ECCLESTON ST. HELENS	Address:
Postcode: WA10 5HY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:
Signature: [REDACTED]	Date: 10/3/2019

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Yes ☒ (Via Email)

No ☐

PART B – YOUR REPRESENTATION

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

Policy <u>1</u>	LP A05 LP A06	Paragraph / diagram / table <u>12</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"/>	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"/>
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 definitive reason or circumstance in the St. Helens borough to warrant building on Green Belt land. 2

1 A so-called need for building has been exaggerated out of all proportion, either ignoring or refusing to discuss the importance of the wide selection of Brown field sites in the borough. This latter should be of paramount importance and of maximum priority - We need to avoid at all costs the incursion of even greater pollution which would inevitably arise through increased traffic etc. if Green Belt land was used.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

<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.

PO2840



St. Helens
Council

456

12 MAR 2019

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

Ref: LPSPD

(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>MRS</i>	Title:
First Name: <i>PAMELA</i>	First name:
Last Name: <i>FORSHAW</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>40 HOWARDS LANE ECCLESTON ST HELENS</i>	Address:
Postcode: <i>WA10 5HY</i>	Postcode:
Tel No: [REDACTED]	
Mobile No:	Mobile No:
Email: [REDACTED]	Email:
Signature: [REDACTED]	Date: <i>10th March 2019</i>

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

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

Yes ☒ (Via Email)

No ☐

PART B – YOUR REPRESENTATION

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

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

Policy <u>1</u> LP <u>A05</u> LP <u>A06</u>	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/> ?
Justified?	<input 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 are no exceptional circumstances in St Helens to warrant building on Green Belt. 2

1 Economic growth and housing needs have been exaggerated. Brown field sites should be used as a priority.

We need a 'green lung' to protect us from the air pollution caused by the increased traffic using the A580. 2

Please continue on a separate sheet if necessary

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

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.**

PO2841

457

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)

Title: MRS

First Name: BETTY

Last Name: LYON

Organisation/company: _____

Address: 589 GARSWOOD RD

NORTH ASHTON, WIGAN.

LANCS

Postcode: WN4 0XH

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 10-3-2019

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.

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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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	PA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is 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.

See separate sheet 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 Green Belt.

Please continue on a separate sheet if necessary

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

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



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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2842



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>MR DARNBROUGH</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>DARNBROUGH</u>	Last Name: _____
Organisation/company: <u>[REDACTED]</u>	Organisation/company: _____
<u>76 ELGIN AVE</u>	_____
Address: <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
<u>WIGAN</u>	_____
Postcode: <u>WN1 4QRH</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>11/3/2019</u>
------------------------------	------------------------

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site 145		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>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The council should be put to strict proof of population estimates. The population of St Helens has been in decline since 1981, where are all the extra people coming from. The purpose release of greenbelt will cause significant harm to the purposes of the greenbelt. The purpose of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other derelict land. Housing in this area isn't sustainable because of lack of school places, doctors surgery and bus routes.</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 Panel from the proposed
removed from the green belt.

Please continue on a separate sheet if necessary

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

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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:

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.

PO2843



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: VALERIE
Last Name: FINNEY
Organisation/company: _____
Address: 65 LEYLAND GREEN ROAD
DOWNALL GREEN
ASHTON-IN-MAKERFIELD, NR WIGAN
Postcode: WN4 0AU
Tel No: [REDACTED]
Mobile No: _____
Email: _____

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature

[REDACTED]

Date: 10th March 2019

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

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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Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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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 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 or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>This site borders the adjacent authority of Wigan an area also Green Belt at this location. It is understood that "common ground" agreement has yet to be reached, it would therefore seem inappropriate to identify land for development, pending the outcome. One of the reasons given for further housing development has been assumed</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.

Because of all comments (paragraph 6)
Please re-think and consider
and keep this land "Green" Belt

Please continue on a separate sheet if necessary

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

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

✓	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.

Attached.

② Mrs Valerie Finney

to be the building of the "huge" warehouses at Florida Farm. However as we know such places are serviced by "Robots" packaging and not humans, so this is not a valid case.

Public transport is abysmal, one bus per hour to St. Helens; it therefore appears more housing would generate greater car usage, contrary to current local and central government guidelines. The two local primary schools are at capacity and therefore educational needs require addressing. Similar situation occurs with health matters, waiting time for appointments at local doctors surgery are already excessive.

This area is a congregating place for various types of birds and especially geese, also for other declining species.

The land is also known to have disused underground coal workings, often resulting in land depression and often resulting in areas fenced off for several months, not I would think ideal for high density development!

Also a very large water main (United Utilities) bisects the proposed land site, surely this also is a reason not to build over.

There is no justification to take this site out of its current status of "Green Belt" for all the reasons stated in this letter. Please consider and re-think.

* continue P.T.O. *

(3)

The site also carries a large water main (United Utilities) bisecting the proposed site. Surely can't be built over.
There is no justification to take this site out of its current status of "Green Belt".



10th March 2019.

PO2844

462 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

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: ALEX

Last Name: FINNEY

Organisation/company: _____

Address: 65 LEYLAND GREEN ROAD

ASHTON-IN-MAKERFIELD (DOWNALL GREEN)

NR. WIGAN, LANC.

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11th March 2019

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

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

☒ Yes (~~via email~~) post

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The housing needs (based upon predicted population) may still be an over-estimation. The nearby large scale logistics warehousing units cannot be assumed to be an indicator of large employment potential opportunity and hence perceived housing need. The complete opposite is more likely as greater automation and robotic technology outstrips the need of large labour forces. In any event any increased housing would only encourage (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.

In view of my comments (under para. 6)

RETAIN THIS LAND WITHIN 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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<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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LP A06 Site 1 HS

... only encourage/greater car usage since public transport facilities are inadequate in this locality in general, and contrary to local and national policy. Similarly the existing local infrastructure barely meets current needs (health facilities, school provision, highways, etc) suggesting that any additional housing would not be sustainable.

It also needs to be pointed out that the Council's statement (ref. GBP 025a Land south of Leyland Green Road.....) is very misleading i.e. "Whilst historic mine shafts are recorded within the sub-plot, there is no evidence that these are so extreme as to make development un-viable". This whole area is riddled with shallow underground mine workings which pre-date the National Coal Board and its successor Coal Authority. Local residents are aware of large depressions/holes appearing on this land which have had to be temporarily fenced off and subsequently filled over the years. No records are believed to exist and consequently further assessment may well prove pre-development costs to be prohibitively expensive for any housing consideration.

Additionally in more recent times a large water main (United Utilities) has been constructed across this land and which will have restrictions imposed upon building over or adjacent to it.

A final point — "Safeguarding" may be used as an argument to approve "piecemeal" development within this area, rather than refusing such if Green Belt status is retained. Enhancement of the local character and distinctiveness will be lost.

PO2845



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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 C A DAINSBROUGH</u>	Title: _____
First Name: <u>CAROL ANN</u>	First name: _____
Last Name: <u>DAINSBROUGH</u>	Last Name: _____
Organisation/company: <u>[REDACTED]</u>	Organisation/company: _____
Address: <u>76 ELGID AVE</u> <u>ASHTON-IN-MAKERFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0RH</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>11/3/2019</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

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

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

Please tick as appropriate

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

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>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. The population of St Helens has been in decline since 1981, where is the population coming from to fill all these new houses.</p> <p>And part of our town is a nice village surrounded by fields. That should stay, instead of being demolished here should stay. Instead of being demolished by new housing. If new housing is needed in St Helens then they should build on brown field sites of which there are plenty.</p>	

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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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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Please keep a copy for future reference.

PO2846

464

12 MAR 2019

Ref: LPSD

(For official use only)

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARGARET</u>	First name: _____
Last Name: <u>MORAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 MANDR CLOSE</u> <u>EARSWOOD</u> <u>ASHTON IN MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SB</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>11/3/2019</u>
------------------	------------------------

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☐ No

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

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

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

Please tick as appropriate

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

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Justified?	<input checked="" type="checkbox"/>
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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See separate sheet attached

Delete this land from the proposed
removed from the Green Belt

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2847



St. Helens
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>JOHN</u>	First name:
Last Name: <u>PODESTA</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>13 MANOR CLOSE</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address:
Postcode: <u>WN4 0SB</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

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

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

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1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2848



St. Helens
Council

466

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>MR</u>	Title: _____
First Name: <u>CLIVE</u>	First name: _____
Last Name: <u>MORAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 MANOR CLOSE</u> <u>GARSWOOD</u> <u>ASHTON IN MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SB</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	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.

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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post to:

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2849



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

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>ADAM</u>	First name:
Last Name: <u>WILSON</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>1 NEWBRIDGE CLOSE</u>	Address:
<u>GARSWOOD</u>
<u>ASHTON-IN-MAKERFIELD</u>
Postcode: <u>W14 0RU</u>	Postcode:
Tel No: [REDACTED]
Mobile No: [REDACTED]
Email: [REDACTED]

Signature: [REDACTED]	Date: <u>04/03/19</u>
-----------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

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**

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planningpolicy@sthelens.gov.uk

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

PART B - YOUR REPRESENTATION

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

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	
LPA06									
SITE 1HS									
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATES 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 THE LEVEL IN 1990 - WHERE ARE ALL THE PEOPLE COMING FROM?</p> <p>2. PLANNING POLICY DICTATES THAT GREEN BELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT/URBAN LAND. RELEASING GREEN BELT GOES AGAINST THIS POLICY & THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "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 DENTIST, 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/GATSWOOD 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 GREEN BELT

Please continue on a separate sheet if necessary

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

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

✓	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.

PO2850



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)

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Title: <u>MR</u>	Title: _____
First Name: <u>ADAM</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 NEWBRIDGE CLOSE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ASHTON-IN-MARKETFIELD</u>	_____
Postcode: <u>W44 0RU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>09/03/19</u>
------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

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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 LPA06 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 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. <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>1. NOT JUSTIFIED - THE COUNCIL SHOULD BE OUT TO STRICT PROOF OF THE SPECIAL NEED FOR THIS TYPE OF DEVELOPMENT AND ON THIS SCALE - AS ALLOCATED AS SAFEGUARDED UNTIL 2035 AND GIVEN THE EXPECTED LIFESPAN OF THIS TYPE OF DEVELOPMENT, THE SITE SHOULD REMAIN IN THE GREENBELT SO THAT THE DISTINCT QUESTION OF NEED CAN BE RE-EVALUATED AT THE END OF THE LOCAL PLAN PERIOD.</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL AND ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT/URBAN LAND. RELEASING GREENBELT GOES AGAINST THIS POLICY (PLANNING POLICY) AND THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION IN GREENBELT IN RESPECT OF 2EA-FFN, ONE UNIT SPECULATIVE AND AS YET UNOCCUPIED - SEE ABOVE COMMENTS. APPLICATIONS HAVE BEEN MADE FOR SIMILAR DEVELOPMENTS AT SEA WEST OF HAYDOCK LANE AND BEA PARKSIDE WEST, NEWTON-LE-WILLOWS.</p> <p>4. HIGH VOLUMES OF TRAFFIC ADDING TO THE ALREADY OVER-CAPACITY JUNCTION 23 OF THE M6 (HAYDOCK ISLAND)</p> <p>5. NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES</p>	

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

<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>✓</p>	<p>No, I do not wish to participate at the oral examination</p>		<p>Yes, I wish to participate at the oral examination</p>

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.

PO2851



St. Helens
Council

474
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: MRS	Title:
First Name: CAROL	First name:
Last Name: SKERRITT	Last Name:
Organisation/company: N/A	Organisation/company:
Address: [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 8.3.2019
-----------------------	----------------

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.

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	LAOS	Paragraph / diagram / table	8HS	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 <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"/> Plan does not consider Brownfield sites.
Justified?	<input checked="" type="checkbox"/> Plan based on flawed methodology
Effective?	<input checked="" type="checkbox"/> Plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> Plan does not comply with NPPF 2018

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

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

The housing targets are based on employment growth predictions but according to current statistics the population of St. Helens has been in decline since 1981. The Council are using the 2014 forecast for the predicted housing need instead of the latest Power 2016 estimate. The plan makes no mention of Brownfield - previously developed land that is not yet available or included on the Brownfield register.

The plan promotes increased car dependency in areas of congested roads and poorer local public transport. There are long term congestion problems on the A580 particularly at Windle Island / Blackhill Rd. The current road improvements will not be able to cope with the increased traffic. The increase in traffic is also unfortunately likely to result in more (often very serious) road traffic accidents.

The loss of agricultural land at a time when we may need to produce more of our own products, seems counter productive.

Please continue on a separate sheet if necessary

In the Eccleston and Windle area the existing schools and health care facilities are struggling to cope at the minute without an increase in the housing stock. What provisions are planned to assist this situation?

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 our Green Belt areas for future generations to experience and enjoy and to preserve local wildlife.

Redevelop Brownfield sites particularly in the town centre to try to revitalise the town rather than extend the periphery.

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

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.**

PO2852



St.Helens
Council

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: <i>MR</i>	Title:
First Name: <i>ERIC</i>	First name:
Last Name: <i>SKEARITT</i>	Last Name:
Organisation/company:	Organisation/company:
Address: [REDACTED]	Address:
[REDACTED]	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <i>8.3.19</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.

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	LAOS	Paragraph / diagram / table	845	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW (2018)					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/> No - PLAN DOES NOT CONSIDER BROWNFIELD SITES
Justified?	<input checked="" type="checkbox"/> No - 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 - PLAN DOES NOT COMPLY WITH NPPF 2018

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

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

- 1) THE ASPIRATIONAL TARGETS FOR ST HELENS ECONOMIC GROWTH ARE BASED ON FLAWED HISTORICAL DATA.
- 2) THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCES HAS BEEN MADE
- 3) THE LATEST ESTIMATE PRODUCED BY THE ONS (2016) PREDICTS THAT 383 HOUSES PER YEAR WILL BE REQUIRED TO MEET THE HOUSING NEED IN ST HELENS THE COUNCIL ARE USING AN OLDER FORECAST (2014) OF 486.
- 4) THE PLAN MAKES NO MENTION OF BROWNFIELD AND PREVIOUSLY DEVELOPED LAND THAT IS NOT (YET) AVAILABLE OR INCLUDED IN THE BROWNFIELD REGISTER.

Please continue on a separate sheet if necessary

6. CONTINUED

5. ST HELENS COUNCIL STATEMENT OF 'CONTAMINATED LAND SITES' (2015) INDICATES 3170 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 3170 ha AVAILABLE, IF IT WERE TO BE REMEDIATED.
6. IT IS NOT REASONABLE TO ASSUME THAT SITES CANNOT BE REMEDIATED WITHIN THE 15 YEAR PLAN OR THE 25 YEAR SAFEGUARDED PERIOD BEING CONSIDERED.
7. THE INFRASTRUCTURE DELIVERY PLAN (IDP) REFERS TO CURRENT ROAD IMPROVEMENTS BUT DOES NOT OUTLINE HOW LOCAL + BOROUGH IMPROVEMENTS ARE TO BE MADE AND FUNDED.
8. THE BOROUGH HAS SIGNIFICANT LONG TERM PROBLEMS AT WINDLE ISLAND, BLEAK HILL ROAD, SKEW BRIDGE IN RAINHILL M6/J23 AND M6/J21-26.
9. THE INCREASE IN TRAFFIC WILL HAVE A SIGNIFICANT IMPACT ON AIR QUALITY, NOISE AND HEALTH. THE PLAN WILL RESULT IN UNSUSTAINABLE TRAFFIC GROWTH THAT WILL NOT SATISFY NPPF (2016).
10. THE EDGE OF TOWN DEVELOPMENTS WILL PROMOTE INCREASED PRIVATE VEHICLE DEPENDENCY.
11. THE IDP DOES NOT FULLY EXPLAIN THE IMPACT UPON HEALTH CARE AND EDUCATION. THERE IS NO REFERENCE TO COLLABORATION WITH THE HOSPITAL TRUST, CCG OR EDUCATION 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.

1) REVISE HOUSING NEED TO REALISTIC FUTURE FIGURE
USING ONS STATISTICS FOR 2016 OF 383 HOUSES PER YEAR
A NEW CALCULATION (2016/35) SHOULD BE USED
(383 x 19) WOULD PROVE A REVISED FIGURE OF 7277
REDUCING TO 5288 AFTER EXPECTED COMPLETIONS
BY 1/4/2020.

2) THIS REVISED FIGURE IS COVERED BY SITES ON THE
EXISTING BROWNFIELD REGISTER

3) REMOVE BHS FROM 'SAFEGUARDED' LAND AND
REVERT BACK TO GREENBELT

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

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

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

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

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

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

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

PO2853



St. Helens
Council

477

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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>KEN</u>	First name:
Last Name: <u>SMITH</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>1 ASKETT CLOSE</u> <u>WYDOCK. ST. HELENS</u>	Address:
Postcode: <u>WA11 0FH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <u>4 - 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 - 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	LA06 SITE 2ES	Paragraph / diagram / table	(3)	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 <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: 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</u> legally compliant 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 the need for this type of development, in this position and on this scale. This site is already safeguarded until 2035 and should remain in Greenbelt so the need can be evaluated at the end of this current period.
- Already allowed large release of Greenbelt for Florida Farm North development - which was based on speculative type build - One site still not occupied.
- This will cause significant harm to purpose of Greenbelt.
- no statement of common ground with neighbouring authorities.
- High Volume of traffic to already congested main road arteries.

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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

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

<input 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.

PO2854



St. Helens
Council

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

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
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: Scott
Last Name: Robinson
Organisation/company: _____
Address: 10 Daniel Avenue,
Garswood, Wigan
Postcode: WN4 0UA
Tel No: _____

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____

Date: 3/3/19

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

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 145 LP A06 B124 6401/Billie		Paragraph/ diagram table (2)	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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
Agriculture LAND Urban sprawl Use Brownfield sites - No Brownfield REGISTER (2)	

Please continue on a separate sheet if necessary

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

Delete this LAND from proposed
removal of greenbelt

Please continue on a separate sheet if necessary

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

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

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

	No, 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.

PO2855



St. Helens
Council

493

12 MAR 2019

Ref: LPSD

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This form has two parts;

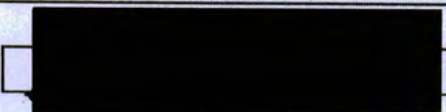
Part A – Personal Details

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: <u>MR</u>	Title:
First Name: <u>CHRISTOPHER</u>	First name:
Last Name: <u>RATCLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>296 SCOT LANE</u> <u>WIGAN</u>	Address:
Postcode: <u>WN5 9TA</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Telephone:

01744 676190

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
145 LPA06		Billinge B						
Other documents (please name document and relevant part/section)				2				

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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.	
Farming LAND Wildlife	
2	

⑦ Remove 1a from proposed removal
from Greenbelt

PO2856



St. Helens
Council

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: KATE DAGNALL

Last Name: DAGNALL

Organisation/company: _____

Address: 12 WATERLAND LANE

PARR

ST HELENS

Postcode: WA9 3AF

Tel No: 2

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

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

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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 1 HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				Billige B			
				(2)			

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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>Housing numbers incorrect</p> <p>(2)</p>	

1) Delete paper 1C from record.
from greenbelt

PO2857

Pf0448

495

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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR.</u>	Title:
First Name: <u>JAMES.</u>	First name:
Last Name: <u>BALMER.</u>	Last Name:
Organisation/company: <u>M.</u>	Organisation/company:
Address: <u>53 COMMON HAYE.</u>	Address:
Postcode: <u>WN7 4QP.</u>	Postcode:
<div></div>	el No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date: 5-3-19.

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

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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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 IHS LPA06		Paragraph/ diagram table Billinge Rd		Policies Map (2)		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
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>Urban sprawl.</p> <p>Housing numbers unjustified</p> <p>Farming LAND</p> <p style="text-align: right;">(2)</p>	

⑦ Dette proposal to remain
1a for greenbelt

PO2858



St. Helens
Council

496

12 MAR 2019

Ref: LPSD

(For official use only)

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

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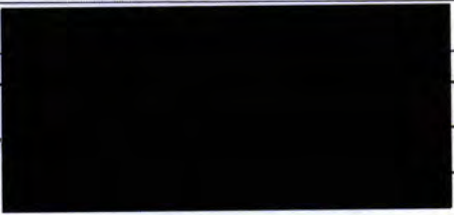
This form has two parts;

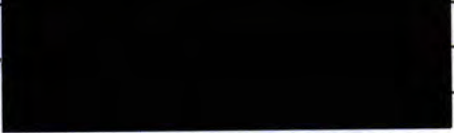
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>SHANU</u>	First name:
Last Name: <u>EDON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>31 ELDON AVE, ST. HELENS MERSEY</u>	Address:
Postcode: <u>WA11 9JU</u>	Postcode:
Tel No: <u>/</u>	Tel No:
Mobile No: <u>/</u>	Mobile No:
Email: 	Email:

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

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (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
Merseyside
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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
1 HS							
LP A06		Billinge R					
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is 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.	
<p>population / Housing figures not sound,</p> <p>Brownfield sites have <u>NOT</u> be considered</p> <p>Urban sprawl</p> <p style="text-align: right;">2</p>	

⑦ Delete IAD from paper
remove from greenbelt

PO2859



St. Helens
Council

497

12 MAR 2019

12 MAR 2019

Ref: LPSD

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>George</u>	First name: _____
Last Name: <u>Pye</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 Lilac Ave</u> <u>Ashton-in-Makerfield</u>	Address: _____
Postcode: <u>WN1 0SL</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____
Signature: _____	Date: <u>3/3/19</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
WA10 1HP**

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy 1 HS LP A06		Paragraph/ diagram table Borough (Leyland) Green		Policies Map 1		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input 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. <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>Safeguarded LAND is unjustified as not required and may not be required in 15 years remain as greenbelt</p> <p style="text-align: right;">1</p>	

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

Remove this LAM
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.

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.

PO2860



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>MR</u>	Title: _____
First Name: <u>Paul</u>	First name: _____
Last Name: <u>Hooton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>56 AVONDALE ROAD</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 0HJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>7th March 2019</u>
------------------------------------------------------------------------------------------------	-----------------------------

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

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

☒ Yes (via email)

☐ No

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

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3. To 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)				LPA06 SITE 2ES					

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>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified, the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as safe guarded until after 2035 and given the lifespan of this operation warehouse development, the site should be remain in the greenbelt so the whole question of need can be re-evaluated at the end of the local plan period.</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)

<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.

PO2861

499 12 MAR 2019

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Karen

Last Name: Hooton

Organisation/company: _____

Address: 56 AVONDALE ROAD
HAYDOCK

Postcode: WA11 0HJ

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

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		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				LPA06 - SITE 2ES					

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The green belt assists in urban regeneration by encouraging the recycling of derelict land. Removal of green belt fails to encourage this. High volumes of traffic will add to the already over capacity on Junction 23 of the M6</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)

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.

PO2862



St. Helens
Council

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

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Victoria

Last Name: Hooton

Organisation/company: _____

Address: 24 Grosvenor Road
Haydock

Postcode: WA11 0HA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 7.3.2019

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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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<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><i>This proposal is not justified as the council has not given strict proof that this type of development is needed. Please remove from proposal & and reevaluate need at the end of the local plan period.</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 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)

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.

PO2863



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: MR

First Name: FRANK

Last Name: BOYLE

Organisation/company: _____

Address: 24 Grosvenor Road
Haydock

Postcode: W11 0HA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 02/03/19

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

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**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 <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>
<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>Removal of Green belt does not encourage the recycling of urban derelict sites.</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.

Please remove this land from proposed removal from 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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PO2864



St. Helens
Council

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: Alex

Last Name: HOOTON

Organisation/company: _____

Address: 24 Grosvenor Road
Holydock

Postcode: WA11 0HA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 07/03/19

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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
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St Helens
WA10 1HP**

or by hand delivery to:

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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)				LPA06 SITE 2 ES					

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 not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Using green belt fails to encourage the regeneration of derelict land.</p>

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

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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PO2865



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: Mr

First Name: ROBERT

Last Name: HLOOTON

Organisation/company: _____

Address: 24 Grosvenor Road
Holydock

Postcode: WA11 0HA

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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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				→ LPA06 SITE 2ES					

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<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><i>Using green belt fails to encourage urban regeneration.</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 this land from the proposed removal from the greenbelt.

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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PO2866



St. Helens
Council

① - LPA05

② - LPA06

504

12 MAR 2019

PFO457

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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: miss	Title:
First Name: michaela	First name:
Last Name: Banola	Last Name:
Organisation/company:	Organisation/company:
Address: 52 The Rides haydock	Address:
Postcode: W11 0GA	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 ☐

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RETURN DETAILS

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

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

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

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

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3. To which part of the Local Plan does this representation relate?									
Policy H5 LP A06 Billinge Ro		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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>Brownfield site to be used before Greenbelt</p> <p>Infrastructure ie Dentist / Doctors / schools</p> <p>problems</p>	

⑦ Delete WAO from paper
remove from greenbelt

PO2867

① - LPA05
② - LPA06

505

12 MAR 2019

PP0458

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: MICHAEL

Last Name: POCKAN - MURRAY

Organisation/company:

Address: 346 3 MURFIELD PARK
GOLBORNE

Postcode: WA3 3XS

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 2/3/19

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☒ Yes (via email)

☐ No

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IHS LP06		Billings Bridg GR					
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Carnal has done nothing to make discontaminated sites become available on register Food security plan is ineffective does not address congestion Hapdock House figures used not sound</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 LAND from popp
Remove from 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, 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.

PO2868



St. Helens
Council

① - LPA06
② - Statement of Common Ground 508 12 MAR 2019

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

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (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>
------------------------------------------------------------------------------------------------------------	----------------------

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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~~) 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. ✓

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WA10 1HP**

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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

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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.

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? ①
- 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 ②

PO2869



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: STEVEN

Last Name: COLLINS

Organisation/company:

Address: 57 THORNHILL RD

GARWOOD

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: 28/2/19

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☒ Yes (via email)

☐ No

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

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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
145 LPA06		Billinge B							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <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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<p>Brownfield sites to be used first</p> <p>Urban sprawl</p> <p>No doctors / School places to accommodate</p> <p>Farming land - Home to LAAWIA</p>	

②

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Delete LAND from proposed
remain or 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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PO2870

PFO463

① - LPA05
② - LPA06

510

12 MAR 2019

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Title: <u>IAN</u>	Title: _____
First Name: <u>BELL</u>	First name: _____
Last Name: _____	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>50 CHURCHLANDS LN</u> <u>STANDISH</u>	Address: _____
Postcode: <u>WN6 0XU</u>	Postcode: _____
[Redacted]	No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

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

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

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<p>Brownfield Site should be used first Doctors / Dentist / School cannot cope LAPWINGS NEST.</p>	

(2)

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

delete LAND for proposed
removal for 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.

PO2872

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

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: 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

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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 IHS LPA06		Paragraph/ diagram table Brown		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Food security - quality growth 10</p> <p>Brownfield site to be considered first</p> <p>Housing figures incorrect</p>	

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 LAND
from proposed removal of 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="" 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.

PO2873



St Helens
Council

① - LPA06

② - LPA06

515

PFO468

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

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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: BARBARA

Last Name: TOPPING

Organisation/company: LOCAL RESIDENT

Address: 33. ABINGER RD.
GARSWOOD, ASHTON-IN-
MAKERFIELD

Postcode: WN4 ORN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 06/03/2019

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

☒ Yes (via email)

☐ No

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

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

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St.Helens Council
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planningpolicy@sthelens.gov.uk

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

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

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

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? *LPA 06 - Site 145*

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?	<i>DONT KNOW</i>	<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.

WHY are they not looking at all the brown field sites, the number of empty properties and where they can improve of those. Sewerage, Water supply, School already full as is Doctors Surgery, transport services, roads, Buses. Senior People, Social areas for everyone ie Children, Teenagers. Disable access at Station (non existence). Police, Ambulances, fire engines. More Houses. WHAT ARE YOU PLANNING? WE DONT NEED ANY

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

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.

PO2874



St Helens
Council

① - LPA06

② - LPA06

515

PFO468

12 MAR 2019

Ref: LPSD

(For official use only)

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(we will correspond via your agent)

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First Name: BARBARA

Last Name: TOPPING

Organisation/company: LOCAL RESIDENT

Address: 33. ABINGER RD.
GARSWOOD, ASHTON-IN-
MAKERFIELD

Postcode: WN4 ORN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 06/03/2019

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

☒ Yes (via email)

☐ No

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

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

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Telephone: **01744 676190**

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</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>Infrastructure - Doctors Dentist</p> <p>Housing figures incorrect</p> <p style="text-align: right;">(2)</p>	

⑦ Delete the 1st from page
remove of gearbelt

PO2875



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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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title:
First Name: <u>Florence</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>
-----------------------	---------------------

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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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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	
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"/>
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.	
Urban sprawl.	
Does not encourage regular or deliberate	
No statement of economic growth	
with other concerns.	

⑦ Delete low four proposed
remove x gear belt

PO2876

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens
Council

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

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Please 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 Apinay Road
Garswood Ashton-in-
Makesfield 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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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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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA 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

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.

PO2877

① - LPA06 ② - Statement of Companion
517 Ground
③ - LPA06

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

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: PHILIP

Last Name: TOPPING

Organisation/company:

Address: 33 Apinawa 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

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

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 <i>IHS</i> <i>LP A06</i>	Paragraph/ diagram table <i>Billinge B</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 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.

Housing figures from -
Branford site not used] (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 the 10 for proposed amendment 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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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.

PO2878

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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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>Caroline</u>	First name:
Last Name: <u>Birchall.</u>	Last Name:
Org. /ation/company:	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>
------------------	----------------------

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
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Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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
IHS LP A06		LP A06 Billings						
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.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - Council should provide Strict proof of population estimate in decline since 1981 Where extra people come from?</p>

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

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.

PO2879



St. Helens
Council

①-LPA05

②-LPA06

519

12 MAR 2019

PF0472

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: DAVID

Last Name: SHUFFLEBOTHAM

Organisation/company: _____

Address: 31 LANGHOLM ROAD

GARSWOOD

W

Postcode: WN4 0SG

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

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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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
IHS LPA06		Billinge B					
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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>STRICT Proof Required Population estimates St Helens declining since 1981. People coming from?</p>	

2

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

Delete 10 from proposed
release of greenbelt 10.

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

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.

PO2880

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)

Title: MRS

First Name: CHERYL

Last Name: SKINNER

Organisation/company:

Address: 428 DOWNALL 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

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:

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

planningpolicy@sthelens.gov.uk

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

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

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 this representation relate?									
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

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 urban regeneration</i> (3)</p> <p><i>No statement of common ground</i> with <i>neighbouring authorities</i> (4)</p>	

⑦ Delete 1a from the project
remove from green belt

PO2881



St. Helens
Council

①-LPA05

521

12 MAR 2019

②-LPA06

**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:	Title:
First Name: DAVID	First name:
Last Name: STOTT	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: 28, WELWYN CLOSE SUTTON HEATH.	Address:
Postcode: WA9 5HL	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: 5319
-----------------------	-------------------

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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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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 1 H 5 LP A06 Mr Billings Ro		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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>Housing figures incorrect</p> <p>USE Brownfield site NOT Greenbelt</p>	

②

⑦

Delete LAND

from proposed

removal of greenbelt

PO2882

① - LPA05
② - LPA06
522
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

(we will correspond via your agent)

Title: MR

First Name: CHRIS

Last Name: PYF

Organisation/company: [REDACTED]

Address: 18 RUSCRO ROAD PALMER

Postcode: WA11 8TX

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: [REDACTED]

Date: 3/03/19

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 - 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.

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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 IHS LPA06	Paragraph/ diagram table Borough Billing	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

Safeguarded LAM is unjustified as not required now it may not be sound or required in 15 years should remain Green belt

②

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

Delete LAND from proposed
Removal from Greenbelt LAND

Please continue on a separate sheet if necessary

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

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

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

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.

PO2883



St. Helens
Council

①-LPA05

②-LPA06

524

12 MAR 2019

PFO477

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: KONSTANTINOS

Last Name: RENTONIS

Organisation/company:

Address: 4 KESWICK RD

WALKDEN - WOLSELEY

MANCHESTER

Postcode: M26 3H7

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 your comments will only be considered if you complete this form and return it to the Council.

Accepted and that in order for your comments to be

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

☒ Yes (via email)

☐ 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
WA10 1HP**

or by hand delivery to:

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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 <i>IHS</i>		Paragraph/ diagram table <i>LPA06</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 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><i>Farming LAND</i></p> <p><i>Housing figures incorrect</i></p>	

②

⑦ Delete LAND
From proposed removal from
Greenbelt

PO2884

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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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> <u>GARSWOOD</u> <u>ASHTON IN MAKERFIELD. WIGAN</u>	Address:
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.

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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 IHS - PA06 Billige B		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
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 - council should be put to strict proof of population estimates - St Helens population is in decline since 1981 - where are ALL extra people coming from Does not encourage urban regeneration</p>	

3

⑦ Remove this law from proposed plan
to remove grandfather

PO2885

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: KIERON MR

First Name: KIERON

Last Name: MCCABE

Organisation/company: _____

Address: 35 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: 26/2/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

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

☐ Yes (via email)

☐ No

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RETURN DETAILS

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

or by hand delivery to:

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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 LPA06		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	SITE 1HS								
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>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT Justified the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981 where are all the extra people coming from?</p> <p>Housing in this area isn't sustainable because of the lack of school places doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Green belt</p>

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

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)

	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.

PO2886



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>Alicia</u>	First name:
Last Name: <u>McCabe</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>35 HILLBECK CRESCENT</u> <u>GARSWOOD</u>	Address:
Postcode: <u>WN4 0RP</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	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

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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 LPA06		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	SITE 1HS								
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"/>

<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 Justified the Council should be put to strict proof of its population estimates. The population of St Helens has been decline since 1981. Where are all the extra people coming from?</p> <p>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. The release of Greenbelt will course significant harm to the purposes of the Greenbelt.</p> <p>High volumes of predicted traffic will be added to the area which will in the long term will make the road network worse.</p>

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

Please continue on a separate sheet if necessary

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	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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ap a copy for future reference.

PO2887

556

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens
Council

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SUSAN</u>	First name: _____
Last Name: <u>JORDAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>36 CRANTOCK GROVE</u>	Address: _____
<u>WINDLE, ST. HELENS,</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

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

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☒ 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		Paragraph/ diagram table		Policies Map	8HS (1)	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - THE PLAN IS BASED ON FLAWED METHODOLOGY
Effective?	<input checked="" type="checkbox"/> NO - THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - IT DOES NOT COMPLY WITH NPPF 2018

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

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

I CONSIDER THE PLAN UNSOUND AS PER ATTACHED.

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

PLEASE SEE ATTACHED

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N/A

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Please keep a copy for future reference.

SUSAN JORDAN - 36 CRANTOCK GROVE
WINDLE ST. HELENS

8HS
PART B-6
7

TRAFFIC

I CONSIDER THE PLAN UNSOUND —
THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC GROWTH, CAUSING SEVERE TRAFFIC ISSUES — THE A580 IS ONE OF THE BUSIEST MAIN ROADS IN THE COUNTRY. THE BOROUGH HAS SEVERE AND SIGNIFICANT PROBLEMS AT THE WINDLE ISLAND JUNCTION AND MANY ACCIDENTS AND PEDESTRIAN FATALITIES HAVE OCCURRED. THE CURRENT ROAD WORKS AT THE JUNCTION ARE TO IMPROVE TRAFFIC FLOW AT PRESENT AND IS TOTALLY UNRELATED TO THE LOCAL PLAN PROPOSALS. GIANT WAREHOUSES ARE CURRENTLY UNDER CONSTRUCTION AND THESE ARE TO LIE ALONG A TEN MILE STRETCH OF THE M57 AND M6 INCORPORATING THE A580 AND WINDLE ISLAND JUNCTION. THIS IS A NORTHERN POWER HOUSE INITIATIVE AND WHEN THE SUPERPORT AT LIVERPOOL BECOMES FULLY OPERATIONAL ALONG WITH OTHER WAREHOUSING DEVELOPMENTS AT BICKERSTAFFE AND SKELMERSDALE, IT IS ESTIMATED THAT THERE WILL BE AN INCREASE OF HGVs OF 300%. WHY ADD AN ESTIMATED 1,800 CARS FROM THE PROPOSED HOUSING INTO THE MIX? ADDING A SIGNIFICANT IMPACT ON AN ALREADY SEVERE TRAFFIC ISSUE AT THE JUNCTION AND SURROUNDING ROADS. IT WILL ALSO IMPACT ON THE A580/M6 JUNCTION 23 AT HAYDOCK WHICH IS HEAVILY CONGESTED ON A DAILY BASIS AND WILL CAUSE MORE DELAYS AND TAILBACKS ALONG THE A580 BACK TO THE WINDLE JUNCTION.

ACCORDING TO THE NPPF 2018 PARA 109 "DEVELOPMENT SHOULD ONLY BE PREVENTED OR REFUSED ON GROUNDS IF THERE WOULD BE AN UNACCEPTABLE IMPACT ON HIGHWAY SAFETY OR RESIDUAL CUMULATIVE IMPACT ON THE ROAD NETWORK WOULD BE SEVERE." THE LOCAL PLAN FOR 8HS WOULD CAUSE A SEVERE IMPACT ON SAFETY AND THE ROAD NETWORKS AND SHOULD BE PREVENTED AS PER NPPF 2018 PARAGRAPH 109.

— CONT TO PAGE 2

SUSAN JORDAN -
36 CRAWTOCK GROVE
WINDLE ST. HELENS.

PAGE 2

SHS

PART B-6.
7.

AGRICULTURAL LAND

THE PLAN HAS IGNORED THAT SHS IS A GRADE 1 AND GRADE 2 AGRICULTURAL LAND AND BY THIS FOOD SECURITY HAS BEEN IGNORED. THIS LAND HAS BEEN CONTINUOUSLY AND CURRENTLY FARMED AND PRODUCES VEGETABLES AND WHEAT. NO THOUGHT HAS BEEN GIVEN TO THE IMPACT THIS WILL CAUSE TO FARMING JOBS LOCALLY.

HOUSING NEED

THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY, AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCE HAS BEEN MADE. THE HOUSING NEED IS ASPIRATIONAL AND DRIVEN BY ECONOMIC GROWTH FORECASTS THAT ARE FLAWED AND OVER OPTIMISTIC. THE NEW MASSIVE WAREHOUSES BEING BUILT LOCALLY ARE ALL TO BE MECHANISED AND DO NOT EMPLOY LARGE WORKFORCES AND THUS IN NO WAY JUSTIFY APPROX 1,000 HOUSES TO BE BUILT. THE LATEST ESTIMATE PRODUCED BY THE ONS (2016) PREDICTS THAT 383 HOUSES PER YEAR WILL BE REQUIRED TO MEET HOUSING NEEDS OF ST. HELENS.

COMMUNITY INFRASTRUCTURE

THERE IS NO COMMUNITY INFRASTRUCTURE REGARDING SCHOOLS, DOCTORS, DENTISTS AND PUBLIC TRANSPORT. - OUR SCHOOLS ARE OVERSUBSCRIBED ALREADY, WE HAVE NO DOCTORS OR DENTISTS IN WINDLE AND WE ALREADY HAVE A REDUCED BUS SERVICE. HOW WILL THE COMMUNITY COPE?

— CONT TO PAGE 3

SHS
PART B - 6.
7

BROWNFIELD POLICY

DUE TO ST. HELENS DECLINE IN GLASS AND OTHER MANUFACTURING THERE ARE A LARGE AMOUNT OF BROWN FIELD SITES IN VARYING DEGREES^{OF} CONTAMINATION. THE ST. HELENS MBC IN CONJUNCTION WITH LIVERPOOL CITY REGION AUTHORITY AND NEIGHBOURING AUTHORITIES HAVE NO POLICY FOR BRINGING "UNSUITABLE" SITES OUTSIDE BROWNFIELD BACK TO USE.

ST. HELENS MBC RECORDS INDICATE THAT LESS THAN 7% OF THE TOTAL AREA OF THE LOWEST LEVEL OF CONTAMINATED SITES NEED TO BE MADE AVAILABLE TO REMOVE GREEN BELT AND SAFEGUARDED LAND FROM CONSIDERATION. THEY HAVE STATED IN THEIR STATEMENT OF CONTAMINATED LAND SITES 2015 THAT 3,170 ha OF THE LOWEST PRIORITY CONTAMINATED LAND EXISTS IN ST. HELENS. IT IS REASONABLE TO EXPECT THEREFORE THAT THE LOWEST CONTAMINATED LAND SITES CAN BE MADE TO BECOME AVAILABLE WITHIN THE 15 YEAR PLAN PERIOD OR THE 25 YEAR SAFEGUARDED PERIOD. THUS TAKING THE NEED AWAY FROM USING SHS AND KEEPING IT IN THE FARMING) GREENBELT AND FREE FROM DEVELOPING FOR EVER.

PO2888

557

12 MAR 2019

Ref: LPSD

(For official use only)



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Council

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Last Name: <u>JORDAN</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>36 CRANTOCK GROVE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/2019</u>
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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
				<i>1</i>	<i>8NS</i>				
Other documents (please name document and relevant part/section)				<i>SEE 3 PAGES OF LETTER.</i>					

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
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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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1
MR J. JORDAN, 36 CRANTOCK GROVE, WINDLE ST. HELENS WA10 6ET

LPA07

TRAFFIC

LPA07 3A

THE A580/A570 WINDLE JUNCTION IS ONE OF THE MOST DANGEROUS IN THE AREA, RESULTING IN MANY ACCIDENTS.

LPA07 3E

THIS JUNCTION'S PRESENT ALTERATIONS WILL ONLY EASE THE PRESENT AMOUNT OF TRAFFIC, BUT NOT ON BREAKHILL ROAD/A570 JUNCTION, PLUS THE DANGEROUS PEDESTRIAN CROSSING AT THIS POINT. THE JUNCTION GETS GRIDLOCKED.

WHEN THE LIVERPOOL SUPERPORT AND GIANT WAREHOUSES AT STONEBRIDGE PARK KNOWSLEY, FLORIDA PARK HAYDOCK, BICKERSTAFFE AND SKELMERSDALE BECOME OPERATIONAL AN INCREASE OF 300% IN H.G.V. TRAFFIC IS EXPECTED. THE INCREASE OF 1027 HOUSES ON 8HS SITE PLUS THE EXTRA H.G.V. TRAFFIC WILL CAUSE DELAYS WINDLE THROUGH TO THE M6 JUNCTION 23.

THE NATIONAL PLANNING POLICY FRAMEWORK 109 STATES:
"DEVELOPMENT SHOULD ONLY BE PREVENTED OR REFUSED ON HIGHWAYS GROUNDS IF THERE WOULD BE AN UNACCEPTABLE IMPACT ON HIGHWAYS SAFETY, OR THE RESIDUAL CUMULATIVE IMPACTS ON THE ROAD NETWORK WOULD BE SEVERE"

PUBLIC TRANSPORT

LPA02.9
+ LPA03.6C

PRESENTLY, WHEN THE NO 38 BUS FAILS TO TURN UP THEN TWICE AS MANY PEOPLE WAIT FOR THE NEXT BUS. I CAN'T SEE HOW AN EXTRA 1027 ^{HOUSES} ON 8HS CAN HELP THIS PROBLEM.

LPA02.2

IF 1027 HOUSES ARE DEVELOPED ON 8HS TO ACCOMMODATE THE EXPANSION OF JOB OPPORTUNITIES AT HAYDOCK OR KNOWSLEY, THEN HOW WILL THEY GET TO WORK WITHOUT USING CARS?

THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC GROWTH CAUSING SEVERE TRAFFIC ISSUES THAT WILL NOT SATISFY THE NPPF (2016).

MR. J. JORDAN, 36 CRANTOCK GROVE, WINDLE, ST. HELENS

BROWNFIELD SITES

BROWNFIELD SITES SHOULD BE USED FIRST INCLUDING THE 7% OF THE LOWEST LEVEL CONTAMINATED LAND AND USED FOR DEVELOPMENT RETURNING 'SAFEGUARDED' LAND TO GREENBELT.

LPA09 AGRICULTURAL LAND

4.33.2 THIS GRADE LAND 2 LAND OF 8HS HAS BEEN FARMED
4.33.3 FOR YEARS GROWING VEGETABLES AND WHEAT HELPING

LPA013D TO FEED THE POPULATION OF THIS COUNTRY. IS IT
LOGICAL AT THIS TIME OF BREXIT TO DESTROY IT?

LPC12 FLOOD RISK AND WATER MANAGEMENT

LPC12.8 SURFACE WATER HAS COLLECTED FOR YEARS ON 8HS AT

LPA018.3.7 WINDLE SMITHIES NEAR COAL MINE INSPECTION COVER.

THE FLOODING OVER THE YEARS HAS NOT BEEN RECTIFIED AFTER INSPECTIONS.

LPC12.14 THE AGRICULTURAL LAND OF 8HS HAS TWO LARGE WATER
PIPES SUPPLYING WATER FROM PRESCOT RESERVOIR TO
WOODCOTE HILL RESERVOIR IN BURY INSTALLED 2009/2010

LPC12.14 "PROTECTION OF WATER AND WASTE ASSETS."

"DEVELOPMENT THAT WOULD COMPROMISE THE PHYSICAL
INTEGRITY OR THE EFFECTIVE MAINTENANCE OF ANY
WATER OR WASTE INFRASTRUCTURE ASSET WILL NOT BE PERMITTED."

LPA07 PEDESTRIAN SAFETY

THE TRAFFIC OVER THE YEARS AT RUSH HOURS HAS
QUEUED UP FROM RAINFORD ROAD TO STUART ROAD
CAUSING A 'RAT RUN' DOWN CRANTOCK GROVE TO BEAT
THE QUEUE, WITH NO REGARD TO CHILDREN.

LPA07.3E THE PEDESTRIAN ISLAND ON RAINFORD ROAD, TESCO
LPA015.3.18A AND STARBUCKS IS VERY DANGEROUS WITH CARS PASSING
ON THE WRONG SIDE OF THE ROAD ACCESSING TESCO/STARBUCKS.

LPA07.3F CARS FROM STARBUCKS ARE DOUBLE PARKED ON THE PAVEMENT
LPA010.8.30.3 BLOCKING EMERGENCY VEHICLE ACCESS TO CRANTOCK GROVE
THIS AREA COULDN'T COPE WITH 1000 NEW HOUSES.

MR J. JORDAN, 36 CRANTOCK GROVE, HINDLE, ST. HELENS

EMPLOYMENT AND HOUSING

MOST OF THE PLANNED EMPLOYMENT WILL COME FROM WAREHOUSING (38) WHICH IS NOW BEING AUTOMATED. THE NEW AMAZON WAREHOUSE (UNIT 1) AT FLORIDA FARM OPENING 2019 AND A SMALL (UNIT 2) OPENING 2020 IS A GOOD EXAMPLE.

IT'S HARD TO IMAGINE THAT 1,487 JOBS WILL BE CREATED AT THESE TWO UNITS (2&A) BY 2022 WHEN WAREHOUSING IS NOW BEING AUTOMATED.

HOUSING.

LPC01.73 ECONOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON FLAWED HISTORICAL DATA THAT DOES NOT JUSTIFY THE ASPIRATIONAL TARGETS INCLUDED IN THE PLAN.

THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCES HAS BEEN MADE.

THE LATEST ESTIMATE PRODUCED BY THE O.N.S. (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.

SCHOOLS

BLEAK HILL SCHOOL IS BEING EXTENDED TO COPE WITH THE CURRENT DEMAND BUT HOW WILL IT COPE WITH 1027 NEW HOUSES, ALSO SECONDARY EDUCATION?

HEALTHCARE

DOCTORS HAVE LEFT THE PRACTICE AFTER MILL STREET MERGED WITH THE NORTH ROAD PRACTICE. HOW WILL THE PRACTICE COPE WITH AN EXTRA 1027 HOUSES?

HOW WILL THE DENTAL PRACTICE COPE AT BROADWAY?

● LPA11.8 HEALTH AND WELLBEING - 8 MANAGE AIR QUALITY AND POLLUTION.

LPD09.1+2 AIR QUALITY - 1 AND 2. MORE HOUSES = MORE CARS.

PO2889

557

12 MAR 2019

Ref: LPSD

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First Name: <u>JOHN</u>	First name: _____
Last Name: <u>JORDAN</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>36 CRANTOCK GROVE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/2019</u>
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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	
				<i>1</i>	<i>8NS</i>				
Other documents (please name document and relevant part/section)				<i>SEE 3 PAGES OF LETTER.</i>					

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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Justified?	<input checked="" type="checkbox"/>
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SEE LETTER

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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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N/A

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1
MR J. JORDAN, 36 CRANTOCK GROVE, WINDLE ST. HELENS WA10 6ET

LPA07

TRAFFIC

LPA07 3A

THE A580/A570 WINDLE JUNCTION IS ONE OF THE MOST DANGEROUS IN THE AREA, RESULTING IN MANY ACCIDENTS.

LPA07 3E

THIS JUNCTION'S PRESENT ALTERATIONS WILL ONLY EASE THE PRESENT AMOUNT OF TRAFFIC, BUT NOT ON BREAKHILL ROAD/A570 JUNCTION, PLUS THE DANGEROUS PEDESTRIAN CROSSING AT THIS POINT. THE JUNCTION GETS GRIDLOCKED.

WHEN THE LIVERPOOL SUPERPORT AND GIANT WAREHOUSES AT STONEBRIDGE PARK KNOWSLEY, FLORIDA PARK HAYDOCK, BICKERSTAFFE AND SKELMERSDALE BECOME OPERATIONAL AN INCREASE OF 300% IN H.E.V. TRAFFIC IS EXPECTED. THE INCREASE OF 1027 HOUSES ON 8HS SITE PLUS THE EXTRA H.E.V. TRAFFIC WILL CAUSE DELAYS WINDLE THROUGH TO THE M6 JUNCTION 23.

THE NATIONAL PLANNING POLICY FRAMEWORK 109 STATES:
"DEVELOPMENT SHOULD ONLY BE PREVENTED OR REFUSED ON HIGHWAYS GROUNDS IF THERE WOULD BE AN UNACCEPTABLE IMPACT ON HIGHWAYS SAFETY, OR THE RESIDUAL CUMULATIVE IMPACTS ON THE ROAD NETWORK WOULD BE SEVERE"

PUBLIC TRANSPORT

LPA02.9
+ LPA03.6C

PRESENTLY, WHEN THE NO 38 BUS FAILS TO TURN UP THEN TWICE AS MANY PEOPLE WAIT FOR THE NEXT BUS. I CAN'T SEE HOW AN EXTRA 1027 ^{HOUSES} ON 8HS CAN HELP THIS PROBLEM.

LPA02.2

IF 1027 HOUSES ARE DEVELOPED ON 8HS TO ACCOMMODATE THE EXPANSION OF JOB OPPORTUNITIES AT HAYDOCK OR KNOWSLEY, THEN HOW WILL THEY GET TO WORK WITHOUT USING CARS?

THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC GROWTH CAUSING SEVERE TRAFFIC ISSUES THAT WILL NOT SATISFY THE NPPF (2016).

MR. J. JORDAN, 36 CRANTOCK GROVE, WINDLE, ST. HELENS

BROWNFIELD SITES

BROWNFIELD SITES SHOULD BE USED FIRST INCLUDING THE 7% OF THE LOWEST LEVEL CONTAMINATED LAND AND USED FOR DEVELOPMENT RETURNING 'SAFEGUARDED' LAND TO GREENBELT.

LPA09 AGRICULTURAL LAND

4.33.2
4.33.3

THIS GRADE LAND 2 LAND OF 8 HS HAS BEEN FARMED FOR YEARS GROWING VEGETABLES AND WHEAT HELPING

LPA013D

TO FEED THE POPULATION OF THIS COUNTRY. IS IT LOGICAL AT THIS TIME OF BREXIT TO DESTROY IT?

LPC12

FLOOD RISK AND WATER MANAGEMENT

LPC12.8

SURFACE WATER HAS COLLECTED FOR YEARS ON 8 HS AT

LPA018.3.7

WINDLE SMITHIES NEAR COAL MINE INSPECTION COVER.

THE FLOODING OVER THE YEARS HAS NOT BEEN RECTIFIED AFTER INSPECTIONS.

LPC12.14

THE AGRICULTURAL LAND OF 8 HS HAS TWO LARGE WATER PIPES SUPPLYING WATER FROM PRESCOT RESERVOIR TO WOODCOTE HILL RESERVOIR IN BURY INSTALLED 2009/2010

LPC12.14

"PROTECTION OF WATER AND WASTE ASSETS."

"DEVELOPMENT THAT WOULD COMPROMISE THE PHYSICAL INTEGRITY OR THE EFFECTIVE MAINTENANCE OF ANY WATER OR WASTE INFRASTRUCTURE ASSET WILL NOT BE PERMITTED."

LPA07

PEDESTRIAN SAFETY

THE TRAFFIC OVER THE YEARS AT RUSH HOURS HAS QUEUED UP FROM RAINFORD ROAD TO STUART ROAD CAUSING A 'RAT RUN' DOWN CRANTOCK GROVE TO BEAT THE QUEUE, WITH NO REGARD TO CHILDREN.

LPA07.3E

THE PEDESTRIAN ISLAND ON RAINFORD ROAD, TESCO

LPB015.3.18A

AND STARBUCKS IS VERY DANGEROUS WITH CARS PASSING ON THE WRONG SIDE OF THE ROAD ACCESSING TESCO/STARBUCKS.

LPA07.3F

CARS FROM STARBUCKS ARE DOUBLE PARKED ON THE PAVEMENT

LPD10.8.30.3

BLOCKING EMERGENCY VEHICLE ACCESS TO CRANTOCK GROVE THIS AREA COULDN'T COPE WITH 1000 NEW HOUSES.

MR J. JORDAN, 36 CRANTOCK GROVE, HINDLE, ST. HELENS

EMPLOYMENT AND HOUSING

MOST OF THE PLANNED EMPLOYMENT WILL COME FROM WAREHOUSING (38) WHICH IS NOW BEING AUTOMATED. THE NEW AMAZON WAREHOUSE (UNIT 1) AT FLORIDA FARM OPENING 2019 AND A SMALL (UNIT 2) OPENING 2020 IS A GOOD EXAMPLE.

IT'S HARD TO IMAGINE THAT 1,487 JOBS WILL BE CREATED AT THESE TWO UNITS (2&A) BY 2022 WHEN WAREHOUSING IS NOW BEING AUTOMATED.

HOUSING.

LPC01.73 ECONOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON FLAWED HISTORICAL DATA THAT DOES NOT JUSTIFY THE ASPIRATIONAL TARGETS INCLUDED IN THE PLAN.

THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCES HAS BEEN MADE.

THE LATEST ESTIMATE PRODUCED BY THE O.N.S. (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.

SCHOOLS

BLEAK HILL SCHOOL IS BEING EXTENDED TO COPE WITH THE CURRENT DEMAND BUT HOW WILL IT COPE WITH 1027 NEW HOUSES, ALSO SECONDARY EDUCATION?

HEALTHCARE

DOCTORS HAVE LEFT THE PRACTICE AFTER MILL STREET MERGED WITH THE NORTH ROAD PRACTICE. HOW WILL THE PRACTICE COPE WITH AN EXTRA 1027 HOUSES?

HOW WILL THE DENTAL PRACTICE COPE AT BROADWAY?

● LPA11.8 HEALTH AND WELLBEING - 8 MANAGE AIR QUALITY AND POLLUTION.

LPD09.1+2 AIR QUALITY - 1 AND 2. MORE HOUSES = MORE CARS.

PO2890

560

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)

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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>ALAN</u>	First name: _____
Last Name: <u>KEARY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>54 SMOCK LANE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>N/A</u>	Mobile No: _____
Email: <u>N/A</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>11.03.2019</u>
------------------------------	-------------------------

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☐ Yes (via email)

☒ No

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WA10 1HP**

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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:

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

Please tick as appropriate

<p>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</p> <p>Please read the Guidance note for explanations of the Tests of Soundness</p>	
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LPA05 – SITE 1HS

- 
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Protected species are known to be nesting in the proposed site.
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PO2891

12 MAR 2019

Ref: LPSD

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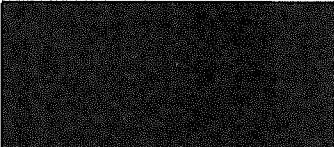
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First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>PODESTA</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>100 BILLINGE ROAD</u> <u>ASHTON IN MAKERFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0XD</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: 	Email: _____
Signature:  Date: <u>10/3/19</u>	

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PO2892

563

12 MAR 2019

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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: DAVID

Last Name: LYON

Organisation/company: _____

Address: 100 BILLINGE ROAD

ASHTON IN MAKERFIELD

WIGAN

Postcode: WN4 0XD

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 10/3/19

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setting out your representation/comment.**

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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?									
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <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.	
See separate sheet 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
removed from the Green Belt.

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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PART B – YOUR REPRESENTATION

2

LPA05 – SITE 1HS

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PO2893

564

12 MAR 2019

Ref: LPSD

(For official use only)



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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>ANTHONY</u>	First name: _____
Last Name: <u>JOHNSTON</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>46 SMOCK LANE,</u> <u>ASHTON - IN - MAKER FELD,</u> <u>WIGAN, LANCs</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>8/3/2019</u>
-----------------------	-----------------------

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

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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 unsound, 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"/>
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Delete this land from the proposed removal from the Green Belt.

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LPA05 – SITE 1HS

2

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

PO2894



St. Helens
Council

569

12 MAR 2019

Ref: LPSD

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>SHARON</u>	First name:
Last Name: <u>COOK</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
Address: <u>1 BARTHOLOMEW CLOSE RAINHILL</u>	Address:
Postcode: <u>L35 6QA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: <u>—</u>	Mobile No:
[REDACTED]	Email:

Signature [REDACTED]	Date: <u>11/3/2019</u>
----------------------	------------------------

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

Yes ☒ (Via Email)

No ☐

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

Policy	LPA 06	Paragraph / diagram / table	3145	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Yes <input type="checkbox"/>	DONT KNOW	No <input type="checkbox"/>	DONT 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

- It is not clear to us where the need (a genuine need) for additional housing comes from, as there has been a steady decline in the population of St Helens since 1981.
- The area will undoubtedly be affected by increased air pollution from increased traffic.
- We are concerned for pedestrian safety too, from an increase in traffic. There was a pedestrian knocked down outside Rainhill High School only in recent weeks.
- There are a number of species of flora + fauna, + birds that are currently part of the EPGC area - these will be lost if this land is developed.

Please continue on a separate sheet if necessary

↳ Please see attached sheets.

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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PART B – REPRESENTATION FROM MRS SHARON M. COOK continued....

St Helen's council brownfield-land-register spreadsheet shows minimum net dwelling potential on brownfields sites as 5818. According to Ministry for Housing, Communities and Local Government (MHCLG) "That's why we have strengthened green belt protection through the publication of our revised National Planning Policy Framework (NPPF) earlier this year. Under this planning authorities have to demonstrate they have exhausted all other reasonable options to meet development needs before even considering changes to the green belt and then evidence exceptional circumstances to justify development."

St. Helen's council have not demonstrated such exceptional circumstances to justify their proposals for the EPGC site. Therefore, all these existing brownfields sites must be used, not greenbelt land.

There is already a problem with traffic congestion on Warrington road near the Skew Bridge, building 956 houses on 3HS (Former Eccleston Park Golf Club, Rainhill Road, Eccleston) would cause unacceptable traffic congestion, increased pollution and without a doubt destroy the character of Rainhill village. With our historic train station & existing railway line there is not the infrastructure to increase the capacity for traffic at this junction.

For 60 years, Green Belts have protected agricultural and other undeveloped land. By doing this they encourage the regeneration of previously developed or 'brownfield' land in urban areas. International comparisons [See United Nations Human Settlements Programme (UN Habitat), Planning Sustainable Cities: Global Report on Human Settlements October 2009.] suggest that without the strong protection Green Belts offer against many forms of development, much more farmland and woods would be consumed by urban sprawl, especially around large cities.

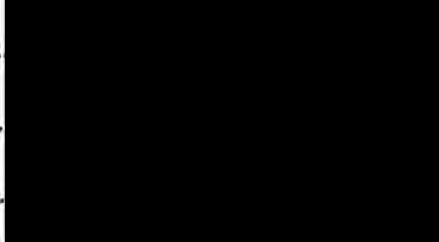
Developing on the EPGC site will mean that Rainhill would have no boundaries with its surrounding areas and so become a huge urban sprawl with less parks, open spaces, green areas for walking, dog walking and for space to exercise to maintain our health.

Our local public services are already stretched to capacity - the local doctors & dentists are over-subscribed, and it is difficult to get an appointment. The development of EPGC will also only serve to put more pressure on our local hospital Whiston & its A&E dept.

The ability to provide enough school places will also come under pressure – all Rainhill schools are already over-subscribed – they cannot accommodate the places needed for families who will inhabit the houses on the suggested development.

For all the various reasons set out above we firmly believe that the proposed development of the EPGC site will have very significant detrimental effects on the Rainhill area and implore you to remove the site from your proposed areas of green belt to develop. Please reconsider & look at using existing brown belt sites.

We the undersigned who reside as a family at 1 Bartholomew Close, Rainhill confirm we have worked together on this response and give our explicit permission for our names to be used.

Signed.....		Sharon M. Cook	Date: 11 th March 2019
Signed.....		Ian Cook	Date: 11 th March 2019
Signed..... 2019		Charlotte Cook	Date: 11 th March

PO2895

577

12 MAR 2019

Ref: LPSD

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1. Your Details

(we will correspond via your agent)

Title:
First Name: KAREN R.
Last Name: RILEY
Organisation/company:

2. Your Agent's Details (if applicable)

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

Signature:

Date: 4.3.19

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The council has already granted planning permission in the greenbelt in respect of site 2EA, less than 2 miles from this site and has also received applications for a similar development at 5EA land to the west of Haydock Lane and 8EA, Portside West.</p> <p>Not justified - council needs to provide strict proof for development type. This allocated sagquard site should be kept under greenbelt and re-evaluated at the end of the local plan period.</p> <p>High volumes of predicted traffic adding to already over capacity at Junction 23 of the M6.</p>

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.

PO2896

578

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)

Title: MISS

First Name: EMMA

Last Name: BROADBENT

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

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	L P A 06	Paragraph/ diagram table	2 ES	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	DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is 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.

The council has already granted planning permission in the greenbelt in respect of site 2 EA - Florida Farm North, less than 2 miles from this site and has also received applications for similar developments at 5 EA, land to west of Haydock lane and 8 EA, Portside West.

NOT JUSTIFIED - COUNCIL needs to provide strict proof for development type. This allocated safeguard site should be kept under greenbelt and re-evaluated at the end of local plan period.

High volumes of predicted traffic will add to already over capacity June 23 of the M6.

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="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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PO2897

580

12 MAR 2019

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: LESLIE

Last Name: CHANCY

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: _____

Email

Signature: _____

Date: 5/3/2019

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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 - 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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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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

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

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
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

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

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

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

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

--

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.

PO2898

12 MAR 2019



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

Ref: LPSD
(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

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.

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

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planningpolicy@sthelens.gov.uk

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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 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.	
1)	The access to the site on Bulving Road, Leyland Green Road would be inadequate.
2)	No statement of common ground with neighbouring authorities
3)	Housing in this area isn't sustainable because of the lack of school places, doctors surgeries (+ doctors) bus routes + other services
4)	The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.
5)	Brownfield and derelict land should be developed before Greenbelt
6)	Lots of Brownfield land available for development.

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.

PO2899

582

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: Ms

First Name: Warren

Last Name: Ashcroft

Organisation/company: [Redacted]

Address: 101 Ocmshirk Road

Upholland

Postcode: WN8 0AH

Tel No: [Redacted]

Mobile: [Redacted]

Email: [Redacted]

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

e No: _____

Signature: [Redacted]

Date: 03/03/2019

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.

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WA10 1HP**

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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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 1HS LP A06	Paragraph/ diagram table Bran 6R	Policies Map 2	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

Traffic problems
National planning policy framework 2018
section 13 protecting greenbelt states all
options have to be examined.
brownfield site remain untouched.

7/

Delete land

from proposed

Remain^{from} greenbelt

PO2900



St. Helens
Council

12 MAR 2019

Ref: LPSD

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR and</u>	Title: _____
First Name: <u>BENJAMIN</u>	First name: _____
Last Name: <u>PORTER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 THORNHILL ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SN</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

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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PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <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.
See separate sheet attached

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress.
There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?