



ST HELENS
BOROUGH COUNCIL

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

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

PLAN ORDER

PO3101 – PO3300

SEPTEMBER 2020

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PO3101

- ①-LPA05 ②-LPA06, 3HS ③-LPA06, 8HS
 ④-LPA04 ⑤-10P

Representor Details

Web Reference Number	WF0073
Type of Submission	Web submission
Full Name	mrs Maureen Daly
Organisation	
Address	48 Springfield Lane Eccleston St, Helens wa10 5ha
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

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①,2,3

So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car. The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

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The bus routes that serve Ecclestone have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars.

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity.

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely be regarded as unsound.

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

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

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

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

Response Date	3/13/2019 1:19:02 PM
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PO3102

- ①-LPA05 ②-LPA06, 3HS ③-LPA06, 8HS
 ④-LPA04 ⑤-10P

Representor Details

Web Reference Number	WF0073
Type of Submission	Web submission
Full Name	mrs Maureen Daly
Organisation	
Address	48 Springfield Lane Eccleston St, Helens wa10 5ha
Agent Details	

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Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Response Date	3/13/2019 1:19:02 PM
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PO3103

Representor Details

Web Reference Number	WF0083
Type of Submission	Web submission
Full Name	Mr William Williams
Organisation	
Address	211 Longton Lane, Rainhill, Prescot, Merseyside. L35 8NX
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

* The population of St Helens has been falling since the 1980's. The ONS figures are for the Nation. These figure do not reflex the future needs of St Helens.

* St Helens has enough Brownfield land to build over 5000 house.

* The surrounding road infrastructure CAN'T sustain any further increase in traffic.

- Portico Lane: will be an entry point for 3HS. This road is a key route to Whiston Hospital and will soon provide access to a 200 unit property development (currently under construction).

- Rainhill Road: will be another entry point to 3HS. This road is at capacity, with a bottle neck point just before Rainhill Bridge.

- Warrington Road / Rainhill Bridge: Rainhill bridge (Skew Bridge) is a protected architectural site, it was the first road over railway bridge in the world. The Skew Bridge is currently over capacity and has no way of expansion.

Warrington Road is at capacity as it is the main route to the M62 motorway, Rainhill High School, Rainhill Village and Whiston Hospital. Several times a day traffic queues from The Skew Bridge on Warrington Road extend for over 1.5miles.

* 3HS is a natural green space which stops the areas of Rainhill, Eccleston Park, Thatto Heath and Whiston, from merging into one urban sprawl.

* 3HS lies on the St Helens Borough and Knowsley Borough border. Knowsley Borough Council currently have a development of 200 houses under construction on Scotbarn Lane, Whiston/Prescot. A development of 400+ houses under construction on Manchester Road, Prescot. Also a planned development of 1600 houses, less than 3 miles from 3HS.

* Sport England consult the British Government and have objected to 3HS (Eccleston Park Golf Club) from loosing its status.

* In a time where we are loosing wildlife with many species becoming close extinction, we need the land of 3HS to remain.

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

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

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

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

Response Date	3/13/2019 12:35:37 PM
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PO3104

① - LPA06 ② - Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0086
Type of Submission	Web submission
Full Name	Mr Marc Gill
Organisation	N/A
Address	[REDACTED]
Agent Details	[REDACTED]

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

The plan to remove eccleston park golf club from green belt to potentially be built on is wrong.

- The local infrastructure is already at breaking point. I live in rainhill which borders eccleston park golf club and the traffic is already terrible, especially in the mornings and evenings so even more homes will cause even greater chaos. Two butt lane and holt lane are often congested. Warrington road going over the bridge, through rainhill village and connecting to the M62 is always congested.
- Trying to get an appointment at the doctors is already impossible so even more people would make it worse.
- The local schools are already at capacity so I don't know where the children would go?
- 2 Housing developments are already being built on scotchbarn lane in knowsley just down the road from the golf club. Also 2/3 more on carr lane in knowsley in prescot is being built. Also halsnead village is being proposed in knowsley in whiston which is a huge housing development. All this housing in such a small area is a huge strain on the local area and I doubt st helens council and knowsley council have communicated with each other about all their planned developments/green belt removing. Surely if they had they would agree the area is becoming saturated will housing.
- The golf course acts as an area that splits rainhill/whiston/eccleston/thatto heath, removing it from green belt and building on it would make it one large urban sprawl causing so much strain as already mentioned.

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- Mulberry homes have already purchased the site even though it is in greenbelt and there have been many meetings between st helens council and mulberry homes alot of which were unminuted. I find this highly suspicious and I am uneasy with these meetings and the fact thay a housing company has bought a large piece of greenbelt land which they are unable to build on and suddenly the council propose to remove the land from greenbelt staus in there local plan
- st helens population has actually decreased over the decades so i believe their is no need to build more housing in the area as their is sufficent housing stock already.
- The leader of st helens council has stated building on brownfield sites is a priority, and their is brownfield sites available which should be used first before even considering releasing greenbelt land.
- old housing on gilbert road by the new housing on scotchbarn lane have seen flooding. More housing will cause more flooding risks.
- I walk on the golf course and think it is a great recreational area that shouldnt be lost. It has a great variety of flora and fauna. I have seen bats flying over the area in the evenings and they may potentially roost in the area.
- more housing will mean more cars and more pollution causing more health problems and straining the nhs system further. Furthermore the golf course is a great green area helping against pollution and improve air quality.
- I moved from liverpool to rainhill just over 1 year ago as traffic where i lived was terrible and more homes were getting built. I moved here to provide a better quality of life for [REDACTED] and believe that removing the golf club from green belt will be detrimental to the local area and to my [REDACTED] future.
- I think it is irresponsible to put this plan forward with the current situation regarding brexit. You cant make a long term plan on such an important issue when we dont know the long term plan for the country. After brexit the housing situation may change, rules regarding greenbelt plans may change and to continue down a path set out in the local plan is poor planning when the actual rules for the plan may change

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

The council should not consider removing the land from greenbelt to place in safeguard. The council should delete this land from the proposed removal from greenbelt land so abiding by national planning policy framework 2019.

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

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

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

Response Date	3/13/2019 12:29:59 PM
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PO3105

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

Representor Details

Web Reference Number	WF0094
Type of Submission	Web submission
Full Name	Mr Alan Ford
Organisation	
Address	19 Fistril Drive Windle St Helens WA10 6EF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018, Demographer's Report, Economist Report

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Consistent with national policy

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

It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from it's protected status into the "safeguard" category.

1. It does not satisfy the requirement for Sustainable development

2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.

3. The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.

①

②

③

①

4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities.

①

5. 8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt. The importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit.

②

6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

①

7. Adequate regional and cross border collaboration has not been undertaken.

④

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

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

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

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

①

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

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

14. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.

③

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).

⑤

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

③

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

⑤

17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted.

18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered.

②

19. The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back

into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough

2

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

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site and identify further small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

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

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

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

Response Date	3/13/2019 12:09:37 PM
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PO3106

① - LPA05 ② - LPA06 ③ - GEN

④ Para 1.7.2 DTC ⑤ - IDP

Represor Details

Web Reference Number	WF0099
Type of Submission	Web submission
Full Name	Mrs Jacqueline Ford
Organisation	
Address	19 Fistril Drive Windle St Helens WA10 6EF WA10 6EF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from it's protected status into the "safeguard" category.

1. It does not satisfy the requirement for Sustainable development

2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.

3. The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.

①

②

③

①

4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities. [redacted] ①

5. 8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt. The importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit. [redacted] ②

6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. [redacted] ①

7. Adequate regional and cross border collaboration has not been undertaken. [redacted] ④

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

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

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

11. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. [redacted] ①

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

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

14. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. [redacted] ③

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). [redacted] ⑤

15. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. [redacted] ③

16. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. [redacted] ⑤

17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted. [redacted]

18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered. [redacted] ②

19. The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back [redacted]

into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough.

2

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

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site or small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

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

There is greater need to retain all Green Belt areas for the future of our communities. There is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst the beautiful, green belt land is lost along with the health benefits it brings and we lose the most important asset that St Helens can offer - it's green spaces and natural beauty - in favour of a concrete town.

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

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

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

Response Date	3/13/2019 12:02:38 PM
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PO3107

Representor Details

Web Reference Number	WF0102
Type of Submission	Web submission
Full Name	Mrs Lisa Jones
Organisation	
Address	45 Brookfield Avenue L35 4PX
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The local infrastructure is already struggling to deal with the current population without adding further stress by increasing the local population, number of cars etc. There are already not enough doctors, schools, dentists.

The transport infrastructure is poor and cannot withstand the current volume of traffic at times especially during rush hours. I do not see how this could be improved as the roads cannot be widened, Rainhill (Skew) Bridge cannot realistically be adapted to facilitate the increased traffic either.

With other local developments such as Halsnead village and Scotchbarn rise, the urban sprawl will be continuous with no green space.

7000+ houses is likely to increase the amount of cars in the local areas by at least 10,000, this will have a detrimental effect on air quality and pedestrian safety.

The area is located in a flood zone, with an already high risk of flooding. By removing the greenbelt and replacing with Housing, tarmac etc we will lose the ability of rainwater to drain natural and therefore increase the likelihood of flooding which is already occurring to residents in close proximity to the Scotchbarn Rise development.

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

The council should not remove this land from the green belt.

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

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

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

Response Date	3/13/2019 11:29:23 AM
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PO3108

Representor Details

Web Reference Number	WF0110
Type of Submission	Web submission
Full Name	Mr Allen Burdett
Organisation	
Address	11 Crantock Grove Windle St helens WA10 6EJ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA07
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Effective

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

8HS

The proposal to have Crantock Grove as an access route into the new housing development of 1,000 + houses is obviously unsound and flawed. The impact on traffic congestion for those in that area would be totally catastrophic.

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

A new junction would need to be provided from the A580 to the proposed new housing development

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

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

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

Response Date	3/13/2019 9:13:18 AM
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PO3109

Representor Details

Web Reference Number	WF0116
Type of Submission	Web submission
Full Name	Mrs Julie Williams
Organisation	
Address	8 Coalport Walk St Helens WA9 5GD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified

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

The plan takes land at Eccleston Park Golf Club out of the Greenbelt. Other than the fact that Mulbury Housing have requested this I cannot see any reasonable reason for this land to be removed from Green Belt. Giving it safeguarded status just leaves it open for future development and once that green belt land is gone it is gone for ever. Houses were built in 2000 on part of this site but they were built where existing buildings were. The land the council proposes to remove from green belt is a habitat for animals and plants. Traffic has been measured around the site but I would question the timings of those measurements. The road near to this site and surrounding roads would not be suitable for more traffic.

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

Leave Eccleston Park Golf club in the Green belt. Do not rescind its status as there are no exceptional circumstances which would merit it being removed.

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

Yes, I wish to participate at the oral examination

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

Response Date	3/13/2019 8:06:21 AM
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PO3110

Representor Details

Web Reference Number	WF0117
Type of Submission	Web submission
Full Name	Mrs Victoria Stock
Organisation	
Address	10 Lynton way St. Helens Merseyside WA10 6DZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

I do not believe the plan is legally compliant in terms of being sustainable in the case of transport and infrastructure as the national planning policy framework, around the 8hs site the road network struggles now.

Also it does not comply with the duty to Cooperate.

The council have not demonstrated any exceptional circumstances for removing quality farmland from the green belt.

It is not sound to develop 8hs and remove high quality farmland and replace it with housing when brown fields sites could be regenerate and brought into use.

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

Further attention should be paid to regenerating brownfield sites as a priority over green belt land. The number of houses being planned should be adjusted in line with the latest forecast by the ONS 2016 which is lower than the figure being used by the council.

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

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

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

Response Date	3/13/2019 7:23:09 AM
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PO3111

Representor Details

Web Reference Number	WF0118
Type of Submission	Web submission
Full Name	Drs. David and Hilary Eccles
Organisation	
Address	8 Churchill Gardens St Helens WA9 5 GB
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

ROAD ACCESS:

The green belt area 3HS is bordered by two B roads and a C road, which are ancient thoroughfares seen on ordinance survey maps dating to the 19th century. As such, they are built up, winding and narrow and they are not suitable for widening. They struggle at peak times to accommodate existing traffic and the development of EPGC will significantly impact on these roads, impacting on traffic, air pollution and therefore also respiratory health of the population. Both Rainhill Road and Portico Lane lead onto Warrington Road which is the main road to Whiston hospital. There is significant traffic with emergency vehicles on these road and in St. Helens, underperforming red light transfer times to Whiston Hospital compared to other Mersey areas. Increasing traffic will not help this and could impact directly emergency access to The EMergency department at Whiston. At the junction with Rainhill Road the Grade 1 listed skew bridge sits. Again there is no opportunity to widen these roads to accommodate the increase in traffic.

URBAN SPRAWL:

Building on EPGC will contribute significantly to urban sprawl. Rainhill is distinctly and surprisingly different in character to Thatto Health. Listen in the shops for dialect!

INFRASTRUCTURE:

There is insufficient infrastructure to support the additional families - school places and primary care most significantly - St Helens is in the bottom quintile for GPs in the country and struggling to recruit. There is no capacity to absorb these additional families currently in Primary care in St Helens. There are other large and significant developments in St Helens Borough locally but also neighbouring boroughs. There appears to have been little or no communication with neighbouring authorities when drawing up the plan.

FUTURE HEALTH OF OUR CHILDREN:

It is well recognised that in the NHS view that the health of the population is based on improving diet and increasing exercise. Open Green space and trees also provide wellbeing for communities. Building on this green space would be a significant loss to the community and our children. Once it is built on, it can't be unbuilt.

BROWN FIELD SITES

There are still significant brown field sites in St Helens to build upon, which would accommodate the future need for housing. St Helens does not have robust industry as it previously has, and new developments will merely be lower cost housing for commuters to Liverpool and Manchester rather than addressing the housing needs of the St Helens population.

SAFEGUARDED LAND.

This is a misnomer. The land has already been purchased by a developer and outline plans are available on the web. Safeguarding should mean saving the land as an open green space, not reserving it to build on at a later date.

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

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

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

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

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

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

Response Date	3/13/2019 1:16:21 AM
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PO3112

① -LPA04.1

② -LPA06

Representor Details

Web Reference Number	WF0120
Type of Submission	Web submission
Full Name	Mr Bevan Price
Organisation	nil
Address	24 Walmesley Road Eccleston St. Helens Lancashire WA10 5JT
Agent Details	n/a

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

1. Government is encouraging councils to adopt policies that reduce pollution. The council policy to encourage lots of warehouse building / distribution centres will bring thousands of additional diesel lorries on to local roads each year, causing a considerable increase in pollution.

□ ①

2. Converting large amounts of green belt land in Eccleston into "safeguarded for future development" is, I believe, seriously flawed. Even with the suggested revisions to Houghtons Lane, traffic towards St. Helens will be funnelled onto other local roads, e.g. Springfield Lane, Howards Lane (Eccleston) that are totally unsuited to deal with huge amounts of additional traffic.

□ ②

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

1. Look for sensible alternatives to provision of warehouse / distribution centres; consider rezoning some of the proposed areas as suitable for housing rather than industrial use.

2. A large reduction of the amount of green belt in Ecclestone proposed for "safeguarding", Whilst Ecclestone cannot avoid all new building, I suggest a maximum of no more than 100 - 150 houses would be more sensible to avoid unacceptable levels of road congestion & pollution.

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

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

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

Response Date	3/12/2019 10:34:10 PM
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PO3113

Representor Details

Web Reference Number	WF0125
Type of Submission	Web submission
Full Name	Mr Neil Shawcross
Organisation	
Address	15 Toftwks Ave Rainhill Prescot L35 0PU L35 0PU
Agent Details	

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

Yes (via e-mail)

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

Policy	Strategic aims number 3, 4 and 6
Paragraph / diagram / table	Page 9
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

There are many questions unanswered by the plan. I am particularly concerned with allegations of undocumented meetings between local council officials and developers interested in Eccleston Park Golf CLUB (EPGC) .

I am also concerned about the dubious nature of Mulberry Homes buying EPGC above its value as a going concern without planning permission being in place. I believe this smacks of a "done deal" between developer and council

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

Transparency in the councils involvement with the developers is paramount in the process being not only compliant in being clear to Borough residents, but also to show there is no underlying collusion between council and developer.

This plan in NO WAY considers the greens pace of the Borough. It will bring traffic chaos, extended wait time for Dr and dental appointments, massive strain in our already struggling hospitals, fewer school places, lower air quality, road damage due to greater traffic, increased respiratory problems due to pollution and many many more issues

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

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

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

Response Date	3/12/2019 10:10:41 PM
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PO3114

Representor Details

Web Reference Number	WF0128
Type of Submission	Web submission
Full Name	mrs julie ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

1. St Helens has a reducing population where is the additional population coming from to justify additional housing.
2. St Helens own brownfield register suggests land availability for 5808 houses 01
3. The councils plan means another 57 hectors land over the Brownfield land to build 1437 houses not the 288 hectors in table 4.5
4. 3HS has a declining industrial base, meaning its population rely s for their employment outside St Helen's boundary. 02
5. The road infrastructure around 3HS isn't capable to cope with existing levels of traffic, increases in traffic will divert more cars into the small roads of the existing estates. namely Longton lane, Two Butt lane, Holt Lane, Mill Lane, View rd, Stoney lane, Blundells lane. 03
6. Warrington Rd and Rainhill Rd junction at Skewed Bridge is at capacity with the councils own figures, similarly the junction at Portico lane and Prescot Rd at capacity. 03
7. Increased traffic increases risk to pedestrians and increases air pollution.
8. The release of greenbelt will cause significant harm to the reason having green belt 01
9. 3HS infrastructure can't sustain increases with dentist, doctor, school places
10. 3HS is a designated flood zone, to loose the land draining leaves existing properties at risk.
11. Sport England objected stage 1 plan, this objection hasn't been answered. 04
12. 3HS incudes more than 13 flora and fauna species protected

13. There is no statement of common ground with neighboring authorities

05

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

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)
The council should not consider removing this land from green belt to place in safeguarded

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

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

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

Response Date	3/12/2019 9:43:01 PM
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PO3115

Representor Details

Web Reference Number	WF0131
Type of Submission	Web submission
Full Name	Mrs Marcelle Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	[REDACTED]

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

Yes (via e-mail)

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

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology.

The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is n

O/L
LPA05

204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately, The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use. So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe".

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe".

The plan proposes to build houses in an area that are already over congested. To build 1,089 houses in 8HS would conceivably add a further 2,000 cars and building 956 houses in 3HS would add a further 1,000 cars. These areas do not have the infrastructure to handle this amount of traffic. This would inevitably lead increased dangers for road users and pedestrians, as they try to navigate their way around.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars.

The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever.

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development.

When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years

Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan.

The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to apricate the current value that land has, in terms of crop production, employment and biodiversity.

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

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

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

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

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

Response Date	3/12/2019 9:19:18 PM
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PO3116

Representor Details

Web Reference Number	WF0133
Type of Submission	Web submission
Full Name	Mr Gerry Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Dear Sir

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

- Fails to use accurate figures for housing targets.
- Fails to consider the use of "Brownfield" sites.
- Fails to provide a sustainable transport plan.
- Fails the requirement for sustainable development.
- Fails to consider food security.
- Fails to be transparent.

Fails to use accurate figures for housing targets ⁰¹

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology.

The economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The borough also has 2,815 houses that have been vacant for over six months. The plan does not make any provision for bringing these houses back into use.

Fails to consider the use of "Brownfield" sites

The plan fails to consider the Brownfield and Previously Developed Land that is not available or included in the Brownfield register. The Council, along with the Liverpool City region and other neighbouring Councils of no policy for bringing Brownfield or previously Used land that is not on the Brownfield Register on to the register. This is an unacceptable oversight. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan

The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectors. This is 6% of the land could be reclaimed for housing. The Contaminated land will have to be cleaned at some point so there is no justification not to include this in the plan.

The Council claim that they need to safeguard land for development, that will consider planning 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use, during the same time period required for 2 or 3 local plans. There can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

It is both morally right make use to reuse brownfield sites, as the land will have to be made useful again at some point. And it makes long term economic sense, as the brown field sites have the benefit of the existing infrastructure. The council should adopt a policy of Brownfield land first. The plan seems to suggest that the use of greenfield sites is required, so that developers would have lower costs and therefore could deliver "affordable housing". This view would not provide an "exceptional circumstance" that could be used to justify the removal of this land from the protection provided by greenbelt status. The plans aim should be to benefit the people of St Helens not delevopers.

Fails to provide a sustainable transport plan

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe".

Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe".

From Windle the route into the town centre, along Rainford Road and Dentons Green. Are already heavily congested as is also the route from traffic coming into town from Rainford and any other traffic coming into town from the East Lanc's Road. The route into town from Eccleston uses Millfield's and Knowsley Road. This route has already two developments at Eccleston Grange, which

will deliver 626 houses and a new development, on the site of the former garage, further down on Knowsley Road. The effects of these developments have not been considered.

Fails the requirement for sustainable development

The plan proposes to build houses in an area that is already becoming over congested and has a very poor infrastructure. Building more houses would only magnify this problem. The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

The Schools in Eccleston and Windle are already over subscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents have to rely on cars.

The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

The increase in traffic proposed in the plan will inevitably lead to a reduction to air quality an increase in noise pollution, with the harmful effects on health and wellbeing issues will cause.

Fails to consider food security

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever.

Fails to be transparent

02 I have been shocked by the cynical way in which the council has marked huge area's of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development.

When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years

By failing to use the most up to date information the plan is seriously flawed from the very start. This error is further compounded by disregarding the use of Brownfield sites. That have the capacity to fill the needs of the plan and could do so well within the 15-year term of the plan. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity.

Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

Taking all these failures in the current plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely be regarded as unsound.

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

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

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

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

Response Date	3/12/2019 9:14:52 PM
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PO3117

Representor Details

Web Reference Number	WF0136
Type of Submission	Web submission
Full Name	Mr Matthew Montgomery
Organisation	
Address	83 Portico Lane Eccleston Park Prescot Merseyside L35 7JW
Agent Details	

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

Yes (via e-mail)

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

Policy	ST.HELENS BOROUGH LOCAL PLAN 2020-2035 SUBMISSION DRAFT JANUARY 2019
Paragraph / diagram / table	3HS - Former Eccleston Park Golf Club, Rainhill Road, Eccleston
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan, and more specifically, the proposal submitted to remove the former Eccleston Park Golf Club, Rainhill Road, Eccleston from the green belt is entirely unsound and unjust.

Soundness as explained in paragraph 35 of the National Planning Policy Framework (July 2018) sets four key parameters in that the Plan is positively prepared, justified, effective and consistent with national policy. I therefore take each parameter in turn to explain why I believe the site of Eccleston Park Golf Club should not be safeguarded and should remain as part of the greenbelt;

The Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated. It is unclear why the removal of Eccleston Park Golf Club from the green belt meets the area's objectively assessed needs. There is no clear need for further housing within the area, and more importantly there is not the infrastructure in place to support such developments if the Plan was to proceed.

The Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. No proportionate evidence has been presented to the community supporting the reasons for the removal of Eccleston Park Golf Club from the green belt.

The proposed development on the site of Eccleston Park Golf Club when it was purchased by Mulberry Warrington Ltd was to build 900+ homes. Destroying the area of green belt which is essential given the amount of brownfield within the St Helens metropolitan borough surrounding the site is not effective.

It is yet to be explained how the Plan falls in line with national policy. The intention to develop a town like St Helens and attract economic growth should not be by way of removing area of designated greenbelt. So to "safeguard" the area as a site for the development of properties with the view to generate finance from the rates charged upon those residing on the site once properties have been built.

Although the site is not listed as an area which will be developed on, the proposal is for the site to be safeguarded which does not guarantee the safety of the land.

I therefore object to the proposal of the site to be safeguarded due to the need for greenbelt land within the borough given the vastly categorised brownfield site that St Helens now finds itself surrounded by.

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

Removing Eccleston Park Golf Club from the safeguarding proposal and restore the area as greenbelt.

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

Yes, I wish to participate at the oral examination

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

I stand by the objections put forward.

Response Date	3/12/2019 9:05:33 PM
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PO3118

Representor Details

Web Reference Number	WF0137
Type of Submission	Web submission
Full Name	Mr John Hunt
Organisation	
Address	83 Rookery Lane Rainford St Helens WA118BL
Agent Details	

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

Yes (via e-mail)

*01 local strategic
02 housing need
03 safeguarded land*

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

Policy	LPA02, LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

Official government and council policy states that Green Belt land should only be released in exceptional circumstances - this remains a central part of planning law in this country. St Helens is a borough with a falling population with house prices both below the national and regional average. Evidence shows that housing in St Helens is comparatively cheap and in low demand. The council want to build 486 houses per year, however, the figures from the Office of National Statistics show St Helens only needs 383 houses a year. Taking this into account, the economic analysis used to create the plan is flawed and based on over-optimistic assumptions that the need for housing is far greater than is actually required. Therefore, there are no exceptional circumstances to justify not using the standard method to calculate housing need in St Helens. If the council took these into consideration and created the plan appropriately with reasonable housing numbers, there would be no need to release any Green Belt land at all.

A secondary concern is the lack of consideration given to exploring more reasonable alternate options that would be more beneficial to developing St Helens effectively. The council's own register

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

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

Most worryingly is that the majority of these Green Belt sites (in particular HA8) are Grade 1 Agricultural Land which is actively used and regularly farmed. HA8 is arguably one of the most fertile lands in the region. This land provides not only food but employment in the agricultural sector which is threatened by the proposed removal of this site from Green Belt protection. The local plan is intended to promote employment and economical growth yet this will have the opposite effect. Surely, when Britain is facing uncertain financial and economic times (which is the prospect of a no-deal Brexit) we should be striving to maintain thriving local business and employment, particularly those areas that provide food supply. To implement a plan that could potentially damage this is very concerning. Surely we should be pushing to preserve farming land in order to be self-sufficient rather than reducing these means leading to a potentially devastating effect.

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

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

This representation is sent on behalf of my household to include the views of the following: Mrs Elaine Hunt, Mr John Hunt, Mr Thomas Hunt, Mr Ethan Hunt and Mr Owen Hunt

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

Points raised in previous section 6.

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

PO3119

Representor Details

Web Reference Number	WF0138
Type of Submission	Web submission
Full Name	Mr Robert Stock
Organisation	
Address	10 Lynton Way St. Helens Merseyside WA10 6DZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

I do not believe the council has fulfilled their legal obligation in their duty to cooperate with their neighbours. They have not demonstrated exceptional circumstances for removing land from green belt.

The plan does not appear to be sustainable in terms of transport and infrastructure as it has been according to national planning policy framework 2018, windle island does not cope well with the current volume of traffic

I do not believe it is sound as there has been limited considerations of brownfield sites, which not only brings unused land into use, but also deals with the issue of cleaning up derelict and potentially contaminated land.

The figure of

It is not sound to Develop 8hs as this would make traffic and pollution at windle island even worse than at present.

It is not effective to remove high quality farmland from use.

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

I believe the council should add to the plan the decontamination of brownfield sites with a view to returning them to use before removing land green from green belt. This preserves land currently farmed which would be unnecessarily removed from green belt in the case of 8hs.
Remove the plan to remove 8hs from green belt.

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

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

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

Response Date	3/12/2019 8:53:58 PM
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PO3120

Representor Details

Web Reference Number	WF0141
Type of Submission	Web submission
Full Name	Miss Emily Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan Lancs WN4 0SP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

This Greenbelt must not be released for housing at any time. The recycling of derelict land must be the primary objective of this plan and protect the purposes of Greenbelt.

The wildlife and its habitats must be protected at all costs.

The council state that there is an expected increase in population, so needing the extra housing.

The council must be put to strict proof of these estimates; the population of St Helens has declined steadily since 1981 - where are all these extra people coming from? We cannot lose this precious Greenbelt on a lie.

The infrastructure of Garswood is unsuitable. The country roads can't take the additional vehicles, either during building works or once the houses are occupied. Access to the site from Billinge Road or Leyland Green Road would be inadequate and if there are any additional necessary highways works then this must be funded by the developer and not the Council Tax payers.

The infrastructure is inadequate for increased housing. The doctors surgery already has long wait times. Local schools are inadequate for a large increase in numbers.

There is no statement of common ground with neighbouring authorities, Wigan infrastructure will be severely impacted, housing, education, roads and medical facilities.

* The adjacent playing fields MUST NOT be removed from Greenbelt. They are a precious amenity, land donated for the benefit of Garswood residents. The council haven't given a good reason for the removal and this cannot be allowed.

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

Response Date	3/12/2019 8:37:08 PM
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PO3121

Representor Details

Web Reference Number	WF0143
Type of Submission	Web submission
Full Name	Mrs. Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

The plan is not effective because it is not deliverable without significant investment in local infrastructure. The high volumes of predicted traffic will impede on J23 and J24 of the M6 motorway which are already over capacity and have a high number of collisions as a result. The council has also failed to take into consideration the increase in traffic from several other large developments that are proposed on Greenbelt sites in this area (that are also listed in this local plan). By only looking at the impact on infrastructure on a site by site basis would mean they do not see the whole picture when these 5 sites (all within a 2 mile radius) are all up and running.

National policy states that building on Greenbelt should only be granted in exceptional circumstances. St Helens council have already built on several Greenbelt areas with no exceptional circumstances having been proven since "providing jobs" does not count as an exceptional circumstance according to the National Planning Framework. The creation of jobs is how they justified releasing the areas from Greenbelt.

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

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

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

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

Response Date	3/12/2019 8:23:54 PM
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PO3122

Representor Details

Web Reference Number	WF0146
Type of Submission	Web submission
Full Name	Mr Thomas Mckeown
Organisation	N/A
Address	22 Jackson Close, Rainhill, Prescot, Merseyside. L35 6DA L35 6DA
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Declining Population in the local Area

Brown fields sites to be used first

Number of houses required calculation flawed

Road infrastructure around 3HS unsuitable

Increase in traffic noise and environmental pollution unacceptable

Increase Traffic around not manageable

Major Roads to congested already without increased numbers

Green belt should be preserved for our health and future generations once gone not replaceable within the same boundaries

Parcel 3HS is of particular beauty and supports a variety of fauna and flora

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

Parcel 3HS of Policy LPA06 should be removed from the proposal of removing its status or land name as GreenBelt

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

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

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

Response Date	3/12/2019 8:14:54 PM
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PO3123

Representor Details

Web Reference Number	WF0150
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	
Address	47 Birch Grove Wigan WN4 0QZ
Agent Details	

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

No

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

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The high volumes of predicted traffic will impede on already over capacity junction 23 of the M6 motorway.

The current plan is also not legal. A statutory requirement is that letters must be sent to people in situations in which their houses are removed from Greenbelt, this has not been done in all situations.

National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building and will not promote the regeneration of many of St Helen's former industrial land. The council has already granted permission for building in the Greenbelt in respect of site 2EA and 5EA. National policy would indicate the Greenbelt should be used in exceptional circumstances yet St Helens council plan to build on Greenbelt land with little consideration.

The plan is not justified as the council requires strict proof that the development is required and has provided insufficient evidence so far.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/12/2019 8:06:15 PM
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PO3124

① - LPA06 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0154
Type of Submission	Web submission
Full Name	Mrs Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	1HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The St Helens local plan is not justified for many reasons. One main reason is that they have based their housing needs on old population projections from the Office of National Statistics and not the most recent (and significantly lower) Office of National Statistics projections which are almost 25% lower than the figures they have used in this local plan. The population of St Helens has been in constant decline since 1981 so this substantial increase in housing is not required as can be proven by the figures released at the end of 2018 by the Office of National Statistics and also by looking at the census records.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. I also know that there are some sites that are currently owned by housing developers, and have been for a few years, yet no house building has yet taken place. These areas have also NOT been included in the local plan for housing, despite the fact the land has already been sold in the past and has approval for housing (an example would be the land next to Tesco in Haydock). This is a classic example of land grabbing. If the borough has a need for housing, surely these brownfield areas should be included in the local plan before any other areas (especially Greenbelt areas) and developers that

①

are holding on to this land should be forced to develop it. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

There is also a complete lack of infrastructure in this area for the existing population. There is already a shortage of school places and there are no plans to build new schools or extend the current ones we have. There is one doctors surgery with long waiting times for appointments – the last time I needed one I had to wait over three weeks. The public transport in Garswood would also need significant improvements if the council proposes building additional homes in the area. According to figures calculated by website On Time Trains, services arrived on time just 7% on average from Garswood to Liverpool Lime Street. In addition, there is no access to the Liverpool-bound platform for people with mobility issues or people with pushchairs since there is only a stepped footbridge to the far platform. Users that need access and who wish to travel to Liverpool would have to make their way to Bryn station which is a ten minute drive away and cannot be accessed from Garswood on other methods of public transport like buses. There are very few access roads in and out of this area and they are already extremely busy. Since public transport in the local area is not sufficient for the existing housing numbers, a substantial increase in housing would result in considerably more cars on local roads – this cannot be supported with the current infrastructure and would require additional funding. I do not feel that St Helens Council have sought sufficient evidence on how population growth in the Garswood area would impact on any of the local infrastructure. I also do not feel that they have conducted enough research on the impact this plan would have on local utilities and services such as broadband access and water supply, which there are already numerous issues with for the existing residents in the area.

There is a long history of flooding on Birch Grove due to water running off the fields that are proposed to be built on. By removing these fields from the Greenbelt for future development, there is a risk of increased flooding when they are eventually built on since the water will have nowhere to soak and will result in even more water flooding into Birch Grove.

Access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate – there would need to be highways improvements in order to give access to any future developments. These works must be funded by developers and not Council Tax payers.

The current local plan is not legal. A statutory requirement is that letters must be sent to residents who are due to have their properties removed from the Greenbelt. Several properties that are affected in this way have not been notified.

There is no statement of common ground with neighbouring authorities and shows a clear lack of communication and joint working. This is of particular importance to Garswood as it is an area that borders with Wigan Council. The lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

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

This local plan should not go ahead without the guarantee of significant investment to improve local services and infrastructure which are already strained with the existing population. Any increase in population without funding would render local services and infrastructure unserviceable.

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

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

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

Response Date

3/12/2019 7:58:18 PM

PO3125

① - LPA06 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0158
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

No

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

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I feel this local plan is not justified as I don't feel it is positively prepared. It doesn't meet the area's needs as the need for extra housing has been greatly exaggerated. The area of St Helens has shown to have a declining population since 1981 and I feel the local council should have clear and obvious proof of population growth to justify these plans. The council have used old population projections from the office of national statistics and not the most recent statistics which show population growth to be significantly lower than those put forward by the council.

①

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to Garswood, an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

③

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The local schools, doctors and bus routes are very limited and a surge in housing would require significant investment in this area. This would further impact local roads as people would be forced to use cars, as local transport options wouldn't be able to support the larger numbers.

①

I do not feel that St Helens council have sought sufficient evidence on how population growth in the Garswood area will impact the local infrastructure and I don't feel St Helens council has conducted

enough research on the impact this plan would have on local utilities and services such as broadband access and water supply.

Garswood has a small number of access roads that are already busy, this plan would not be effective without significant investment in roads by any developer, which is unrealistic.

The current plan is also not legal. A statutory requirement is that letters must be sent to people in situations in which their houses are removed from Greenbelt, this has not been done in all situations.

National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building and will not promote the regeneration of many of St Helen's former industrial land.

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①

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

Delete this land from the proposed removal from the Greenbelt unless a guarantee can be made to fund significant improvements in local services and infrastructure.

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

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

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

Response Date	3/12/2019 7:49:32 PM
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PO3126

① - LPA06 ② - Green Belt Review 2018 ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0167
Type of Submission	Web submission
Full Name	Mr Neil Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan WN4 0SP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06-Site1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Council should be put to strict proof of its population estimates. The population of St Helens has been in steady decline since 1981 and now they think it's suddenly going to improve. Where are all these people going to come from?

The Greenbelt must be protected at all costs and the removal of this Greenbelt for immediate and future housing must be a last resort. The Council has taken the easy option of removing Greenbelt rather than the most environmentally friendly option of using brownfield and derelict land. This option must be utilised first. Once the Greenbelt is sold to developers it will never be replaced. One of the purposes of Greenbelt is to encourage the recycling of derelict land and this must be observed.

Garswood has a large amount of wildlife - bats, wild birds and small animals that will lose their habitat and never return.

The infrastructure in Garswood is not sustainable. The narrow country roads couldn't take the extra traffic, either during building works or once the houses are built. The site access to either Billinge Road or Smock Lane would be inadequate and any necessary highway works must be funded by the developer and not the Council Tax payers.

There is a lack of doctors surgeries - the current one already has long waiting times.

①

The Council have admitted that there isn't a village centre but seem intent on building more houses without infrastructure. Garswood is unsuitable as the commuter area they appear to want. The railway station has NO parking and nowhere to put any and there is no disabled or pram access to the station platforms. Residents are forced to use their cars and if they want to use public transport the bus routes are few and the railway station not fit for purpose.

The local schools wouldn't be able to cope with an influx of children.

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to be used for children in Garswood, these plans would appear to show that there is no statement of common ground with the neighbouring authorities.

* The adjacent playing fields are also planned to be removed from the Greenbelt. This mustn't be allowed to happen as it is one of the very few amenities that young people in the area have. If it isn't planned for housing, and the council line is that it isn't, then it MUST stay as Greenbelt. As a professional football coach I know of the benefits to young and old alike of all sports and this land must be protected.

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

Delete this land - and the playing field - from the proposed removal from the Greenbelt.

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

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

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

Response Date

3/12/2019 7:03:25 PM

PO3127

①-LPA06 ②-GEN ③- Statement of Common Ground

Representor Details

Web Reference Number	WF0168
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

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

Yes (via e-mail)

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

Policy	LPA06 - 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 - 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. 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.

②

①

The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate. ①
Any necessary highways works must be funded by the developer and not the Council Tax payers.
There is no statement of common ground with neighbouring authorities. ③

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

Response Date	3/12/2019 7:03:24 PM
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PO3128

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0171
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

A development of this type is not justified as there is no strict proof of need. As the 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 after the end of the local plan period the whole question can be re-evaluated.

This is agricultural land used for crop growing and should remain so - as an island race, Brexit etc these fields could become the lifeblood for the nation.

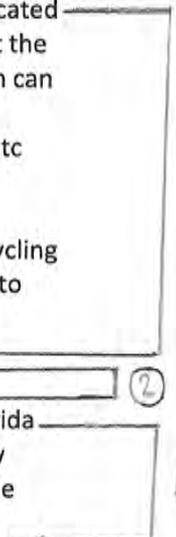
Release of greenbelt will cause significant harm to the purposes of the greenbelt.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land, by using greenbelt this fails to encourage this and is contrary to NPPF policy/guidelines.

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

There is no statement of common ground with neighbouring authorities.

Planning permission in the greenbelt has already been granted by the council in respect of Florida Farm North site 2EA this is extremely close to this development along with applications already received for similar development at site 5EA land to the west of Haydock Land and 8EA Parkside West, NLW



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

Delete this land from the proposed removal from the greenbelt.

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

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

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

Response Date	3/12/2019 6:04:18 PM
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PO3129

①-LPA06 ②-LPA04

Representor Details

Web Reference Number	WF0172
Type of Submission	Web submission
Full Name	Mr Michael Dennett
Organisation	
Address	17 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

It is a disgrace to be giving up greenbelt land for housing when there is so much brownfield land available within the town. Past sites such as The Shires had to be cleared and treated to build on and this could be done again with numerous plots around the borough. Knowsley council did this with the old BICC site so it can and should be done first.

The roads around proposed site 8HS are already gridlocked at rush hour and the works at Windle Island have turned Eccleston roads into a rat run, an extra 1000+ cars a day cannot be sustained. It takes weeks to get a Doctors or Dentist appointment and the local schools are at bursting point with the projected admittance of children who already live here nevermind an extra 1500 families. St Helens council are using old statistics to try and pull the wool over peoples eyes about how many house are actually needed, they are using stats from the ONS(2014) stating 486 a year will be needed to meet housing needs when a more up to date report from 2016 states that it's actually 383 needed!!

The greenbelt should be saved for future generations to enjoy and not have a town that was once green to look at and just be left with 1000's of hectares of post industrial mess to enjoy!!

The loss of grade 1 and 2 agricultural land which has been farmed for over 100 years is a joke when we don't know what is going to happen with Brexit.

The land 8HS south of A580 is used by the community to walk and exercise in and around.

①

It makes me laugh how on one hand in the councils propaganda magazine St helens first, they are talkin about "The year of environment" with a councillor quoting "The council is fully committed to this initiative which is a great opportunity for members of the public to get out in our beautiful parks and OPEN SPACES..." and then on the other hand trying to take it away.

The plan is not effective and is just a back door to building in high council tax areas.

They are living in a dream world with completely made up assumptions about jobs being created and the house they will build in the greenbelt will not alleviate the so called housing crisis as the jobs provide in warehousing are minimum wage roles.

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

All green belt land should be retained for future generations.

Re-develop brownfield and PDL sites- it can and should be done and there is plenty of evidence in the surrounding areas- Southport developing an old landfill site.

If brownfield sites are not developed we will be left with derelect old industrial sites, whilst the beautiful green belt has gone for greedy house builders and the council letting this happen in the HIGHER COUNCIL TAX BANDS!!

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

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

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

Response Date	3/12/2019 5:50:31 PM
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PO3130

Representor Details

Web Reference Number	WF0173
Type of Submission	Web submission
Full Name	Mr Nigel Lea-Wilson
Organisation	Mr
Address	1 Nicholl Road WA10 5LN
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	8HS (formerly HA16)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

1. The plan is based on a deeply flawed methodology. The Plan makes no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield register. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

2. The plan is not actually deliverable.

It promotes unsustainable traffic growth causing severe traffic issues.

3. And it definitely does not comply with NPPF 2018.

The Borough has intractable long-term traffic problems at Windle Island (despite current improvements). The increase in traffic proposed in the plan will have a significant impact on noise, air-quality, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

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

Focus on food security by considering Agricultural Land Quality. Focus instead on Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register. In particular, concentrate on sites nearer to the heart of St Helens which can be realistically linked via sustainable transport methods, especially using expanded cycle ways and have facilities such as adequate GP surgeries and school places provided.

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

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

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

Response Date	3/12/2019 5:45:21 PM
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PO3131

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0179
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

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

No

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

Policy	LPA06 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not sure if the plan is legally sound would have put 'don't know' but no box

The population of St Helens has been in decline since the early 1980's, and has an ageing population.

Where are all the extra people coming from?

Release of greenbelt will cause significant harm to the purpose of the greenbelt and alteration of greenbelt boundaries should only be undertaken in very special circumstances - which these are not. As the land is neither urban, in need of recycling or derelict then greenbelt release would not assist in urban regeneration and is against NPPF policies.

The land is used for agriculture and in light of Brexit, etc it should remain solely for that purpose.

There is no statement of common ground with neighbouring LAs.

Due to lack of infrastructure/services etc house building in this area is not sustainable - shortage of doctors/surgeries, dentists lack of school places. Garswood CP has 1 place available, Rectory 53, no immediately available Catholic primary school - St Mary's in Billinge has 5 places and would necessitate the need for travel, Our Lady's in Bryn is out of the Borough. Many secondary school children in Garswood travel outside of the Borough and into GM for their education.

Access to the site would be inadequate any necessary highways works must be funded by the developer and not from the public purse ie council tax payers.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 4:23:21 PM
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PO3132

①-LPA05 ②-LPA06 ③-GEN ④-IDP

Representor Details

Web Reference Number	WF0186
Type of Submission	Web submission
Full Name	Miss Marie Hull
Organisation	
Address	17 Sandfield Road Eccleston St.Helens Merseyside WA10 5LR
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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

I don't believe that St.Helens Council has listened to the people of the Borough that bothered to respond to the Preferred Options stage of the Local Plan. This new Submission Draft of the Local Plan is in no way an indication that they have reviewed and considered those responses and adapted the plan accordingly. I fear having read it, The Local Plan has increasingly just become a paper exercise that will eventually be undemocratically forced down our throat whether we like it or not.

I think St. Helens Council are just steaming ahead with their blinkered vision not listening to the people of the borough because firstly, how can they justify releasing Green Belt Land to be developed or safeguarded for development when we as a Borough have so much Brownfield land.

I believe the council are OBLIGED to consider all land but they will not consider contaminated land even when we have so much of it. Our Borough has throughout history and still to this day paid its dues with industrial related deaths of its residents, diseases and the prominent eyesores of past industry. It is 2019 we no longer need these ugly derelict scars blighting our Borough. They need to be cleaned up no matter the cost, developers have very healthy profits they could help and St.Helens Council could work with the Liverpool City Region Combined Authority to make this happen. These past industrial contaminated sites need to be turned into something that we as a Borough can be proud of and that provide for the future generations of the town whose ancestors

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gave their lives to build. If the Brownfield first approach was genuinely adopted we could see this land contaminated or not cleaned up to provide housing for people as well as making the Borough a more desirable place to live in general. At the moment two thirds of the Boroughs land is contaminated. If the Local Plan were to include just 7% of the total area of the lowest level contaminated sites to be considered for development, then all Green Belt Land and Safeguarded land could be removed from consideration. The Plan is not effective.

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The Green Belt Review (2018) does not feed in enough solid facts and the people's opinions of the borough. The land marked as HA16 which is now referred to as 8HS is Grade 1 and 2 agricultural land. This land is vital for jobs, food production, wildlife habitats and the health and well being of many. I can refer to the Green belt land labelled 8HS as I use, appreciate and value this space daily. St. Helens Council fail to acknowledge food security by ignoring Agricultural Land Quality. The land marked as 8HS has far more negative factors associated with it such as flooding, public rights of way within it, effect on biodiversity, transport infrastructure etc than other pieces of land available yet The Local Plan still favours this site when others were discounted from the plan for far less. It was published in the journal The Lancet in 2017 the link between living near major roads and the incidence of dementia, Parkinson's Disease and multiple sclerosis. Why does this local plan favour a site for housing that is right next to a main A road with a terrible safety history? This Plan is not justified or effective.

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From reading this Local Plan it is clear it promotes low density edge of town development which will mean an enormous amount of car journeys to already struggling distant amenities. It does not satisfy the criteria for sustainable transport . The plan has not been positively prepared. The increased dependency on cars will have a negative impact on air quality, noise and general health. St. Helens Council are obliged to make effective use of land and by opting to favour these types of developments they are in no way helping to ease the supposed housing crisis only the bank balances of large building development firms. They are concentrating on Green Space development over town centre development with higher densities.

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The figures St. Helens Council are using are not the most recent and current, so I do worry that other projections and data may as well be mythical and are in fact manipulated. Data from 2016 should be used over data from 2014. The Plan is not justified.

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I believe another mythical element of the local plan is the scale of growth being aspired to the borough along with the infrastructure needed to support it. The housing targets proposed are based on aspirational employment growth predictions. Lets face it we can all be aspirational or as I like to say live in cloud cuckooland. The infrastructure delivery plan only scrapes the surface of how they're dealing with what we face today never mind what will be in place if The Local Plan is adopted. The Plan is not effective.

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I cant' believe this to be a sound Local Plan as I can only believe the truth and facts, something I feel this plan is lacking in.

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

I believe the modifications needed are to remove all Green belt land which is considered for development or safeguarded for development from the plan. This is for the health and wellbeing of present and future generations. There are no exceptional circumstances to release this Green Belt and this must be realised.

The Brownfield first approach must be put into action and developed before the classification of Green belt land is even changed never mind allowed to be developed.

History has shown that decisions made because of lack of funds within a council are never good, justified or right. To name a few; selling off school fields and cheapening school meals resulting in major obesity problems across the population. Selling off council houses resulting in there now being hardly any council house stock and people at the mercy of slum private landlords.

Why make decisions to remove Green belt and force future generations to suffer the consequences. Develop the Brownfield sites and clean up the contaminated land and make this a Local Plan that sets a precedent and starts a new movement for how our country should be developed. Be the council that puts St. Helens firmly back on the map for the right reasons. A Local Plan that shows the future generations are at its heart, not profits.

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

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

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

Response Date	3/12/2019 2:24:47 PM
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PO3133

① - LPA05 ② - GEN ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0191
Type of Submission	Web submission
Full Name	Mrs Susan Vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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

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

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

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/12/2019 10:50:56 AM
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PO3134

Representor Details

Web Reference Number	WF0194
Type of Submission	Web submission
Full Name	Mr Ben Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified

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

Please don't ruin my future here in Eccleston ! I don't want you to force me out of the area I have lived in for all my life because of your lack of concern and understanding !

97% of 6000 local residents have already voiced that they do not want the greenbelt to be effected.

Why aren't you listening to this as our local council ??

Already there are not enough spaces in the schools, GP surgeries and local hospitals/healthcare centres.

Increasing traffic will have a major effect not only on our roads as in congestion, but also it will effect the safety of our children/residents, not to mention the added noise poorer air quality and overall general health.

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

use existing brownfield sites please

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

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

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

Response Date	3/12/2019 9:37:22 AM
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PO3135

Representor Details

Web Reference Number	WF0195
Type of Submission	Web submission
Full Name	Mrs Joan Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified

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

97% of 6000 local residents have already voiced that they do not want the greenbelt to be effected.

Why aren't you listening to this as our local council ??

Already there are not enough spaces in the schools, GP surgeries and local hospitals/healthcare centres.

Increasing traffic will have a major effect not only on our roads as in congestion, but also it will effect the safety of our children/residents, not to mention the added noise poorer air quality and overall general health.

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

use existing brownfield sites

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

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

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

Response Date	3/12/2019 9:31:09 AM
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PO3136

Representor Details

Web Reference Number	WF0196
Type of Submission	Web submission
Full Name	Mr Stuart Douglas Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified

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

There is already way too much traffic in the area and with the recent changes to Windle Island and further proposals for more development on the East Lancs Road this will simply make this so much worse for everyone. There will be so much noise and traffic pollution it will be unhealthy.

There are not enough school places as it is for our kids there are no definitive plans or details to provide for this as well as doctors and healthcare - this is really poor !

Why oh why are you not already listening to what our concerns are - evidently 6000 of us have registered our concerns what more can we do to show how strongly we feel about keeping our greenbelt ??

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

use existing brownfield sites !

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

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

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

Response Date	3/12/2019 9:21:08 AM
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PO3137

Representor Details

Web Reference Number	WF0202
Type of Submission	Web submission
Full Name	Mr John Owen
Organisation	
Address	63 Alder Road Prescot Merseyside L34 2SG
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I firmly believe that the land of Eccleston Park Golf Club should not be removed from the Green Belt to become safe guarded and that the St Helens Borough Local Plan 2020-2035 is unsound for the following reasons.

As a local resident living very close to the golf course it is clear that the transport infrastructure, notably the road infrastructure is made up of already busy B roads struggling cannot cope with the current level of road traffic during peak times. Adding to this will only generate more traffic and therefore more noise and higher air pollution levels for the residents living in the area. Warrington Road (the only A road) in particular is already stretched serving various areas such as Rainhill, Prescot, Eccleston Park, Whiston etc. and this includes new developments such as Scotchbarn Lane, Stephenson Grove, Two Butt Lane and others. Between 2013 and 2015 St Helens was well above the national average for respiratory disease in the under 75's (51.9 deaths per 100,000 vs the average of 33.1 for the rest of England) with Thatto Heath one of the highest effected areas in the borough. Thatto Heath is one of the directly affected areas as a result of the removal of EPGC from the Green Belt and one that particularly can't afford any increase in deaths related to respiratory disease. On top of this the plan is putting pedestrian safety at risk with many residents choosing to walk to the local train station, bus stop or even the local shop. Other smaller estates and also minor B and C roads could also be impacted such as Alder Road which is already utilised by drivers as a shortcut.

Other roads such as Mill Lane, Longton Lane and Blundells Hill would likely see increase in traffic and such roads were never built to handle those levels of traffic meaning that significant investment would be required to make them suitable for the amount of traffic.. St Helens Council figures confirm that the junction of Portico Lane and Prescott Road are at capacity and as someone who uses this junction on a daily basis I am in agreement that from a safety perspective this junction cannot handle an increase in traffic. Cars will be required for any developments on ECPG as there simply is not enough local services to cope with the demand e.g. dentist, doctors, hospital and particularly school places. I believe that Brexit and the impact of it has also not been factored into this plan, we know that we have a declining population (since 1981) and that Brexit could further reduce the population so it is questionable as to where all the additional people are coming from to justify such an increase in housing. From reviewing the St Helens Council Brownfield register it is apparent that there is availability for 5808 houses. Table 4.6 illustrates a requirement for 7245 houses therefore leaving a need for 1437 houses, it is not clear why the local plan is detailing a 288 hectare requirement and this needs further explanation. We know that 3HS is a confirmed flood zone and has a very high water table, as my property has a small brook to the rear of the garden I think that building on EPGC would seriously put my property and many others at risk of flooding. Finally I have concerns that any development on EPGC would seriously impact existing property pricing by removing an area of natural beauty and essentially creating one continuous area of urban dwellings. It is also noted that Sport England objected to EPGC status being changed from a Golf Club at stage one and as far as I can see this objection has not been addressed by St Helens Council nor have the council provided any compelling evidence that there is an over subscription to gold within the area.

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

St Helens Council should not consider removing Eccleston Park Golf Club land from the Green Belt to place in safeguarded for the reasons mentioned in this representation. Eccleston Park Golf Club should be removed from the proposal to remove from the greenbelt therefore abiding by the National Planning Policy Framework (2019).

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

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

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

Response Date	3/11/2019 9:15:50 PM
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PO3138

Representor Details

Web Reference Number	WF0223
Type of Submission	Web submission
Full Name	MRS ANITA MORRIS
Organisation	
Address	5, PARK AVENUE ECCLESTON PARK PRESCOT MERSEYSIDE L34 2QY
Agent Details	n/a n/a n/a n/a n/a, n/a

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS ECCLESTON PARK GOLF CLUB
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

ECCLESTON PARK GOLF CLUB (3HS)

I do not believe that Eccleston Park Golf club (3HS) should be taken out of greenbelt and classed as 'safeguarded' under the current local plan for the reasons stated below:

3HS is a natural green space that separates Eccleston Park, Thatto Heath, Nutgrove & Rainhill. If it was removed from greenbelt and placed into 'safeguarding', and then subsequently developed, then this would create a continuous area of housing, and break up the boundaries which stop urban sprawl.

- If taken out of greenbelt and development went ahead I feel that there would be an increase of traffic on roads in our area which are already heavily congested. There are two B roads and one C road around 3HS. They are Rainhill Road, Portico Lane and Two Butt Lane.

- Portico Lane is a very busy road. Over the year there have been many accidents and many cars speed down the lane and do not adhere to the speed limit. Portico lane has many side roads

which suffer from a lack of visibility, not only for crossing the road, but also for driving out of. (Central Avenue, Middlehurst Close, Orchard Close and Park Avenue). The bend at Portico Nursery is extremely dangerous already as there are many residents who park their cars outside their homes before the bend. This forces traffic over onto the other side of the carriageway into oncoming traffic. There have been many accidents on this bend over the years and I expect that more traffic from a potential development will only make this worse. There are often tailbacks further down the road from the Grapes Pub junction where it meets St Helens Road. Many drivers use Park Avenue as a cut through to miss out the lights. The drivers who cut through, often at speed pose a risk to pedestrians in Park Avenue. If a development went ahead it would cause more congestion at the junction, causing more drivers to cut through the side roads to cut time off their journey and thus increase the risk to pedestrians.

- The pavements on Portico Lane are very narrow at certain points making it very dangerous to pedestrians. Extra traffic from a development will cause further danger to pedestrians walking along these paths and also pedestrians trying to cross the road.
- Two Butt lane is a very narrow road with Chicanes for traffic calming. There have been a number of accidents down there over the years and I do not believe that this road could take any further traffic from a development. It is also very tricky for pedestrians as the road only has a footpath on one side, which in places is very narrow.
- Rainhill Road is also an extremely busy road already, very often with tailbacks and has also seen a number of accidents over the years too. If 3HS was taken out of greenbelt I do not believe that this road could cope with anymore additional traffic. Housing is already planned at the old Suttons site nearby for approximately 400 homes and much of the traffic from this development will spill onto Rainhill road.
- A number of these local roads are already used as rat runs. Additional traffic from a new development on 3HS would make the situation worse. Park Avenue is a rat run for people avoiding the lights at the Grapes pub junction. Two Butt lane is a cut through for people wanting to get onto Warrington Road by missing out the lights opposite Whiston Hospital. Holt Lane and Longton Lane also suffer with traffic cutting through these roads to avoid traffic lights so they can gain access to Warrington Road via the Holt lane and Longton Lane junctions.
- Our local roads are already in a state, with so many pot holes, which pose a danger to both cyclists and Motorcyclists who are at serious risk of injury or death. Many of our roads are in disrepair and I feel that extra traffic from a potential development on 3HS will further impact on our roads which are not being repaired.
- The Liverpool Lime street train in the morning rush hour is one of the busiest in the country. Commuters are already packed on like sardines so how will it manage with additional people from potential new development. There isn't any parking at Eccleston Park station and all the commuters who drive to the station tend to leave their cars in neighbouring roads (Central Avenue and Fairholme Avenue), causing problems for residents.
- I believe that if taken out of greenbelt and development goes ahead on 3HS the potential 1800 extra cars from the proposed development on our local roads would create more pollution. Asthma and breathing problems are all on the rise and this would just increase, putting our community at risk of poor health, which would in turn put pressure on the NHS. Any proposed development on 3HS (Eccleston Park Golf Club) would put an extra strain on our local resources.
- Whiston Hospital is already struggling to meet demand. There are already long waits in Accident and emergency. If new housing developments were to go ahead on 3HS this would create more demand for hospital / doctor services which I feel they wouldn't be able to cope with. This in turn would cause delays in routine appointments and further delays in Accident and Emergency, putting a further burden on an already cash strapped NHS. I also think this could cause delays in response times with ambulances not getting to emergencies on time due to traffic issues, which in turn would, put patients lives at risk.

- I believe that there wouldn't be enough Doctors or dental surgeries in the area to cover additional patients from such a large scale new housing development. It is already hard for many people to access routine appointments and this will be made more difficult with people from the new housing trying to access care too.
- Our Fire services have had cutbacks in recent years and a number of closures have been made. I believe that if the development were to go ahead then this would put lives at risk as I feel that they would not be able to cover the area effectively. This will put many lives at risk.
- Our Police service has also had to endure cut backs. It is my belief that the additional homes from a development would create more crime and disorder in the area. There is already a shortage of police officers to cover our area and with additional housing, this would mean that they would not be able to cover the area effectively which would make people in the area feel insecure.
- Schools in the area are already full to capacity. I cannot see any proposals in the Local plan for new schools. If taken out of greenbelt and a new development went ahead it would impact on the local schools. We cannot possibly put more children into already full schools as this will impact on the children's education and put teachers under more pressure. Our secondary school education in the area is already very poor, and if this were to go ahead it will only make the problem worse. This will impact on all the local children who deserve much better.
- I do not believe that any of the above factors have been considered in the Local Plan that has been submitted and no provisions made.

Wildlife/Countryside

- I oppose any development on the golf course as I believe that building on such a vast area of land could cause a potential flooding risk locally.
- If taken out of greenbelt any proposed development on the golf course would cause a major loss of wildlife, trees and plants to the area. The golf course is home to numerous birds, foxes, hedgehogs, plants and trees. The golf course also has ponds which are home to numerous amphibious creatures. Not to mention the rough areas of grass which are homes to small animals and insects. If we destroy all this it will impact on a much wider area and scale.

Other Reasons

- I believe that we should not take 3HS out of greenbelt as our local greenspaces are already dwindling and greenbelt is of great importance to both our physical and mental wellbeing (many news articles back this up for example http://www.euro.who.int/__data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1 and I believe this should be kept for future generations to come.
 - I believe that brownfield land should be used first for development and that we should be encouraging developers to invest in these, rather than take away greenbelt as quick easy solution. St Helens brownfield register suggests that there is availability for 5808 homes. I also believe that you should be looking at the empty properties within the borough and bringing them up to habitable standards according to your empty homes strategy.
 - There are already more than enough housing developments taking place in our area already under ST Helens Council and Knowsley Council and I feel that taking 3HS out of greenbelt and leaving it open to development is completely unnecessary considering the numbers of homes being built and the number of potential cars taking to our roads.
 - I oppose any development as I believe that it would cause a loss of public rights of way.
 - I believe that brownfield land should be used first for development and that we should be encouraging developers to invest in these, rather than take away greenbelt as quick easy solution. St Helens brownfield register suggests that there is availability for 5808 homes. I also believe that you should be looking at the empty properties within the borough and bringing them up to habitable standards according to your empty homes strategy.
- 3HS (ECCLESTON PARK GOLF CLUB) should continue to be kept in greenbelt for the future, and protected for generations to come. Removing it is unnecessary, and damaging to the health and safety of our local population.

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

Eccleston Park Golf club (3HS) should be removed from St Helens Councils local plan proposal to change it's status from Greenbelt to 'safeguarded', therefore abiding with the National Planning Policy Framework 2019.

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

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

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

Response Date	3/11/2019 2:19:26 PM
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PO3139

Representor Details

Web Reference Number	WF0224
Type of Submission	Web submission
Full Name	Mrs Sharon Wilkie
Organisation	
Address	4 Litchborough Grove Prescot L35 7NE
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	x
Other documents	x

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

We have a declining population in the area, so who are we expecting to purchase all these houses or the ones that they leave to move to a new one?

Brownfield sites in the area can build 5808 houses, so why do we need to build an extra 1437 on extra greenbelt land?

Local road infrastructure is currently unable to support current demand, I live off Portico Lane and it can be a nightmare to even get out of my road, and we struggle to even get to the local Tesco's due to volume of traffic. How will these new properties especially on the golf course impact on the road infrastructure. Even getting through Rainhill to the motorway can take at times, up to 40 minutes! There is no facility within this current road structure to enlarge them, therefore how will this affect the current road delays, especially at peak times.

There is only 1 A road A57 Warrington Road and it is gridlocked now at peak times, you then have traffic diverting down the local roads to bypass the lights and stationary traffic. It can be a nightmare and a dangerous situation, the proposed new builds will make this situation worse and impact on the current estates and minor B and C roads such as Kendal Drive Estate, Royal Oak estate, Stoney Lane, Blundells Lane, Mill Lane, Holt Lane, Longton Lane and View Road.

It has already been confirmed by council figures that the Warrington Road/Rainhill Road and Portico Lane/Prescot Road junctions are at full capacity. Major works would need to be done to improve them for increased traffic. The area is already gridlocked with current temporary lights for the

various new builds already taking place and there is already a lot of congestion just to get through the lights.

The increased traffic already affects pedestrian walking areas, I don't take my dog on walks down this area anymore due to the volume of traffic, noise and air pollution in these areas.

The section of 3HS is a natural green area that buffers Whiston, Portico, Eccleston Park, Nutgrove, Thatto Heath and Rainhill. It is what makes this area special, by removing this from greenbelt and placing into Safe Guarding and possibly building on it would create a continuous urban development area and push out wildlife and raise air pollution issues.

The area is already unsustainable due to lack of school places (neighbours have struggled to place their children in local schools), there a no DR or Dentist places in the walkable area, thus forcing people into their cars. People moving into the area are already struggling to access these crucial facilities, how will more development cope if there are no places as there does not seem to be any further DRs or Dentists opening for the increased population, never mind schools junior or senior! 3HS is a confirmed zone two and three flood area, we already have a high water table in our area off portico Lane and have had flooding issues in our gardens. There has been reported issues with the new build site on Scotchbarn Lane, how will new development affect this area and the ability of the land to drain along the existing brook which is already overflowing and flooding areas as mentioned above.

Sport England, a statutory government consultant has objected at local plan stage 1 to EPGC status being changed from the Eccleston Golf Club. The objection has not as yet been answered and an objection from a statutory consultee much be resolved or upheld. St Helens Council has yet to provide evidence that there is an oversubscription of gold clubs within this area.

The area of 3HS supports many species of flora and fauna, this includes more than 13 species that are protected, we cannot afford to lose this wildlife and have already seen an increase decline in previous species in the 20 years I have lived in the area.

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

I want to see the council remove the proposed development and safeguarding of this greenbelt land and abiding with the National Planning Policy Framework (2019).

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

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

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

Response Date	3/11/2019 1:58:50 PM
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PO3140

Representor Details

Web Reference Number	WF0225
Type of Submission	Web submission
Full Name	MRS JOANNE Naylor
Organisation	
Address	213 LONGTON LANE RAINHILL PRESCOT MERSEYSIDE L35 8NX
Agent Details	N/A N/A N/A N/A N/A, N/A

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS (ECCLESTON PARK GOLF CLUB)
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

ECCLESTON PARK GOLF CLUB (3HS)

I do not believe that Eccleston Park Golf club (3HS) should be taken out of greenbelt and classed as 'safeguarded' under the current local plan for the reasons stated below:

3HS is a natural green area that separates Eccleston Park, Thatto Heath, Nutgrove & Rainhill. If it was removed from greenbelt and placed into 'safeguarding', and then subsequently developed, then this would create a continuous area of urban dwellings.

- If taken out of greenbelt and development went ahead I feel that there would be an increase of traffic on roads in the area which are already congested. There are two B roads and one C road around 3HS. They are Rainhill Road, Portico Lane and Two Butt Lane. Two Butt lane is a very narrow road with Chicanes to slow traffic. Unfortunately many people still fail to slow down and force their way through causing near misses. There have also been a number of collisions over the last few years. I believe that Two Butt lane is not designed to cope with any more traffic which if 3HS is taken

out of greenbelt and heavily developed this would produce. Bushes on one side of the road add to the problems as they are sometimes overgrown which forces traffic out further into the road when giving way. The road only has one pedestrian footpath too which would put pedestrians more at risk with more traffic going down the road.

- A number of these roads are already used as rat runs. Additional traffic from the new development a 3HS would make the situation worse. Two Butt lane is a cut through for people wanting to get onto Warrington Road by missing out the lights opposite Whiston Hospital. Holt Lane and Longton Lane also suffer with traffic cutting through these roads to avoid traffic lights so they can gain access to Warrington Road via the Holt lane and Longton Lane junctions. On top of this Longton Lane also has school run traffic. Extra traffic would also put pedestrians at risk especially children from nearby Longton Lane Primary School. Longton Lane is supposed to be a 20mph zone. However, many drivers ignore this and speed down the road once they have exited the traffic calming. I believe that if the development goes ahead, the extra traffic and speeding will pose a danger to pedestrians. In particular school children walking to and from Longton Lane Primary School, but also people walking to work etc. In addition to this it is already difficult trying to get out of our driveways at peak times due to vehicles speeding down the road and the number of cars driving down.

- Portico Lane is a very busy and relatively narrow road. It also suffers from speeding drivers and has seen it's fair share of accidents over the years. It has numerous side roads which are not easy to emerge from in a vehicle due to the lack of visibility (Central Avenue, Middlehurst Close, Orchard Close and Park Avenue to name but a few). The bend near to Portico Nursery is particularly dangerous as there are many residents cars parked on the bends. This forces traffic over onto the other side of the carriageway into oncoming traffic. Over the years there have been many accidents on this bend and I expect that additional traffic will only make this situation worse. Traffic often backs up further down the road from the junction at the Grapes Pub where it meets St Helens Road. Unfortunately many drivers become impatient and use Park Avenue as a cut through to miss out the lights. These speeding drivers who cut through pose a risk to pedestrians in Park Avenue and children who may be playing in the street. If the development went ahead it would cause more congestion and make more drivers cut through the side roads to cut time off their journey and thus increase the risk to pedestrians.

- The pavements on Portico Lane are very narrow at certain points making it dangerous to pedestrians. The pavement before Central Avenue is particularly narrow and hazardous for pedestrians as vehicles pass very close to the pavement. Any extra traffic from a development will no doubt in my mind pose further danger to pedestrians walking along these paths and also pedestrians trying to cross the road. There is also a railway bridge with a blind summit just before the junction of Central avenue. Extra traffic will pose further risk to those trying to exit that junction or cross the road.

- The Liverpool Lime street train in the morning rush hour is one of the busiest in the country. Commuters are already packed on like sardines so how will it manage with additional people from potential new development. There isn't any parking at Eccleston Park station and all the commuters who drive to the station tend to leave their cars in neighbouring roads (Central Avenue and Fairholme Avenue), causing problems for residents.

- I believe that if taken out of greenbelt and development goes ahead on 3HS the potential 1800 extra cars from the proposed development on our local roads would create more pollution. Asthma and breathing problems are all on the rise and this would just increase, putting our community at risk of poor health, which would in turn put pressure on the NHS. We should not take this risk lightly. Both of my young daughters suffer from Asthma which it is unpleasant for them, and having to take inhalers out everywhere they go is a daily task. I don't want them to breathe in more fumes from more cars on the roads, or risk their safety going to school etc. Our area cannot cope with more developments.

Resources

Any proposed development on 3HS (Eccleston Park Golf Club) would put an extra strain on our local resources.

- Whiston Hospital is already struggling to meet demand. There are long waits in Accident and emergency already. If new housing developments were to go ahead on 3HS this would create more patients which I do not believe the hospital would be able to cope with. This in turn would cause delays in routine appointments and further delays in Accident and Emergency. Not only this but there could be delays in response times with ambulances not getting to emergencies on time, putting patients lives at risk.
- I believe that there aren't enough Doctors or dental surgeries in the area to cover additional patients from a large new housing development. It is already hard for many people to access routine appointments and this will only be made more difficult by more people coming into the area.
- Our Fire services have had cutbacks in recent years and a number of closures have been made. I believe that if the development were to go ahead then this would put lives at risk as I feel that they would not be able to cover the area effectively. This will put many lives at risk.
- Our Police service has also had to endure cut backs. It is my belief that the additional homes from a development would create more crime and disorder in the area. With a shortage of police, this would mean that they would not be able to monitor this which would make the community feel insecure.
- If the development went ahead I do not feel that the council would be able to cope with the additional rubbish these new homes would create. The council already struggle to collect recycling on time especially during holidays, and brown bins are only collected fortnightly which is not enough (and council considering 3 weekly). In addition to this recycling often spills all over the roads and pavements due to crates and bags that are far too tiny. On windy days this problem is even worse. This creates the perfect environment for vermin which will become a bigger problem .
- Schools in the area are already full to capacity. I cannot see any proposals in the Local plan for new schools. If taken out of greenbelt and a new development went ahead it would impact on the local schools. We cannot possibly put more children into already full schools as this will impact on the children's education and put teachers under more pressure. Our secondary school education in the area is already very poor, and if this were to go ahead it will only make the problem worse. This will impact on the all the local children.
- I do not believe that any of the above factors have been considered in the Local Plan that has been submitted and no provisions made.

Wildlife/Countryside

- If taken out of greenbelt any proposed development on the golf course would cause a loss of wildlife, trees and plants to the area. It is home to birds, foxes, hedgehogs, plants and trees. The golf course also has ponds which is home to numerous amphibious creatures. Not to mention the rough areas of grass which are homes to small animals and insects.
- I oppose any development on the golf course as I believe that building on such a vast area of land will also change the land contours and increase the risk of flooding to the area.

Other Reasons

- I oppose any development as I believe that it would cause a loss of public rights of way.
- I believe that St Helens should not feel the need to compete with the cities to keep up with the number of homes built. We are only a small town and we should not feel that we should have to take away all our green spaces which are so beneficial to the health of our community.
- There are more than enough housing developments taking place in our locality already under ST Helens council and Knowsley Council and I feel that taking 3HS out of greenbelt and leaving it open to development is completely unnecessary. The following is a list of developments taking place locally which is by no means exhaustive and includes the approximate numbers of housing, which will all impact on our area, and proves that there is no need to take 3HS out of greenbelt.
- KNOWSLEY
- Rosaline Gardens – Carr Lane, Prescot (Barratt) – 95 homes

- Carrs Rise – Prescot (Anwyl) – 123 homes
- Hamlets Woods – Carr Lane – 173 homes
- Scotchbarn Rise, Scotchbarn lane – (Bellway) – 133 homes
- Callendars Green – Scotchbarn Lane – (Stuart Milne) – 68 homes
- Halsnead Garden Village – Whiston – 1500 homes
- Earlsfield Park – Knowsley Lane (Bellway) – 133 homes

ST HELENS

Suttons - 400 homes

Lea Green – 114 homes

Wigget Homes, Forest Green, Walkers Lane, Sutton Manor (16 homes)

Norlands Lane (Taylor Wimpey) – 77 homes

- I believe that should we need to build homes, we should be looking at the alternatives to using green belt, such as looking at brownfield sites and investing in these. St Helens brownfield register suggests that there is availability for 5808 homes. I also believe that you should be looking at the empty properties within the borough and bringing them up to habitable standards according to your empty homes strategy.

- I also believe that St Helens council should be looking to regenerate the town. The areas which have become run down and the housing that has become dilapidated should have investment to make them more attractive and habitable to live in before anyone considers building on our green belt land. Green belt land should in my opinion continue to be protected.

- As 3HS (ECCLESTON PARK GOLF CLUB) has already been sold to a housing developer. I do not believe that this should be an influencing factor on removing this land from greenbelt. Removing it from greenbelt and placing it in 'safeguarded' status will be seen as predetermined for development in future.

3HS (ECCLESTON PARK GOLF CLUB) should continue to be kept in greenbelt for the future, and protected for generations to come. Removing it is wholly unnecessary, greedy and damaging to the health and safety of our local population.

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

ST Helens council should remove Eccleston Park Golf Club 3HS from the local plan proposal to change it from Greenbelt land to safeguarded, therefore abiding with the National Planning Policy Framework 2019.

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

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

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

Response Date	3/11/2019 1:30:53 PM
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PO3141

Representor Details

Web Reference Number	WF0227
Type of Submission	Web submission
Full Name	Mrs Kathryn Adamson
Organisation	
Address	5 Regal Drive Windle St Helens WA10 6BJ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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

8HS is not a sustainable part of land on which to build over 1000 houses. It is adjacent to the A580 which is main route for traffic from Liverpool super port to the M6 This area is noisy and polluted. The safeguarding provision in the St Helens local plan submission draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low level contaminated sites being brought back into use. Windle Brook runs through the site and this lies on a flood plain. The local road networks, health service, schools, policing, public transport cannot support the proposed massive expansion of housing. The plan is not effective. The local plan submission draft is based on flawed employment forecasts and cannot be supported by historical facts. 8HS should be maintained as green belt for the above reasons

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

Retain all green belt areas for the future of our communities
redevelop brownfield sites

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

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

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

Response Date	3/11/2019 10:42:59 AM
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PO3142

Representor Details

Web Reference Number	WF0231
Type of Submission	Web submission
Full Name	mr tom bowers
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	lpa05/ lpa06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

NPPF(2016) WILL NOT BE SATISFIED DUE TO TRAFFIC GROWTH.

criteria for sustainable transport will not be met.

sustainable housing - targets are based on aspirational growth predictions

effective land use will not be met as green belt development is promoted over brownfield sites/ town centre developments that we vary over time.

Agricultural Land - Grade 1 and 2 will be destroyed causing job losses and food sourcing will be unsustainable.

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

We live in Eccleston and struggle to get a doctor's appointment. Schools are being extended but there are insufficient teachers. The infrastructure will not support more residents, cars and houses. Economic predictions used to support the proposed plan are inflated and inaccurate. cross border discussion must be effective and considered - this is yet to be completed fully.

Brownfield land is everywhere and must take precedence over the use of green spaces.- in line with government guidelines.

Road improvements do not outline how local and borough wide amends will be planned and funded.

Air quality, pollution, noise, wildlife and general health will be adversely affected to the detriment of all - where is the indication/ reference to collaboration with local hospital trusts, ccgs and education authorities?

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

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

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

Response Date	3/10/2019 9:08:19 PM
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PO3143

Representor Details

Web Reference Number	WF0233
Type of Submission	Web submission
Full Name	Mr K Seward
Organisation	
Address	23 Amanda Rd, Rainhill L35 8PN
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Justified

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

Eccleston Park Golf Club (3HS) plays an important role in separating the communities of Rainhill and Eccleston Park. If it was built on, these two settlements would merge. The purpose of green belt land is to prevent neighbouring urban areas from merging into one another and to check urban sprawl – the parcel of land designated as 3HS does just that and therefore it must score highly against green belt purposes 1 & 2 in the Green Belt Review.

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

The old Eccleston Park Golf Club should be removed from safeguarding and returned to green belt status, especially as there's no real need for all of the proposed extra housing in St Helens. This change will correct the inaccurate scores for green belt purposes 1 & 2 and make the Local Plan sound.

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

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

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

PO3144

Representor Details

Web Reference Number	WF0234
Type of Submission	Web submission
Full Name	Mr Roger Yates
Organisation	Mrs
Address	12 Moss Lane Windle WA11 7QD
Agent Details	

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

No

① ②

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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

Regarding 8HS

①

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

②

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

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded

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

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

Reinstate 8HS back into Green Belt and instead re-develop available brownfield sites.

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

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

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

Response Date	3/10/2019 7:51:04 PM
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PO3145

Representor Details

Web Reference Number	WF0235
Type of Submission	Web submission
Full Name	Mr Paul Campbell
Organisation	Mrs
Address	12 Moss Lane Windle WA11 7QD
Agent Details	

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

No

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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

Regarding 8HS

① The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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

② The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded

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

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

Reinstate 8HS back into Green Belt and instead re-develop available brownfield sites.

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

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

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

Response Date	3/10/2019 7:50:39 PM
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PO3146

Representor Details

Web Reference Number	WF0236
Type of Submission	Web submission
Full Name	Mrs Nicola Campbell
Organisation	Mrs
Address	12 Moss Lane Windle WA11 7QD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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

Regarding 8HS

① The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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

② The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded

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

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

Reinstate 8HS back into Green Belt and instead re-develop available brownfield sites.

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

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

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

Response Date	3/10/2019 7:50:21 PM
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PO3147

Representor Details

Web Reference Number	WF0237
Type of Submission	Web submission
Full Name	Mrs Lisa LOWE
Organisation	
Address	25 Ellerslie Avenue Rainhill Merseyside. L35 4QD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Consistent with national policy

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

- The towns population has been in decline for decades there is no justification for an increase in housing stock.
- Brownfield sites across St Helens have not been adequately exploited for housing, the register suggests brownfield space for 5808 residences.
- Development and extra housing will put increased pressure on already oversubscribed health, educational and social care facilities.
- The road infrastructure around the 3HS site comprises two B roads (Rainhill Rd and Portico Ln) and one C road (Two Butt Ln). These roads are inadequate for the current levels of traffic during peak times. Any additional development will exacerbate congestion.
 - Traffic congestion in Rainhill village is already a problem with traffic jams and associated pollution a regular occurrence. Council figures confirm Skew Bridge is at capacity. There is no scope at Skew Bridge to facilitate extra traffic.
- The council has a responsibility to ensure clean air is maintained, unnecessary development with associated increase in traffic will lead to higher levels of air pollution, destruction of the greenbelt will remove vital vegetation which would otherwise absorb this.

- The 3HS site is a designated flood zone with a watercourse (Pendlebury Brook) running through it. Replacing the greenbelt land and vegetation with a development will dramatically increase the rate at which water drains into the watercourse, thus putting existing properties at risk of flooding
- The 3HS site supports a rich and bio-diverse ecosystem of plants, insects amphibians and mammals many of which are protected, development will unnecessarily destroy this.

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

The council should not remove this land from the greenbelt and should abide by the National Planning Policy Framework (2019)

The council should not consider changing the status of the 3HS site from Greenbelt to 'Safeguarded'.

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

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

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

Response Date	3/10/2019 7:43:44 PM
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PO3148

Representor Details

Web Reference Number	WF0238
Type of Submission	Web submission
Full Name	Mr Philip LOWE
Organisation	N/A
Address	25 Ellerslie Avenue Rainhill, Merseyside. L35 4QD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- The towns population has been in decline for decades there is no justification for an increase in housing stock.
- Brownfield sites across St Helens have not been adequately exploited for housing, the register suggests brownfield space for 5808 residences.
- Development and extra housing will put increased pressure on already oversubscribed health, educational and social care facilities.
- The road infrastructure around the 3HS site comprises two B roads (Rainhill Rd and Portico Ln) and one C road (Two Butt Ln). These roads are inadequate for the current levels of traffic during peak times. Any additional development will exacerbate congestion.
 - Traffic congestion in Rainhill village is already a problem with traffic jams and associated pollution a regular occurrence. Council figures confirm Skew Bridge is at capacity. There is no scope at Skew Bridge to facilitate extra traffic.
- The council has a responsibility to ensure clean air is maintained, unnecessary development with associated increase in traffic will lead to higher levels of air pollution, destruction of the greenbelt will remove vital vegetation which would otherwise absorb this.

- The 3HS site is a designated flood zone with a watercourse (Pendlebury Brook) running through it. Replacing the greenbelt land and vegetation with a development will dramatically increase the rate at which water drains into the watercourse, thus putting existing properties at risk of flooding
- The 3HS site supports a rich and bio-diverse ecosystem of plants, insects amphibians and mammals many of which are protected, development will unnecessarily destroy this.

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

The council should not remove this land from the greenbelt and should abide by the National Planning Policy Framework (2019)

The council should not consider changing the status of the 3HS site from Greenbelt to 'Safeguarded'.

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

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

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

Response Date	3/10/2019 7:39:55 PM
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PO3149

Representor Details

Web Reference Number	WF0241
Type of Submission	Web submission
Full Name	Miss Anna Geier
Organisation	On behalf of Rainhill Civic Society (Registered Charity)
Address	Flat 4 Victoria Court, 571 Warrington Road, Rainhill L35 4LS
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA02, 05, 06
Paragraph / diagram / table	Tables 4.5, 4.6 — ③
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Appendix 7

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Rainhill Civic Society Response to St Helens Borough Local Plan 2020-2035 Submission Draft
Rainhill Civic Society is a local amenity society founded over 50 years ago in Rainhill. One of its aims is the preservation and enhancement of the township of Rainhill. The society has approximately 300 members and works with the local community, the Parish Council and other groups to make Rainhill an enjoyable place to live. This response has been collated by the Society's Planning Sub-committee and has been approved and minuted by the full Committee of the Society.

①

Policy LPA02

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

②

Policy LPA05 & Appendix 7 — ③

The Society objects to Policy LPA05 and Appendix 7, which outline the Council's aim for 486 dwellings per annum across the Borough and 956 units for the safeguarded 3HS site. Housing

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

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

The introduction of increased road traffic will add further strain and congestion on local communication routes such as Warrington Road (A57), the only A-road through Rainhill, Rainhill Road (B5413) including Skew Bridge, Portico Lane (B5201) / Prescott Road junction which are currently at capacity according to St Helens Council. Increased traffic will also impact small resident estates and minor B and C roads including Two Butt Lane, Kendal Drive Estate (Rainhill), Royal Oak Estate (Whiston), Mill Lane, View Road, Stoney Lane, Blundells Lane, Longton Lane and Holt Lane. As a statutory body, Sports England objected to the Stage 1 Local Plan due to the change of use of Eccleston Park Golf Club (3HS). The Council has an obligation to address such objections from statutory bodies either as being resolved or upheld. St Helens Council should provide compelling evidence for over subscription of the golf creational facilities in the local area which is still awaited.

4

Policy LPA06

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

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

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

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

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

Response Date	3/10/2019 7:00:51 PM
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PO3150

Representor Details

Web Reference Number	WF0244
Type of Submission	Web submission
Full Name	mr andrew bowers
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

UNSUSTAINABLE TRAFFIC GROWTH, - DOES NOT SATISFY NPPF 2016
 INEFFECTIVE USE OF LAND CONCENTRATING ON GREENBELT RATHER THAN BROWNFIELD SITES
 /TOWN CENTRE DEVELOPMENT FUTURE FOOD SECURITY REQUIREMENTS ARE BEING IGNORED -
 THIS LAND IS AGRICULTURAL LAND OF HIGH QUALITY
 THE HOUSING IS NOT SUSTAINABLE AS TARGETS FOR EMPLOYMENT ARE INACCURATE

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

The proposal is significantly flawed and would require too many amend to list. Issues of healthcare, education traffic density, resulting pollution and effects on health - all aspects that are ill considered in the plan and out of date data has been used to justify the use of the land.

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

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

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

PO3151

Representor Details

Web Reference Number	WF0245
Type of Submission	Web submission
Full Name	mrs HELEN BOWERS
Organisation	
Address	[REDACTED]
Agent Details	HELEN BOWERS

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

Yes (via e-mail)

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

Policy	LPA05 + LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	~
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

THE plan is based on flawed methodology.

the plan is not deliverable

the plan does not comply with Nat Policy NPPF2018.

The plan does not meet criteria for sustainable growth housing transport target are based on incorrect predictions, assumptions.

The plan does not make effective use of land - green space versus town centre developments. The land does not need to be used for development - other brown site areas could be used

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

I do not see how the Plan can become compliant due to the number of issues

incorrect economic predictions

required regional and cross border collaboration has not been undertaken.

standard methodology for the housing need assessment has not been used.

Outdated forecasts are being used for housing needs showing inflated numbers - overestimating.

The brownfield register must be referred to and adequately used with adjustments over time.

The negative impact on farming jobs has not been justly considered.

NPPF 2016 cannot be met as the plan promotes unsustainable traffic growth causing severe traffic issues.

Air quality, pollution, general health will all be negatively impacted given the detail of the proposed plan.

Vehicle dependency will increase due to the location of the site.

Healthcare and Education requirements of the plan can never be met. They are not met now with the current level of housing. Schools, doctors surgeries etc. can be built but the required level of qualified staff must work in them. This is not currently happening in St Helens

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

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

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

Response Date	3/10/2019 6:18:50 PM
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PO3152

Representor Details

Web Reference Number	WF0247
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13, Peebles Close Garswood Wigan Lancs WN4 0SP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06-Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Greenbelt shouldn't be the first, easy, choice to release for housing. It is universally accepted that protecting Greenbelt land is a sign of good, positive planning and this plan is the opposite. There are approximately 6,000 properties that could be built in the borough on derelict and brownfield sites and these must be looked at first. It is vital that we preserve Greenbelt and once it's gone for housing there's no turning back.

The wildlife in Garswood is never seen in the urban sprawl up the road in Winstanley and we are fortunate to have varieties of bats, wild birds, and small animals here and they must be protected. The Council have stated that the population 'is expected to grow' and they need to build these houses. They must prove not only the figures but how they have been reached as the population in St Helens has declined every year since 1981. Where are all these people needing homes expected to come from? We must see the evidence. I'm not a 'NIMBY' but don't wish to lose precious Greenbelt and associated wildlife benefits because the Council have a wish list of a higher population, that cannot happen.

This area isn't suitable for the planned housing. The roads are narrow country lanes with already too many cars using the. The doctors surgery has long waiting times and schools are almost at capacity, if not full. Where are these children going to go to school.

St Helens Council have stated that 'Garswood has some shops and services.....no distinct central shopping/service centre...it is large enough to form a key settlement.' There are few amenities in the area and the houses that are planned will force people into their cars. The rail service isn't suitable for commuters, it's a slow train to Liverpool and you need to change trains (and station!) at Wigan to get to Manchester. The train station has no parking and no space to create one. There is no disabled or pram access or lift so is not suitable for the large numbers that the Council intend to potentially use the station.

The buses are practically non-existent so it would be rail or car. As the train station and roads are unsuitable, the Plan should be rejected. Access to the site from either Leyland Green Road or Billinge Road would be inadequate on the narrow country roads. Should this plan go ahead, the developers must fund any necessary improvements, not the Council Tax payers.

The Council state that they have worked in conjunction with neighbouring authorities. They must prove this as Wigan will be adversely affected with schools and GP surgeries needing expanding as it is so close to the boundary and speaking from personal experience most of Garswood use Wigan amenities for convenience. There is already a formal agreement in place for education and it's isn't just the local primary schools in Bryn that will be affected but the 3 high schools in Ashton-in-Makerfield that will be impacted.

The playing fields adjacent to LPA06-Site 1HS are also in the plan to be removed from Greenbelt. The planners have tried to say that there are no plans to build and there's no point having 'an island' of Greenbelt. If there's no intention of building in the future, why remove it from the Greenbelt? This MUST continue to be protected as it is one of the precious few amenities the young people of Garswood have, greed cannot be allowed to prevail.

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

Delete this land from the proposed removal from the Greenbelt!

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

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

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

Response Date	3/10/2019 6:05:50 PM
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PO3153

①-LPA05 ②-LPA06 site 3HS&8HS ③ Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0254
Type of Submission	Web submission
Full Name	Mr Simon Mackenzie
Organisation	
Address	29 Seddon Close St Helens WA10 5AG
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

③

①

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. The Plan is not effective.

①

②

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

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

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

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

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

Response Date	3/10/2019 4:33:11 PM
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PO3154

Representor Details

Web Reference Number	WF0259
Type of Submission	Web submission
Full Name	Ms Joanna Hayward
Organisation	JAK Fine Art Printing
Address	502 Garswood Road Garswood WN40XH
Agent Details	Adrian Storey

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

Yes (via e-mail)

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

Policy	LPA 06 - Site 1HS
Paragraph / diagram / table	Housing at Billinge Road Garswood
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. In fact the population of Britain is estimated to be on the decline. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

PO3155

Representor Details

Web Reference Number	WF0261
Type of Submission	Web submission
Full Name	Miss Caroline Edwards
Organisation	
Address	22 Ansdell Villas Road Rainhill St Helens L35 4PN
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- Increase in traffic congestion: Rainhill has one A road (Warrington Road) which already becomes congested at peak times due to its useful road connections. Adding a development of this size so close to this road will only dramatically worsen this congestion, causing an increase in air pollution and therefore the population's health. This will also raise the concern of public/pedestrian safety.
- Biodiversity: This area of land contains more than 13 protected species.
- Flood Risk: This area is at high surface water risk and increasing infiltration rates into the brook and raising the pressure on our current drainage systems.
- Population: The population in the vicinity of Rainhill has not increased in decades so there is no need for our area to take on the responsibility of accomodating such a large housing estate, with no benefit to us.
- Housing prices: Rainhill is a sought after area not only for its transport links but also for it's surroundings. By taking away huge slices of our green belt, you are taking the attraction away from the area and therefore the desire to want to live here; decreasing out house prices.
- Local services: There are already a lack of local services including spaces in our local schools and local GP surgeries.

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

St Helens Borough Council should remove any plans to develop on Rainhill's greenbelt, starting with this application. Please do not remove this land from our list of green belt areas!!

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

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

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

Response Date	3/10/2019 2:25:15 PM
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PO3156

Representor Details

Web Reference Number	WF0262
Type of Submission	Web submission
Full Name	Mr Arthur Caddick
Organisation	
Address	18 Amanda Road Rainhill L35 8PP
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Effective

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

When Rainhill hospital closed approval was given to build on the footprint of the old hospital buildings only, why are you now proposing to build on the old hospital farm land. The plan is to build 900+ houses, the local schools are full, there are only 2 doctors surgeries in the village (1 of which is not accepting any new patients). What are the proposals for education and healthcare?

900+ houses will generate at least 1500 vehicles trying to exit the estate, it will be extremely dangerous to exit onto a very narrow Rainhill Road or even more dangerous to exit onto an even narrower Portico Lane which has a hazardous blind spot at the railway bridge at Eccleston Park Station.

By building on this green belt land the consequence will be that St Helens will join up with Rainhill to create a sprawling mass of houses with no green space.

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

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

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

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

Response Date	3/10/2019 2:20:35 PM
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PO3157

- ①-LPA04 ②-LPA05 ③-LPA06
 ④-IDP ⑤-Statement of Common Ground

Representor Details

Web Reference Number	WF0265
Type of Submission	Web submission
Full Name	Mr Geoffrey Holmes
Organisation	
Address	13,VILLIERS CRESCENT ECCLESTON ST. HELENS WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	ST HELENS BOROUGH LOCAL PLAN 2020 – 2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

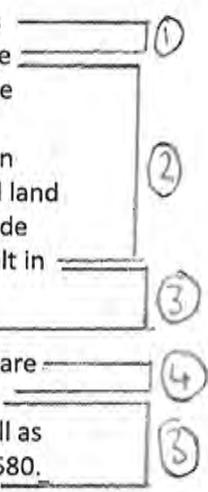
ST HELENS BOROUGH LOCAL PLAN 2020 – 2035 SUBMISSION DRAFT JANUARY 2019

The forecast employment growth is based on unreasonable and untested assumptions. There is nothing to underpin these aspirational figures. This then results in an oversupply of housing. The whole plan stands or falls on this test for the correct housing need. The figures quoted should be replaced by the ONS (2018) which uses more current data.

St Helens has stated a principle of brownfield first which is entirely correct however it has shown very little imagination and diligence in identifying suitable sites of brownfield and contaminated land which could easily meet housing need. In order to justify the release of greenbelt it has to provide exceptional circumstances it has failed to identify these. For Eccleston the inclusion of Green Belt in the plan which is to be safeguarded is mainly Grade 1 and 2 agricultural land, a very necessary resource at this time. This Plan is not justified or sustainable.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the only greenspace for Windle that also acts as a buffer to pollution caused by the A580.

The Plan is not effective.



The Plan does not comply with NPPF(2018) Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over predicting employment growth leading to an oversupply of housing which cannot be sustainable in this area of the North West.

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Suggestion

Adopt the ONS(2018) housing need statistics, source funding for regeneration and decontamination, bring contaminated land especially town centre sites into the housing plan and remove all Green Belt reallocation from the Plan.

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

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

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

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

Response Date	3/10/2019 1:20:56 PM
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PO3158

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0267
Type of Submission	Web submission
Full Name	Mr Adrian Storey
Organisation	JAK Fine Art Printing
Address	502 Garswood Road. Garswood. WN40XH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
Policies Map	site 1HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified. The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the use of derelict and other urban land. Using Greenbelt fails to encourage this.

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

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

The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate.

Any necessary highways works must be funded by the developer and not the Council Tax payer.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 12:52:57 PM
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PO3159

Representor Details

Web Reference Number	WF0272
Type of Submission	Web submission
Full Name	Dr Sobhan Vinjamuri
Organisation	
Address	9 Churchill Gardens St Helens WA9 5GB
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- 1) Unsure of legal compliance due to lack of environmental impact on additional residential complexes within a suburban/ semi-urban setting.
- 2) No impact assessment on local amenities including schools, medical services, emergency services, electricity, water, high-speed internet
- 3) No impact assessment on additional traffic burden on small roads
- 4) No acknowledgement of lack of equitable access to local amenities currently. So how can the borough cope with more.
- 5) Areas of beauty are likely to be affected and give way to more urban sprawl

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

- 1) Full impact study on environmental impact
- 2) Full impact study(ies) on impact on local amenities, addressing current shortfalls and any future shortfalls
- 3) More local engagement with communities likely to be directly affected

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

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

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

Response Date	3/10/2019 10:42:01 AM
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PO3160

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0274
Type of Submission	Web submission
Full Name	Mr John Cunningham
Organisation	
Address	19 Sherwood Close Rainhill Prescot Merseyside L35 4RA
Agent Details	

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

No

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The road network surrounding 3HS is already at capacity now and would be made unsustainable by the proposed housing development. There is only one A road serving the Rainhill area (Warrington Road), together with a B road (Rainhill Road) and a C road (Two Butt Lane). These roads at times are currently unable to support present traffic demands, particularly during rush hours, and developing further houses in the vicinity will only add to the problem for all residents who own vehicles and make it more dangerous for pedestrians and cyclists. Because of existing traffic jams around the junction of Rainhill Road and Warrington Road (skew bridge), traffic already uses residential estates around Longton Lane as a cut through and this will only be exacerbated. The junction at skew bridge would require significant widening and improvement to support this housing development. Furthermore, housing development would be unsustainable in this locality due to a lack of infrastructure and services such as doctors surgeries, dental practices, schools, hospitals and A&E facilities. These services are already under strain without the proposed housing development. In addition, the water table of 3HS is already a confirmed zone 2 and 3 flood zone and further housing development on this land would put houses bordering the brook [REDACTED] at increased risk of flooding. Furthermore, the land at and around 3HS supports a variety of wildlife and plants, including 13 protected species. Development at this site would be detrimental to these species, as

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well as having a negative effect on people's wellbeing by removing some of the only green belt land in this locality. Housing development would lead to increased risk of air pollution and would result in increased risk of premature death from respiratory diseases, which are already higher in St Helens compared to regional and national averages (e.g. between 2013 and 2015 there was an average of 51.9 deaths per thousand in St Helens, compared to 33.1 deaths per thousand in England as a whole). Finally, there has been no statement of common ground with neighbouring authorities such as Knowsley Borough Council, where new housing developments are already under way, negating the need for further housing development on 3HS.

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

The Council should not consider removing 3HS from classification as green belt land, therefore abiding with the National Planning Policy Framework (2019).

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

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

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

Response Date	3/10/2019 9:52:26 AM
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PO3161

Representor Details

Web Reference Number	WF0294
Type of Submission	Web submission
Full Name	Miss Anna Edwards
Organisation	
Address	22 Ansdell Villas Road, Rainhill Prescot Merseyside L35 4PN
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- The register for brownfield areas show capacity for over 5,000 houses
- The current infrastructure of the roads cannot support the population of Rainhill at this time, not to mention what danger pedestrians and road users could be put in by adding 1,000 houses
- The current Greenbelt area in question supplies a buffer between the urban areas of Rainhill, Thatto Heath and Whiston. Without this the area would be overcrowded and swollen by urban dwellings
- The social services (Ambulance, Fire and Police) in the area is already stretched and has significant cuts in funding yearly. Such an influx of residents cannot be supported as the Government cannot afford to increase funding for the aforementioned services across the country
- To build such a large scale estate would mean new schools and services would have to be built. However, the time-scale for those buildings to have permission and funding would be unknown, leaving current schools at full-capacity and low funding/support
- It is a confirmed Zone 2 and 3 flood zone. Building on this may cause detrimental effects to nearby housing
- Approval of building would mean a huge loss of wildlife and the destruction of habitat for 13 protected species

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

The Council should delete this land from the proposed removal from the Greenbelt therefore abiding by the National Planning Policy Framework (NPPF) of 2019. The Council shouldn't consider removing this land from Greenbelt to place in Safeguarded.

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

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

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

Response Date	3/9/2019 2:50:08 PM
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PO3162

①-LPA05 ②-LPA06, 8HS ③-GEN

Representor Details

Web Reference Number	WF0295
Type of Submission	Web submission
Full Name	Mr Liam Keenaghan
Organisation	
Address	[REDACTED]
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

- The Green Belt Review (2018) contains questionable decisions. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land.
- Sustainable infrastructure has not been addressed and will cause problems if site 8HS is allowed to be safeguarded for development. The decision to include this parcel in the Plan leads to significant doubt that the Plan has been positively prepared.
- St Helens Council has used ONS(2014) statistics rather than later and more accurate ONS(2016) data. The Council are aware of this reduction in housing need but still chooses to uplift older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the need to build on Green Belt.
- The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). St Helens Council states that 3,170 ha of the lowest priority contaminated brownfield land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites, barely 7% of the 3,170-ha available. There is little justifiable need to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. It is not reasonable to assume that sites cannot be made available within the 15- year Plan period being considered.

②

①

- The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered. ①
The Plan is not justified.

- The lack of infrastructure and the poor healthcare and education offering means that St Helens is a less desirable place to live and work. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. ③
The Plan is not effective.

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

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

Re-develop brownfield sites. If this action is not taken it will leave large areas of the borough as barren, brownfield deserted sites, whilst our beautiful green belt will be gone.

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

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

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

Response Date	3/9/2019 2:10:35 PM
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PO3163

Representor Details

Web Reference Number	WF0299
Type of Submission	Web submission
Full Name	Dr Helen Parr
Organisation	Garswood Surgery
Address	Billinge Road Garswood Ashton-in Makerfield WN4 0XD
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	sustainability and strategic environmental assessment
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared

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

Garswood Surgery is situated adjacent to both proposed housing developments. These combined views are from the GP partners and staff of the surgery

- Garswood Surgery was not consulted regarding their capacity to accept a large influx of patient registrations
- Garswood Surgery is already at maximum capacity for the number of clinicians. We are not aware of any other GP practices that would have these houses in their practice boundaries – certainly no St Helens CCG practices
- Potential retirement of GP at neighbouring surgery has led to increase in numbers of patients requesting to register at Garswood Surgery
- There is a current, unresolved issue, with transfer of medical records from patients transferring from a neighbouring surgery to Garswood Surgery. This is compromising patients' safety of care.
- Safety of patient care would be further compromised if there was a large influx of patients (this includes those patients transferring from neighbouring surgery). This is likely to necessitate an application to close the list.

- St Helens borough has an ongoing, well recognised problem with the recruitment and retention of GP's and other clinical staff in primary care. Recruitment of new GP's for Garswood and the neighbouring surgery may not be possible – again, impacts on safety

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

1. Primarily funding to cover large increase list size which would broadly need to cover;
 - Recruitment of additional clinical and administration staff
 - Training of staff
 - Interim salaries of these staff until list size increases
 - Increase rental cost in the building – more rooms will be required. Of note, we believe this to be substantial increase cost
2. Support for the neighbouring practice to enable them to maintain their current patient list to prevent further impact on our practice list.
3. CCG to reduce practice boundary for Garswood Surgery

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

Yes, I wish to participate at the oral examination

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

As a Practice, we need have sound and sensible discussions regarding safe and effective measures that can potentially be put into place if any new housing developments were to go ahead.

Response Date	3/8/2019 3:24:50 PM
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PO3164

Representor Details

Web Reference Number	WF0302
Type of Submission	Web submission
Full Name	Mr Robert Jost
Organisation	
Address	15 Stapleton Avenue Rainhill L35 4PR
Agent Details	, L35 4PR

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

1. Polls tell us that the population is in decline so why do we need more houses.
2. The Rainhill area schools are almost all near capacity, where would the extra children go as there are no plans for new schools.
3. No new Drs surgeries, dental practices planned waiting times would be increased.
4. Traffic in the area is a nightmare now, increasing the population would worsen this and affect pedestrian safety and air pollution.
5. Building on the Eccleston Park Golf Club site would add to the urban sprawl we already have, use brownfield sites. It would also have a great impact on the wildlife and fauna on the site.
6. Whiston Hospital has bed problems now, increasing the population in the area would make the wait longer and increase this problem.
7. There is little or no industry in Rainhill and Nutgrove new residents would have to travel out of the area to work increasing road use and air pollution which would lead to roadsurface breakdown and increased respiratory problems with less chance of a hospital bed.

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

The council should find brownfield sites to build on and so prevent urban sprawl.
The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Framework (2019).
The greenbelt land should not be removed to safeguarded land.

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

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

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

Response Date	3/8/2019 11:03:35 AM
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PO3165

Representor Details

Web Reference Number	WF0304
Type of Submission	Web submission
Full Name	Mrs Tess Clancy
Organisation	
Address	22 Ansdell Villas Road Rainhill Prescot Merseyside L35 4PN
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

* Road infrastructure (Rainhill Rd, Portico Lane and TwoButt Lane) cannot support the proposed extra traffic as it is currently very busy at peak times.

* increased traffic will have an adverse impact upon all neighbouring local roads and estates

* Warrington Rd/Rainhill Rd junction and Portico Lane/Prescot Rd junction are already at capacity according to council figures.

* significant increase in traffic will introduce more poor air pollution which will adversely affect our community. Many schoolchildren walk along the above roads to/from a number of local schools.

* the area of 3HS is a natural green buffer which if removed from the green belt would reduce the local identity of a number of areas (Whiston, Rainhill, Portico, Nutgrove) into one large urban area.

* population in St Helens is declining so not sure where the justification for the figures in the report has come from

* this area is known for its very high water table so extensive building on it will impact upon drainage and therefore increase risks of flooding

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

St Helens council should remove this land from the proposed removal from the greenbelt. The council should keep this land in greenbelt and not place it in safeguard status.

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

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

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

Response Date	3/7/2019 8:06:50 PM
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PO3166

Representor Details

Web Reference Number	WF0307
Type of Submission	Web submission
Full Name	Mr Kevin Dennett
Organisation	
Address	32 Crocketts Walk Eccleston St Helens WA10 5DU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Ecclestone and Windle with employment areas. The Local Plan Submission Draft is based on flawed employment forecasts and cannot be supported by historical facts.

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

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

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

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

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

Response Date	3/7/2019 4:07:36 PM
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PO3167

Representor Details

Web Reference Number	WF0308
Type of Submission	Web submission
Full Name	Mrs Michelle Dennett
Organisation	
Address	32 Crocketts Walk Eccleston St Helens WA10 5DU
Agent Details	

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

No

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

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

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

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 49 ha and 53 ha (contributing to an overall total of 143ha) are being reclassified as safeguarded land sites in the plan and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

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

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

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

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

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorities are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastructure improvements. The Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the East Lancs Road between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the Northern Powerhouse initiative. These giant warehouses lie along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic.

Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

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

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

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

St. Helens has relatively high unemployment rate compared to the other Local Authorities in the North West, with a 7.1% rate. There is no mention of policies to try and reduce unemployment rates to boost jobs for residents living within St. Helen. A 1%age point reduction, for example, would reduce the numbers of new dwelling needed by some 50 dpa.

Even without any change in jobs over the projection period, the population change (due to ageing) is driving a large increase of the housing growth, a point acknowledged in Section 6.3.5 of the Local Plan Update . Assuming the ONS SNPPs are in the right ball park for the 75+ age group and bearing in mind that only small numbers of the 75+ age group move, then 367 of the total housing growth comes from the 75+ age group (from the 2014 SNHPs). That would leave $486 - 367 = 119$ dwellings for new jobs.

However, in order to accommodate 7,797 new jobs (Table 9, SHMA Update - Scenario 2 - Option 3) it would require a huge boost to the working age population. In rough terms, an extra 11,900 16-74 population (assuming 67% Economic Activity Rate and no change to unemployment rates or commuting rates) which translate to around 16,000 people (the 16-74s make up 70% of the total population) or an extra 940 people per annum (All ages). If you feed an extra 940 people each year into the population and household projections, this generates a household population of 930 (less Institutional Population of 1.1% as at 2033 - 2014 SNHPs) divided by the average household size (AHS) in 2033 (2.17, 2014 SNHPs) and vacancy rate of 3% gives 440 dwellings pa to add to the 367 for the 75+ which gives 807 dpa.

The numbers of dwellings (and population) arising from the extra 7,797 jobs would be well above what is projected due to the age structure of St. Helens where the 75+ age group accounts for 71% of the increase. There is a clear disjoint in the relationship between jobs, dwellings and population.

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

The points raised throughout the Green Belt Review (2018) clearly show inconsistencies with subjective scoring and findings. It's almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

There are no exceptional circumstances to justify not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

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

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

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

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

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

PO3168

Representor Details

Web Reference Number	WF0309
Type of Submission	Web submission
Full Name	Mrs Carole Dawson
Organisation	
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

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

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

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorities are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastructure improvements. The

Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the A580 between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the Northern Powerhouse initiative. These giant warehouses lie along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic on the A580.

2 Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

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

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

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

Develop the Infrastructure Delivery Plan to explain the impact on Roads networks, Health Care and Education.

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan. This will remove site 8HS which will reduce the ever increasing demand on an already failing road network at Windle Island and the A580.

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

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

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

Response Date	3/7/2019 3:38:51 PM
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PO3169

Representor Details

Web Reference Number	WF0310
Type of Submission	Web submission
Full Name	Mrs Glennis Parkinson
Organisation	
Address	37 Springfield Park Haydock St.Helens Merseyside WA11 0XP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 06 Site 2HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I do not understand why this site is being safeguarded.

It is a sustainable site for development

It has the benefit of - perfect transport links of regular bus and train services etc

School places and medical services widely available

No flooding problems

Park side development would give job opportunities to new residents

Newly refurbished leisure facilities nearby.

Newly refurbished Newton Railway Station within 1 mile providing the city centres on a regular basis.

Daytime/evening economy of the Newton le Willows High Street

The market town of Earlestown nearby

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

This site should be allocated for immediate delivery. Many people want to live in this area.

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

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

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

Response Date	3/7/2019 3:30:31 PM
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PO3170

Representor Details

Web Reference Number	WF0311
Type of Submission	Web submission
Full Name	Mr Keith Dawson
Organisation	
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

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

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. There will be more and more post industrial sites becoming available over the next 15 years as the town continues to lose investment- why does vast areas of greenbelt land such as HA16 have to be 'safeguarded' in the plan when the need for building here will be unnecessary given the amount of brownfield available both now and in the future.

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

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

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

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

There is adequate brownfield land in St Helens to develop and meet the housing need. An update of the Brownfield register to include Brownfield and PDL that is not included is necessary to show no need for greenbelt release.

Include in the plan sites which are lowest priority contaminated land to be remediated should housing need not be met, removing the need for 'safeguarded' sites.

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

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

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

Response Date	3/7/2019 2:49:31 PM
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PO3171

Representor Details

Web Reference Number	WF0314
Type of Submission	Web submission
Full Name	Mr Christopher Dunn
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

1 } I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

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

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

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

2 } Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

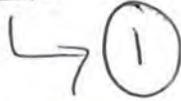
The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

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

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

The Plan is not effective.



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

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

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

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

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

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

Response Date	3/7/2019 11:02:31 AM
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PO3172

Representor Details

Web Reference Number	WF0315
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

1) I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

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

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

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

2) Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

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

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

The Plan is not effective. ①

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

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

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

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

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

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

Response Date	3/7/2019 10:59:49 AM
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PO3173

Representor Details

Web Reference Number	WF0316
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	15 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

① I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

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

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

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

② Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

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

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

The Plan is not effective. ↳ ①

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

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

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

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

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

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

Response Date	3/7/2019 10:59:44 AM
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PO3174

Representor Details

Web Reference Number	WF0317
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	15 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Effective

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

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

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

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

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

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

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

The Plan is not effective. → ①

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

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

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

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

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

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

Response Date	3/7/2019 10:58:22 AM
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PO3175

Representor Details

Web Reference Number	WF0318
Type of Submission	Web submission
Full Name	Miss Johanna Milton
Organisation	
Address	15 Alder Close Prescot Merseyside L342SN
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

1. 3HS supports many flora and fauna.
2. The roads are already extremely busy. The congestions which was experienced on the old Bridge is now experienced through Rainhill. There is only one A road through this area.
3. Air quality will be impacted further, during the period between 2013 and 2015 St Helens averaged 51.9 per 100,000 from respiratory disease in under 75's.

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

I request the council removes does not just safeguard this land but puts it back to its former state of being a green belt.

Green belts are there for a reason as listed above.

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

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

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

Response Date	3/7/2019 7:13:59 AM
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PO3176

Representor Details

Web Reference Number	WF0319
Type of Submission	Web submission
Full Name	Mr Phil Mouldsdales
Organisation	
Address	25 Nottingham Close Rainhill Prescot Merseyside L35 4QZ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I do not believe there is a requirement for this number of houses to be built when St,Helens and surrounding areas is seeing a declining population. There is clearly a large number of brownfield sites In the borough that have not been considered for housing. St.Helens is a town in decline with little or no industry so people do not live and work in the borough but travel outside the borough to their place of work. This creates a massive issue with traffic , you can see this by some of the schemes in place to improve congested traffic. We have had small road improvements on Warrington Road Rainhill which caused huge issues in the village.Larger schemes at Windle Island and at Elton Head Road are only taking place because of the number of cars/people travelling to places of work outside the borough. Rainhill and surrounding areas cannot cope with current traffic levels and if the houses are built with 2 car families this will create further havoc. Rainhill/Eccleston are small villages with infrastructure creaking at the seams, not large towns. Increased traffic also brings increase pollution and the associated health risks . There is also no scope to increase education and health care provisions in Rainhill to meet an increased population. The golf course currently provides a wonderful environment for Wildlife and flora and fauna . Green belt land should stay as green belt for future generations to enjoy.

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

The council should delete this application to remove this from greenbelt . It should not be placed from greenbelt to safeguarded.

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

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

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

Response Date	3/6/2019 9:57:00 PM
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PO3177

Representor Details

Web Reference Number	WF0322
Type of Submission	Web submission
Full Name	Mr Paul Brabin
Organisation	
Address	13 East Close Eccleston Park Prescot Merseyside L34 2RA
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The proposal to remove the 3HS parcel of land from greenbelt is fundamentally unsound for the following reasons:

- 1) The surrounding road network is overloaded at peak times as it is (Portico Lane, Delph Lane, Two Butt Lane, Warrington Road etc). The overloading will be exacerbated by the hundreds of new houses being built on Scotchbarn Lane and Halsnead Garden Village.
- 2) This parcel of green land separates Eccleston Park, Rainhill and Nutgrove. If removed there will be a continuous suburban sprawl.
- 3)The increased traffic will pose a risk to health in terms of air pollution and pedestrian safety. St Helens has a higher average death rate from respiratory disease than England as a whole and Thatto Heath is the second worst affected area in the borough.
- 4) There are no local employment opportunities commensurate with the number of new homes proposed for this land, therefore prospective homebuyers will be working outside the borough and travelling to work probably via the M62 - leading to more pollution, traffic jams and carbon emissions.
- 5)The local secondary schools - Rainhill High, Prescot, and Edmund Arrowsmith are outside walking distance, leading to even more pressure on the roads.

- 6) The area currently supports many species of plants and animals, several of which are protected.
- 7) The current use of the land as a golf club provides a useful and beneficial service to the community both for physical exercise and social interaction. It is well patronised as is Grange Park golf club. There is clearly no oversupply of golf in the area.
- 8) 3HS is a zone 2 and zone 3 flood zone. Building on it will reduce the ability of water to drain away and increase the risk of local flooding.
- 9) There are plenty (enough for 5808 houses) of brownfield sites available in St Helens on which houses should be built first. Given the economic uncertainty of Brexit and the declining population and industry of St Helens it is unclear why there will be a demand for housing justifying building on greenbelt land.
- 10) There are a lack of places locally in doctors, dentists and primary schools which will only be exacerbated by the additional houses proposed.
- 11) 3HS could not be bettered as an example of why the concept of greenbelt land is an extremely valuable principle. Building on it would totally undermine the idea of Greenbelt land.
- 12) The areas around 3HS contain some very pleasant places to live - as I can attest having lived in Eccleston Park for many years - the quality of life here and in Rainhill, Prescott and Whiston will inevitably deteriorate if 3HS is used for housing.

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

The council should not remove this land from greenbelt to place in safeguarded. By keeping it as greenbelt it will be abiding by the National Planning Policy Framework (2019).

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

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

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

Response Date	3/6/2019 8:03:44 PM
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PO3178

Representor Details

Web Reference Number	WF0325
Type of Submission	Web submission
Full Name	Miss Caroline Cassidy
Organisation	N/A
Address	128 Leach Lane St Helens WA9 4PH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 06
Paragraph / diagram / table	Appendix 5,6,7
Policies Map	HS04 Land at Bell Lane
Sustainability Appraisal / Strategic Environmental Assessment	Fragmented build due to multiple ownership
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Basically, the land was set for release (safeguarded). Now, the council have decided not to release it because there are multiple owners & they feel it is too difficult when there are plots with only one owner. That's fine, but when they safeguarded it, they knew about the situation & have done for 12 years. This decision is discriminatory in my opinion. I have worked hard to contact the owners who are all willing to sell their land. A lot of the unsold land belongs to the company who sold it to us in the first place, so it is not in their interests not to sell the land. This land has new builds right up to the perimeter of the land. A residential housing area behind it & other farm houses just past it. So, why it hasn't been released is a mystery. The problem is, a lot of the landowners are in their retirement and in another 15 years, they may not be alive. The land they own, [REDACTED] go to charity or family members. So, when you finally run out of land and want to use it for housing, it will be an even bigger problem than it is now.

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

Firstly, I think that the wording of this plan is so confusing, so having a say on it is difficult. Landowners have been put off filling in these forms, so my comments may not be in the right area or indeed answer your questions. This process should be made simpler than it is. I feel there has been no help from the council for the Bell Lane site. A planning officer assured me he would write to the landowners to try & help matters when I couldn't locate a few of the owners.

That didn't happen. The same officer said the council did not want to put any resources into this site since other (easier) sites were available. A new build in this area I feel would enhance the local area which has been on the decline for years. Small businesses have closed due to not having any passing trade. Houses are all around it. The council have been busy allowing playing fields that have been enjoyed & used for many years to be built upon, clogging up a very small side road with traffic, doing nothing to enhance my area in the slightest. Yet the land we own has been left an eyesore, with overgrown shrubbery blocking anyone's view of the countryside. At some point you are going to need this land, as you simply cannot build in front of it before you release this parcel as you will have already set the precedent for housing. But, the longer it is left, the more trouble you will have getting anyone to sell. I have worked tirelessly over the years contacting the plot owners & we all feel very let down by the council. Safeguarding the land for housing gave us all so much hope as many of us lost our life savings on buying this land from PropertySpy. To confirm, some of the owners have given up on filling these forms in, so I hope that someone, somewhere will reconsider this plot of land and hopefully add it to the local plan.

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

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

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

Response Date	3/6/2019 5:10:12 PM
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PO3179

Representor Details

Web Reference Number	WF0344
Type of Submission	Web submission
Full Name	Mrs Ann Cooper
Organisation	N/A
Address	16 Darvel Ave Garswood WN4 0UA
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

The use of greenfield sites in this area is unnecessary when compared with vacant brownfield sites and available accommodation. The extra traffic would cause unacceptable delays and possible loss of leisure/sports areas. Research shows that sport and activity is vital to the health, education and wellbeing of children. There are not enough services in this area to support these plans.

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

Do not use this site, use brownfield and vacant housing.

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

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

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

Response Date	3/6/2019 11:55:40 AM
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PO3180

Representor Details

Web Reference Number	WF0348
Type of Submission	Web submission
Full Name	Mrs Kathleen McKeon
Organisation	
Address	37 Sandfield Road Eccleston St Helens Merseyside WA105LR
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

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

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

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

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of “Contaminated Land (CL) sites” (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing ‘unsuitable’ sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 6:15:42 PM
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PO3181

Representor Details

Web Reference Number	WF0349
Type of Submission	Web submission
Full Name	Miss Alice McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Local Plan
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of “Contaminated Land (CL) sites” (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing ‘unsuitable’ sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 6:11:32 PM
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PO3182

Representor Details

Web Reference Number	WF0350
Type of Submission	Web submission
Full Name	Mrs Wendy Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 Site 2E2
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

* It is not believed there is sufficient justification for the need for this type of development in terms of position and scale. Although safeguarded until 2035 - the site should remain in the green belt so at the end of the local plan period the need can be re-evaluated.

*Will not help with purpose of green belt to assist urban regeneration by recycling derelict land. Encouraging the use of green belt fails to do this.

*Significant, substantial and permanent harm to the green belt would be caused.

*Currently used for agricultural use and should continue to do so.

*The predicted high volumes of traffic placed on J23 M6 will only add to the already over-capacity of the junction.

*Main water shunting pipe for the region is on site and should not be tampered with.

*Lack of statement of common ground with neighbouring authorities.

*Granted permissions in the greenbelt in respect of Florida Farm North 2EA is just over a mile away and similar developments at 8EA and 5EA are noted, along with proposals and 6EA. Too much of the same in a concentrated area.

7. Please set out modification(s) you consider are necessary

The land should be deleted from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 4:14:33 PM
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PO3183

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0352
Type of Submission	Web submission
Full Name	Mrs Wendy Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 SITE 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

*Lack of sustainability - shortage of local services in relation to school places (many children are schooled in GMR), lack of provision for health care dentists/doctors, making it necessary to travel by car.

*Gb release will cause significant and lasting harm to purpose of gb.

*By using gb as opposed to other brownfield sites it is not encouraging recycling of land.

*Falling population of borough year on year over at least 30 years, proof of population estimates should be provided.

* No common ground statements with neighbouring authorities seen.

*Inadequate highways infrastructure would leave residents footing the bill when this should be down to developer.

*Currently available for food stuff/crop growing and should remain so.

7. Please set out modification(s) you consider are necessary

Delete this land from proposed removal from gb

①
②
①

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 3:52:12 PM
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PO3184

① - LPA05 ② - LPA06, 8HS ③ - IDP ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0362
Type of Submission	Web submission
Full Name	Mr Christopher Farmer
Organisation	
Address	46 Ecclesfield Rd Eccleston St Helens Merseyside WA105NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa.

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014)of 486 houses per year).

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

St Helens has recently become a pilot site for regenerating contaminated brown field land. This was post the local plan being drafted. This surely negate the so called requirement to safeguard any green belt land.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review,

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within the comment section the rationale used to protect other green belt sites have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status.

2

With the many brownfield sites across the borough it is highly likely that other sites are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

1

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens.

Effective

How local infrastructure will support the plan has not been explored or defined.

3

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met.

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

2

As a result, it is to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being.

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry.

8HS offers significant protection and food for wildlife.

Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bears the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

1

7. Please set out modification(s) you consider are necessary

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating existing brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/4/2019 6:05:02 PM

PO3185

① LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0366
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't 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.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 3:50:14 PM
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PO3186

Representor Details

Web Reference Number	WF0372
Type of Submission	Web submission
Full Name	Mrs Irene Johnson
Organisation	
Address	12 Crantock Grove Windle WA10 6EJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Local Plan 2018
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I had to tick some boxes in Section 4 that I don't know about - I had no option to tick "Don't know" so had to make a decision upon which I am not qualified. Also the wording of Question 5 does not make sense. This does not give me confidence in the other material supplied from the Council.

I have lived in Windle [REDACTED] and would like to comment on the proposal to build over 1000 houses on the nearest Green Belt land. The access to the new development (8HS) will be opposite [REDACTED]. Currently it is difficult to exit from my road onto Bleak Hill Road at certain times of the day due to the amount of traffic. There is a Primary School, Bleak Hill, close to this junction and I worry that an accident could happen.

A thousand more houses could result in over 2000 extra cars. The local roads cannot take the strain of these extra cars and it will cause grid-lock, especially at the beginning and end of the school day. The school has recently had permission to increase numbers to 90 per year to accommodate the rising number of children already in the area. Residents are worried that these extra cars will result in accidents and increased traffic, adding 1000 plus more houses will certainly require a new school and there is no available space for another primary school.

The Green Belt land nominated to be removed from Green Belt lies between Windle and, the very busy, East Lancs Road (A580). This road has undergone a £7.6 million investment to speed up traffic from the Liverpool Super ports to the M6. The traffic noise can be heard both night and day and the pollution must be high near to the Windle Island Junction. Building 1000 more houses on this site

will mean that the houses are very close to this noisy and polluted road. This fact appears to have been ignored in the St Helens Council Green Belt Review (2018).

In summary, St Helens Council have not considered the problems when allowing this site to be accepted for safeguarding in the Green Belt Review (2019). Ignoring these potential traffic problems is negligent and 8HS should be retained as Green Belt.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 8:58:57 AM
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PO3187

Representor Details

Web Reference Number	WF0374
Type of Submission	Web submission
Full Name	Mr Denis Holmes
Organisation	
Address	50 Lester Drive WA10 5ES
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the planners are making this decision for the wrong reasons, to safeguard the green belt instead of removing. This could be they know local residents are right but the council like to keep their options open for future development In case the government put pressure on them. So make the right decision -remove from future development. You are aware of the problems this borough has and what this new development could cause.

More pollution, pollution and pollution

Increasesd traffic.

Over populated.

Not enough school places

Not enough doctors - excessive waiting times

Hospitals underpressure

Loss of wild life habitat

Loss of land for growing food

Loss of beautiful outside space.

Clean up the existing parts of this town and redevelop brown sites. This will encourage people to have pride in our town. Over populate and build huge housing estates doesn't solve already existing problems.

Green belt should be kept as it was meant - not too be built on, don't open a can of worms. Show by example, people of St. Helens and the environment comes first.

7. Please set out modification(s) you consider are necessary

I imagine many people in the borough of St. Helens are all saying the same thing, use all brown and contaminated land, make good any unused existing properties and buildings. This will make the town a nicer, cleaner, happier place to live in. Keep our green belt out of any future development, this must be kept for growing food and grazing live stock. We're not a big island, were a beautiful island don't make this the start of a concrete jungle. Not good for for people over all well being.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 7:32:25 PM
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PO3188

Representor Details

Web Reference Number	WF0376
Type of Submission	Web submission
Full Name	Mrs Jane Mingham
Organisation	Home owner
Address	15 Nottingham Close Rainhill Prescot L35 4PQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Eccleston Park Golf Club
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

7. Please set out modification(s) you consider are necessary

Eccleston Park Golf Club (EPGC), has Greenbelt status & should NEVER have been considered for sale to Mulberry Warrington Ltd. I feel that this sale was not made in a transparent way. There was no opportunity for discussion or information given to the local people.

There are a number of species of birds, mammals & flora across the EPGC site, hence its Greenbelt status.

The infra-structure in the area around EPGC, is already stretched to the limit! Rainhill Road is always busy & could never be expected to hold a further 900+ vehicles. This would affect schooling, medical services, public transport, libraries, policing, other emergency services...etc. The chaos any building works would cause would have serious implications for local people-pedestrians-elderly, as well as children, drivers, bus routes etc.

These homes would not be 'affordable' housing for most people. The majority of people are considered to be 'employed poverty' & could never afford a new house.

There are already a lot of housing developments in the area-Scotchbarn Lane has 2-3 new housing sites that are being built, Halsnead is another one & the 2 up off Elton Head Road-one is called

Radley Place. All of these will affect the surrounding roads. Rainhill Road, Elton Head Road, Warrington Road, Portico Lane & Scotchbarn Lane.

EPGC was an asset to the area & local residents. 'Safeguarding' this site is NOT a guarantee of protecting this Greenbelt area & is not good enough!

We do not want our beautiful, green area turned into another busy, urban mess, like many other areas, where concrete replaces the trees & nature. We NEED our green spaces for health reasons - cleaner air & less pollution. These new housing developments will most certainly affect this.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 6:07:39 PM
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PO3189

①-LPA06 ②-GEN

Representor Details

Web Reference Number	WF0377
Type of Submission	Web submission
Full Name	Mrs Karen Holmes
Organisation	
Address	50 Lester Drive, Eccleston WA10 5ES
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This is a considerable amount of new properties which is not needed in this area. I assume the council thinks all this new housing is needed because of an increase in population then why build on the green belt, surely it makes sense to keep these fields for food, it's no good having a nice house but living in a country that cannot feed you due to all the farm land they have built houses on. We will end up having to import more and more, we need to be more self sufficient. We are all concerned about pollution on the environment so let St Helens be the first and keep our green belt that will reduce the impact on the environment. You need to clean up and make new All contaminated sites, making this town more pleasing on the eye.

If you don't live near the east lincs road then you don't know the problems that occurs with all the traffic. By increasing the population it will increase the traffic three fold, so what will your solution be- make the road a motor way with 3 - 4 lanes each side, more impact on the environment. This will have a huge impact on the mental health of the residents who already live here, the open space and fields gives you places to walk and breath and a sense of space. You need to drive around liverpool and see how claustrophobic it is, houses, estates, factories, roads, noise, pollution and people having no sense of space, please don't force this on to the people of St, Helens. Yes we all need a nice house to live in but above that the environment and people's well being needs to be put first. We have a shortage of facilities in this borough, not enough doctors, hospitals, schools, our transport isn't that efficient either. More houses, more people means much more problems.

①

②

7. Please set out modification(s) you consider are necessary

I have already suggested, all existing brown and contaminated sites should be used. Using this method of building new properties should be priority. Lots of run down buildings should be made into homes. Let's put people first not targets. We need lots of open space, come up with new innovative ideas, make St. Helens a nice place to live not a concrete, claustrophobic jungle. Please don't make the same mistake you made with the town centre, encouraging the shops to move on to retail parks, make use of what we already have should be priority. Large housing estates breed problems, you only have one chance to get this right, listen to the people they live here.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I feel so strongly about the town I live in and the people. I want what's best, not something the government says you should be doing. As we know at the moment our government is not capable of governing.

Response Date	3/3/2019 5:09:28 PM
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PO3190

①-LPA05 ②LPA06, 8HS ③-Green Belt Review 2018

Representor Details

Web Reference Number	WF0378
Type of Submission	Web submission
Full Name	Mrs Gemma Scott
Organisation	
Address	17 Calderhurst Drive St. Helens Windle WA10 6DX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am flabbergasted at the utter contempt St Helens Council appears to hold for its residents. Aside from the clear fact that these properties are not to aid the development of low income affordable homes and are clearly placed in order to maximise council tax revenue, the truth is that St Helens does not need so many houses. The growth in the Borough does not justify the extra house building and as such, there are no special circumstances that warrant Green Belt release.

The site of 8HS is not a sustainable parcel of land on which to build over 1000 houses either. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted and already a hazard. The addition of thousands of vehicles is hardly likely to improve this.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered and the results will be to the detriment of air quality, noise, tranquility and general health.

8HS is currently a mixture of Grade 1 and 2 agricultural land and should be protected for this reason as such. The site also has a main river running through it. There is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system. Other Green Belt sites have been discounted for this reason, 8HS has not and St Helens Council have not justified this choice of parcel.

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The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Ecclestone and Windle with employment areas. The council have only just agreed to the reinstatement of some bus routes, hundreds of additional residents are not going to help.

The Local Plan is based on flawed employment forecasts and cannot be supported by historical facts. The latest ONS estimate (2016) suggests that 383 houses per year are to be required and yet the council continues to use the older higher forecast from 2014 of 486 a year in order to justify this nonsense.

The Green Belt Review (2018) appears driven by developer's requests and not by local need. This parcel of land has been accepted for safeguarding for development when it should be maintained as Green Belt for the reasons above.

This plan is neither positively prepared, justifiable, effective nor in compliance with central policy since it does not comply with the NPPF 2018.

Quite simply, it is a dreadful idea to remove the site 8HS from the greenbelt to safeguard it for future development.

7. Please set out modification(s) you consider are necessary

Keep 8HS in the greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 4:53:09 PM
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PO3191

① - LPA05 ② - LPA06, 8HS ③ - Green Belt Review, 2018

Representor Details

Web Reference Number	WF0379
Type of Submission	Web submission
Full Name	Mr Simon Scott
Organisation	
Address	17 Calderhurst Drive St. Helens Windle WA10 6DX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	HA16/8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am flabbergasted at the utter contempt St Helens Council appears to hold for its residents. Aside from the clear fact that these properties are not to aid the development of low income affordable homes and are clearly placed in order to maximise council tax revenue, the truth is that St Helens does not need so many houses. The growth in the Borough does not justify the extra house building and as such, there are no special circumstances that warrant Green Belt release.

The site of 8HS is not a sustainable parcel of land on which to build over 1000 houses either. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted and already a hazard. The addition of thousands of vehicles is hardly likely to improve this.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered and the results will be to the detriment of air quality, noise, tranquility and general health.

8HS is currently a mixture of Grade 1 and 2 agricultural land and should be protected for this reason as such. The site also has a main river running through it. There is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system. Other Green Belt sites have been discounted for this reason, 8HS has not and St Helens Council have not justified this choice of parcel.

①

②

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Ecclestone and Windle with employment areas. The council have only just agreed to the reinstatement of some bus routes, hundreds of additional residents are not going to help.

The Local Plan is based on flawed employment forecasts and cannot be supported by historical facts.

The latest ONS estimate (2016) suggests that 383 houses per year are to be required and yet the council continues to use the older higher forecast from 2014 of 486 a year in order to justify this nonsense.

The Green Belt Review (2018) appears driven by developer's requests and not by local need. This parcel of land has been accepted for safeguarding for development when it should be maintained as Green Belt for the reasons above.

This plan is neither positively prepared, justifiable, effective nor in compliance with central policy since it does not comply with the NPPF 2018.

Quite simply, it is a dreadful idea to remove the site 8HS from the greenbelt to safeguard it for future development.

7. Please set out modification(s) you consider are necessary

Keep 8HS within the greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 4:48:51 PM
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PO3192

Representor Details

Web Reference Number	WF0380
Type of Submission	Web submission
Full Name	mrs rita barrow
Organisation	
Address	94 Kiln Lane Eccleston WA10 4RJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	lpa 05 and lpa06
Paragraph / diagram / table	
Policies Map	8 hs
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

plan is not sustainable in a congested area like this with reducing employment. car dependency will increase. it is not effective use of agricultural land when town centre sites could be used. NPPF(2018) will not be satisfied as there will be traffic growth which cannot be accomodated safely by local roads without expensive improvements. air quality and road safety will be negatively impacted.

7. Please set out modification(s) you consider are necessary

rethink the whole plan in another area which would not encounter the problems i have outlined

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 4:38:40 PM
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PO3193

Representor Details

Web Reference Number	WF0385
Type of Submission	Web submission
Full Name	Mrs Julie Andrew
Organisation	
Address	9 Gunning close Eccleston St Helens WA10 5DP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Ref 8HS

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 11:35:58 AM
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PO3194

① LPA06.8HS

② -LPA06, 8HS

③ - GEN

Representor Details

Web Reference Number	WF0387
Type of Submission	Web submission
Full Name	Miss Abigail Johnson
Organisation	
Address	15 Crantock Grove Windle St Helens WA10 6EJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	resident and their concern?

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am writing this letter to further outline my concerns if the land labelled as 8HS within 'the local plan' continues to be NOT FULLY PROTECTED FROM ALL FUTURE DEVELOPMENTS. The recent change of status to 'safeguarded' is a real positive for my local area, as all of us local residents feel our voices have been listened to.

①

As I write this 2nd letter of concern, to ask that this 8HS land is now TOTALLY REMOVED FROM 'THE LOCAL PLAN' and is now NOT termed or recognised as 'safeguarded FOR future development', this NEEDS TO BE CHANGED TO 'SAFEGUARDED FROM ALL FUTURE DEVELOPMENTS' and left as a price of green belt land, with NO changes made to it all, ever.

②

Since I wrote my previous letter to yourselves, personally I would say that I have experiences an increase in traffic during my daily commute to and from work. During peak times, driving down the East Lancashire Road (A580), now that the Florida Farm land is being developed for warehouses, this has caused a lot more cars to be on these local roads. This is a concern for all of us that use this route, as this will only get worse, especially once June '19 arrives when these warehouses open for business and the staff also need to drive to them and also the customers of these newly created business opportunities.

③

If 1000 new houses will be built on the 8HS land, so close to these new warehouses / employment opportunities, even more people will need to use already busy local roads around the St Helens area

②

to get to them, especially the A570/A580. As most people who will live in these potential new houses to be built on 8HS, will probably commute out of town to places of work, as employment opportunities are quite low at the moment within St Helens, it will just create many gridlocked roads.

As a resident of Windle, close to the 8HS land, I watch every year how this land is regularly farmed and uses as a profit-making opportunity by the farmer. There is wheat and vegetables grown on the land every year and this land is clearly still sustainable and somewhere local produce is being farmed – something which may become a rarity post-Brexit!! This land is never left untouched from year-to-year by the farmer and so it makes no sense at all to remove this greenbelt land from our town for these unnecessary houses.

As a society we are constantly reminded to be environmentally friendly and concerned about our carbon footprint and climate change, I do not know how any further developments of 8HS could possibly be justified? By actively encouraging an extra (potential) 2000 cars to be parked up on this new estate, in this town and for all of the extra environmental damage, noise and air pollution created by them, I am asking you, our town council, to think of the future of our town and its residents. We all want to live in an unpolluted and green town, instead of an urbanised and built-up area with no actual land that has not been concreted over or built on for even more housing estates- with no residents who want to move there and live in them.

General attitudes to this uncertainty for 8HS and the fact it is not totally safeguarded from future development is a real concern for the people of Windle and Eccleston as there are already other future developments to take place within 'the local plan', which will also produce extra traffic and pollution across this town. To add even more of these developments to another area of town just seems future madness in my opinion.

Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

7. Please set out modification(s) you consider are necessary

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2

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Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 10:33:02 AM
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PO3195

① LPA06.8HS

② -LPA06, 8HS

③ - GEN

Representor Details

Web Reference Number	WF0387
Type of Submission	Web submission
Full Name	Miss Abigail Johnson
Organisation	
Address	15 Crantock Grove Windle St Helens WA10 6EJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	resident and their concern?

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am writing this letter to further outline my concerns if the land labelled as 8HS within 'the local plan' continues to be NOT FULLY PROTECTED FROM ALL FUTURE DEVELOPMENTS. The recent change of status to 'safeguarded' is a real positive for my local area, as all of us local residents feel our voices have been listened to.

①

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②

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③

If 1000 new houses will be built on the 8HS land, so close to these new warehouses / employment opportunities, even more people will need to use already busy local roads around the St Helens area

②

to get to them, especially the A570/A580. As most people who will live in these potential new houses to be built on 8HS, will probably commute out of town to places of work, as employment opportunities are quite low at the moment within St Helens, it will just create many gridlocked roads.

As a resident of Windle, close to the 8HS land, I watch every year how this land is regularly farmed and uses as a profit-making opportunity by the farmer. There is wheat and vegetables grown on the land every year and this land is clearly still sustainable and somewhere local produce is being farmed – something which may become a rarity post-Brexit!! This land is never left untouched from year-to-year by the farmer and so it makes no sense at all to remove this greenbelt land from our town for these unnecessary houses.

As a society we are constantly reminded to be environmentally friendly and concerned about our carbon footprint and climate change, I do not know how any further developments of 8HS could possibly be justified? By actively encouraging an extra (potential) 2000 cars to be parked up on this new estate, in this town and for all of the extra environmental damage, noise and air pollution created by them, I am asking you, our town council, to think of the future of our town and its residents. We all want to live in an unpolluted and green town, instead of an urbanised and built-up area with no actual land that has not been concreted over or built on for even more housing estates- with no residents who want to move there and live in them.

General attitudes to this uncertainty for 8HS and the fact it is not totally safeguarded from future development is a real concern for the people of Windle and Eccleston as there are already other future developments to take place within 'the local plan', which will also produce extra traffic and pollution across this town. To add even more of these developments to another area of town just seems future madness in my opinion.

Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

7. Please set out modification(s) you consider are necessary

I am writing this letter to further outline my concerns if the land labelled as 8HS within 'the local plan' continues to be NOT FULLY PROTECTED FROM ALL FUTURE DEVELOPMENTS. The recent change of status to 'safeguarded' is a real positive for my local area, as all of us local residents feel our voices have been listened to.

As I write this 2nd letter of concern, to ask that this 8HS land is now TOTALLY REMOVED FROM 'THE LOCAL PLAN' and is now NOT termed or recognised as 'safeguarded FOR future development', this NEEDS TO BE CHANGED TO 'SAFEGUARDED FROM ALL FUTURE DEVELOPMENTS' and left as a price of green belt land, with NO changes made to it all, ever.

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If 1000 new houses will be built on the 8HS land, so close to these new warehouses / employment opportunities, even more people will need to use already busy local roads around the St Helens area to get to them, especially the A570/A580. As most people who will live in these potential new houses to be built on 8HS, will probably commute out of town to places of work, as employment opportunities are quite low at the moment within St Helens, it will just create many gridlocked roads.

As a resident of Windle, close to the 8HS land, I watch every year how this land is regularly farmed and uses as a profit-making opportunity by the farmer. There is wheat and vegetables grown on the

2

land every year and this land is clearly still sustainable and somewhere local produce is being farmed – something which may become a rarity post-Brexit!! This land is never left untouched from year-to-year by the farmer and so it makes no sense at all to remove this greenbelt land from our town for these unnecessary houses.

As a society we are constantly reminded to be environmentally friendly and concerned about our carbon footprint and climate change, I do not know how any further developments of 8HS could possibly be justified? By actively encouraging an extra (potential) 2000 cars to be parked up on this new estate, in this town and for all of the extra environmental damage, noise and air pollution created by them, I am asking you, our town council, to think of the future of our town and its residents. We all want to live in an unpolluted and green town, instead of an urbanised and built-up area with no actual land that has not been concreted over or built on for even more housing estates- with no residents who want to move there and live in them.

General attitudes to this uncertainty for 8HS and the fact it is not totally safeguarded from future development is a real concern for the people of Windle and Eccleston as there are already other future developments to take place within 'the local plan', which will also produce extra traffic and pollution across this town. To add even more of these developments to another area of town just seems future madness in my opinion.

Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 10:33:02 AM
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PO3196

Representor Details

Web Reference Number	WF0391
Type of Submission	Web submission
Full Name	Mrs Beryl Preston
Organisation	
Address	1 Lynton Way, Windle, st helens Wa106eq
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There is lots of previously developed/brownfield land available in our borough...much more than the amount of Greenbelt planned for release which the council have failed to mention in the local plan. Neighbouring Councils have developed contaminated land successfully recently. Road networks would struggle to cope with the extra traffic and the area around 8hs is already an accident black spot. The council are working on 2014 predictions for growth when 2016 predictions are available. The plan is not effective

7. Please set out modification(s) you consider are necessary

Brownfield land, previously developed and contaminated land should be remediated as in previous large developments in our borough before and release of grade1&2 agricultural Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/2/2019 4:42:54 PM
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PO3197

Representor Details

Web Reference Number	WF0401
Type of Submission	Web submission
Full Name	Mrs dorothy heron
Organisation	Mrs
Address	7 St. James Road Rainhill L35 0PB
Agent Details	dorothy heron

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	LPA06
Sustainability Appraisal / Strategic Environmental Assessment	3HS
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

T

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 4:43:56 PM
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PO3198

Representor Details

Web Reference Number	WF0403
Type of Submission	Web submission
Full Name	Mr Anthony Simpson
Organisation	
Address	Brookfield Cottage 5 Houghtons Lane Eccleston St Helens WA10 5QF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	St Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Clearly out of date traffic data has been used to support this proposal. The "rat run" that Houghtons Lane has become has already claimed at least one fatality and other serious injuries in 2 major accidents that have happen on that stretch of A580 and Houghtons Lane. The traffic situation due to Windle Island road works have caused this "bottle neck" to happen imagine increasing the number of vehicles using Houghtons Lane by at least double again! All this before we even get to environmental impact.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 4:25:21 PM
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PO3199

Representor Details

Web Reference Number	WF0414
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan Lancs WN4 0SE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Safeguarded land to the north of Billinge Road Policy LPA06 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't 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.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 3:14:42 PM
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PO3200

Representor Details

Web Reference Number	WF0415
Type of Submission	Web submission
Full Name	Mr William Glynn Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this. The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities. The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers. There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:28:33 PM
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PO3201

Representor Details

Web Reference Number	WF0416
Type of Submission	Web submission
Full Name	Mrs Jessie Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:21:38 PM
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PO3202

Representor Details

Web Reference Number	WF0417
Type of Submission	Web submission
Full Name	Master Hayden O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the list of land proposed to be removed from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:12:03 PM
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PO3203

Representor Details

Web Reference Number	WF0418
Type of Submission	Web submission
Full Name	Miss Rebecca O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this. The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities. The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers. There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the list of proposed land to be removed from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:09:07 PM
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PO3204

Representor Details

Web Reference Number	WF0419
Type of Submission	Web submission
Full Name	Mr Andrew O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this. The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities. The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers. There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:06:30 PM
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PO3205

Representor Details

Web Reference Number	WF0420
Type of Submission	Web submission
Full Name	Mrs Sarah O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses? One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 2:03:02 PM
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PO3206

Representor Details

Web Reference Number	WF0421
Type of Submission	Web submission
Full Name	Miss Kathryn Coburn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Development of 8HS and 3HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe that the Local Plan does satisfy the requirement for sustainable development and the criteria for sustainable transport. This area has significant long term problems at Windle island and bleak hill road. The plan promotes unsustainable traffic growth causing severe issues which will not satisfy the NPPF (2016) The increase in traffic proposed in the plan will have a significant impact on air quality, noise and general health. The IDP does not explain the impact on healthcare or education - the current situation is either missing or vague. There is no discussion on any collaboration with hospital trusts, local CCG's or education authorities.

The Housing needs assessment does not use standard methodology and no case for exceptional circumstances is made. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The council are using an older forecast of 486 from 2014.

7. Please set out modification(s) you consider are necessary

This plan does not satisfy the requirement for sustainable development or the criteria for sustainable transport as it promotes increased car dependency.

It does not satisfy the requirement for sustainable housing as it is based on aspirational growth predictions.

The plan should explore effective land use and look at options for town centre development rather than focus on the green spaces. The council is obliged to consider all reasonable alternatives. The council considers the clean up of contaminated areas as too costly. However no exploration of the degrees of contamination in different areas is made.

The IDP needs to elaborate on how hospitals need to grow in order to provide safe service for the increased demands. It also should indicate how they are to improve highway infrastructure to ensure gridlock does not prevent access to the hospitals. The IDP needs to also indicate what the local plan impact will be on the long term educational needs of the new and existing communities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 12:49:07 PM
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PO3207

Representor Details

Web Reference Number	WF0428
Type of Submission	Web submission
Full Name	Miss Rebecca O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

"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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows.

High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities."

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 12:00:30 PM
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PO3208

Representor Details

Web Reference Number	WF0429
Type of Submission	Web submission
Full Name	Mr Hayden O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

"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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows.

High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities."

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 11:55:20 AM
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PO3209

Representor Details

Web Reference Number	WF0431
Type of Submission	Web submission
Full Name	Mr Glynn Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 10:41:39 AM
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PO3210

Representor Details

Web Reference Number	WF0432
Type of Submission	Web submission
Full Name	Mrs Jessie Williams
Organisation	NA
Address	166 Victoria Rd Garswood wn4 0uh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 10:35:23 AM
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PO3211

Representor Details

Web Reference Number	WF0433
Type of Submission	Web submission
Full Name	Mr Andrew O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 10:29:52 AM
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PO3212

Representor Details

Web Reference Number	WF0434
Type of Submission	Web submission
Full Name	Mrs Sarah O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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 Safeguarded until after 2035 & 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.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 10:21:38 AM
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PO3213

Representor Details

Web Reference Number	WF0436
Type of Submission	Web submission
Full Name	Ms Sarah Byrne
Organisation	N/A
Address	9 Amanda Road, Rainhill L35 8PN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

① ② ③ ④ ⑤

3. To which part of the Local Plan does this representation relate?

Policy	LPA01, LPA02, LPA05, LPA06, LDP01
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am unable to comment if the Local Plan is legally compliant as I am not legally trained. I would have selected 'Don't Know' if that was available. However, I do believe that the plan is contradictory throughout - please see below.

① — LPA01 and LPA02: — ②

Points 2 and 4 of this Policy refer to the development providing necessary infrastructure and services, and that the development will be sustainable or made to be sustainable. Infrastructure and services such as doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. Additionally, the ageing population of Rainhill does not correlate with the proposed need for more housing to be built; care homes and local authority are services are already at maximum capacity, hence the rise in council tax to accommodate this.

Point 8 of this Policy refers to the quality of life, health and well-being for residents. I disagree with this point. As stated above, doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. I believe the development will add to an already strained NHS, and in the long term will impact the physical and mental health of residents, in addition to the staff having to provide these services.

Further, I believe that additional traffic that will result from the potential development is a danger to residents (particularly children and the elderly, the latter being a large part of the Rainhill demographic). 'A' and 'B' roads such as Warrington Road, Rainhill Road and Portico Lane are already frequently jammed, especially Monday to Friday 15:00-18:30. As a result, this adversely affects minor 'B' and 'C' roads such as View Road, Two Butt Lane and Longton Lane. Warrington Road in particular also already services the Liverpool City Regional Plan. Warrington Road, Rainhill Road, and Portico Lane have been confirmed by the council as being already at maximum capacity for traffic. Building more houses will only add to this problem.

Most households have an average of two cars; I believe that further developments will double the already heavy traffic within Rainhill, in addition to impacting the quality of the environment – how will this reduce the impact on climate change, carbon emissions and promote healthy communities as also set out in LPA01? How is the proposal for more development in line with wider government climate change and healthy lifestyle priorities?

③ LPA05 and LPA06: — ④

Number of houses proposed is too great in these sections – I do not believe that the level of development is sustainable, and would have detrimental effects on the environment, quality of life, traffic and pollution levels, and public services. St Helens area, particularly Thatto Heath, is the second highest effected by respiratory disease, St Helens having an average of 51.9 deaths per 100,000 in under age 75 in comparison for the North West (which stands at 44.3). How will an increase in traffic and destroying greenbelt land reduce this figure? I believe developments may encourage existing residents to move from the area. I am currently entertaining this idea; one of the main reasons I moved to Rainhill was because of its natural space and smaller community. I did not move from an urban area to live in another urban area.

How is urban sprawl being controlled if the parcel of 3HS is released for development? The whole idea of having a greenbelt is to ensure neighbouring boroughs do not merge, to safeguard protected flora and fauna species (of which St Helens boasts 13 protected species), and control flooding/water flow which will be adversely affected if this land is built on. 3HS is a confirmed zone two and three flood zone with a high water table. How will this land be able to control and drain flooding if it is built on? Will the council be responsible for damage to properties as a result of this potential flooding if they fail to consider this confirmation? Will the council accept responsibility for the reduction or demise of the at least 13 protected flora and fauna species on this land? Greenbelt land is greenbelt for good reason and is meant to be sustained for a variety of reasons, not sold when the price is right.

Objections submitted at stage one of the local plan by Sport England in relation Eccleston Park Golf Club losing status as a recreational space and golf club remains unanswered by St Helen's Council. Any objection from a statutory consultee must be resolved – why is this still outstanding and when will it be addressed?

Additionally, although competition between developers has been suggested, I do not believe that the developments will be affordable. I believe that these houses will be retailed at maximum prices, thus resulting in slow if no uptake. Slow uptake of the recent developments at Badgers Close in Rainhill strongly suggest this. Growth of employment opportunities does not necessarily mean growth of income. Proposed employment industrial/storage/warehousing sites often employ those on minimum wages or just over. [REDACTED]

[REDACTED] Additionally, table 4.6 in LPA06 shows the need for 7245 houses; 1437 additional houses using 57 hectares of land is required, not 288 as claimed in table 4.5.

LDP01: — ⑤

I believe the level of proposed development is a direct contradiction to points 1 (ii, iii, iv, v and viii) and 2 (iii).

7. Please set out modification(s) you consider are necessary

In line with the National Planning Policy Framework for 2019, this land should not be listed as land for proposed removal from the greenbelt, and should therefore be deleted from this list. Further, this land should not be removed from the greenbelt for development, and also should not be re-listed/re-categorised as 'safeguarded'.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/27/2019 3:16:23 PM
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PO3214

Representor Details

Web Reference Number	WF0437
Type of Submission	Web submission
Full Name	Mr Nigel Brocklehurst
Organisation	
Address	134 Bleak Hill Road, Windle, St. Helens. WA10 6DN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Release of Green Belt land
Paragraph / diagram / table	Site ref. 8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Ref. the St. Helens Local Plan Submission Draft (2020-2035)

and specifically the Green Belt land known as 8HS (Site ref. GBP_098)

The Local Plan has re-classified the 8HS site as "safeguarded" in order to meet potential housing needs beyond the Plan period, currently 2035. This is totally unjustified.

In order to make a change to the Green Belt boundary the Local Plan has to detail any 'exceptional circumstances' (National Planning Policy Framework (NPPF) para 83). Housing (or employment land need) can be an exceptional circumstance to justify a review of the Green Belt boundary. Where is the Council's evidence that there are 'exceptional circumstances'?

Population:-

In the "Population Bulletin" dated December 2018 the St. Helens Council quotes population forecasts in line with the latest published data from the Office for National Statistics (ONS):-

Current population	179,331	
Population by 2025	182,900	increase of 3,569
Population by 2041	187,300	increase of 7,969

Using the same ONS data the forecast for the period covered by the Local Plan up to 2035 is 185,742, an increase of 6,411.

Housing:-

To calculate housing needs, guidance was given to the Council to ignore the above Office for National Statistics data from 2016 and instead to use data from 2014. Why should out-of-date data have been used when more recent, and more realistic, published forecasts were available? The result is that an unreal population growth figure has been used as the unsound starting point for calculating the housing need.

Historically occupancy per dwelling has been around 2.2 people per dwelling. A simple projection based on population growth alone would therefore indicate a housing need of 2,962 by 2035. This averages out at 174 houses per year. The Local Plan, using out-of-date population forecast data and factoring in unsubstantiated economic growth aspirations, states that the housing need is 486 per annum. The difference cannot be justified and the methodology is unsound.

Urban regeneration:-

In assessing the reclassification and release of Green Belt land, there are five "Purposes" specified by the National Planning Policy Framework (NPPF) which have to be considered. Green Belt Purpose 5 should be observed by the Council - "to assist in urban regeneration by encouraging the recycling of derelict and other urban land". The Council emphasises that urban regeneration and town centre rejuvenation are two of its biggest priority strategies. The "Contaminated Land (CL) sites (2015)" indicates that 3,170 ha of the lowest priority contaminated land exists in St. Helens. In the Local Plan all the Green Belt sites which are to be reclassified as 'safeguarded land sites' represent less than 7% of the 3,170 ha available if it were to be remediated. The Council is not honouring its commitment to urban regeneration and not maximising the opportunities offered by existing brownfield sites.

Traffic:-

The existing road network around the 8HS site would not be able to cope with the additional traffic resulting from any housing development on the site. In the absence of public transport, the increase in traffic would be approximately 900 vehicles for people travelling daily to work (estimated from 2011 Census data) in addition to the daily flow of vehicles for shopping, school runs, businesses, deliveries, tradesmen, leisure and visitors. The suggestion of introducing another major intersection on the A580 East Lancs Road at the end of Houghtons Lane would create a bottleneck for traffic flowing along the A580 and create another potential accident blackspot. Feeder roads back from the site towards St. Helens town centre which are already congested would be overloaded and cause yet more pollution.

Conclusion:-

In consideration of all the above factors, I must ask you to record my objection to the Local Plan proposal to release Green Belt land, specifically site ref. 8HS. Green Belt land cannot justifiably be reclassified as 'safeguarded'. It must not be allowed to go ahead. The basis is unsound.

7. Please set out modification(s) you consider are necessary

Brownfield sites must be cleared and made available for redevelopment, before any Green Belt land is reclassified. The Council needs to honour its strategy for urban regeneration.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/27/2019 1:23:21 PM
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PO3215

Representor Details

Web Reference Number	WF0438
Type of Submission	Web submission
Full Name	Mr David Wainwright
Organisation	
Address	54 Windlebrook Crescent Windle St. Helen's Merseyside WA106DY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	This
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I see no reason or justification for building on Green Belt land. Where is the demand for these homes seems to me we have empty houses all over the borough both new and old. How can it be effective when Windle has no doctor no dentist and schools that are already full to capacity. The A580 is already busy and is going to get worse without additional traffic from new homes. Windle island is a total mess even with the ongoing improvements it will only get worse. Bleak Hill Road, Calderhurst Drive, are dreadful at school times, what will they be like with the massive increase of children and traffic.

National Policy must see an increase in food growth for an increase in population. Building these new homes on Agricultural land is not a long term solution, it's a short term disaster.

7. Please set out modification(s) you consider are necessary

Simply scrap the development and concentrate on brown fill sites. Also let's look at the number of houses standing empty and get them up to living standard for all different age groups and earnings.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/26/2019 10:16:29 PM
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PO3216

Representor Details

Web Reference Number	WF0440
Type of Submission	Web submission
Full Name	MS CHRISTINE GORMAN
Organisation	
Address	16 MOSS LANE WINDLE ST.HELENS WA11 7QD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It fails to recognise the green belt. It fails to recognise the need to use brown field sites. It fails to recognise the additional pollution caused by this development. It fails to recognise the additional strain on already stretched services of utilities, transport, traffic, GP surgeries, schools, and pollution controls. It fails everyone.

7. Please set out modification(s) you consider are necessary

Stop building on green belt. Stop polluting an already over populated and polluted area. Use the numerous brown field sites which are crying out for re-development. Once the green belt is gone it is gone forever. We need our agricultural land for agriculture and well being. We don't need more pollution from noise, and emissions. Stop it now.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

PO3217

Representor Details

Web Reference Number	WF0441
Type of Submission	Web submission
Full Name	Mrs. SHEILA DEVENISH
Organisation	LOCAL RESIDENT
Address	40 CALDERHURST DRIVE WINDLE ST. HELENS WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan is UNSOUND .for the following reasons:

1. It is based upon flawed information and aspirational housing needs. The Council's predicted housing need was based upon a forecast made in 2014 for a minimum of 486 houses per year. The ONS prediction now (in 2016) is for a need for 383 houses per year.
2. It is not deliverable. The access for the additional vehicles associated with a capacity for 1027 dwellings cannot be accommodated by the existing roads, particularly Houghtons Lane, Lynton Way, Calderhurst Drive and the A580.
3. It does not comply with NPPF2018 because the adverse effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Abandon the "safeguarded" status of the area and revert to the protected status of Green Belt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/25/2019 4:49:13 PM
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PO3218

Representor Details

Web Reference Number	WF0442
Type of Submission	Web submission
Full Name	Mr. Michael Devenish
Organisation	Local Resident
Address	40 Calderhurst Drive Windle St. Helens WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan in respect of Area 8HS is UNSOUND for the following reasons:

1. It is based upon flawed methodology and aspirational housing needs. The predicted need for 486 houses per year was based upon a forecast made in 2014; the latest (2016) ONS prediction is for 383 houses per year.
2. It is not DELIVERABLE. The access for the additional vehicles associated with a capacity for 1027 dwellings could not be accommodated by the existing infrastructure, particularly Houghtons Lane, Calderhurst Drive and the A580.
3. It does not comply with NPPF2018 because the effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Leave area 8HS as part of the Green Belt - not "Safeguarded for Future Development".

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/25/2019 3:38:19 PM
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PO3219

Representor Details

Web Reference Number	WF0449
Type of Submission	Web submission
Full Name	Mrs Carmel Farmer
Organisation	
Address	46 Ecclesfield Rd, Eccleston, St Helens, Merseyside WA105NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa. 01

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014)of 486 houses per year). 02

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review, within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status. 03

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens. 04

Effective

How local infrastructure will support the plan has not been explored or defined.

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met. 05

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

As a result, it as to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being. 06

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry. 07

8HS offers significant protection and food for wildlife. 03

Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bares the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

7. Please set out modification(s) you consider are necessary

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 6:36:43 PM
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PO3220

Representor Details

Web Reference Number	WF0450
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared. 01

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective. 02

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

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Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites. NB I submitted this form on 22nd Feb, but did not receive an automated reply so have re-submitted, in case the first one was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:59:21 AM
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PO3221

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0451
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

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①

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③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

①

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

③

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:52:37 AM
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PO3222

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0452
Type of Submission	Web submission
Full Name	Mrs William Clarey
Organisation	Private householder
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

2

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1

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3

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

4

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

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1

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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3

The Plan is not effective.

7. Please set out modification(s) you consider are 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?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:46:41 AM
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PO3223

① -LPA05 ② -LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0453
Type of Submission	Web submission
Full Name	Mrs Helen Clarey
Organisation	Private Householder
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

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②

①

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

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①

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③

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④

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It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

②

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The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

③

7. Please set out modification(s) you consider are 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?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:41:44 AM
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PO3224

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0455
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HB
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't 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.

①

②

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

PO3225

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0460
Type of Submission	Web submission
Full Name	Mr Micheal John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - 1HB.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not Justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of lack of schools, 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.

①

②

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

PO3226

① - LPA05 ② LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0462
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

①

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

①

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

②

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

③

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather rejuvenating brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/22/2019 9:08:16 AM
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PO3227

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0463
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston ST. HELENS Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. (4)

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. (1)

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. (3)

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

2/22/2019 8:48:05 AM

PO3228

Representor Details

Web Reference Number	WF0469
Type of Submission	Web submission
Full Name	Mr John Harris
Organisation	
Address	34 Crantock Grove, Windle WA10 6EJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Development and greenbelt de classification of sites 8HS and 3HS

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan falls short of efficient use of existing and lesser contaminated brownfield sites before use of greenfield sites.

The plan also puts significant strain on local resources such as schools, dentists, doctors surgeries etc.

Finally the existing road infrastructure is already significantly strained without considering the additional traffic that development could introduce.

7. Please set out modification(s) you consider are necessary

You must consider de-contamination of brownfield sites for development before the permanent removal and destruction of greenbelt land.

You must consider building new schools especially primary schools alongside any development in the Eccleston/ Windle area as the existing primary schools are already struggling.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/20/2019 10:34:09 PM
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PO3229

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0471
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN40RR
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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.

One of the purposes of the Greenbelt is to assist urban regeneration by encouraging the recycling of derelict land and other urban land. Using Greenbelt fails to encourage this.

Housing in this area isn't sustainable because of the lack of school places, doctor's and dentist's surgeries, bus routes and other services. The use of cars on already overcrowded roads is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

①

②

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/20/2019 3:48:21 PM
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PO3230

① - LPA05

② - LPA06

③ - GEN

Representor Details

Web Reference Number	WF0474
Type of Submission	Web submission
Full Name	The Hon Edward Mercer
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Monday 18 February 2019

Local Plan Preferred Options Consultation

St.Helens Council,

Town Hall,

Victoria Square,

ST HELENS

WA10 1HP

Dear St Helens Council.

Re: Local Plan Preferred Options Consultation

Whiston Hospital is bursting at the seams. Just a couple of weeks ago they made an appeal for people to stay away from A&E unless they have a dire emergency. Meanwhile GP's surgeries are struggling to cope and the pharmacies where we were urged to go for medical advice are under threat of closure.

Dental practices are not a whole lot better with many reluctant to take on new NHS patients.

As many parents know places in local schools are increasingly difficult to obtain forcing pupils to travel. Given the congestion on our roads travelling even a few miles can be a long commute.

③

So here we are with your plans to build thousands of homes on our beautiful green belt land and n'er a word about infrastructure. While plans announced so far are specific on the number of houses they are rather vague on the details of schools and healthcare facilities.

Joined up thinking it isn't.

I'm no expert but would it not be a good idea to start with a plan of the infrastructure before they start throwing up hundreds of new houses or is that too logical? Are we going to wait until the roads are gridlocked and schools are using Portakabins for classrooms?

We already have the sick sleeping in hospital corridors and ambulances unable to offload patients for lack of beds. St Helens Council have had a vendetta about Eccleston for many years and seem to be hell-bent on closing every facility they can get away with. So what's going on?

How can they plan cut-backs and closures at the same time they are planning thousands of additional houses? It makes no sense whatsoever.

The only logic to be deduced from this is that projects generating profit will be acted upon with great alacrity while those requiring expenditure will be ignored, avoided and denied until the chaos becomes overwhelming. It's a self-perpetuated crisis.

We are not fools. That proportion of the East Lancashire Road close to Windle Island has nose to tail traffic from about 4pm every evening. New residents will love the petrol fumes and all access roads being blocked.

I don't know what image these developments are supposed to project but I'm guessing it isn't overcrowded schools, gridlocked roads and an overnight stay in a hospital corridor.

The recent turn out by Eccleston and Windle residents just goes to show the strength of feeling here. People are angry as the bigger developments will have an even more detrimental effect on our village. The consultation is very clear on the plans for very large numbers of new homes but very sketchy on what kind of infrastructure would be needed to support them. It is blatantly obvious our infrastructure simply cannot cope with these plans. We have no idea for example of how our roads will cope, no idea about how our health services will cope and we don't know how our schools can handle hundreds of extra pupils. If we lose our Greenbelt, it will change our village forever and I am not about to sit back and let that happen without a fight.

Eccleston has always been a highly sought after semi rural village due to its attractiveness and village feel but if all the homes you intend to build here go ahead then it would totally change the village and it would become a massive and unattractive urban sprawl. What makes you think so many

houses need to be build? The figures you have arrived at are pure fantasy based on completely

inaccurate projections and nothing more. What makes you think so many people will be rushing to

move to all these new houses when your town centre has totally failed in its objectives. New home buyers want to live close to towns with a great choice of wonderful shops and amenities like in

Warrington or Wigan. There have been so many new developments in Eccleston over the last 25

years including Longmeadow, The Cloisters, Eccleston Woods, Pikes Bridge Fold, Millers Fold, Percival Way, St Thomas Close, The Spires, Eccleston Grange, need I go on? We have had far too

much development causing roads to be congested, amenities put under great strain already. Our

only surgery being in a port-a-cabin in the church hall car park, a chemist under a threat of closure and the promised new one hasn't even been built yet at Eccleston Grange, we have two village

schools who would not cope with many more hundred extra pupils, we have one tiny village hall with an unusable church hall. There is so much more brownfield sites across the borough which you

have never bothered to look into the possibility of building here.

Can you really see thousands of vehicles going to and from home to work or school once, twice or

many more times a day through residential estates, past schools and along our country lanes? I do

not. You will not be able to make it safer as how are you going to widen roads when so many houses

are in the way? Obviously you have not seen the traffic jams along Gillars Lane and it's junction with Burrows Lane, the huge volume of traffic along Rainford Road towards Windle Island, down Bleak Hill Road to its junction with Rainford Road at peak times and this is now before any more

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2

1

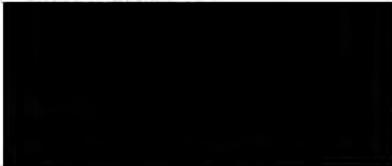
2

developments are made. Open your eyes and just see how our infrastructure here is and imagine how much worse it would be with the development you propose.

To hear that developers want to destroy the green belt land here is almost beyond belief. There is so much other open land in the borough that isn't green belt, so you should be building on that first and not using the greenbelt just because it's easier or better for you or because they will generate you more profit as they will be in some of the most desirable locations in the borough and you won't need to do anything to detoxify the land.

I totally accept we do need to build more homes in England, but this can be done in a way that preserves our green belts for future generations and prevents urban sprawl. There are alternative ways to build more homes, such as prioritising brownfield development. You have not done this. You have also totally failed to take into account any of the infrastructure issues.

Yours sincerely,
Edward Mercer



7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/18/2019 7:12:26 PM
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PO3231

① - LPA06 ② - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0475
Type of Submission	Web submission
Full Name	Dr Hannah Denno
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Green belt land in Windle
Paragraph / diagram / table	Site 8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the estimated housing need is too high, and that the figures are based on incorrect assumptions, there are therefore no exceptional circumstances to justify use of Green Belt Land. Other local options have not been sufficiently explored such as the use of previously developed land nearer the town centre. This land needs to be reclaimed and used for housing this would enhance the appearance of the town centre in a more sustainable way that did not need new infrastructure. This is an area with ecologically diverse habitats which is used for recreation and leisure. The Council have failed to cop-operate with other councils and have not published any statement(s) of common ground.

①

②

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

PO3232

Representor Details

Web Reference Number	WF0476
Type of Submission	Web submission
Full Name	Mrs Lynn Balmer
Organisation	
Address	59 SANDHURST ROAD RAINHILL L358NF
Agent Details	Mrs Lynn Balmer 59 Sandhurst Road, L35 8NF

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

As a parent, I am concerned by tge amount of extra traffic building these houses on Eccleston Park Golf Club will create. Parking in Rainhill is already inadequate and traffic is extremely busy. Drs and schools are already at stretching point, with it taking weeks to get a drs appointment, which will get worse with so many more people moving in, putting strain on Whiston Hospital. There will also be no greenland around locally for families to enjoy nature.

7. Please set out modification(s) you consider are necessary

The community of Rainhill has not been approached by the council for their opinions as the majority are against this development.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/17/2019 9:36:03 AM
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PO3233

①-LPA04 ②-LPA05 ③-LPA06 ④-IDP ⑤-Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0478
Type of Submission	Web submission
Full Name	Mrs Susan Barton
Organisation	
Address	19 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared. ①

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. ②

This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. ④

The Plan is not effective. ③

The Plan does not comply with NPPF(2018) as it was written prior to it's publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also planning to over supply housing which cannot be sustainable in this area of the North West.

187

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7. Please set out modification(s) you consider are necessary

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/16/2019 2:35:45 PM
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PO3234

Representor Details

Web Reference Number	WF0483
Type of Submission	Web submission
Full Name	Dr Charles Earnshaw
Organisation	
Address	49 Laurel Drive Eccleston WA10 5JB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The population of St Helens has fallen over the last decade. There is no need to remove further land from the Green Belt prior to 2035: a concerted effort should be made to build on the extensive Brown Field land within the Borough. Only once the subsequent 15 years are well underway should the consideration of removing land from the Green Belt be revisited. To destroy animal habitats, increase noise and fuel pollution, and to put further strain on our already strained public services is simply causing unnecessary harm to a local area that has no immediate requirement for further housing.

7. Please set out modification(s) you consider are necessary

There should be a concerted effort to change the strategy behind developing the local plan: for a town to thrive, a town centre that the residents are proud of must exist. Therefore, the local plan must focus on developing the many Brown Field sites that exist within St Helens into sustainable apartments and housing, which will go a significant way towards rejuvenating the town centre. With more people, businesses will follow. This will trigger a positive cycle whereby more people want to live in the centre, and more businesses will want to capitalise on these new residents. The increased tax revenue from the businesses and residents, and most importantly the new pride in the town centre, means this is a much more appropriate and worthwhile way to direct the local plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/4/2019 9:49:47 PM
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PO3235

Representor Details

Web Reference Number	WF0484
Type of Submission	Web submission
Full Name	Mr Sean Lally
Organisation	Pilkington / NSG Group
Address	23 Ecclesfield Road Eccleston St Helens WA10 5NE WA10 5NE
Agent Details	Sean Lally

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	8HS
Habitats Regulation Assessment	8HS
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is my view that the plan does not adhere to the below obtained from central government, as it is well known and common knowledge of the amount of Brownfield available and will becoming available in the borough. Therefore there seems to be no sound reason as to why 8HS cannot be retained as Green Belt for the community and tomorrows youth, and the agriculture; also given the enormous lack of surrounding infrastructure in this area (which is already at bursting point in part due to already building many houses) it seems entirely inappropriate to consider building. To also add, migration is forecast to drop significantly following Brexit.

The NPPF 2018 thus reiterates Government policy and encourages the use of brownfield land in almost the same terms as the draft revised NPPF. On protecting the Green Belt, it urges LPAs to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries and sets out the conditions that must be fulfilled for "exceptional circumstances" to exist, to justify such changes.

The Housing White Paper, published in February 2017, reiterated the Government's commitment to the Green Belt. It also emphasised that authorities should amend Green Belt boundaries only when

they could demonstrate that they had examined fully all other reasonable options for meeting their identified development requirements.

7. Please set out modification(s) you consider are necessary

It is my belief that we should be looking to fully exhaust opportunities closer to the town centre, so that regeneration can continue. I am fully behind the council in wishing to support the town centre vision. Footfall is incredibly important and housing closer to amenities and services promotes the use of those amenities and services. The opposite is also true, building on the peripheral (outskirts) encourages shopping etc away from St Helens and into surrounding (competing) towns and cities. I would like to see 8HS retained as Green Belt for the above reasons (part 6 & 7), [REDACTED]

[REDACTED]

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I can participate if required. If not required to then I am fine not to do so

Response Date	1/30/2019 1:01:22 PM
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PO3236

Representor Details

Web Reference Number	WF0489
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	
Address	8 Mallard Gardens, St Helens, Merseyside WA9 5BL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPC01, LPC02, LPC05, LPD03
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The area is subject to flooding and the underground drains only just cope with the heavy rain due to previous low lying land and 3 x ponds that were previously in situ around Broadlands and the three closes including Mallard.

There are too many houses being built in the area and insufficient roads to be able to cope with the additional traffic. This will cause heavier use of the roads. At present it can take 20 minutes to get out of our close at present and this is before the end of Elton Head Road is opened up to all the new houses there.

The road and drainage will not be able to sustain more houses plus the infrastructure as there were multiple power cuts when the Broadlands were being built and also the Larches and Retirement village on Elton Head Road.

The field is also one of the last pieces of open land in the area now that Riverside and the Sutton sites are being built and the industrial units on the link way will make the area look more city than country. Building more houses on open land is unnecessary and there are many existing sites that can be redeveloped rather than destroying more green belt land.

The council needs to gain more funds because of cuts but to destroy the areas for short term gain and put additional strain on the infrastructure and make the area more like one huge housing estate is ludicrous and unjustifiable.

7. Please set out modification(s) you consider are necessary

Review the actual turnover of homes and what is being sold before deciding to build even more homes without the supporting schools, hospitals, utilities and roads and look at rebuilding areas that already have had buildings and get the builders to use those sites rather than destroy virgin green land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	1/21/2019 8:52:56 PM
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PO3237

Representor Details

Web Reference Number	WF0489
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	
Address	8 Mallard Gardens, St Helens, Merseyside WA9 5BL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPC01, LPC02, LPC05, LPD03
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The area is subject to flooding and the underground drains only just cope with the heavy rain due to previous low lying land and 3 x ponds that were previously in situ around Broadlands and the three closes including Mallard.

There are too many houses being built in the area and insufficient roads to be able to cope with the additional traffic. This will cause heavier use of the roads. At present it can take 20 minutes to get out of our close at present and this is before the end of Elton Head Road is opened up to all the new houses there.

The road and drainage will not be able to sustain more houses plus the infrastructure as there were multiple power cuts when the Broadlands were being built and also the Larches and Retirement village on Elton Head Road.

The field is also one of the last pieces of open land in the area now that Riverside and the Sutton sites are being built and the industrial units on the link way will make the area look more city than country. Building more houses on open land is unnecessary and there are many existing sites that can be redeveloped rather than destroying more green belt land.

The council needs to gain more funds because of cuts but to destroy the areas for short term gain and put additional strain on the infrastructure and make the area more like one huge housing estate is ludicrous and unjustifiable.

7. Please set out modification(s) you consider are necessary

Review the actual turnover of homes and what is being sold before deciding to build even more homes without the supporting schools, hospitals, utilities and roads and look at rebuilding areas that already have had buildings and get the builders to use those sites rather than destroy virgin green land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	1/21/2019 8:52:56 PM
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PO3238

Representor Details

Web Reference Number	WF0210
Type of Submission	Web submission
Full Name	Councillor Rob Reynolds
Organisation	
Address	10 The Spinney, Rainford, Lancashire WA11 8AS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	All
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**Legality of the plan**

In page 2 of the council's guidance on this form (https://www.sthelens.gov.uk/media/9460/lpsd-representation-form_guidance-note.pdf) under the heading "Legal compliance and duty to cooperate" they say that "The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI)".

The SCI is available here: <https://www.sthelens.gov.uk/media/3195/statement-of-community-involvement-november-2013.pdf>

The SCI says that "evidence gathering" and "community involvement" must precede the decision to adopt the plan; however I believe that the Councillors in charge of the process had made their minds up before the consultation began. I believe this can be demonstrated by consideration of the facts. The consultation was announced shortly before Christmas and ran over the Christmas break, this made press coverage and opposition difficult. Despite this the council was obviously overwhelmed by the response. This is evidenced by their repeated failure to meet their own deadlines.

At the beginning of the local plan process St Helens Council did not have a brown field register and when pressed to prepare one by opposition councillors they refused saying they did not need one. They have since been forced to prepare one by the government, but again I think this shows that the minds of the councillors in charge of the process were made up before the consultation even began. They wanted more council tax and business rates and they had an overwhelming majority on the council to force this through, evidence was unnecessary and greenbelt land was expendable.

Senior Councillors from the ruling group have made numerous statements which suggest that their minds were made up prior to the consultation. One example is the comment by the then leader of the council on 1/05/2017 that one group of residents opposing the plan were "#nimbys". Bizarrely this comment was posted at 1.40am. [REDACTED] said that "As I say you are #nimbys it's ok to build just not in my back yard." While this was after the consultation I believe this makes his mindset and his attitude to the plan and to disagreement with it very clear.

[REDACTED] went on to say that "People forget that as a council we have had £90m cuts. We must do something to bring in money. I support jobs and investment any day over nimbyism." In my view the reference to the reduction in the council's central government grant shows that his principle interest was in generating a greater income for the council from council tax and non-domestic rates. While this is not an unreasonable position for him to take it is not one that justifies the release of large areas of greenbelt land. His comments can be read here:

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

On page 12 of the SCI at paragraph 3.5 it says that the council will "foster good relations between people in a diverse community". I do not believe they can possibly have complied with this when the then leader of the council resorted to childish personal insults in the early hours of the morning, to residents of the borough he was meant to be leading.

In November 2017 [REDACTED] (who was then a member of the council's executive) said that "Some of that green belt like at Florida Farm used to be pit head. Some of it used to be coal mines. It's not as if we are talking about the rolling hills of Shropshire here. But then there are other parts of St Helens that are also listed as green belt that are absolutely outstanding and deserve protection." He was dismissing the concerns of local residents about the loss of their greenbelt land because in his view it isn't as pristine as land in Shropshire. This comment shows that his thinking was being influenced by factors that were totally irrelevant to the decision. His comment can be found using the link below, you will note that St Helens Council failed to respond to resident's concerns about [REDACTED] views: <https://www.sthelensreporter.co.uk/news/protest-groups-seek-clarification-on-councillor-s-greenbelt-remarks-1-8863709>

[REDACTED] was initially the council executive member with responsibility for the local plan, however he was sacked during infighting within the ruling group. He was replaced by [REDACTED] who had clashed with opponents of the plan on social media and had in his own words given "vocal support to the Local Plan and other planning applications."

[REDACTED] said that "It is not fair on the council that the objections that this has attracted should overshadow the delivery of an ambitious Local Plan that this council deserves." I believe this shows that [REDACTED] mind was made up and that he was more concerned about the interests of the ruling group of the council and what he felt they deserved than he was about local residents. [REDACTED] resigned a week later after being served with an official notice by police which set out an allegation of harassment against him (he denied any link between the notice and his resignation). I cannot believe that [REDACTED] was the right person for the role given his antagonistic relationship with opponents of the local plan and the fact that the council's standards committee had already ruled against him once. He was replaced by the man he had himself replaced a week earlier, [REDACTED] ([https://www.theboltonnews.co.uk/news/15289535.\[REDACTED\]_resigns_from_growth_role_after_a_week/](https://www.theboltonnews.co.uk/news/15289535.[REDACTED]_resigns_from_growth_role_after_a_week/)).

A further illustration of [REDACTED] behaviour and his relationship with opponents is found in the fact that he was subsequently censured for comments made between November 2016 (before the consultation) and September 2017 "related to various campaign groups"

<https://www.wigantoday.net/news/politics/councillor-accused-of-sending-phallic-symbol-to-campaign-group-1-8911889> Again referring back to paragraph 3.5 of the SCI, given his behaviour the appointment of [REDACTED] could not but harm efforts to "foster good relations between people in a diverse community".

██████████ the new leader of the Council refused to defend the local plan in our meeting of 21/12/2018 saying that "As council leader, I became one of the unpaid council representatives on the long-standing partnership set up to regenerate the former Parkside Colliery site. For openness and transparency, I will follow my usual practice and make a declaration of interest and follow the convention of leaving the room for that item." If ██████████ was too conflicted to vote on the decision to adopt the plan should he not have removed himself from the process of developing it? Either he had a conflict of interests or he did not, this cannot be a sort of Schrodinger's conflict of interests which applies when it suits him does but not when it does not

<https://www.sthelensreporter.co.uk/news/politics/st-helens-council-leader-slams-opposition-vote-against-local-plan-1-9504626>

It is my belief that this local plan is not legally compliant as the council have failed to comply with their own Statement of Community Involvement. My belief that they have failed in this duty is founded on my view that senior members of the ruling group made their minds up based on factors that are irrelevant to the process and that they never took the consultation process seriously. I believe I have demonstrated this through my comments above.

Soundness of the local plan

The council's own guidance says that the plan has to be "prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As I have set out above I believe that senior members of the council's ruling group, including two members who had been in charge of the plan and the then leader of the council have shown that they were being influenced by irrelevant factors. These factors include the desire to increase the council's income from council tax and business rates, a feeling that the council "deserved" the local plan and the fact that some of the land affected was not as pristine as "the rolling hills of Shropshire". This is what the senior councillors in charge of the process were willing to say in public. I cannot begin to imagine what they were saying in private. 01

I have also set out above some of my concerns relating to the attitude to consultation and the decision making process. Additionally when the question of whether the council should adopt this plan was finally brought to Councillors they called a special meeting for the 20th of December, less than a week before Christmas. Opposition councillors were only given two weeks to consider the plan before this meeting, members of the ruling group were briefed a week earlier. Most councillors are not professionals, many of us have jobs and commitments to our friends and families. Many of us had long standing plans in the run up to Christmas that we could not cancel.

The decision to hold an extra meeting at such short notice and give us so little time to prepare was totally unjustified and really quite outrageous. No apology was made for this and no explanation offered, we had a council meeting planned for January and no reason has ever been offered as to why this could not have waited until then. The decision to give Councillors from the ruling group a briefing a week before opposition members is, in my view, an appalling abuse of power. Especially given the timescales involved. If the plan was sound I do not believe the council would have made decisions which made opposition so difficult. They should have been willing to give opponents a fair chance to set out their views and then listened with an open mind.

The council has departed from the standard method to calculate housing need and there are no exceptional circumstances to justify this. The population projections used are overly optimistic about population growth in the borough. I fear that the land released from our greenbelt will be developed first as it is easier and cheaper than development on brownfield sites and that at the end of the process the population will not have increased by as much as expected. In this scenario we would have lost our green spaces and would be left with undeveloped brownfield sites. There is therefore, in my view, no "exceptional circumstances" justifying the release of greenbelt land. 02

The vision section of the local plan "high quality new employment development", but the only sector I could see specifically mentioned in a section on "Economy and skills" is logistics. The whole economic development side of the plan seems to be based on warehouses. The figures for how the land allocated for economic development will be used send a clear message; office space 10-15 03

hectares, research and development 1-4, light industry 15-20 hectares, storage and distribution is 110-155 hectares. Out of 190-239 hectares in total; more than half of that land is to be allocated to warehouses. Again I believe that the council's estimate of how many jobs "logistics" will create are an absurd over estimation.

Talk of "a diverse portfolio of accessible employment" is a fig leaf to hide an over reliance on one sector, a sector of poorly paid unskilled jobs and one that is increasingly automated. This is not long-term strategic thinking, it is a sign of how intellectually bankrupt this plan is and just how badly it would fail our Borough. St Helens has low paid jobs, we need a much greater diversity in employment that this plan would not deliver.

With respect to site 8HA in my own ward (and home) of Rainford. This site floods almost every winter and is obviously unsuitable for development. It slopes down towards a stream that runs through an area of the Borough called Blackbrook. Blackbrook regularly floods in heavy rain and both the Council and the Environment Agency have acknowledged the role that these fields play in slowing down the flow of water into the brook and therefore in reducing the peak flow of water in the stream. To build on these fields is an obvious folly that can only make this situation worse. The land is also grade one agricultural land and intensively farmed. Road access to the site is, in my view, inadequate for the addition of several hundred new cars and the roads could not be expanded without either eating into the site or demolishing houses. Many residents fear the effect that this development would have on doctors surgeries and local schools.

The council say that they want to have some of the land released from the greenbelt without incorporating it into the current local plan. This is in case it might be needed for a future local plan. This is self evidently not an exceptional circumstance.

I apologise for the length of my comments, but I feel very strongly about this and I have tried to the point.

7. Please set out modification(s) you consider are necessary

To adopt more reasonable population projections which will reduce the requirement for greenbelt land.

To come up with a new economic development plan that is not so heavily focussed on warehousing and which would again reduce the amount of greenbelt land required.

To remove site 8HA from the local plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 8:08:19 PM
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PO3239



St Helens LP 2020-2035 (Submission Draft)

Tony McAteer

to:

planningpolicy

13/03/2019 08:46



2 Attachments



Local Plan Reprs Form.pdf Local Plan Reprs.pdf

Dear Sirs

Please see attached representations to the above draft LP on behalf of Eccleston Homes Ltd. We would be grateful if you could acknowledge receipt.

Regards

Tony McAteer
McAteer Associates Ltd



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Mark	First name: Tony
Last Name: Fillingham	Last Name: McAteer
Organisation/company: EcclestonHomes Ltd	Organisation/company: McAteer Associates Ltd
Address: Suite114 Newton House Bichwood House Warrington	Address: 4 St Johns Wood Lostock Bolton
Postcode: WA3 6FW	Postcode: BL6 4FA

Signature:

Date:

12 March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete **PART B** of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA02 LPA03 LPA05 LPA06 LPA01		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				See Attached representations						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input 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 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	

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 Attached Representations

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)

<p>No, I do not wish to participate at the oral examination</p>	<p>X</p>	<p>Yes, I wish to participate at the oral examination</p>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

To ensure the representations are fully understood by the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

McAteer
associates^{ltd}
PROVIDING PLANNING SOLUTIONS

St. HELENS BOROUGH LOCAL PLAN 2020-2035

Representations to the Submission Draft

January 2019

On behalf of

Eccleston Homes Ltd

McAteer Associates Ltd
4 St Johns Wood
Lostock
Bolton
BL6 4FA

5 Policy LPA06

5.1 Eccleston Homes support the Council's realisation that the development need of the Borough cannot be met without releasing land currently allocated as Green Belt.

10

5.2 However, for the reasons stated elsewhere they object to the content of point 2 in the policy. Eccleston Homes consider the policy should be amended to indicate that Safeguarded Land could come forward in the Plan period, rather than only post 2035, if there was a demonstrable need for additional development.

11

5.3 Eccleston Homes consider that their site at Station Road, Haydock is capable and suitable for housing in the Plan period for the reasons stated in respect of the objection to Policy LPA05. However, if their view is not accepted, then as was recognised in the Regulation 18 LP, when the site was Site HS11, the land at Station Road, Haydock should be allocated as Safeguarded Land in Table 4.8.

12

PO3240



St Helens Local Plan Submission Draft
McBride, Sean
to:
'planningpolicy@sthelens.gov.uk'
13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards
Sean

Sean McBride
Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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**St. Helens Borough Local Plan
2020-2035 Submission Draft**

Representations submitted on behalf of Persimmon Homes North West

March 2019



development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

Policy LPA06: Safeguarded Land

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

Policy LPA06 Extent of the Green Belt and Safeguarded Land

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

Policy LPA08 Infrastructure Delivery and Funding

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

Policy LPC01: Housing Mix

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24

PO3241



St Helens LP 2020-2035 (Submission Draft)

Tony McAteer

to:

planningpolicy

13/03/2019 08:46



2 Attachments



Local Plan Reprs Form.pdf Local Plan Reprs.pdf

Dear Sirs

Please see attached representations to the above draft LP on behalf of Eccleston Homes Ltd. We would be grateful if you could acknowledge receipt.

Regards

Tony McAteer
McAteer Associates Ltd



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

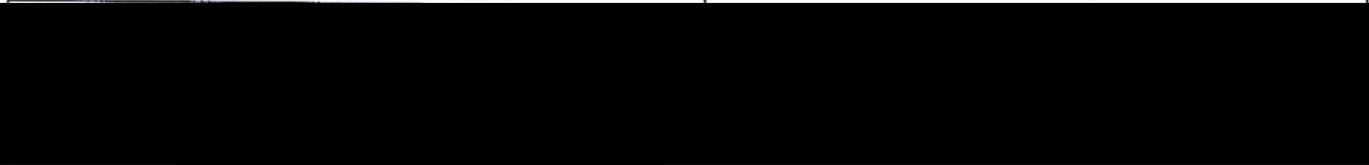
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Mark	First name: Tony
Last Name: Fillingham	Last Name: McAteer
Organisation/company: EcclestonHomes Ltd	Organisation/company: McAteer Associates Ltd
Address: Suite114 Newton House Bichwood House Warrington	Address: 4 St Johns Wood Lostock Bolton
Postcode: WA3 6FW	Postcode: BL6 4FA



Signature:	Date: <input type="text" value="12 March 2019"/>
-------------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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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

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete **PART B** of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA02 LPA03 LPA05 LPA06 LPA01		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				See Attached representations						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input 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 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	

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 Attached Representations

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)

<p>No, I do not wish to participate at the oral examination</p>	<p>X</p>	<p>Yes, I wish to participate at the oral examination</p>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

To ensure the representations are fully understood by the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

McAteer
associates^{ltd}
PROVIDING PLANNING SOLUTIONS

St. HELENS BOROUGH LOCAL PLAN 2020-2035

Representations to the Submission Draft

January 2019

On behalf of

Eccleston Homes Ltd

McAteer Associates Ltd
4 St Johns Wood
Lostock
Bolton
BL6 4FA

5 Policy LPA06

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5.2 However, for the reasons stated elsewhere they object to the content of point 2 in the policy. Eccleston Homes consider the policy should be amended to indicate that Safeguarded Land could come forward in the Plan period, rather than only post 2035, if there was a demonstrable need for additional development. 11

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PO3242



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02

Cc:
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner

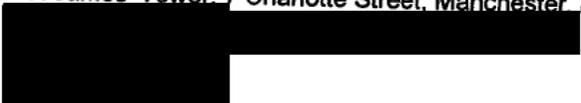


indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No []

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<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.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

This requirement is vague and it is unclear what is meant by expanded or enhanced infrastructure. It should therefore be removed given the policy and plan as a whole addresses infrastructure requirements adequately.

24

-
- 4.30. LPA05.1(3) require development proposals which only cover part of a Strategic House Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site.

25

-
- 4.31. Murphy Group are strongly promoting their land at Leyland Green Farm (site ref. 1HS) for residential development of up to 291 dwellings within the plan period. Therefore, Murphy Group are seeking that their safeguarded land for housing allocation is upgraded to a housing allocation, which can be delivered in the immediate term. The site is in one ownership and therefore does not suffer from the constraints or potential issues associated with land in multiple ownerships and potential delays in delivery as a result. The site is otherwise unconstrained (apart from existing Core Strategy Green Belt status). The St Helens land at Leyland Green Farm, combined with the Wigan land at Leyland Green Farm (indicative capacity of 210 dwellings), could deliver circa 501 dwellings in total.

26

- 4.32. Initial feasibility studies on sustainability, highways and landscaping indicate that the Leyland Green Farm site (Ref. 1HS) is available, suitable and deliverable and can come forward immediately within the plan period. We consider that it is not appropriate to safeguard this land for housing post 2035 when it can come forward for development within the plan period.

Policy LPA06: Safeguarded Land

- 4.33. Despite Murphy Group's desire for the Leyland Green Farm site (ie land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood) (site ref. 1HS) to be upgraded from safeguarded land for housing to a housing allocation, in the event that this does not occur, we strongly support the removal of the Leyland Green Farm site from the Green Belt and its allocation as safeguarded land for housing, as per Policy LPA06.1.

27

- 4.34. We support that the site is considered suitable for Green Belt release as it forms a natural extension to the settlement of Garswood. Development on the site will be a logical rounding off of the settlement when considered in context with the proposed housing allocation to the south (Site Ref. 1HA).

-
- 4.35. Table 4.8 identifies an indicative site capacity for 291 dwellings (based on an indicative 75% net developable area and 30 dwellings per hectare). Murphy Group have produced a draft indicative masterplan (contained within the Delivery Statement submitted alongside this representation) which indicates a capacity for 291 new dwellings. As such, this reflects the number of units which could be achieved based on known site constraints / opportunities tied into deliverability. Ensuring this yield on this safeguarded site will also reduce the pressure on the delivery of brownfield sites.

- 4.36. Murphy Group is keen to work with the local planning authority to bring forward development proposals for housing in the immediate term within the plan period (if allocation is upgraded), but in the event it does not, to ensure housing development is delivered beyond 2035. Murphy Group have their own house building division and therefore are equipped to begin house building straight away.

-
- 4.37. Appendix 7 of the local plan provides requirements for the site. We support the identification of site access via Leyland Green Road and Billinge Road. Murphy Group have instructed Vectos to undertake initial highways work and assess suitable site access locations. The initial transport work is contained within the supporting Delivery Statement submitted alongside this representation. Murphy Group are aware that the site will require a pedestrian and cycleway connections across the site and to connect the site to the wider area.

28

- 4.38. Murphy Group acknowledge that the ground conditions are not known at this stage as no ground investigation work has commenced. This would be commissioned prior to the planning application stage. However, the site is in arable use and ground conditions are expected to be similar to the land to the south that has been allocated for new residential development.
- 4.39. Policy LPA06.2 highlights that planning permission for development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment of safeguarded sites in the plan period will be refused. We request further clarity on when a full review of the will be triggered. 29
- 4.40. We object to this on the basis that if housing allocations are not coming forward in the timescales referred to in the local plan (at Table.45 'Sites allocated for new housing development' (either before 31.05.35 and after 31.05.35)), or development is stalled, safeguarded housing sites should be brought forward for development within the plan period. Waiting for the plan to be reviewed could be a lengthy delay during which the housing crisis is exacerbated further. It is therefore not appropriate to include a policy in the local plan which authorises the point-blank refusal of planning application on safeguarded housing land within the plan period. Such applications should be assessed at that time (which would inevitably be later in the plan period), on a case by case basis, and considering the wider context and planning balance (ie housing delivery/under delivery, five year housing land supply or lack of).
- 4.41. We support that safeguarded land should be developed before other Green Belt and greenfield sites. 30

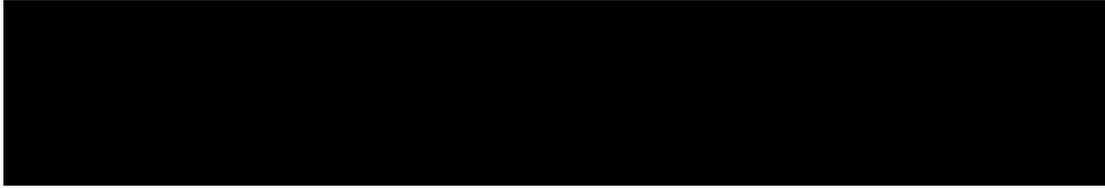
Policy LPA07: Transport and Travel

- 4.42. We support that Policy LPA07.1.b. seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport. 31
- 4.43. Garswood offers a range of local services, facilities and public transport connections and is well positioned to accommodate growth. The St Helens Core Strategy confirms that improvements have been made to Garswood train station, offering journeys to both Wigan and Liverpool, whilst the town has good road linkages to areas across Merseyside.
- 4.44. Within Garswood and in context of the Leyland Green Farm site, there are a number of key amenities located within an appropriate walking distance of the site which would serve some of the day-to-day needs of future residents, including primary schools, healthcare facilities and local shops. The site is served by numerous bus routes however, which provide high frequency services to Ashton-in-Makerfield, therefore providing the potential for sustainable travel when undertaking general day-to-day activities.
- 4.45. The identification of a proposed housing allocation of land south of Billinge Road, East of Garswood Road and West of Smock Lane (site ref. 1HA), with an indicative capacity of 216 dwellings, demonstrates the settlement is a suitable and sustainable location, in transport terms, to accommodate development.
- 4.46. In the St Helens Emerging Local Plan Evidence Base Transport Impact Assessment, housing allocations are ranked in terms of their accessibility to local facilities. Whilst it does not refer directly to the Leyland Green Site, it assesses the land directly adjacent to the south of our site (ie land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood (site ref. HA2)). It is assessed as 'excellent' in terms of accessibility to the railway station by cycle, major food stores, primary schools and healthcare facilities. The Leyland Green Farm site (which adjoins the housing allocation to the north) shares similar accessibility ratings to the housing allocation and is therefore well connected to local services and facilities.
- 4.47. Policy LPA07(9) states that further details of the policy will be set out in a future review of the 32

PO3243



CPRE Lancashire response
jackie.copley
to:
planningpolicy
13/03/2019 09:20



1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

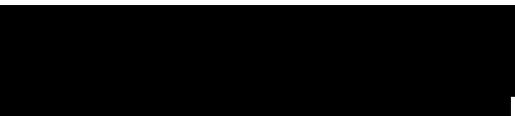
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCert
Planning Manager



Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU
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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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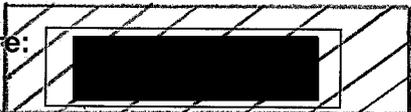
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature:  Date:

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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Justified?	<input checked="" type="checkbox"/>
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CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However we think that there may be more brownfield sites to be recorded as "suitable" on the Brownfield Register, than is currently the case.

CPRE Lancashire believes there are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is in reality available for development. We hope to engage community members to help identify more brownfield sites in the next few months, and we have developed a Toolkit to support people to engage better with the Council's planners. www.cprelancashire.org.uk/resources/housing-and-planning/planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit?highlight=WyJOb29sa2l0l10=

We therefore think Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing being allocated in existing Green Belt. We also recommend the Council introduces a brownfield target, to focus activity in regard to a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could achieve such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The gratuitous ambitious targets bear no resemblance to the facts.

We also query whether the minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF by not making effective use of land.

CPRE agrees that adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future would mean that jobs and housing figures can be revised upwards or downwards on the basis of robust analysis at the relevant time.

Policy LPA05.1: Strategic Housing Sites

CPRE Lancashire is opposed to needless release of Green Belt land for housing, we reserve the right to comment on all the housing sites included in LPA05.1 at the examination.

Policy LPA06: Safeguarded Land

St Helens Council is really going for a "slash and burn" approach to the Green Belt. CPRE Lancashire is strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss. This approach is all the more relevant in view of the historically large amounts of land within the Borough which have been despoiled by mining and heavy industry, and the need to place emphasis on saving what remains of the unspoiled land for the benefit of young people and future generations.

CPRE accepts that safeguarded land can be a useful tool, however proposing 85.88 hectares for employment (equal to 39.9% of employment land), and 114.19 hectares for housing (equal to 28.6% of housing land), is hugely excessive.

CPRE Lancashire is concerned that if too much land is allocated all at once, then developers will target that which is most profitable, which tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it, in the case of St Helens large tracts of land to the south east need rejuvenation. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

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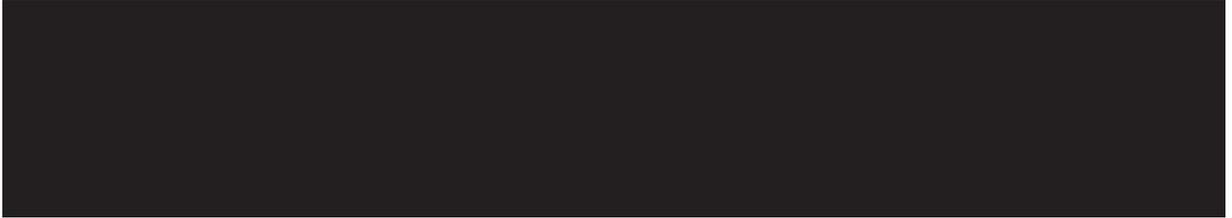
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PO3244



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
graham.hale
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:26



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13 03 2019 St Helens BC Local Plan Submissions Document Representation Form FINAL V2.pdf

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The representation concerns Policy LPA06: Safeguarded Land, and more specifically land at the former Eccleston Park Golf Club, Eccleston.

I trust this representation is duly made, and I would be grateful if you could confirm receipt of the attached.

Should you have any queries, please do not hesitate to contact either myself or my colleague Simon Peake (Associate Director – WYG Manchester Office).

Yours faithfully,

Graham Hale
Associate - Planning

WYG
Lakeland Business Park, Lamplugh Road, Cockermouth, Cumbria, CA13 0QT



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Title: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH
[Redacted]	[Redacted]

Signature: [Redacted] **Date:** 7th March 2019

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Other documents (please name document and relevant part/section)				St Helen's Borough Local Plan 2020-2035 Green Belt Review (December 2018)		

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Introduction

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The Golf Club closed in June 2018 due to it being no longer commercially viable, in part because the local market for golf courses is saturated, and also because too few younger memberships are coming through to sustain them. The Golf Club was developed in 1999 on the site of the old Rainhill Hospital Farm, which is why the Department of Health and Social Care still hold an interest in the site. The original planning permission for the golf course was granted under application reference 1993/0066. A subsequent approval was granted for various alterations and extensions to the clubhouse under application reference 2004/523.

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Planning context

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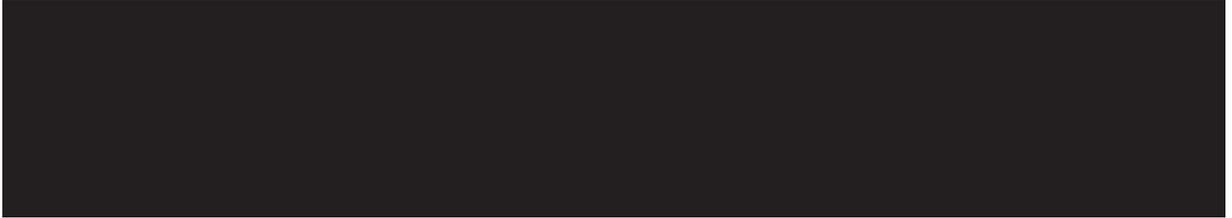
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PO3245



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Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
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Scenario 3. Further sensitivity options are provided in the analysis based on different employment sites not coming forward during the Plan period suggesting a potential range from 474-511 dwellings per annum for Scenario 2, and 459-476 dwellings per annum for Scenario 3.

It is not clear as to why St Helens Council has therefore chosen to opt for 486 dwelling units per annum given the higher requirement suggested by the recent SHMA Update (January 2019). Against this background of unmet housing need, it is also not clear as to the planning justification for the removal of the Eccleston Park Golf Club site as an allocation, when the Council had previously considered the site suitable for allocation in the Preferred Options Local Plan in December 2016 compared to the other former Green Belt sites, which have now been retained as allocations in the Submissions draft (January 2019).

02

This lack of planning justification is explored further below in the context of the next section, which considers the Green Belt Review.

St Helens Borough Council Green Belt Review

Whilst it is welcomed that the site of Eccleston Park Golf Club has been removed from the Green Belt as confirmed in the Council's Green Belt Review (December 2018), the Department of Health and Social Care consider the Local Plan 2020-2035 Submission Draft Local Plan (January 2019) to be not sound for the following reasons.

03

The Eccleston Park Golf Club site was previously proposed by the Council as an allocated site for residential development (reference HA8) at the Local Plan Preferred Options stage in December 2016. Nothing has materially changed in terms of the physical characteristics of the site since then to warrant it being downgraded to 'Safeguarded Land'. The Council's Green Belt Review (December 2018) suggests that there are constraints, but these are over-played and not correctly balanced against the planning merit of bringing forward the site for development compared against other sites which have been taken forward as allocations in the current Local Plan period.

04

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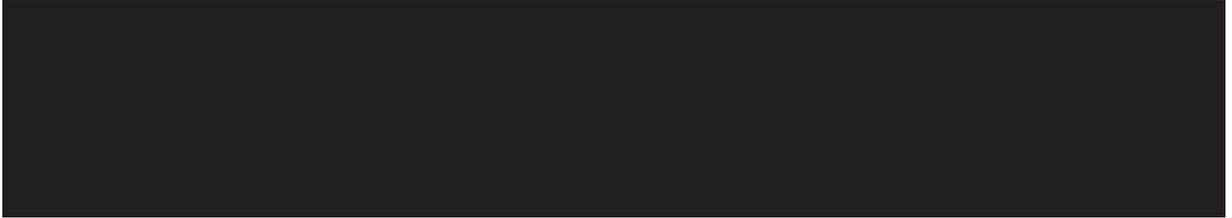
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PO3246



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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH

Signature: **Date:** 7th March 2019

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Legally Compliant?	Yes <input type="checkbox"/> √	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> √
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> √
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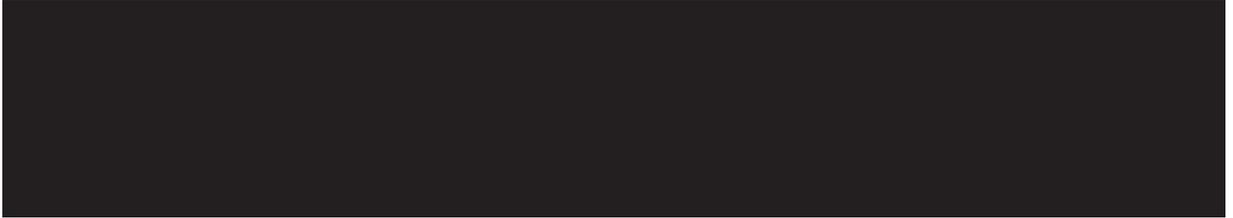
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[Redacted]	[Redacted]

Signature: [Redacted]

Date:

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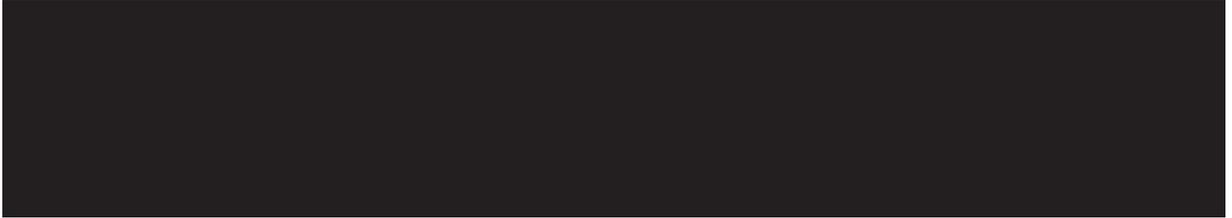
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06

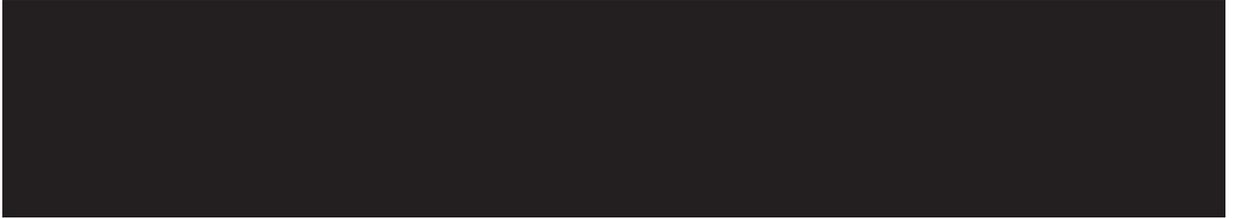
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PO3249



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
graham.hale
to:
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St. Helens
Council

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Ref: LPSD

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Part A – Personal Details
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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: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH

Signature: **Date:** 7th March 2019

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Town Hall
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St.Helens
Merseyside
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Policy	LPA06: Safeguarded Land	Paragraph / diagram / table - Appendix 7	Table 4.7 – 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston	Policies Map –	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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Legally Compliant?	Yes <input type="checkbox"/> √	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> √
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> √
Effective?	<input type="checkbox"/> √
Consistent with National Policy?	<input type="checkbox"/> √

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this

Scenario 3. Further sensitivity options are provided in the analysis based on different employment sites not coming forward during the Plan period suggesting a potential range from 474-511 dwellings per annum for Scenario 2, and 459-476 dwellings per annum for Scenario 3.

It is not clear as to why St Helens Council has therefore chosen to opt for 486 dwelling units per annum given the higher requirement suggested by the recent SHMA Update (January 2019). Against this background of unmet housing need, it is also not clear as to the planning justification for the removal of the Eccleston Park Golf Club site as an allocation, when the Council had previously considered the site suitable for allocation in the Preferred Options Local Plan in December 2016 compared to the other former Green Belt sites, which have now been retained as allocations in the Submissions draft (January 2019).

02

This lack of planning justification is explored further below in the context of the next section, which considers the Green Belt Review.

St Helens Borough Council Green Belt Review

Whilst it is welcomed that the site of Eccleston Park Golf Club has been removed from the Green Belt as confirmed in the Council's Green Belt Review (December 2018), the Department of Health and Social Care consider the Local Plan 2020-2035 Submission Draft Local Plan (January 2019) to be not sound for the following reasons.

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The Submission Draft Local Plan proposes 9,234 net additional dwellings over the Plan Period up to 2035 at an average of at least 486 dwellings per year. The accompanying Green Belt Review suggests that the reduced amount of new housing that is now identified as being required in the Borough has led the Council to change its view relating to this parcel of land. However, it is not clear as to the reasoned planning justification for a reduced level of housing, and as far as we can see there is no evidence as to the reasons for the exclusion of the Eccleston Golf Club site from the Local Plan allocations, which we believe is a more sustainable and suitable housing site than others that have been retained. If there were sound reasons, a number of other (and some larger) former Green Belt sites, which remain allocated, should also have been removed as well. However, this has not been the case and whilst the Sustainability Appraisal does provide an assessment of the reasons for the allocation, safeguarding or discarding of sites (see Table 6.3 - housing and employment), there is no clear assessment of the relative or comparative merits of the potential housing sites to determine why some housing sites are considered worthy of allocation and others relegated to safeguarded sites. We also do not agree with the assessments made in Table 6.3 of the Sustainability Appraisal.

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There are six former Green Belt sites, which have been taken forward for allocation in the Local Plan 2020-2035 Submissions Draft (January 2019) under Policy LPA05. These sites are listed in the table below:

06

Table 1 – Extract form Table 4.5: Sites allocated for new housing development

Site ref	Name	Area (Ha)	NDA	Minimum Density	Capacity before	Capacity post	Total
----------	------	-----------	-----	-----------------	-----------------	---------------	-------

					31/03/35	31/03/35	
1HA	Land south of Billinge Road, East, East of Garswood Road and West of Smock Lane, Garswood	9.58	75%	30	216	0	216
2HA	Land at Florida Farm, Slag Lane, Blackbrook	23.19	75%	30	400	122	522
4HA	Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold	132.86	75%	30	480	2,508	2,988
5HA	Land south of Garton's Lane and former St Theresa's Social Club, Gartons Lane, Bold	21.67	75%	35	520	49	569
7HA	Land west of the A49 Mill Lane and to the east of the West Coast mainline railway line, Newton-le-Willows	8.02	75%	30	181	0	181
8HA	Land south of Higher Lane and east of Rookery Lane Rainford	11.49	75%	30	259	0	259
	Totals	206.81	N/A	N/A	2,059	2,679	4,738

All these sites were assessed in the Council's Green Belt Review and there do not appear to be any material planning reasons as to why they have taken precedent over Eccleston Park Golf Club.

These sites could provide a total of 2,059 dwellings (out of a total of 9,234 units) in the Plan period, plus a further 2,679 dwellings post 2035. Sites 1HA, 2HA, 4HA, 5HA, 7HA, and 8HA are sites that until now lay in the designated Green Belt, and we consider they are not as sustainably located or well-related to the main urban centre of St Helens compared to the Eccleston Park Golf Club site. These alternative sites would also intrude out beyond the built-up area into open countryside contrary to the clear aims of maintaining the Green Belt.

Regardless of these other sites, the Eccleston Park Golf Club site would provide additional flexibility during the Plan period and beyond, and development within the site could be phased to ensure that new housing is brought forward in a managed way.

An initial WYG summary review of the spatial location of each former Green Belt site concludes as follows:

- site 1HA is a large greenfield site located some distance away from the urban centre of St Helens south of the B5207 on the north-western edge of Garswood;
- site 2HA is a substantial greenfield site situated on the outer edge of Haydock adjacent to the A580 and some distance from the main urban core of St Helens;
- site 4HA is a very substantial greenfield site located on the south east side of Sutton and extends out into open countryside and some distance away from the urban core of St Helens;
- site 5HA is a substantial greenfield site located to the other side of the A569 near site 4HA to the south-west and on the outer edge of the built-up area on the south side of Gartons Lane and abuts Sutton Manor Woodland;
- site 7HA whilst being a brownfield site is not well-related to the core built-up area of St Helens and is physically separated from the built-up area of Newton-le-Willows by the railway line and the A49;
- site 8HA is a greenfield site not well-related to the urban area of St Helens and is situated south of Rainford extending into open countryside in the north western edge of the Borough.

In comparison, site 3HS - Eccleston Park Golf Club is surrounded by built development and would provide a natural rounding of the settlement limits being contained by residential development to the west, south and north-east of the boundary of the site. The development of

this site would not represent an incursion into open countryside unlike the other former Green Belt sites referred to above. The proposed safeguarding of the site in the Local Plan until after 2035 would effectively sterilise any development of the site in the interim, which would be contrary to the aims of national Government's policy contained in the NPPF where there is a presumption in favour of sustainable development. Given that the Golf Club has closed there is little future potential for the site with the restrictions put in place by Policy LPA06.

The settlement of Garswood (site 1HA), for example, is identified in the Local Plan Submission Draft as a village that has some shops and services. Likewise, Rainford (site 8HA) is described as the largest village in the north of the Borough, which contains a local shopping centre. These other sites would result in physical incursions into undeveloped open countryside contrary to the purposes of the Green Belt as set out in the NPPF.

The Department of Health and Social Care consider that whilst it may be reasonable to enable some new housing development to come forward in these outlying areas of the Borough, St Helens Council has taken a disproportionate approach to not allocating the Eccleston Park Golf Club site, given its better location and proximity to the urban core and its overall sustainability.

We would concur with the findings of the Green Belt Review that the removal of the Eccleston Park Golf Club site from the Green Belt would not undermine the five purposes of that designation as set out in the NPPF. The Green Belt Review acknowledges that this site is sustainably located and accessible to a range of local services.

The development of the Eccleston Park Golf Club site would **not**:

- lead to unrestricted sprawl of the urban area because the site is self-contained and surrounded by other development and has strong physical boundaries;
- result in the merger of towns into one another because the strategic 'gap' has already been compromised by other nearby development and there is no longer any visual/perceptual separation of Eccleston Park, West Park, Rainhill and Whiston;
- lead to encroachment into open countryside because the site lies in the heart of the built-up area, lacks a sense of openness and does not extend out into undeveloped countryside;
- undermine the setting and special historic character of the area because there is no historic urban part of St Helens in proximity to the site; and
- undermine the urban regeneration of other derelict or urban parts of the Borough because in the same vein the Council must have concluded that it would be acceptable to develop the other former Green Belt sites referred to above, which would likewise not undermine regeneration in the area.

As the Eccleston Park Golf Club site is therefore derelict, there is a duty upon St Helens Council to ensure that an alternative beneficial use can be found, otherwise the site and the buildings contained within it will fall into disrepair contrary to the aims of national planning policies, which supports regeneration. In this regard, the National Planning Policy Framework (NPPF) states:

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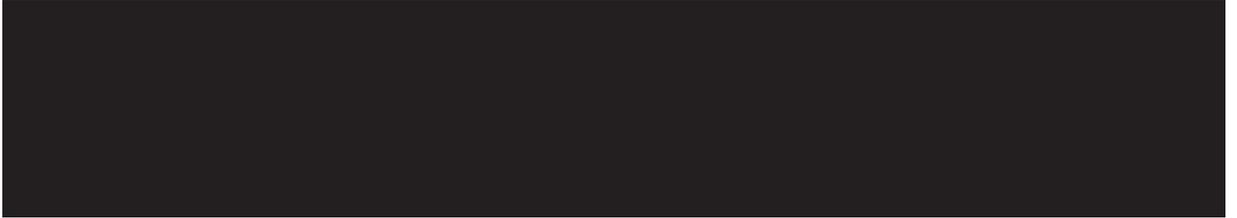
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PO3250



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
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Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH

Signature: **Date:** 7th March 2019

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Legally Compliant?	Yes <input type="checkbox"/> √	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> √
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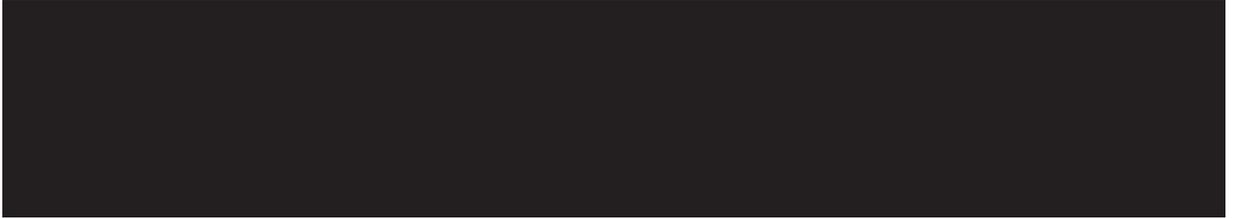
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PO3251



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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH

Signature: **Date:** 7th March 2019

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this site would not represent an incursion into open countryside unlike the other former Green Belt sites referred to above. The proposed safeguarding of the site in the Local Plan until after 2035 would effectively sterilise any development of the site in the interim, which would be contrary to the aims of national Government's policy contained in the NPPF where there is a presumption in favour of sustainable development. Given that the Golf Club has closed there is little future potential for the site with the restrictions put in place by Policy LPA06.

The settlement of Garswood (site 1HA), for example, is identified in the Local Plan Submission Draft as a village that has some shops and services. Likewise, Rainford (site 8HA) is described as the largest village in the north of the Borough, which contains a local shopping centre. These other sites would result in physical incursions into undeveloped open countryside contrary to the purposes of the Green Belt as set out in the NPPF.

The Department of Health and Social Care consider that whilst it may be reasonable to enable some new housing development to come forward in these outlying areas of the Borough, St Helens Council has taken a disproportionate approach to not allocating the Eccleston Park Golf Club site, given its better location and proximity to the urban core and its overall sustainability.

We would concur with the findings of the Green Belt Review that the removal of the Eccleston Park Golf Club site from the Green Belt would not undermine the five purposes of that designation as set out in the NPPF. The Green Belt Review acknowledges that this site is sustainably located and accessible to a range of local services.

The development of the Eccleston Park Golf Club site would **not**:

- lead to unrestricted sprawl of the urban area because the site is self-contained and surrounded by other development and has strong physical boundaries;
- result in the merger of towns into one another because the strategic 'gap' has already been compromised by other nearby development and there is no longer any visual/perceptual separation of Eccleston Park, West Park, Rainhill and Whiston;
- lead to encroachment into open countryside because the site lies in the heart of the built-up area, lacks a sense of openness and does not extend out into undeveloped countryside;
- undermine the setting and special historic character of the area because there is no historic urban part of St Helens in proximity to the site; and
- undermine the urban regeneration of other derelict or urban parts of the Borough because in the same vein the Council must have concluded that it would be acceptable to develop the other former Green Belt sites referred to above, which would likewise not undermine regeneration in the area.

As the Eccleston Park Golf Club site is therefore derelict, there is a duty upon St Helens Council to ensure that an alternative beneficial use can be found, otherwise the site and the buildings contained within it will fall into disrepair contrary to the aims of national planning policies, which supports regeneration. In this regard, the National Planning Policy Framework (NPPF) states:

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy conditions." (paragraph 117).

The NPPF goes on to state that planning policies should:

"promote and support the development of under-utilised land and buildings, especially where this would help meet identified needs for housing where land supply is

constrained and available sites could be used more effectively.” (paragraph 118).

Regeneration of the Eccleston Park Golf Club site for housing in the Plan period would therefore bring about very significant benefits in meeting local housing needs but it would also achieve net environmental gains for the area in accordance with the objectives set out in Chapter 11 of the NPPF.

Given the number and quantity of housing land proposed on the other former Green Belt sites referred to above, the reason put forward by the Council for not allocating the Eccleston Park Golf Club site on the grounds that the Council has prioritised previously-developed land to meet development needs is ill-founded. The approach taken by the Council to the preparation of the Local Plan is therefore inconsistent and not sound as it has discriminated against allocating a deliverable sustainable site situated near the urban core of St Helens. The Council but has instead incorrectly favoured less sustainable locations that would intrude into the open countryside and which cannot be considered previously-developed in accordance with their assessment criteria. The Council’s approach to allocating sites has not therefore been rational, consistent nor transparent.

08

Sustainability

The Department of Health and Social Care agrees with the Council’s Green Belt Review when it states:

“Although the parcel (i.e. the Eccleston Park Golf Club site) is of substantial size and has open views across it, it is also reasonably well contained by existing housing to the south, west and north-east and a railway line to the north. Whilst the parcel lies between a number of built up areas, it is not considered to form part of a strategic gap in Green Belt policy terms. This is because the ‘gap’ has already been compromised by existing development in the Eccleston Park and Nutgrove areas.”

The sustainability credentials of the site are recognised in the Council’s Green Belt Review when it states:

“The parcel has good levels of accessibility to a range of services, jobs and public transport (including Eccleston Park railway station, which is immediately adjacent to the parcel). There is scope to improve facilities at the adjacent railway station by the provision of car parking within the parcel.”

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In addition, the Green Belt Review concludes:

“The 2018 SA (Sustainability Assessment) assessed the parcel and concluded that development within it would have a positive impact on the achievement of a number of SA objectives.”

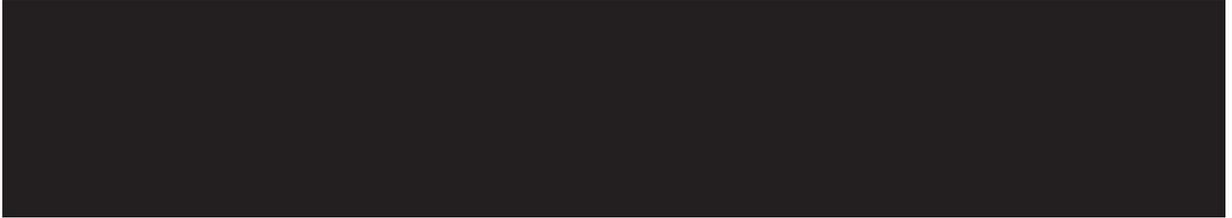
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Given the pattern, scale and proximity of nearby development, the site is therefore a sustainable

PO3252



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
graham.hale
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:26



1 Attachment



13 03 2019 St Helens BC Local Plan Submissions Document Representation Form FINAL V2.pdf

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Please find attached a representation on behalf of the Department of Health and Social Care relating to the above Local Plan consultation.

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I trust this representation is duly made, and I would be grateful if you could confirm receipt of the attached.

Should you have any queries, please do not hesitate to contact either myself or my colleague Simon Peake (Associate Director – WYG Manchester Office).

Yours faithfully,

Graham Hale
Associate - Planning

WYG
Lakeland Business Park, Lamplugh Road, Cockermouth, Cumbria, CA13 0QT



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Registered Office: Arndale Court, Otley Road, Headingley, Leeds, West Yorkshire LS6 2UJ. VAT No: 431-0326-08.



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St. Helens
Council

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Site 3HS - Eccleston Park Golf Club is 'deliverable' and 'developable' within the meaning of the NPPF, as it available now for development having been closed as a golf club since mid-2018.

It is a suitable and sustainable location as evidenced by the assessment below, and there are no impediments to development that could hinder housing being developed on the site within the 0-5 or 5-10 year periods (i.e. within the Plan period).

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Years 10-15:	240
Post 15 years:	332
Total:	956

This would therefore make a significant contribution to meeting the Council's housing requirement and would make this a key strategic housing site, which is deliverable.

Therefore, there are no reasons for not allocating the site in the Local Plan and hence the decision by the Council to defer consideration of the site post 2035 for a subsequent Local Plan review is considered unreasonable and not justifiable.

Golf course provision in the Borough

The key constraint identified by the Council to bringing forward the Eccleston Park Golf Club site for development in the current Plan period appears to relate to its continued use as a golf course. However, this is not a reasonable assessment. Golf course provision in the area is saturated, and this is demonstrated by the fact that there are eight, 18-hole courses within St. Helens Borough. In addition, there are two courses (Haydock Park and Alder Root golf courses) which are situated on the border of the Borough (with Wigan and Warrington respectively). There are a further 12 courses within a 20-minute drive time of St. Helens. The Borough is also serviced by two driving ranges - Sherdley Park, which has 12 bays and The North West National Driving Range, which has 27 bays (see St Helens Council Indoor and Built Sports Facilities Needs Assessment – Golf Course Addendum – June 2016).

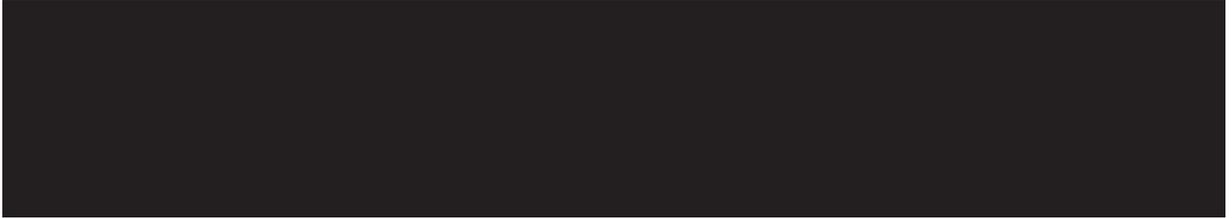
A number of these golf courses are located very close to Eccleston Golf Club, and include: Grange Park Golf Club, Blundells Hill Golf Club, Huyten Prescot Golf Club, Sherdley Park Golf Course and St Helens Miniature Golf Course, which also indicates the level of saturation of golf club facilities in proximity to each other.

The Council's Indoor and Sports Facilities Needs Assessment Golf Course Addendum (June 2016) confirms that based on the adult population figure, St. Helens has the highest holes per

PO3253



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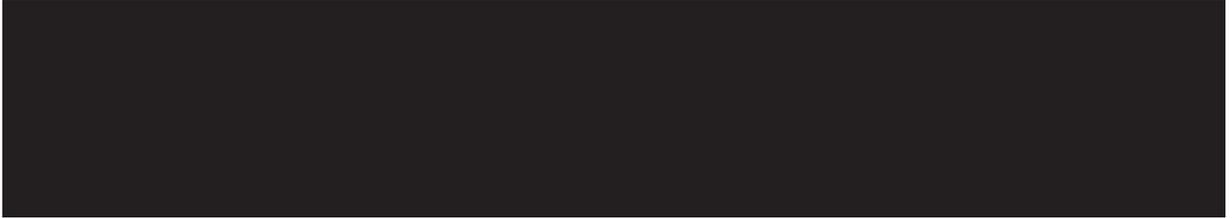
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PO3254



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
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Associate - Planning

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Ref: LPSD

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Title: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds Postcode: LS2 7UE	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester Postcode: M17 1HH
[Redacted]	[Redacted]

Signature: [Redacted] **Date:** 7th March 2019

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Legally Compliant?	Yes <input type="checkbox"/> √	No <input type="checkbox"/>
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and suitable location for residential development within the Plan period in accordance with the principles in the National Planning Policy Framework (NPPF). The same cannot be stated about the Green Belt sites in the Submission Version of the Local Plan. The Eccleston Park Golf Club site is better related in spatial terms for the reasons outlined above compared to the other former Green Belt sites which have been taken forward for allocation.

Deliverability and developability

Site 3HS - Eccleston Park Golf Club is 'deliverable' and 'developable' within the meaning of the NPPF, as it available now for development having been closed as a golf club since mid-2018.

It is a suitable and sustainable location as evidenced by the assessment below, and there are no impediments to development that could hinder housing being developed on the site within the 0-5 or 5-10 year periods (i.e. within the Plan period).

We estimate the following number of residential units could be delivered in the following period (applying the Council's own conservative 65% capacity estimate, which would also allow significant areas of public open space to be delivered; and an average net density of 30 dwellings per hectare):

Years 0 to 5:	144
Years 5-10:	240
Years 10-15:	240
Post 15 years:	332
Total:	956

This would therefore make a significant contribution to meeting the Council's housing requirement and would make this a key strategic housing site, which is deliverable.

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The Indoor and Sports Facilities Needs Assessment Golf Course Addendum indicates that the population in St. Helens is projected to rise by 7.5% by 2037. Given the current spare capacity on golf courses in St. Helens, this rise is unlikely to lead to a rise in the demand for more courses, but rather current courses will be able to accommodate it. The Golf Course Addendum confirms that following a survey of clubs in the area, all had spare capacity for all types of members. It referred to a consultation with Eccleston Golf Club at the time, which indicated that the nearby Sherdley Park Golf Club was a direct competitor to it. The Golf Course Addendum states that there does not appear to be any unmet demand for golf participation across the Borough.

The Golf Course Addendum concludes in Section 6 by saying that:

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Transport and Accessibility

The second constraint identified in the Green Belt Review relates to the impact of the proposed development upon the transport network. These matters can be addressed through a Masterplan exercise where the detailed assessments can be made as part of the pre-application process. In addition, the development of the site could be phased so as to ensure that the highways impacts can be properly managed and the necessary infrastructure put in place to mitigate any adverse impacts. These details can be assessed at the planning application stage in the normal way. We do not consider that access represents a strategic and insurmountable impediment to the development of the site.

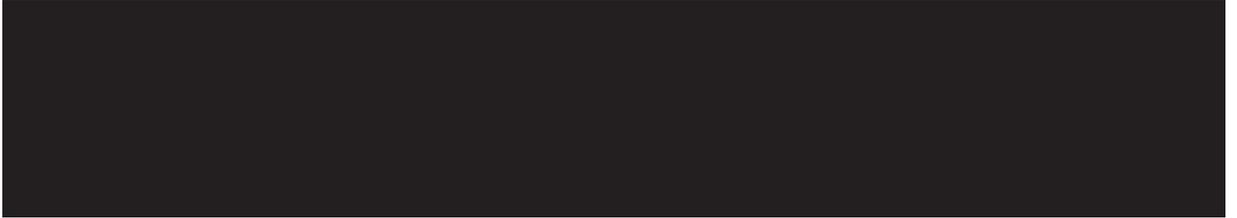
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PO3255



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“As evidenced from the base year traffic model, whilst there are some delays along the

route during peak periods, particularly though Rainhill, most of the key junctions operate within practical capacity.” (paragraph 7.11.3)

The TIA goes onto state:

“It can be seen from Table 35 below that forecast junction operation is generally similar to that for the Do Minimum scenario, with the Holt Lane and Longton Lane junctions remaining within practical capacity, and the Rainhill Road and Wilmere Lane junctions remaining within absolute capacity.” (paragraph 7.11.6)

Both Holt Lane and Longton Lane are located in proximity to the Eccleston Park Golf Club site. In light of the findings of the TIA, it is unreasonable to withhold the allocation of the Eccleston Park Golf Club site on grounds of adverse transport impact when other Green Belt sites that are less well-related and accessible have been so allocated. We also wish to remind the Council that the relevant test from the NPPF is that any highways impact, following mitigation, would have to be judged ‘severe’ to prevent planning permission being granted.

Mitigation and enhancement

The third constraint identified in the Green Belt Review refers to physical constraints such as electricity pylons that run through the parcel of land. The Department of Health and Social Care contend that a Masterplan for the site and engagement with the local power network operator would easily deal with these constraints. If buffers are required, these areas could form part of the open space provision and offer a green lung within the scheme. The anticipated development capacity of 65%, and the large size of the site, allows sufficient flexibility for this to be masterplanned effectively and so would not represent a constraint to delivery.

Other mitigation could be provided including buffer areas adjacent to the railway line and protection for other infrastructure assets such as those identified by United Utilities and similarly these would all be addressed within a well-designed Masterplan.

Likewise, concerns raised about the potential impact of new housing within the site on trees protected by a Tree Preservation Order, the setting of a nearby Grade II Listed Building – Green House Farmhouse – and the proximity of a nearby Conservation Area can also be mitigated against with a suitable Masterplan for the site designed to ensure that important assets are not undermined. Given the size of the site, these all represent relatively minor constraints, which would be expected in any comparable development site.

In terms of concerns raised over Flood Risk, the Eccleston Park Golf Club site lies within Flood Zone 1 despite a tributary running through the southern half of the site, and therefore it is not at risk of significant flooding, contrary to objections raised in previous representations.

The matters raised by the Council and other consultees are therefore insufficient planning grounds not to bring forward this sustainable site for development within the Local Plan period.

Conclusions

In light of all the above factors, the Department of Health and Social Care would contend that the St Helens Local Plan 2020-2035 Submissions Draft (January 2019) is **not** justified, effective and consistent with national policy.

The reasons are that:

12

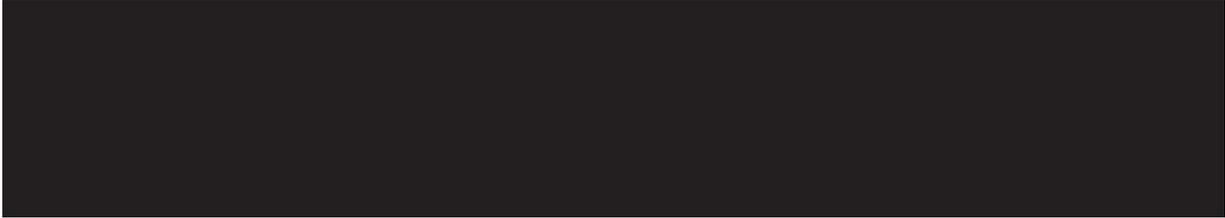
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PO3256



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Postcode: LS2 7UE	Postcode: M17 1HH
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Signature: [Redacted] **Date:** 7th March 2019

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Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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	LPA06: Safeguarded Land	Paragraph / diagram / table - Appendix 7	Table 4.7 – 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston	Policies Map –	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				St Helen's Borough Local Plan 2020-2035 Green Belt Review (December 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> √
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> √
Effective?	<input type="checkbox"/> √
Consistent with National Policy?	<input type="checkbox"/> √

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route during peak periods, particularly though Rainhill, most of the key junctions operate within practical capacity.” (paragraph 7.11.3)

The TIA goes onto state:

“It can be seen from Table 35 below that forecast junction operation is generally similar to that for the Do Minimum scenario, with the Holt Lane and Longton Lane junctions remaining within practical capacity, and the Rainhill Road and Wilmere Lane junctions remaining within absolute capacity.” (paragraph 7.11.6)

Both Holt Lane and Longton Lane are located in proximity to the Eccleston Park Golf Club site. In light of the findings of the TIA, it is unreasonable to withhold the allocation of the Eccleston Park Golf Club site on grounds of adverse transport impact when other Green Belt sites that are less well-related and accessible have been so allocated. We also wish to remind the Council that the relevant test from the NPPF is that any highways impact, following mitigation, would have to be judged ‘severe’ to prevent planning permission being granted.

12

Mitigation and enhancement

The third constraint identified in the Green Belt Review refers to physical constraints such as electricity pylons that run through the parcel of land. The Department of Health and Social Care contend that a Masterplan for the site and engagement with the local power network operator would easily deal with these constraints. If buffers are required, these areas could form part of the open space provision and offer a green lung within the scheme. The anticipated development capacity of 65%, and the large size of the site, allows sufficient flexibility for this to be masterplanned effectively and so would not represent a constraint to delivery.

Other mitigation could be provided including buffer areas adjacent to the railway line and protection for other infrastructure assets such as those identified by United Utilities and similarly these would all be addressed within a well-designed Masterplan.

13

Likewise, concerns raised about the potential impact of new housing within the site on trees protected by a Tree Preservation Order, the setting of a nearby Grade II Listed Building – Green House Farmhouse – and the proximity of a nearby Conservation Area can also be mitigated against with a suitable Masterplan for the site designed to ensure that important assets are not undermined. Given the size of the site, these all represent relatively minor constraints, which would be expected in any comparable development site.

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The matters raised by the Council and other consultees are therefore insufficient planning grounds not to bring forward this sustainable site for development within the Local Plan period.

Conclusions

In light of all the above factors, the Department of Health and Social Care would contend that the St Helens Local Plan 2020-2035 Submissions Draft (January 2019) is **not** justified, effective and consistent with national policy.

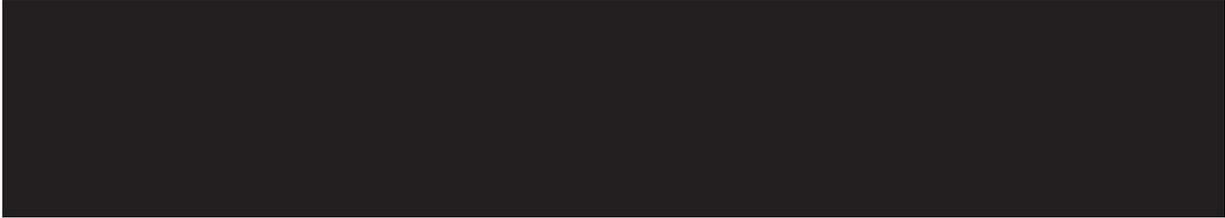
The reasons are that:

14

PO3257



St Helens Borough Local Plan 2020-2035 Submissions Draft Consultation - Land at former Eccleston Park Golf Club, Rainhill Road, Eccleston
graham.hale
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:26



1 Attachment



13 03 2019 St Helens BC Local Plan Submissions Document Representation Form FINAL V2.pdf

Dear Planning Policy Team,

Please find attached a representation on behalf of the Department of Health and Social Care relating to the above Local Plan consultation.

The representation concerns Policy LPA06: Safeguarded Land, and more specifically land at the former Eccleston Park Golf Club, Eccleston.

I trust this representation is duly made, and I would be grateful if you could confirm receipt of the attached.

Should you have any queries, please do not hesitate to contact either myself or my colleague Simon Peake (Associate Director – WYG Manchester Office).

Yours faithfully,

Graham Hale
Associate - Planning

WYG
Lakeland Business Park, Lamplugh Road, Cockermouth, Cumbria, CA13 0QT



WYG Environment Planning Transport Limited. Registered in England number: 03050297.
Registered Office: Arndale Court, Otley Road, Headingley, Leeds, West Yorkshire LS6 2UJ. VAT No: 431-0326-08.



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Jackie	First name: Simon
Last Name: Kirkman	Last Name: Peake
Organisation/company: Property Surveyor, Company Management Branch, Commercial Directorate, Finance & Group Operations, Department of Health & Social Care	Organisation/company: WYG
Address: Room 2S25 Quarry House Quarry Hill Leeds	Address: Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester
Postcode: LS2 7UE	Postcode: M17 1HH
[Redacted]	[Redacted]

Signature: [Redacted] **Date:** 7th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes (Via Email) No

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Conclusions

In light of all the above factors, the Department of Health and Social Care would contend that the St Helens Local Plan 2020-2035 Submissions Draft (January 2019) is **not** justified, effective and consistent with national policy.

The reasons are that:

14

- St Helens Council has not given good planning reasons to justify not allocating the Eccleston Park Golf Club site for residential development in the Plan period;
- the Council has not applied all the material planning considerations in favour of the site in a consistent and realistic manner compared against other former Green Belt sites which have been allocated;
- the lack of inclusion as an allocation in the Plan would mean that a deliverable site would not be capable of being brought forward and in so doing the Local Plan as it stands would stifle the provision of much needed housing in a sustainable location in the Borough. It would also lead to a redundant and disused site remaining incapable of re-development for nearly 20 years, which is detrimental to the local environment and does not represent sustainable planning in line with the NPPF;
- the Eccleston Park Golf Club site is now closed and there is ample provision of such golf facilities in the area; and
- the site is preferable in locational terms to other former Green Belt sites which have been brought forward, and the Eccleston Park Golf Club site would significantly contribute towards meeting the Borough's housing needs.

As a consequence, the Local Plan as it currently stands is not effective, and the unnecessary exclusion of a sustainable deliverable site would be contrary to the presumption in favour of sustainable development, as set out in the NPPF paragraph 11.

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 Department of Health and Social Care would recommend that the Local Plan be amended to include the allocation of the Eccleston Park Golf Club site for residential development within the Plan period under Policy LPA05 Table 4.5 – Sites allocated for new housing development.

It is also suggested that a comparative review of the other former Green Belt sites should be undertaken to reduce the scale of housing proposed at these other locations, and a more proportionate approach be taken to the spatial distribution of former Green Belt sites within the Borough.

A realistic conclusion from such an approach would enable development at the Eccleston Park Golf Club site to come forward within the Plan period.

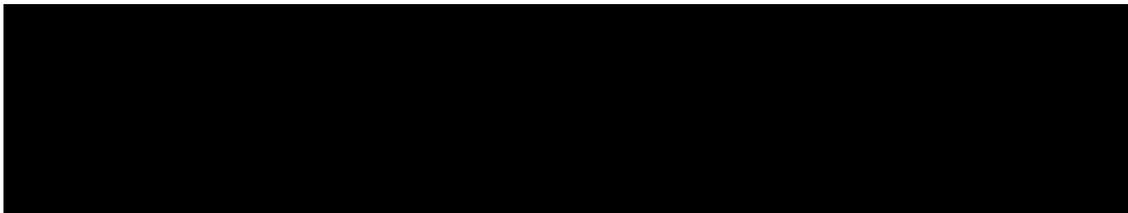
Such an approach would better align the Local Plan with the sustainable principles set out in the NPPF and hence lead to a sound Local Plan.

Please continue on a separate sheet if necessary

PO3258



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd
Shaun Taylor
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:21



5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

Kind regards
Shaun



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Shaun Taylor
Managing Director





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Council

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Shaun
Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm, Mag Lane, Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signatu	13.3.19
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Please tick as appropriate

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The site is currently identified in the St Helens Borough Local Plan 2020-2035 Submissions Draft (January 2019) as 'Safeguarded Land' (reference 3HS) for residential purposes under Policy LPA06. Under this Policy the site would make available 49ha of land with a net developable area of 65% and the potential to deliver 956 dwelling units. Under this designation the site could only come forward following a future Local Plan review that proposes the development. Furthermore, Policy LPA06 will restrict the development of Safeguarded Land to beyond the Plan period (i.e. beyond 2035), which means that Eccleston Park Golf Club would not be able to come forward for any re-development before 2035, despite the golf club having been closed since 2018 because it is no longer viable.

Eccleston Park Golf Club is surrounded by built development and would provide a natural rounding of the settlement limits being contained by residential development to the west, south and north-east of the boundary of the site. The development of this site would not represent an incursion into open countryside unlike the other former Green Belt sites referred to above. The proposed safeguarding of the site in the Local Plan until after 2035 would effectively sterilise any development of the site in the interim, which would be contrary to the aims of national Government's policy contained in the NPPF where there is a presumption in favour of sustainable development. Given that the Golf Club has closed there is little future potential for the site with the restrictions put in place by Policy LPA06.

The accompanying Representations submitted on behalf of Mulbury Warrington Ltd provide evidence as to why this site is deliverable and also set out in greater detail why the current housing land supply identified by the council is outdated, inaccurate and overly optimistic.

The wording of Policy LPA06 Safeguarded Land is also considered unsound by virtue of it not being ineffective

Criteria 2 of the policy is written as follows:

"Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused."

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

05

06

Please continue on a separate sheet if necessary

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A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

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:

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EiP to the benefit of the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



Representations

on behalf of:

Mulbury (Warrington) Ltd

at

Eccleston Park Golf Course,

Eccleston, St Helens

March 2018



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				capacity issues at Junction 23 of the M6 motorway at Haydock which will restrict the level of growth in this corridor during the Plan period without very significant improvements at this location.
4HA	Reginald Rd	2988	480 within plan period	This is a new Allocation within this version of the Local Plan. No evidence has been put forward to demonstrate the deliverability credentials of this Site. There are known access issues with this Site and we would raise considerable concerns regarding the locational sustainability credentials of this Site and whether it should be allocated at all. There is no evidence to demonstrate the Site could deliver 480 dwellings during the forthcoming plan period. <i>EPGC by contrast is in a highly sustainable location, could deliver up to 1,000 dwellings, including 300 affordable homes, and critically, the Site could easily be delivered prior to 2035.</i>
10HA	Moss Nook Urban Village	802	Within Plan Period	See comments above for SHLAA Ref 9.

3.12. Based on the sites highlighted above, we consider these Sites are unlikely to come forward within the plan period at the rates envisaged by the Council. This creates the need for additional allocations to meet the housing requirements set out in the Plan.

Safeguarded Sites

3.13. The table below provides some comments regarding two other safeguarded Sites where we are aware of issues that may affect their suitability for Safeguarding.

LPSD Ref	Name	Notional Capacity	Time frame	Comments
1HS	Land south of Leyland Green Rd, Garswood	291	Post 2035	We understand the current landowner does not support the release of the Site and



				does not wish for it to be developed for housing.
8HS	Land south of A580 between Houghtons Lane and Crantock Drive	1,027	Post 2035	We consider this Site to be significantly constrained by access. The Junction at Windle Island suffers from significant queuing during peak and off-peak times despite several highways schemes that have targeted a reduction in queuing traffic.

3.14. We consider there to be a need for further evidence to support the safeguarding of these Sites.



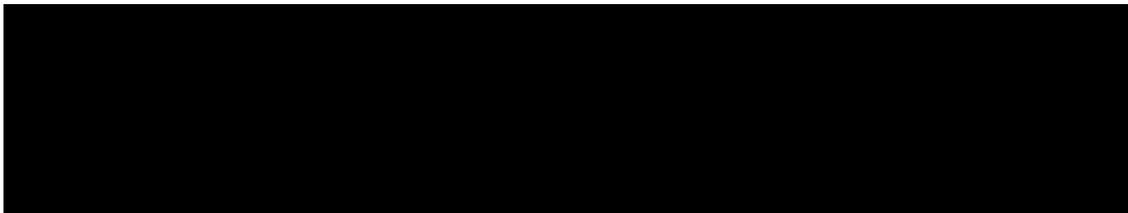
7. Summary and Conclusions

- 7.1. These representations have identified the Council's evidence base in relation to PDL is outdated and inaccurate. Assumptions are un realistic, therefore the delivery of the housing requirement is in jeopardy.
- 7.2. It is clear from these representations the available supply of existing PDL in the urban area is unlikely to come forward as expected and therefore more sites are required to be allocated for development. Those Sites currently identified as Safeguarded that score highly (such as EPGC) should be allocated for housing in the forthcoming Plan period.
- 7.3. Our clients site continues to be a sound choice to be allocated for development within the plan period as it was in the previous LPPO. The Council has not provided any evidence for their change in position. Additional evidence has been provided as part of these representations to address the constraints and concerns highlighted by the Council in their evidence, mainly the Green Belt Review 2018. The site is deliverable and can contribute promptly to providing much needed housing in St Helens. A number of benefits will also be brought to the borough as a result.
- 7.4. Mulbury are an experienced developer with a proven track record delivering complex sites for market and affordable housing and varying forms of care uses. As highlighted earlier in these representations, Mulbury are currently in detailed discussions with two major housebuilders and a number of Registered Providers (regarding the affordable requirement) with a view to accelerated housing delivery from this Site, this would include the early delivery of Affordable Housing. This Site therefore offers the opportunity to make a very significant contribution to the five-year housing land supply.
- 7.5. Turning to benefits associated with housing developments, it is accepted that all residential developments can deliver various benefits, however, only those Sites that are truly deliverable will provide these benefits. Our clients Site is available now and capable of very early delivery, therefore securing the multiple benefits set out in these representations.

PO3259



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd
Shaun Taylor
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:21



5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

Kind regards
Shaun



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PLANNING & DEVELOPMENT

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Shaun Taylor
Managing Director





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Yes (Via Email)No

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RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

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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	Paragraph / diagram / table	Table 4.7 – 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				St Helen's Borough Local Plan 2020-2035 Green Belt Review (December 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input 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 site is currently identified in the St Helens Borough Local Plan 2020-2035 Submissions Draft (January 2019) as 'Safeguarded Land' (reference 3HS) for residential purposes under Policy LPA06. Under this Policy the site would make available 49ha of land with a net developable area of 65% and the potential to deliver 956 dwelling units. Under this designation the site could only come forward following a future Local Plan review that proposes the development. Furthermore, Policy LPA06 will restrict the development of Safeguarded Land to beyond the Plan period (i.e. beyond 2035), which means that Eccleston Park Golf Club would not be able to come forward for any re-development before 2035, despite the golf club having been closed since 2018 because it is no longer viable.

Eccleston Park Golf Club is surrounded by built development and would provide a natural rounding of the settlement limits being contained by residential development to the west, south and north-east of the boundary of the site. The development of this site would not represent an incursion into open countryside unlike the other former Green Belt sites referred to above. The proposed safeguarding of the site in the Local Plan until after 2035 would effectively sterilise any development of the site in the interim, which would be contrary to the aims of national Government's policy contained in the NPPF where there is a presumption in favour of sustainable development. Given that the Golf Club has closed there is little future potential for the site with the restrictions put in place by Policy LPA06.

The accompanying Representations submitted on behalf of Mulbury Warrington Ltd provide evidence as to why this site is deliverable and also set out in greater detail why the current housing land supply identified by the council is outdated, inaccurate and overly optimistic.

The wording of Policy LPA06 Safeguarded Land is also considered unsound by virtue of it not being ineffective

Criteria 2 of the policy is written as follows:

"Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused."

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

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.

A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes , I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EiP to the benefit of the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3260



I would like to object to the proposed local plans as follows.

1. 2ES
2. 4EA
- 3.6EA
- 4.5EA

These plans will have a negative effect on the quality of life of all local residents both in St Helens and Ashton-in-Makerfield.

The air quality is already poor and can only be made worse.

Volume of traffic is also a big problem in this area and we dread the prospect of even more heavy traffic.

Surely brown field sights could be found in the St Helens area causing less obstruction and damage than these Green Belt sights.

Yours truly

Madeleine Preston

4 Calverhall Way

Ashton-in-Makerfield

WN49LB

Sent from my iPhone

PO3262

Representor Details

Web Reference Number	WF0486
Type of Submission	Web submission
Full Name	Mr Michael Collins
Organisation	
Address	61 Old Hall Drive Ashton in Makerfield Wigan WN4 9NA
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA 06 Safeguarded Land
Paragraph / diagram / table	4.7
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The inclusion of site 2ES in not consistent with government requirements for the improvement of air quality. The air quality in this area is already defined as poor in the submission at 8.274. This will add to the worsening of health conditions for residents of ashton in Makerfield Haydock And newton le willows

7. Please set out modification(s) you consider are necessary

This site should not be safeguarded and should remain in the green belt which exists to prevent urban sprawl and contributes to optimising air quality where there is already a heavy vehicle presence which has led to higher than recommended pollution limits

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

PO3263



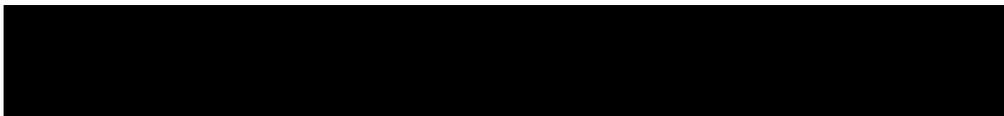
REPRESENTATION FORM LPA 05- OBJECTION

roper mike

to:

planningpolicy

13/03/2019 11:34



1 Attachment



Representation Form LPA 05 Mike Roper.Objection..pdf



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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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: Michael	First name:
Last Name: Roper	Last Name:
Organisation/company:	Organisation/company:
Address: 18 Pike House Road, Eccleston, St Helens.	Address:
Postcode: WA10 5JY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	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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WA10 1HP**

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <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 <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 <input type="checkbox"/>
Justified?	X <input type="checkbox"/>
Effective?	X <input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Plan is not justified.

The removal of 8HS from the Green Belt and reclassification as Protected Land cannot be justified by St Helens Council, it is not an effective use of land available and is based on a LP

that has not been positively prepared.

There is no evidence of adequate regional and cross border collaboration. The housing need assessment does not use Standard Methodology and there is evidence presented to justify exceptional circumstances.

The housing need assessment is calculated using out-of-date information and because of this provides an exaggerated housing requirement.

If the most current data available, produced by the ONS in 2016 predicts annual housing need of 383 houses, why is the council using 2014 data to justify a false need of 486 houses per year?

The plan takes no account of Brownfield and Previously Developed Land that will become available and added to the Brownfield Register over the lifetime of the LP.

According to St Helens Council of Contaminated Land Sites (2015), there is currently 3170 ha of the lowest priority contaminated land in St Helens. This land should be remediated and made available for building before the use of Green Belt Land is justified.

It is not acceptable that St Helens Council in conjunction with Liverpool City Region Combined Authority (LCRCA) have no coherent policy to bring currently unsuitable sites back into the Brown Field register for use.

Previously, St Helens Council has utilised remediation contaminated land, examples being Cansfield Street Laundry and the former Providence Hospital site.

Knowsley Council has also achieved the same on the extensive BICC sites.

These examples show what can be achieved when if there is a real willingness to do so.

It is completely naïve to believe developers, with their keen sense for maximising profits will be willing to utilise any less than perfect sites when they know ex-greenbelt land in a prime location is available.

I fear this safeguarded land will be used in preference to less desirable land as a deal enhancement in future dealings between our Council and developers.

Much of 8HS is prime quality agricultural land, fully utilised for local crop production. These crops are available locally, feeding the community and the farming provides jobs and income to the community.

In these uncertain times, it is completely irrational to consider losing this resource in favour of concrete and housing when alternatives are available. The loss of food production capacity will have an ever-increasing impact on our future. What is more important than sustaining our ability to feed ourselves?

Food security must to be considered now as a National priority. Political changes, migration and climate change make it imperative that current food production capability is preserved. It will be too late when this land is lost from the green belt

This beautiful, ecologically diverse open space must be protected [REDACTED]. To squander it forever for the financial benefit of developers and their shareholders, when reasonable alternatives are available, is nothing short of criminal.

What about the additional pollution caused by sourcing and transporting this food from outside our community?

The plan is not positively prepared or effective.

The LP contains little to show there has been any meaningful research or development into local infrastructure to support an additional 1000 homes on 8 HS.

The use of Houghtons Lane as entry and egress to the development with an island at its junction with the A580 would overload an area that is already at capacity. To avoid the A580 traffic would likely turn towards Springfield Lane, overloading, Church Lane, Chapel Lane and Millfields.

An example of what we can expect can be seen now as a result of the roadworks at Windle Island. To avoid this, cars are using residential local roads in that area including Walmsley Rd and Gunning Avenue as rat runs. This is aggravated by total lack of concern shown by drivers clearly exceeding speed limits and showing total disregard for pedestrians.

The provision of local amenities including shops, doctors and schools is also woeful, with even the current planned improvements is only just sufficient for current need.

The suggestion from United Utilities that Windle Brook can cope with the outfall from a further 1000 houses and associated roadways and pavements is clearly ridiculous. The brook, even after currently passing through fields reaches dangerously high levels after heavy rain. As the direction of flow is through already established housing, further development would place those properties at increased risk of flooding.

The development of 8HS will only create an isolated, car dependant housing estate on the outskirts of St Helens that overloads local amenities. All future residents would be forced to drive for employment, shopping, leisure, health care and schooling.

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 the only sensible and environmentally sound modification for the plan is to leave 8 HS within the Green Belt and preserve the diversity and food production capability of the land.

This loss of housing space can be easily replaced by mediation of only a small percentage of low-level contaminated land currently available or use of suitable brown field sites that are likely to become available during the lifetime of the LP.

██████ deserve better, we must think of them before we squander the few natural resources we have left.

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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PO3264



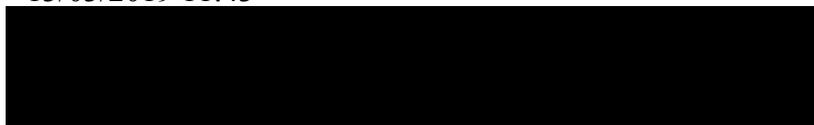
REPRESENTATION FORM. MRS S ROPER. LPA 05. OBJECTION

roper mike

to:

planningpolicy

13/03/2019 11:43



1 Attachment



REPRESENTATION FORM. MRS S ROPER. LPA05. OBJECTION.pdf



St.Helens
Council

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Susan	First name:
Last Name: Roper	Last Name:
Organisation/company:	Organisation/company:
Address: 18 Pike House Road, Eccleston, St Helens.	Address:
Postcode: WA10 5JY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/3/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes (Via Email)

No

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Other documents (please name document and relevant part/section)				Green Belt Review 2018					

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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 <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 <input type="checkbox"/>
Justified?	X <input type="checkbox"/>
Effective?	X <input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Plan is not justified.

The removal of 8HS from the Green Belt and reclassification as Protected Land cannot be justified by St Helens Council, it is not an effective use of land available and is based on a LP

that has not been positively prepared.

There is no evidence of adequate regional and cross border collaboration. The housing need assessment does not use Standard Methodology and there is evidence presented to justify exceptional circumstances.

The housing need assessment is calculated using out-of-date information and because of this provides an exaggerated housing requirement.

If the most current data available, produced by the ONS in 2016 predicts annual housing need of 383 houses, why is the council using 2014 data to justify a false need of 486 houses per year?

The plan takes no account of Brownfield and Previously Developed Land that will become available and added to the Brownfield Register over the lifetime of the LP.

According to St Helens Council of Contaminated Land Sites (2015), there is currently 3170 ha of the lowest priority contaminated land in St Helens. This land should be remediated and made available for building before the use of Green Belt Land is justified.

It is not acceptable that St Helens Council in conjunction with Liverpool City Region Combined Authority (LCRCA) have no coherent policy to bring currently unsuitable sites back into the Brown Field register for use.

Previously, St Helens Council has utilised remediation contaminated land, examples being Cansfield Street Laundry and the former Providence Hospital site.

Knowsley Council has also achieved the same on the extensive BICC sites.

These examples show what can be achieved when if there is a real willingness to do so.

It is completely naïve to believe developers, with their keen sense for maximising profits will be willing to utilise any less than perfect sites when they know ex-greenbelt land in a prime location is available.

I fear this safeguarded land will be used in preference to less desirable land as a deal enhancement in future dealings between our Council and developers.

Much of 8HS is prime quality agricultural land, fully utilised for local crop production. These crops are available locally, feeding the community and the farming provides jobs and income to the community.

In these uncertain times, it is completely irrational to consider losing this resource in favour of concrete and housing when alternatives are available. The loss of food production capacity will have an ever-increasing impact on our future. What is more important than sustaining our ability to feed ourselves?

Food security must to be considered now as a National priority. Political changes, migration and climate change make it imperative that current food production capability is preserved. It will be too late when this land is lost from the green belt

This beautiful, ecologically diverse open space must be protected [REDACTED]. To squander it forever for the financial benefit of developers and their shareholders, when reasonable alternatives are available, is nothing short of criminal.

What about the additional pollution caused by sourcing and transporting this food from outside our community?

The plan is not positively prepared or effective.

The LP contains little to show there has been any meaningful research or development into local infrastructure to support an additional 1000 homes on 8 HS.

The use of Houghtons Lane as entry and egress to the development with an island at its junction with the A580 would overload an area that is already at capacity. To avoid the A580 traffic would likely turn towards Springfield Lane, overloading, Church Lane, Chapel Lane and Millfields.

An example of what we can expect can be seen now as a result of the roadworks at Windle Island. To avoid this, cars are using residential local roads in that area including Walmsley Rd and Gunning Avenue as rat runs. This is aggravated by total lack of concern shown by drivers clearly exceeding speed limits and showing total disregard for pedestrians.

The provision of local amenities including shops, doctors and schools is also woeful, with even the current planned improvements is only just sufficient for current need.

The suggestion from United Utilities that Windle Brook can cope with the outfall from a further 1000 houses and associated roadways and pavements is clearly ridiculous. The brook, even after currently passing through fields reaches dangerously high levels after heavy rain. As the direction of flow is through already established housing, further development would place those properties at increased risk of flooding.

The development of 8HS will only create an isolated, car dependant housing estate on the outskirts of St Helens that overloads local amenities. All future residents would be forced to drive for employment, shopping, leisure, health care and schooling.

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 the only sensible and environmentally sound modification for the plan is to leave 8 HS within the Green Belt and preserve the diversity and food production capability of the land.

This loss of housing space can be easily replaced by mediation of only a small percentage of low-level contaminated land currently available or use of suitable brown field sites that are likely to become available during the lifetime of the LP.

██████████ deserve better, we must think of them before we squander the few natural resources we have left.

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.**

PO3265



Local Plan Representation Form

[REDACTED] to: planningpolicy

13/03/2019 12:37

[REDACTED]

1 attachment



NW Representaion Form.pdf

Attached is my form



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Neil	First name:
Last Name: Winstanley	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Windle Grove Windle St Helens Postcode: WA10 6HL	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [REDACTED]	Date: <input type="text" value="11/3/19"/>
---	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <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

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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 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?	X
Justified?	X
Effective?	X
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, the land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town there are numerous examples of developments where remediation has been required, why should the council give up our heritage of the green belt to give quick profits to housing developers and leave large plots of brownfield sites fallow. The plan should focus on developing those brownfield sites with the housing developers part of the package includes the land remediation as have other councils in the area. It can be done if there is a willingness to do so. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

Recognising that St Helens Council has used the ONS (2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS (2016)) are available. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens, the Council are using the older forecast of 486. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

There is a complete lack of infrastructure in the area as the local road networks, health service, schools, policing, public transport, barely supports the current Windle and Eccleston neighbourhoods, a massive expansion of housing into otherwise farming land. The Infrastructure Delivery Plan does not address these requirements and only points to current work at Windle Island and Bleakhill School, but these are to meet the current needs not those of a massive new development. The Plan is not effective.

The location of the site does not meet those for sustainable development as it would require everybody to use cars or taxi's as the public transport options are already minimal and what facilities that exist are actually being moved further from the proposed site (New Millfield Healthcare facilities).

The very large risk from flooding has been blatantly overlooked, the designation of the flood zones within the area apply to an undeveloped site and are too small for the run off that would be created from developing the site. In addition, flood defences installed at various locations along Windle Brook into the centre of St Helens installed after numerous flooding problems in the past would be overwhelmed by the runoff from the new housing developments that is currently being absorbed into the fields

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3266



Ref LPSD
dot garnett
to:
planningpolicy
13/03/2019 13:00



1 Attachment



new doc 2019-03-13 12.47.51-20190313125714 pm.pdf

St Helens Council

Please find attached Representation form to oppose planning on Rainhill greenbelt.

Dorothy Garnett
14 Gardeners Way
Rainhill
L35 4PU



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: DOROTHY GARNETT	First name:
Last Name: GARNETT	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 14 GARDENERS WAY RAINHILL	Address:
Postcode: L35 4PU	Postcode:
[REDACTED]	Tel No:
	Mobile No:
	Email:

Signature: [REDACTED] Date: 13/03/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

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RETURN DETAILS

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post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP A06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> Don't Know <input type="checkbox"/>	No <input type="checkbox"/> Don't Know <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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 style="text-align: center;"><i>Evidence for below is from personal experience of living here.</i></p> <p>• We live in Gardeners Way, we have to emerge onto Rainhill Road several times a day. The traffic is <u>so</u> busy and not only rush hours morning and early evening. It is necessary to edge right into the road before it is possible to see (parking on double-yellow lines close to our road makes this worse).</p> <p>- the increase in traffic if these homes are built will make it impossible to turn onto Rainhill Road, especially a right-turn, therefore increasing the likelihood of accidents, potentially serious. The road cannot cope with any more traffic that these plans would cause. (Already accidents occur)</p> <p>- I walk along Rainhill Road [redacted] and otherwise, trying to cross-over is nearly impossible at times. The pavements are so narrow in places, I am always fearful of being knocked by</p>	

Please continue on a separate sheet if necessary

SECRET

Continued from previous page - Part B - Your representation.

... bus or larger vehicle. This again would decrease the safety of road users, mainly pedestrians on Rainhill Road.

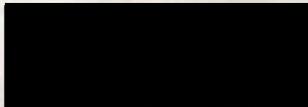
Pollution from vehicles is bad enough now so presents an increasing level of fumes to damage health. There are scientific links that prove vehicle fumes cause cancer, lung problems and other serious health conditions.

My representation is based on my/our own experience of living here and the problems of road traffic at the moment, which would increase several-fold if this planning application is passed and homes built.

In summary the additional traffic the additional homes would generate would be substantial and therefore make the area a poorer and less healthy place to live.

The greenbelt once gone, will never be back. This would be so sad for the people that live here, the environment and wildlife.

Dorothy Barnett
14 Gardeners Way
Rainhill
L35 4PU


13/03/19

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should remove plans to build on our greenbelt to stay in keeping with National Planning Policy framework.

The council should safeguard our greenbelt for the good of the area, people who live here and our treasured environment.

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.

PO3267



Local plan response

Michaela Rutherford to: planningpolicy@sthelens.gov.uk

13/03/2019 13:40

1 attachment



Local plan response.pdf

Attached is my response to the local plan 2020-2035.
Scanned with DocScan
<http://itunes.apple.com/app/id453312964?mt=8>

Michaela Sian Rutherford
876 Warrington Road
Rainhill
L356PG



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by **no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

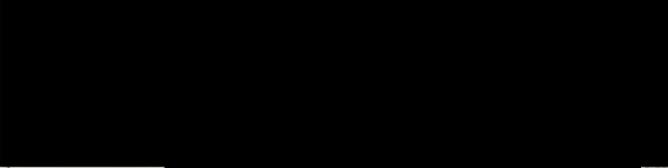
This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>MICHAELA SIAN</u>	First name:
Last Name: <u>RUTHERFORD</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
Address: <u>876 Warrington Rd Rainhill, Prestot Merseyside</u>	Address:
Postcode: <u>L35 6PG</u>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <u>13/3/19</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.

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	Paragraph / diagram / table	3H5	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?	Yes <input type="checkbox"/>	Don't Know <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The road infrastructure around 3H5 cannot support additional traffic as they are only B roads which are already highly populated. The one main A road (A57 Warrington Rd) which continues through to other proposed developing areas in Knowsley is already at max capacity and any further development will seriously impact on local small estates and B roads. The impact on the environment and air quality will be awful, St Helens already has a high number of asthmatics due to poor air quality. This existing Greenbelt is a natural buffer from urban sprawl and release from greenbelt will have significant harm and not to mention the impact on the local wildlife, flora and fauna which many are protected. Also our local NHS services, police and fire are all ready over stretched.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This land should not be placed in safeguarding and should therefore remain as Green Belt Land and council should abide by the National Planning Policy Framework (2019)

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)

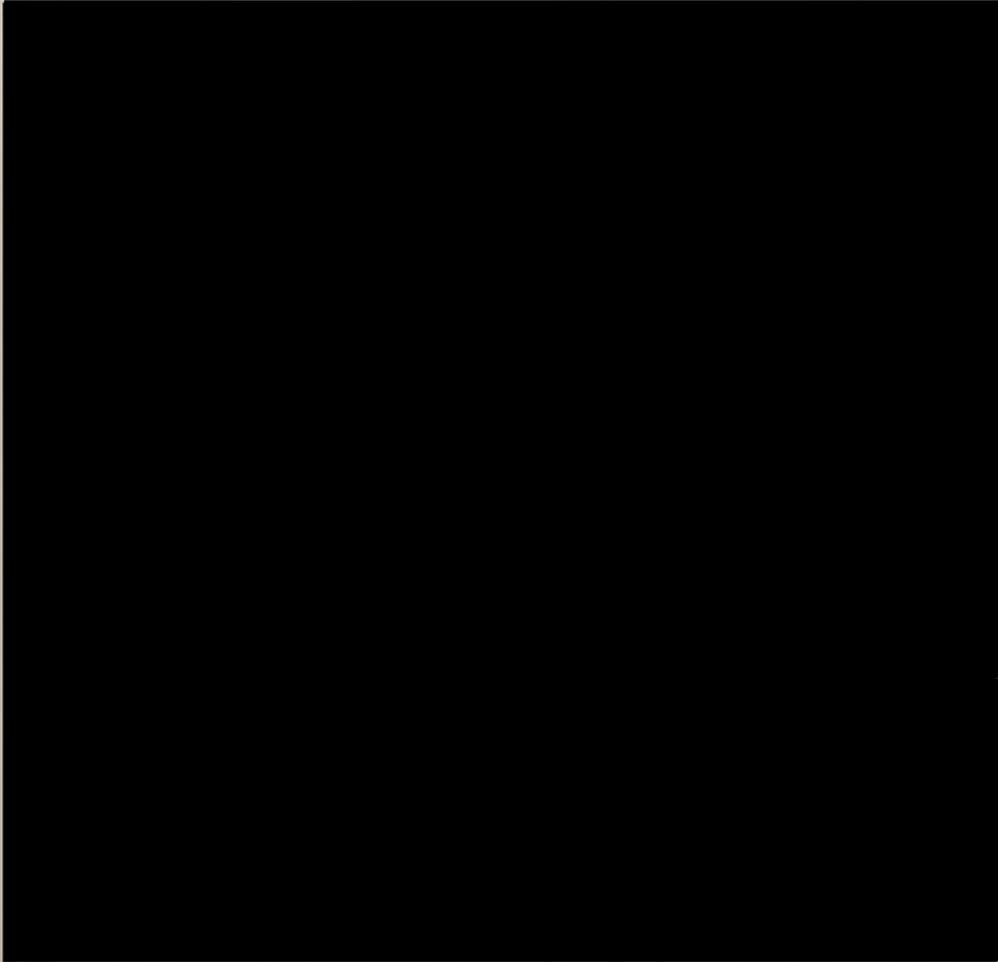
X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

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

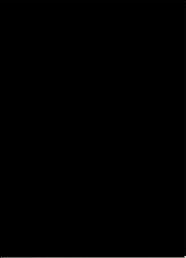
Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

I give explicit permission for my name to be used in this response:



S. W. BYRON

A. G. RUTHERFORD



G. Rutherford

A. J. GLOVER

PO3268



LDP Representation Form

██████████ to: planningpolicy

13/03/2019 16:30



1 attachment



CW Representaion Form.pdf

Sent from my iPad



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Christine	First name:
Last Name: Winstanley	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Windle Grove Windle St Helens Postcode: WA10 6HL	Address:
Tel No: [REDACTED]	Postcode:
Mobile No:	Tel No:
Email: [REDACTED]	Mobile No:
	Email:

Signature: [REDACTED] Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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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	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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 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?	X
Justified?	X
Effective?	X
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, the land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town there are numerous examples of developments where remediation has been required, why should the council give up our heritage of the green belt to give quick profits to housing developers and leave large plots of brownfield sites fallow. The plan should focus on developing those brownfield sites with the housing developers part of the package includes the land remediation as have other councils in the area. It can be done if there is a willingness to do so. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

Recognising that St Helens Council has used the ONS (2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS (2016)) are available. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens, the Council are using the older forecast of 486. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

There is a complete lack of infrastructure in the area as the local road networks, health service, schools, policing, public transport, barely supports the current Windle and Eccleston neighbourhoods, a massive expansion of housing into otherwise farming land. The Infrastructure Delivery Plan does not address these requirements and only points to current work at Windle Island and Bleakhill School, but these are to meet the current needs not those of a massive new development. The Plan is not effective.

The location of the site does not meet those for sustainable development as it would require everybody to use cars or taxi's as the public transport options are already minimal and what facilities that exist are actually being moved further from the proposed site (New Millfield Healthcare facilities).

The very large risk from flooding has been blatantly overlooked, the designation of the flood zones within the area apply to an undeveloped site and are too small for the run off that would be created from developing the site. In addition, flood defences installed at various locations along Windle Brook into the centre of St Helens installed after numerous flooding problems in the past would be overwhelmed by the runoff from the new housing developments that is currently being absorbed into the fields

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

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<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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***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.**

PO3269

EL0120



St Helens Borough Local Plan 2020 - 2035 (Submission Draft) - Representations submitted

on Behalf of Mr A Jones

Guy Evans

to:

planningpolicy@sthelens.gov.uk

12/03/2019 18:19



① GBR

② LPA05

③ LPA06

④ LPA02

⑤ TABLE 4-6

⑥ TABLE 4-5

⑦ TABLE 4-8

3 Attachments



Appendix 1_DTA Elton Head Road_St Helens Council response to preapp Nov2017.pdf



LP submission draft representations v311.03.19.pdf



lpsd-representation-form COMPLETED for Mr A Jones 12.03.19.pdf

Dear Sir / Madam

Please find attached representations submitted on behalf of Mr A Jones in respect of land south of Elton Head Road, Thatto Heath, St Helens.

Confirmation of receipt would be appreciated.

Regards

Guy Evans BSc (Hons) MSc MRTPI

Director

Chartered Town Planner

Cassidy+Ashton

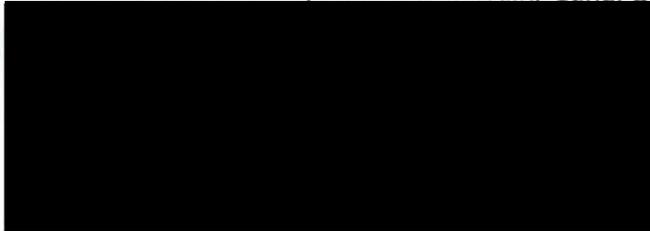
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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Guy
Last Name: Jones	Last Name: Evans
Organisation/company:	Organisation/company: Cassidy + Ashton
Address: c/o Agent	Address: 10 Hunters Walk, Canal Street, Chester
Postcode:	Postcode: CH1 4EB
[Redacted]	

Signature:	[Redacted]	Date:	12.03.2019
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

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St.Helens Council
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Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

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PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05.1 LPA06 LPA02 LPA05	Paragraph / diagram / table	Table 4.8 Table 4.5	Policies Map	Yes	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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

Refer to separately submitted representation / response statement

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.

Refer to separately submitted representation / response statement

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 checked="" type="checkbox"/> x	<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:

Requirement for detailed discussion around housing land supply and the Plan's spatial strategy. Critical analysis of housing land requirements and supply (Table 4.6) required. Critical analysis of Green Belt Review and site selection required.

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.**

Cassidy+ Ashton

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St. Helens
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT
JANUARY 2019

**A BALANCED PLAN FOR
A BETTER FUTURE**

**St. Helens Borough Local Plan
Submission Draft Consultation
Response Statement on behalf of the
Jones Family – Land off Elton Head Road**

CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

7.14 It is requested that table 4.5, cross-referenced within Policy LPA05 – Meeting St. Helens Borough’s Housing Needs is altered to include Land off Elton Head Road, as an individual site with an area of 3.70 hectares and an indicative capacity of a minimum of 84 units.

} 6

7.15 **Policy LPA06 – Safeguarded Land**

7.16 Subject to acceptance of the site as an allocation, it is requested that table 4.8 – Safeguarded Land for Housing is updated to exclude reference 7HS.

} 7

PO3270



RE: LOCAL PLAN REPRESENTATION

carr michael

to:

planningpolicy, [REDACTED]

13/03/2019 10:22



1 Attachment



LOCAL PLAN REPRESENTATION MADE BY MR MIKE CARR.pdf

Dear Sir/Madam,

further to the online representation that I made this morning, please see the attached formal representation setting out my comments in relation to the Local Plan process and Parcel GBP 098.

Please can you confirm receipt?

Regards

Mike Carr

REPRESENTATION MADE BY MR MIKE CARR [REDACTED] – 12th MARCH 2019

THIS REPRESENTATION RELATES TO THE PROPOSED DEVELOPMENT PARCEL GBP 098 - LAND SOUTH OF A580 EAST LANCASHIRE ROAD AND EAST OF HOUGHTONS LANE, WINDLE - DEVELOPMENT SITE TO BE REMOVED FROM THE GREEN BELT, BUT TO BE SAFEGUARDED FOR FUTURE.

FUTURE REPRESENTATIONS.

I would like to make it clear at this stage that I wish to take part in any forthcoming Inquiry into the adoption of the Local Plan. I am happy to make verbal representations to the Planning Inspector and to be cross-examined by the Council Counsel and the Counsels that are likely to represent the developers who have an interest in developing land in the Borough, which the Local Planning Authority (LPA) proposed to be released from the Green Belt.

BACKGROUND COMMENTS

St Helens Council (The LPA) sets out its position in relation to the release of land from the Green Belt, identifying that this process and the release of proposed development sites, would somehow result in “a balanced plan for a better future”. The underpinning arguments are that the Borough needs to release this land from the Green Belt to support the provision of much needed new homes and sites for commercial development, despite there being no robust evidence to support such a concept.

In addition, it is quite clear that there is ample brownfield land and other more sustainably located and less constrained green belt land, which would allow the LPA to provide new homes and employment land if such an argument stands up to reasonable scrutiny.

In reality, it seems clear from the sites that are proposed to be released from the green belt, provide ‘easy’ options for the developers that they will rely on to develop these site. This would be detrimental to the residents of the Borough and would cause a level of harm that is unjustified and unsustainable.

THE CURRENT POSITION IN RELATION TO THE PROPOSED RELEASE OF LAND SOUTH OF A580 EAST LANCASHIRE ROAD AND EAST OF HOUGHTONS LANE, WINDLE

The most up to date document offered by the LPA is the Green Belt Review December 2018. This document provides the LPA’s current position in relation to sites, which it intends to take forward to the formal adoption stage through the Inquiry process.

Whilst there are considerable negative arguments to be made in relation to the proposed release of other sites in the Borough, this statement relates specifically to parcel GBP 098.

Taking this into account, the Green Belt Review December 2018 identifies that:-

- This large parcel (GBP 098) is located outside the edge of the current urban area to North West of Windle and Eccleston. Although the parcel was proposed by the Council as an allocated site at the LPPO stage, a number of constraints affect it that would have a

significant impact on the NDA and the deliverability of development within it. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this parcel.

The parcel has well defined boundaries formed by existing housing and adjacent highways. However, it constitutes a substantial green field site which provides high quality agricultural land. Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge. These factors mean that the release of the parcel for development, and the timing of its development, would need to be carefully justified in the light of the Council's objective of making efficient use of previously developed land to meet development needs.

Significant improvements to highways infrastructure would also be required to support the successful development of the parcel. It would not be possible to provide vehicular access (except for potentially a very limited number of dwellings) directly from the estate roads from the south due to existing capacity issues along small estate roads and junctions. As a result, access is likely to be primarily from Houghton's Lane, which is currently a narrow country lane which would require a substantial upgrade and realignment through the parcel and a new junction to link with the A580. Significant improvements would also be likely to be needed to public transport facilities including (due to the scale of the parcel) a new bus route through the parcel.

The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area. Any proposed development would need to be informed by a suitable ecological study informed by wintering bird surveys. If the use of the parcel by the relevant species is confirmed, a mitigation strategy (which may need to be of substantial scale given the size of habitat which may be affected) would need to be agreed and implemented, probably using land which is outside the parcel. This process is likely to take a considerable period of time. Development would only be acceptable if a suitable and deliverable mitigation strategy is agreed.

A further factor that needs to be considered is the availability of schools capacity and other social infrastructure. Given the scale of the parcel it is possible that a new primary school will be required and potentially upgrades to other social infrastructure and amenities.

The parcel is also affected by a number of other constraints as set out below. It is considered that these can be addressed within the master planning of a new development.

A buffer of approximately 20m would be required to protect Windle Brook (a designated LWS, which runs through the site). This can be readily accommodated as part of the green infrastructure to serve development within the parcel.

Two UU pipelines, including a main combined sewer, run through the site from its north-eastern to south western corners. Their size and location is likely to limit the residential capacity of the parcel.

Due to the parcel's proximity to the A580 a significant buffer (with a minimum width of 40m) would be needed, together with other attenuation measures, to mitigate the impacts of noise and air pollution from the road.

The 2018 SA concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of likely negative effects in relation to biodiversity, landscape sensitivity, agricultural land and the historic environment. Whilst these effects (with the exception of the loss of agricultural land) are considered to be likely to be capable of being suitably mitigated this will impact on the phasing of development.

In summary, the parcel is considered suitable for removal from Green Belt. However, having regard to all the factors described above, it is now recommended that the parcel be safeguarded (in order to meet potential housing needs beyond the Plan period) rather than allocated for development.

KEY COMMENTS MADE BY THE LPA IN ITS CURRENT ASSESSMENT RELATING TO PARCEL GBP 098

1. Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge.

This statement by the LPA clearly supports the conclusions that the allocation of this land in the local plan would conflict with the fundamental aim of Green Belt policy, which is to prevent urban sprawl by keeping land permanently open.

It also identifies the purposes of including land within the Green Belt as being:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The release of parcel GBP 098 would conflict with the fundamental aim of the Green Belt and with points 1, 2, 3 & 5 set out above.

2. The constraint parameters set out by the LPA at the start of this process were pre-selected by the LPA, and DID NOT allow all the sites put forward to be properly and lawfully assessed in relation to the constraints attached to each particular site. Whilst the LPA are allowed a certain amount of flexibility in terms of the assessment parameters they set, what is clear is that any LPA MUST take into account the requirements of applicable planning guidance, which specifically relates to site constraints.

Taking this into account, the initial green belt review set out an extremely limited criteria base, so as to assess the suitability of site in terms of their importance to the Boroughs green belt. This initial aims of the review appear to have discounted/included sites on that

basis only. I say this because of the many examples of the site allocation process set out in the NPPF (2012 & 2018) and the NPPG, which set out specific rules and guidance through which LPA's consider planning applications and allocate sites through the Local Plan process.

In particular, and amongst other site constraints, there is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system.

Further to the above, and through the initial allocations process, the LPA set out a site parameter test of 2/3 of a site not being covered by fluvial flooding. This is something that the LPA appear to have made up, without any reference whatsoever as to the requirements of Paragraph 100 of the 2012 NPPF.

Such an approach is fundamentally incorrect.

At the time of the initial green belt review, the 2012 NPPF provided the governing planning rules attached to all elements of the planning process. In terms of flooding, Section 10 - Meeting the challenge of climate change, flooding and coastal change set out the Government's policies. In this case, paragraph 100 identified the following:-

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

THE SEQUENTIAL TEST REQUIREMENTS SET OUT IN THE 2012 NPPF AND THE CURRENT DOCUMENT ARE LEGAL REQUIREMENTS THAT FOR PART OF THE LOCAL PLAN PROCESS AND THE DECISION MAKING PROCESS.

THE LPA'S APPROACH TO PARCEL GBP 098 IN TERMS OF FLOOD RISK

I attended the meeting at St Julies and discussed this with [REDACTED]. I asked him where the Sequential test document was, through which the Council assessed sites in terms of flooding, as directed above. He advised me that there was a Flood Risk Assessment but no sequential test.

Such an approach is contrary to the requirements set out in the NPPF, and has resulted in the Parcel GBP 098 being left as a preferred option, despite there being many other sites identified in the Green Belt Review, that did not fall within an area of potential flooding, which paragraph 100 seeks to fundamentally avoid.

Such an approach by the LPA in this Local Plan process, indicates that the allocation of Parcel GBP 098 as a safeguarded development site, would be unlawful because the LPA HAVE NOT FOLLOWED THE LAWFUL REQUIREMENTS SET OUT IN THE NPPF.

So that there is no doubt as to the Governments approach, the updated 2019 NPPF version, sets out the same required process in Section 14, paragraphs 155 – 165 set out what is required.

[REDACTED] claimed that the Eccleston sites flooding issues could be dealt with through the development of the site at some time in the future, which is perhaps true. However, and what is essential to recognise is that St Helens Council did not follow the applicable policy and legally required directions set out in the NPPF, as it chose not to sequential test any sites that were susceptible to flooding and identified in a flood risk area.

Given that the Eccleston site was and still is promoted as one parcel of development land, the specific requirements attached to the site being sequentially tested have not been carried out. If this were a planning application, St Helens Council would be bound to refuse the planning application through lack of information.

Further to this, [REDACTED] a planning application in Congleton, whereby the refused planning application for residential development went to appeal. The Planning Inspector concluded that to all intents and purposes, the proposed development was acceptable. However, the site fell within a flood zone that required a sequential test to be carried out. This had not been done.

As such, because the requirements of the NPPF had not been followed, he could not allow the appeal.

In terms of St Helens Local Plan process and the allocation of site, the Eccleston site was not tested in any way, but remained as a preferred option. This is a failure of Policy and potentially makes its allocation unlawful.

THE CURRENT REVIEW

The current Green Belt Review December 2018 clearly identifies a significant series of planning constraints that should have formed part of the constraint parameters used at the start of this whole process. Those constraints, the LPA now identify as being a number of constraints affect it that would have a significant impact on the NDA and the deliverability of development within it. Those constraints are identified as:-

- The site is a substantial green field site which provides high quality agricultural land.
This is contrary to NPPG guidance

- Significant improvements to highways infrastructure would also be required to support the successful development of the parcel.
This is potentially contrary to the provisions of the NPPF

- The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area.
This is potentially contrary to the NPPF and in conflict with European Habitat Regulations

- The availability (or lack) of schools capacity and other social infrastructure. Given the scale of the parcel it is possible that a new primary school will be required and potentially upgrades to other social infrastructure and amenities.
This indicates that the allocation of this site would conflict with the 3 strands of sustainable development

- A buffer of approximately 20m would be required to protect Windle Brook (a designated LWS, which runs through the site).
This is contrary to the provisions off the NPPF as this site remained in the process, despite their being many sites that would have been sequentially preferable, if such a tet had actually been carried out.

- Two UU pipelines, including a main combined sewer, run through the site from its north-eastern to south western corners. Their size and location is likely to limit the residential capacity of the parcel.
This adds further to the potential of flooding on the site if there is a breakdown in pipeline infrastructure.

- Due to the parcel's proximity to the A580 a significant buffer (with a minimum width of 40m) would be needed, together with other attenuation measures, to mitigate the impacts of noise and air pollution from the road.

This suggest that the development of this site would be contrary to health and thereby conflict with the 3 strands of sustainable development.

CONCLUSIONS

The LPA's current 2018 Green Belt review sets out the substantial constraints that are applicable to this site. When read together, and taking into account all other relevant material planning considerations in relation to the position of the site within the Borough, it is entirely reasonable to conclude that the allocation of this site and any future development of the site would be unsustainable. This is due to such a development having clear and demonstrable adverse impacts on this part of the borough, thereby meaning that the allocation of the site does not represent sustainable development.

What is also clear is that if these constraints had been identified in the first instance, as the LPA were legally required to do through the provisions of the NPPF, then Parcel GBP 098 would most likely have failed the sequential test approach, although we will now never know.

As such, the LPA's failure to carry out its statutory responsibilities, despite claims that they can deal with flooding on the site through the development process, is at best misinformed, and at worst unlawful.

What is also clear is that the release of parcel GBP 098 would conflict with the fundamental aims of the Green Belt, and its allocation would conflict with 4 of the 5 purposes of including land within the Green belt. The LPA may argue that there are Very Special Circumstances that outweigh this harm, although when you consider the identified constraints of this site at the same time, there is no justifiable reason why Parcel GBP 098 should remain as a preferred site.

PO3271



St Helens Borough Local Plan 2020-2035
CHRIS MOORE
to:
planningpolicy
13/03/2019 12:06



16
Knowsley
Road
Rainhill
Prescot
Merseyside
L35 0PA
12 March,
2019

Dear Sir,

Re, St Helens Borough Local Plan 2020-2035

In response to consultation on the St Helens Borough Local Plan 2020-2035, as it affects Rainhill, please see below.

Our comments are with regards to Policy LPA06: Safeguarded Land proposes to safeguard site 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston for future housing development.

We are aware that no development is proposed on the site prior to 2035, but should the site be considered for future development we would ask that the following be taken into consideration as future development would:

- o Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand
- o Have a detrimental effect on highway safety, for vehicles and pedestrians alike
- o Increase the pressure on schools and nurseries, which are already over-subscribed
- o Increase the pressure on social infrastructure e.g. Doctor’s surgeries and dentists
- o Exacerbate existing health problems for residents, due to increase vehicle pollution
- o Be detrimental to residential amenity, due to the loss of Green Belt.

If the above concerns could not be addressed, the policy LPA06 would be unacceptable as future development on the former Eccleston Park Golf Club site.

Yours faithfully,

Chris Moore
Barbara Moore

PO3272



St Helens Borough Local Plan 2020-2035

CHRIS MOORE

to:

planningpolicy

13/03/2019 12:06



16
Knowsley
Road
Rainhill
Prescot
Merseyside
L35 0PA
12 March,
2019

Dear Sir,

Re, St Helens Borough Local Plan 2020-2035

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- Exacerbate existing health problems for residents, due to increase vehicle pollution
- Be detrimental to residential amenity, due to the loss of Green Belt.

If the above concerns could not be addressed, the policy LPA06 would be unacceptable as future development on the former Eccleston Park Golf Club site.

Yours faithfully,

Chris Moore
Barbara Moore

PO3273



St Helens Local Plan
Ian Leyland
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:36



1 Attachment



Green Belt Letter - Mr I Leyland.docx

Please find attached my response to the St Helens Local Plan to be considered as part of the consultation process.

Sent from [Mail](#) for Windows 10

Mr I Leyland
42, Ecclesfield Road,
Eccleston,
St Helens

13th March 2019

Reference: St Helens Local Plan

Dear Sirs,

I have recently read the latest version of the Local Plan which I think continues to be fundamentally flawed and inconsistent with National Policy. I would ask the following points be taken into account and considered.

Duties of an Elected Representative

The local Councillors taking decisions on whether to approve the plan are elected representatives of the people of St Helens. Whilst I recognise that there is always a balance between leadership and representing the people as an elected politician, the Councillors have a duty to consider the views of those who have elected them.

In terms of the local plan, and in particular the release of Green Belt land for housing, there is overwhelming opposition to the Council Proposals from the people. I have heard very few voices, if any, in support of this. When the opposition to a proposal is so universal then the Councillors would be failing in their democratic duties to approve such a plan and would undermine the confidence of the political process.

Unrealistic Aspirations

The plan is based on unrealistic expectations regarding future growth. Whilst it is right for a council to be aspirational, they should at least be realistic and base their assessment on the latest information. The Office for National Statistics estimate from 2016 that there is a requirement for 383 houses per year, yet the local plan still refers to the older figures from 2014, which forecasts a requirement for 486 houses per year.

Brown Field First

The Government and Council have a stated policy of Brownfield first. The Council's own Brownfield Register suggests land availability for 5808 houses. It would be my contention that provides sufficient Brown Field land for development and there is no requirement to release green belt land at this time.

Future Development

Whilst the Council are claiming that there is a requirement to release land from the Green Belt to Safeguard for longer term development to plan beyond this 15 year Local Plan, the amount being proposed to be released is excessive. How can the Council possibly justify safeguarding an additional

155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 04

Given the amount of Brownfield land already available, plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. 05

Lack of Infrastructure

The plan lacks detail on the necessary future infra-structure to meet demands in terms of houses, schools and medical services. 06

The plan promotes unsustainable traffic growth in the exact areas that the Borough already has significant problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. 07

It also lacks detail on how it will deal with the additional demand for medical services and educational requirements that such a rapid proposed growth of population would require.

Given all the above I return to my first point regarding the peoples trust and confidence in their elected officials and the political system. I am sure most would recognise that this is currently at an all-time low with a number of people suggesting and feeling that they are unrepresented. The fact is that if the land is released unnecessarily it will further damage the relationship of the people and with the political class. What the Council leaders would be doing is demonstrating an arrogance that only their views matter, and that consultation with the electorate is meaningless. Not releasing the green belt land, and listening and responding to the views put forward would be a step to repair an already damaged and fragile relationship.

Taking all of the above cumulatively, the Local Plan in its current form, when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely follow that it cannot be considered sound and rejected. 08

Yours Sincerely,

I Leyland

PO3274



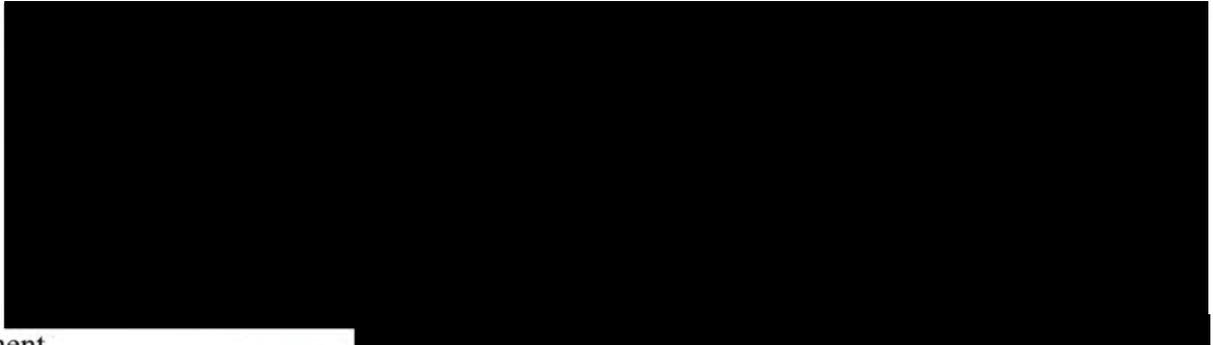
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

Kennedy, Amy (UK - Manchester)

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:58



1 Attachment



CCfE_reps to St Helens Local Plan_without appendices_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom

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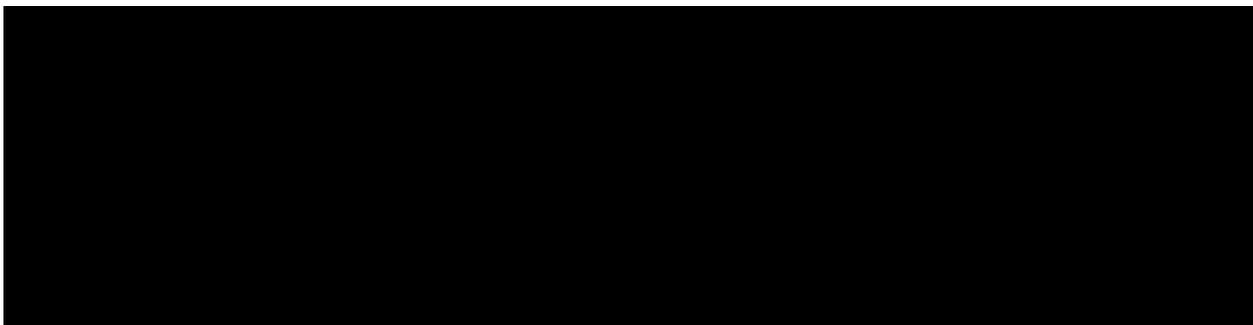
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP



From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



Subject: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





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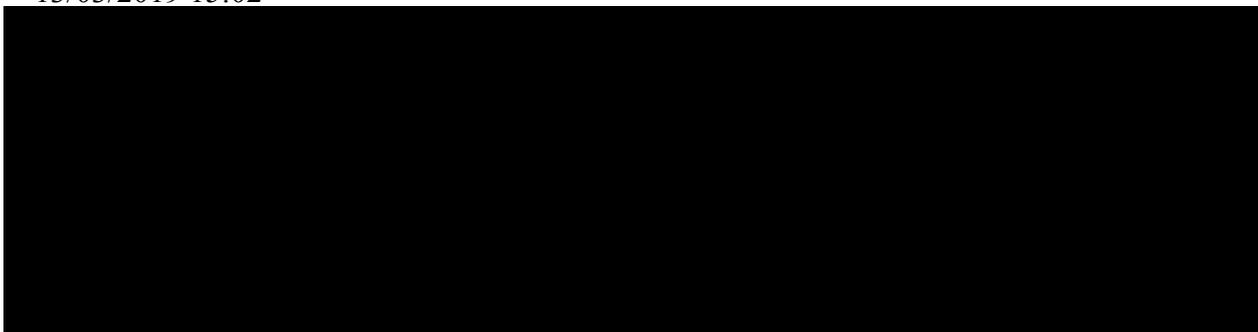
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

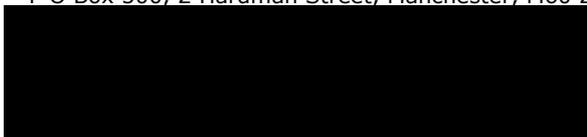
Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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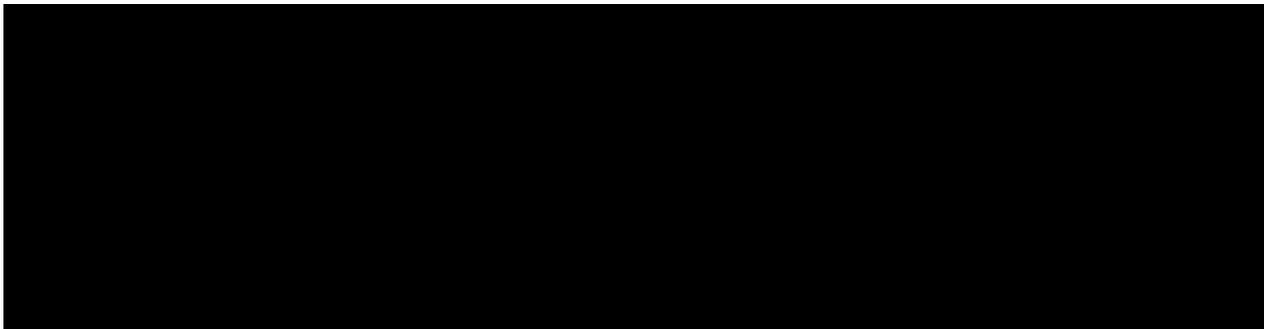
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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**Representations to the Submission Draft
St Helens Borough Local Plan 2020 – 2035**
Prepared on behalf of the Church Commissioners
for England

March 2019

help boost housing numbers in Rainford, and would assist with the future growth of the north of the Borough. The additional land identified should then be removed from the Green Belt and safeguarded subject to a Local Plan review.

- 3.68 National Planning Practice Guidance (PPG) advises that sites being put forward for allocations should be assessed according to their suitability, availability and achievability. These criteria are considered below.

- **Suitability**

The Commissioners recognise the importance of ensuring any future proposals are both sustainable and able to successfully mitigate any impacts. Our analysis of the land contained within the appended Development Framework shows that the site can be brought forward without insurmountable technical constraints. The 2012 SHLAA assessment by the Council also confirms this position. The appended Green Belt Assessment also shows that the site is suitable for release from the Green Belt.

- **Availability**

The Commissioners own all of the land that has been identified and so if released from the Green Belt and allocated for residential land, development would be readily deliverable.

- **Achievability**

The Commissioners have the resources and commitment to ensure that development on the land is achievable.

-
- 3.69 To sum up, the Hydes Brow site is deliverable, viable, and suitable for release from the Green Belt. The Commissioners therefore consider that it is an appropriate site for consideration as an allocation for residential development within the Draft Plan, in order to meet identified housing need within the Borough, and to comply with national planning policy in contributing to the achievement of sustainable development within St Helens.

017

Land to the east of Higher Lane / south of Muncaster Drive / at White House Lane

Site Location and Description

- 3.70 The Commissioners' site at Land to the east of Higher Lane / south of Muncaster Drive / at White House Lane ('Land to the east of Higher Lane') comprises approximately 11 ha and is made up of several agricultural fields (Figure 6). White House Farm and associated agricultural structures are located within the western part of the site. A private dwelling (known as 'Primrose Hill') is situated within the eastern element of the site, adjacent to the Public Right of Way which defines the site's south-eastern boundary.
- 3.71 The largest field compartment is immediately to the east of the back gardens of the Higher Lane properties, extending east to the top of slope. Five other smaller field compartments, orientated east to west, are found between White House Farm and Holiday Moss Farm to the north-east. Currently the land is used for arable farming and grazing with some equestrian uses.
- 3.72 Field boundaries are open and defined by post and wire fences. The exception to this is found along White House Lane and Muncaster Drive, both of which are lined with hedgerows. The site is bounded by a series of footpath Public Rights of Way to the north on

Muncaster Drive, along White House Lane, and along the eastern boundary of the site.



Figure 6: Site area plan showing the Land to the east of Higher Lane outlined and shaded in red (Ordnance Survey / OPEN, 2019)

Access

- 3.73 Access into the site is currently undertaken via several informal gated agricultural accesses along White House Lane, which is a private lane within the ownership of the Commissioners. Land to the north and east of the Site is also within the ownership of the Commissioners which means that additional points of access can easily be created. Pedestrian access to the site can also be gained via the Public Right of Way which runs north-east from Higher Lane along the perimeter of the site.

Surrounding Area

- 3.74 The site lies to the south-east of the village of Rainford, immediately adjacent to the existing urban edge. The context to the west of the site is defined by the fragmentary presence of the now demolished Muncaster Hall and the remnant estate woodlands and mature trees associated with it, which continue to provide a strong edge to the settlement boundaries along Muncaster Drive.
- 3.75 Higher Lane is found to the south-west of the site, with White House Lane to the north-west. Holiday Moss Farm lies immediately to the north-east of the site on the opposite side

of White House Lane, with arable and pastoral fields to the north-east and east.

- 3.76 To the south-east of the site along Higher Lane, the adjoining urban form is predominantly residential, comprising mainly twentieth century housing from a range of periods. These houses are typically 2-storey detached and semi-detached properties, with some bungalows. Throughout the village, low stone walls are common features and the use of brick predominates. Rainford Church of England Primary School is found north of the site along Higher Lane, with Rainford High Technology College further along this road.
- 3.77 In addition to local educational facilities, there are a number of other key local services within close proximity of the site, including a supermarket and other local shops, sports facilities, a GP Surgery, and bus and rail connections.

Planning History

- 3.78 A search undertaken through the Council's Public Access website shows no relevant planning permissions associated with the site.

Previous Site Representations

- 3.79 As with the Hydes Brow site, and as outlined in Section 1 at paragraphs 1.3 to 1.5, the Commissioners have promoted the land to the east of Higher Lane as safeguarded land within local planning policy for a number of years, and supported its previous safeguarded allocation within the December 2016 Local Plan Preferred Options document under Site reference HS18, with an indicative capacity for 206 dwellings.
- 3.80 The site was submitted alongside the Hydes Brow site through the "Call for Sites" process in 2011 and was considered within the 2012 SHLAA. In the same way that the Hydes Brow site generally scored positively within the 2012 SHLAA, the document noted that the land to the east of Higher Lane:
- Falls within Flood Zone 1 (low probability of flooding);
 - Is not within a Health and Safety Executive Consultation Zone;
 - Does not contain Tree Preservation Orders or areas of high landscape value;
 - Does not have issues of ground conditions or land contamination;
 - Presents no infrastructure issues; and
 - Is located in close proximity to a number of local facilities.
- 3.81 However, the site was not taken forward by the Council at the time given its Green Belt status.
- 3.82 The subsequent 2016 Green Belt Review undertaken by the Council indicated the site as being suitable for release from the Green Belt, although the land was not included within the 2016 SHLAA. Therefore, in consistency with our comments in relation to the land at Hydes Brow above, the Commissioners objected to the 2016 SHLAA in being insufficiently robust in not assessing all the sites that were been put forward for consideration by the Council within our January 2017 representations.

Vision Framework

- 3.83 As noted at paragraph 3.23, the land to the east of Higher Lane has now been rejected following the Council's most recent Green Belt Review (December 2018). The Commissioners object to the removal of the site's allocation as safeguarded land, and consider the approach taken in considering the site unsound in that it is inconsistent, not positively prepared and does not comply with national planning policy.
- 3.84 The Commissioners consider that the site remains suitable to be removed from the Green Belt and allocated as safeguard land for future residential development within the Draft Plan, as a suitable addition to the existing 'Key Settlement' of Rainford, which would assist in the Borough's growth over a longer term.
- 3.85 In support of our assertion that the site's safeguarded status should be reinstated, a Vision Framework for the land to the east of Higher Lane has been prepared by OPEN, and is included within these representations at Appendix A. The Vision Framework demonstrates how the site could be sensitively developed to accommodate c. 150 - 175 new homes.

Design principles and layout

- 3.86 A Vision Framework and Landscape and Visual Appraisal (LVA) have been prepared by OPEN in respect of the site. The Vision Framework is included at Appendix A, and the LVA is included at Appendix C. The Framework demonstrates that the site has the size and flexibility to accommodate a range of residential densities, typologies and character areas.
- 3.87 The Indicative Masterplan included in the Vision Framework has been informed by the findings of the LVA, which identifies key strategic principles that have shaped the proposed development form, density, and housing typology, which in turn have responded to different parts of the site's characteristics.

Open Space Network / GBI

- 3.88 The identified strategic principles in the Vision Framework point towards a form of development that is landscape-led. This has resulted in the inclusion of green corridors, a habitat area and a green gateway landscape in the Indicative Masterplan.
- 3.89 Development edges have been set back from site boundaries to allow green space and landscapes to be presented to public footpaths, to filter views and maintain a countryside edge character.
- 3.90 Native planting is proposed at the south west of the site, as this is where the site meets existing residential dwellings and can provide a semi-natural habitat.
- 3.91 To the north of the site a blend of open space and new planting is proposed to reference the Muncaster Hall estate landscape.

Transport and Access

- 3.92 An Initial Access Appraisal has been undertaken by Pell Frischmann in respect of the site and is included at Appendix B. The Appraisal Report concludes that the site is considered to be well connected to the local, regional and strategic highway network, with good access to a range of public transport services. It is well-positioned to facilitate pedestrian and cycling access to numerous local amenities and recreation opportunities.

- 3.93 A review of local and national design guidance has been undertaken (including the St Helens Street Design Guide (SHSDG)), in order to ensure that the proposed access for the development complies with the appropriate technical standards.
- 3.94 To provide for access into the site it is proposed that White House Lane and the junction formed with Higher Lane is upgraded to provide a 'Connector Street' in line with the SHSDG, with access into the site then taken via an adjoining 'Local Residential Street'. The junction where White House Lane meets Higher Lane will be upgraded to provide a 5.5m carriageway with 2m footways on either side. This would include the requirement to use land to the south of the existing junction which is within the ownership of the Commissioners.
- 3.95 At present there is an existing pedestrian access onto Higher Lane on the southern boundary of the site. It is proposed to improve the existing condition of this Public Right of Way, and to provide an enhanced pedestrian and cycleway. The current width is approximately 4m in width, and if deemed necessary or appropriate Emergency Vehicle access could also be provided in this location.
- 3.96 The resulting design option is considered to represent an appropriate and workable access solution for the site. It has also been demonstrated that appropriate visibility splays for the design speed of the road can be accommodated, in accordance with the *Manual for Streets*. For further details, please refer to the An Initial Access Appraisal Report (which includes technical drawings of the proposed access arrangements) included at Appendix B.

Landscape Considerations

- 3.97 A Landscape and Visual Appraisal (LVA) has been undertaken by OPEN in respect of the site and is included at Appendix C. The LVA concludes that the potential landscape effects from the proposed development (as outlined in the accompanying site promotion document) would be localised to within the site.
- 3.98 The LVA recommends a number of mitigation measures which would provide an appropriate setting for the integration of the proposed development within the existing landscape context. Suggested mitigations measures include:
- Built elements of the proposed development should be located below the elevation of the top fields of the site area;
 - Set built elements of proposed development back from the road and footpath to minimise visual effects;
 - Residential housing should be located in the western areas of the site which are already influenced by residential development;
 - Existing trees and hedgerows should be retained and enhanced;
 - Strengthen the existing planted urban edge of Rainford by introducing further woodland planting along the south and east edges of the proposed development site reinforcing the contrast between urban and rural landscape; and
 - Limit the extent of built development in eastern parts of the site area in order to minimise visual effects, keeping built development below the topographical ridgeline that intersects the site area south-east to north-west.
- 3.99 Any potential visual effects from the proposed development would be largely limited to

within the immediate context of the site providing the recommended landscape and visual mitigation is broadly adhered to in the development of any future proposals. This is reflected in the masterplan proposals included at Appendix A.

Benefits of Allocating the Site within the Draft Plan

3.100 The Development Framework for the Hydes Brow site noted the clear benefits of bringing forward the site for allocation within the Draft Plan. These benefits include:

- Contributing to the housing needs of St Helens Borough
- Contributing to the social and economic vitality of Rainford;
- Provision of open space;
- An appropriate and logical extension to an established settlement.

Summary of the Site's suitability for Allocation within the Draft Plan

3.101 In addition to the benefits set out above, as with the Hydes Brow site the land to the east of Higher Lane has clear advantages in terms of its location, given its proximity to local services within Rainford and links to St Helens to the south, with Rainford Junction nearby providing rail connections to locations further afield.

3.102 The Commissioners note that the land is suitable, available and achievable in a similar manner to the land at Hydes Brow.

3.103 We therefore object to the removal from the land to the east of Higher Lane of the site's previous identification as safeguarded land from the Draft Plan and which should be reinstated. Our call for the release of this land from the Green Belt as safeguarded land to be considered for release following a Local Plan review is supported by a range of technical information as set out within the Appendices to these representations.

3.104 The technical studies demonstrate that the land to the east of Higher Lane is an appropriate site for consideration as an allocation for residential development within the Draft Plan, in order to meet identified housing need within the Borough, and to comply with national planning policy in contributing to the achievement of sustainable development within St Helens.

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PO3275



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: Joan M.	First name: N/A
Last Name: Maloney	Last Name: N/A
Organisation/company: N/A	Organisation/company: N/A
Address: 3 Garsdale Avenue, Rainhill, Prescot, Merseyside	Address: N/A
Postcode: L35 4QE	Postcode: N/A
	Tel No: N/A
	Mobile No: N/A
	Email: N/A

Signature: 	Date: <input type="text" value="12 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 X (Via Email)

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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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	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	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 unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

This representation is from the following:

Mr & Mrs Maloney, [REDACTED]
 Mr Maloney & Mrs Roberts-Maloney, [REDACTED]
 Mr & Mrs Roberts, [REDACTED]

We have been residents in Rainhill [REDACTED]. The key point of our representation is the protection of the Greenbelt space for future generations and to avoid urban sprawl and overcrowding in Rainhill. We believe this will help promote a healthier lifestyle and environment for the residents. The physical and mental wellbeing needs of residents have to be considered now as it will have an impact on future generations especially if green spaces are taken away.

- We think that in Rainhill there is a lack of green spaces for parents and children to relax in [REDACTED] [REDACTED] we think this is extremely important. A safe, dog-free zone, away from busy polluted roads is lacking in Rainhill and this should be considered a priority for the current community over and above the need for housing.

- Air quality is already established as a factor in childhood and adult respiratory illness so adding extra roads, traffic and congestion is not good for the current and future population of Rainhill and St Helens.

- Increased traffic will impact pedestrian safety and health.
- We would argue that the planned housing is not required as quite often new housing developments are not 'affordable' for the average person. New housing will also have an impact on the saleability of current housing.
- Alongside any planned new housing there would be a need for nurseries, schools, hospital spaces, GP & dentist surgeries, etc within the local vicinity of the housing to avoid the need to drive thus creating more congestion and pollution. [REDACTED] to add further pressure on these school spaces would be impractical.
- The greenbelt space was designated as such to avoid urban sprawl and a continuous area of housing and roads. Releasing the greenbelt space negates the reason it was put there in the first place.
- Extra housing means extra car use and the traffic in Rainhill is already a major issue. Warrington Road is the only main road through Rainhill and is used by freight vehicles, buses and cars at all times of day. At busy times the road can be backed up through the village and if there is an incident on the M62 the traffic can be backed up the whole way along Warrington Road. [REDACTED] we have seen how quickly the traffic can back up. There is often particular issue with the entrance to the Jones' Estate which has just one entry/exit point for several hundred houses. This junction is always crowded and can be difficult to use especially as it is effectively a crossroads with Knowsley Road.
- The new junction structure at Longton Lane/Mill Lane may add some relief to the traffic problems along Warrington Road but the traffic leading up to the Skew Bridge from Warrington Road and Rainhill Road is the main problem.
- We already see the issue of parking outside all the schools and on adjacent roads such as those on the Briscoe's estate. Double parking is a factor and can lead to issues with emergency vehicles getting access.
- Adding extra traffic to Warrington Road will impact the historic Skew Bridge as there is little scope for developing this.
- The junction from Vincent Road to Rainhill Road is already extremely busy and difficult to use at busy times. Vincent Road is often used as a cut-through to avoid the Rainhill Rd/Warrington Rd junction and traffic lights and despite traffic calming measures the traffic on Vincent Road is increasing. Adding further housing along Rainhill Road on the old Eccleston Golf Club will make the Vincent Rd/Rainhill Rd junction impossible to use due to increased traffic.
- Rainhill has an historic past and is known as the home of the Railway. We think it is important for the village to remain as much as possible a 'village' whilst modernising in an appropriate way. We should be developing Rainhill as an historic destination and creating a proper Railway museum rather than focusing on housing.
- Rainhill station is on a busy commuter route to Liverpool and Manchester [REDACTED] I know the trains area already busy at peak times. The council should be in discussion with Northern Rail as to the need for increased train capacity should any new housing be considered.
- We want Rainhill to be a vibrant community and village not part of an urban sprawl that looks like everywhere else.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council should delete this land from the proposed removal from the Green Belt, 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

***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		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3276



St. Helens Council

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
11 MAR 2019
(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title:
First Name: ELAINE	First name:
Last Name: LEWIS	Last Name:
Organisation/company:	Organisation/company:
Address: 23 WINDLEBROOK CRESCENT WINDLE ST HELENS	Address:
Postcode: WA10 6DY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 20/02/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA 06	Paragraph/ diagram table	TABLE K.8	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 type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is <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>The area REF 8HS land south of A580 between Houghtons Lane and Crantock Grove windle is <u>GRADE 1 and 2</u> Agricultural land.</p> <p>The need for food security is being ignored and Agricultural land quality. There is a negative impact for farming and distribution of jobs not considered.</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.

Remove the area
Ref 8HS From the Local
Plan.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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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.

PO3277

1420

6102 LWW E 1
13 MAY 2019



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: Kim Quinn	First name:
Last Name: Gilardi	Last Name:
Organisation/company:	Organisation/company:
Address: 18 Station Rd Garswood	Address:
Postcode: WN4 0SA	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: 03-05-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP06		9			IHS				
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

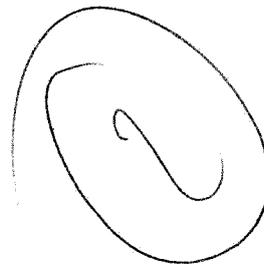
5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition . there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

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Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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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.**

PO3278



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: Katy	First name:
Last Name: Johnson	Last Name:
Organisation/company:	Organisation/company:
Address: 514 Garwood Road Wigan	Address:
Postcode: WN4 0XH	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 11/05/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy		Paragraph / diagram / table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP 2006			2	IHS				
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

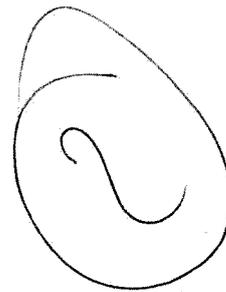
5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

[Empty box for representation]

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:

[Empty box for response]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3279



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1422
13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>HELEN</i>	First name:
Last Name: <i>JABLAN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>362 GARSWOOD RD</i>	Address:
Postcode: <i>WN4 0T2</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than **5pm on ~~Monday 13th MAY~~ 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LP06		②		IHS			
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

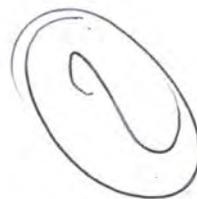
5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

[Empty box for representation]

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:

[Empty box for response to question 9]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3280



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>RICHARD</i>	First name:
Last Name: <i>CRAWLEN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>525 GARSWOOD RD GARSWOOD</i>	Address:
Postcode: <i>WN4 0XN</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <i>11 5 19.</i>
-----------------------	-----------------------

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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 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	<u>2</u>	Policies Map	1HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

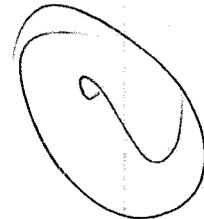
5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

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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.
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PO3281



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by **no later than 5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1424
13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M	Title:
First Name: Shawn	First name:
Last Name: Nolan	Last Name:
Organisation/company:	Organisation/company:
Address: 442 Garstwood Road	Address:
Postcode: WN4 0XJ	Postcode:
Tel N: [REDACTED]	Tel No:
Mobi: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 11th May 2018

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than **5pm on MONDAY 13TH MAY 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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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		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
LP Part 6		2		1 HS						
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

[Empty box for representation]

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)	
<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

[Empty box for explanation]

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.**

PO3282



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1425

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: STANLEY	First name:
Last Name: GARDNER	Last Name:
Organisation/company:	Organisation/company:
Address: 524 GARSWOOD RD	Address:
Postcode: WN40X1-1	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: 11/5/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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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 LP A06	Paragraph / diagram / table	Policies Map 1HS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
-------------------------	-----------------------------	----------------------------	--	--------------------------------

Other documents (please name document and relevant part/section)

(Handwritten circled '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?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

(Handwritten circled '2')

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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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.**

PO3283



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1426
13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CHARLES	First name:
Last Name: BAILEY	Last Name:
Organisation/company: _____	Organisation/company:
Address: 336 GAREWOOD ROAD	Address:
Postcode: W4 9TY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	
Signature: [REDACTED] Date: 11-5-2019	

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on MONDAY 13TH MAY 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LP06		2			1HS		
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

I support the above.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

I support the above.

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
--	---

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.**

PO3284



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1427
13 MAY 2019

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: Mr Mawds	Last Name:
Organisation/company:	Organisation/company:
Address: 317A Garswood Road	Address:
Postcode: WN4 0TV	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 12.05.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on ~~Monday 13th MAY~~ 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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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>LPD 6</i>		Paragraph / diagram / table	<i>2</i>	Policies Map	<i>HS</i>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

[Empty box for representation text]

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	---	--------------------------	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

[Empty box for response to question 9]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO3285

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

01

02

01

01

03

So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

03

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

01

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

04

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

06

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

04

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

06

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

04

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 06

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. 01

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable. 08

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 8:53:31 AM
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PO3286

Representor Details

Web Reference Number	WF0190
Type of Submission	Web submission
Full Name	Mr BRIAN HEYDON
Organisation	
Address	11 Stone Cross Drive Upton Rocks WA8 9DL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	TABLE 4.8 ref 3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Whilst no development is proposed on the site prior to 2035, should the site be considered for future development

without major infrastructure changes
it would

- i. Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;
- ii. Have a detrimental effect on highway safety, for vehicles and pedestrians alike;
- iii. Increase the pressure on schools and nurseries, which are already over-subscribed;
- iv. Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;
- v. Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- vi. Be detrimental to residential amenity, due to the loss of Green Belt.

Unless these issues are addressed before any development I would consider LPA06 to be unsound

7. Please set out modification(s) you consider are necessary

Addressing the concerns laid out in part 6 above.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 11:21:25 AM
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PO3287

Representor Details

Web Reference Number	WF0369
Type of Submission	Web submission
Full Name	Mrs Angela Wood
Organisation	
Address	51 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	4.8
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Refer to above
Habitats Regulation Assessment	Refer to above
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This version does not satisfy:

the criteria for sustainable development; the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs; sustainable housing, targets proposed are based on aspirational employment growth predictions; effective land use by concentrating on Green Space development over town centre development with higher densities; food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

I wish that housing development should take place on brownfield sites. Otherwise, I would like the Local Plan to be abandoned.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 10:44:47 AM
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PO3288

Representor Details

Web Reference Number	WF0370
Type of Submission	Web submission
Full Name	Mr John Wood
Organisation	
Address	51 Springfield Lane Eccleston St Helens Merseyside WA105HB WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	4.8
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Refer to above
Habitats Regulation Assessment	Refer to above
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This version does not satisfy: the requirement for sustainable development; the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs; sustainable housing, targets proposed are based on aspirational employment growth predictions; effective land use by concentrating on Green Space development over town centre development with higher densities; food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

I wish that any new Housing be confined to brownfield sites. Otherwise, I would like to see the Local Plan abandoned.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 10:34:25 AM
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PO3289

Representor Details

Web Reference Number	WF0449
Type of Submission	Web submission
Full Name	Mrs Carmel Farmer
Organisation	
Address	46 Ecclesfield Rd, Eccleston, St Helens, Merseyside WA105NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa. 01

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014)of 486 houses per year). 02

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review, within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status. 03

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens. 04

Effective

How local infrastructure will support the plan has not been explored or defined.

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met. 05

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

As a result, it as to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being. 06

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry. 07

8HS offers significant protection and food for wildlife. 03

Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bares the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

7. Please set out modification(s) you consider are necessary

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 6:36:43 PM
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PO3290



St.Helens Local Plan Submission Draft (LPSD)

Rita Fenton

to:

planningpolicy@sthelens.gov.uk

09/03/2019 15:14



I hereby submit my objection to the above plan in particular to the reclassified land between the A580 Crantock Grove, Ecclesfield Road and Houghtons Lane 8HS land now reclassified as ^safeguarded^ - As such, the land being removed from the green belt when the Local Plan has been adopted and safeguarded only for future development when the Local Plan Period has ended or until the Local Plan is reviewed by Council which could result in allowing developers to apply for planning permission to develop the site within a few years! It is vital to save this green belt land by removing it from the list of safeguarded sites in the Local Plan and for it to remain as green belt preserving it for future generations.

The use of Brownfield sites for housing purposes should be the priority over and above using green belt land, thus helping to regenerate and helping to sustain a vital core to our town centre.

Environmental issues should be taken seriously e.g., the extensive wildlife in the area, any increase in housing will result in unacceptable and severe impacts on our road networks. Extra traffic brings more pollution, noise and health concerns. The local infrastructure can barely cope at the moment. Local schools have little or no further capacity for pupils and Bleak Hill School is having to be extended to cope with EXISTING demand let alone coping with children of hundreds of new families.

Secondary education needs are also under increasing pressure. The local pharmacy has recently moved, shortly to be joined by the only GP service, to another site which the Local bus service doesn't cover - it is equally difficult to access local hospitals. The local fire station is also shortly to close.

Finally, the 8HS land is agricultural grade 1 and 2 land and for years has produced wheat and vegetable crops, why destroy this valuable asset?

I earnestly submit my above comments for your serious consideration and await your reply in due course.

PO3291



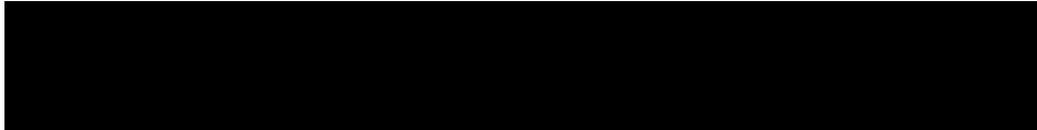
Rainhill Green Belt (Eccleston Park Golf Club)

Malcolm

to:

planningpolicy@sthelens.gov.uk

09/03/2019 18:46



Sent from [Mail](#) for Windows 10

From:-

Malcolm Hadwin
2 Manor Avenue,
Rainhill,
Merseyside
L35 0QP

ST. HELENS LOCAL PLAN (RAINHILL GREEN BELT)

Regarding the current proposal to remove the area of land, formerly occupied by Eccleston Golf Club, from the Green Belt.

Although plans to build on this land have seemingly been put off until 2035, I wish to point out the detrimental effect that any building will have on the community of Rainhill.

Requirement.

Are these houses really necessary ? The area as a whole seems to be losing population and there have been thousands of new houses built in nearby Warrington, Widnes and Liverpool. Apparently brown field sites exist to meet any local demand that might exist.

Infrastructure.

With over 900 houses, even at a low projected occupancy level, this could mean around 3000 people and 2000 cars. This will load even more traffic on Rainhill Centre particularly the two sets of lights on Warrington Road (jcn Rainhill Road and Longton Lane.) There has been a raft of roadworks in this area recently to try to improve the traffic flow. 2000 extra cars would be chaotic. Especially when coupled with the extra building in Prescott such as Halsnead Park.

Today it took me over 2 minutes to get from my estate exit road onto Warrington Road, even then I had to barge my way on. This was in a quiet period (1.30pm).

The occupants of these new dwellings may want to commute from one of the rail stations (as encouraged by government). Eccleston and Rainhill have very little parking and Lea Green often gets full so more and more cars will be “ abandoned” in side roads and footpaths etc causing a nuisance to all and helping to hinder traffic flow even further..

Services.

Rainhill is not blessed with one of those new Health Centres. [REDACTED] and the other practice that I am aware of is based in a small unit near the village centre. Can they cope with 3000 extra people. [REDACTED]

and have to wait 6 weeks. The same question applies.

Environment

It is apparently the intention of local government to retain the autonomy of such communities as Rainhill and to avoid an urban sprawl. The building on Eccleston Golf Club would effectively join Rainhill to Thatto Heath and hence to St Helens.... i.e. Urban Sprawl.

All the aforementioned problems will cause extra pollution. We need Green Belts to break down this pollution and provide fresh air. It supports wild life and offers a pleasant environment for people to relax and enjoy.

Conclusion

The above represents the dangers that I see will exist **if** building is allowed on Eccleston Golf Club. It has supposedly been recognised that these problems exist hence the decision to put back building to 2035. The question is therefore “why remove it from the Green Belt”?. It makes no sense. No sense unless the plan is to quietly proceed with building once the land has been released, in which case there would be a lot of anger in the local community.

The Green Belts were put there for a purpose – they should not be touched.

PO3292



St Helens Local Plan 2020/2035 Draft
Dave Watson to: planningpolicy

10/03/2019 18:36

[REDACTED]

Dear Sir/Madam

[REDACTED] and I continue to be distressed about the proposed release of greenbelt land directly opposite [REDACTED] this is now described as safeguarded land, which will be used for future development. Some areas of greenbelt have now been taken out of the equation, why then is the piece of land from Houghtons Lane to Crantock Grove remained in the plan? this is one piece of land that alone has three public footpaths which are regularly used by ourselves and many, many members of the community.

On a personal note, which I know will not be acknowledged, but I wanted to include this anyway, [REDACTED] because of the amazing views and the fact that we would be able to live in the countryside (greenbelt area) of Eccleston, with an improved quality of life, which improved overnight on moving here, we have access to some wonderful walks which we use on a daily basis to exercise [REDACTED] It is an absolute pleasure living here in this part of the town.

We see the local wildlife in their natural habitats where they are safe and treated with respect. We see many local people enjoying these wonderful walks on our doorstep and importantly they are maintaining a healthy lifestyle and mental health wellbeing, which is extremely important with the very busy lives we all lead. There are many people in this neighbourhood from all walks of life and at different stages in their lives, [REDACTED] some are working some are retired, all of whom, currently have the opportunity to get out into the greenbelt and enjoy a peaceful walk. I urge you to use these footpaths yourselves before making any decisions to see what could be potentially lost. There are a wide variety of different species of animals in this area; indeed, our understanding is there are water voiles and other protected species- birds, owls, and bats living in this area which should be considered equally as important as the need to build houses, and their protection should be a primary factor for any decisions made.

The fact that the local council has decided to look at this land for development has had a dramatic impact on the people of Eccleston; the community will be affected beyond belief, it will no longer be a village environment, our beautiful walks will be snatched away and replaced by a massive scale development taking many, many years to complete. Our quality of life will deteriorate overnight and it will be extremely stressful for the very long period of time for the building work required. The scale of this proposed development will greatly affect the health of the people living in Eccleston because of the long term building works, the heavy machinery, the chaos on the roads during building and when the development is completed. This will undoubtedly cause road safety issues on a large scale, as those many people who can no longer access the foot paths will be attempting to cross the East Lancashire Road to enjoy a walk, this already very busy road will become busier than ever, this will be extremely dangerous and I find this very concerning.

I am sure that the people unaffected by this and who do not live in the area will have no issues with the concerns we raise as a community, as this will be, I do not doubt, be an extremely lucrative development for all involved. Sadly this will be at the cost of the lives of all the people currently living in Eccleston. This greenbelt land can never be recovered if the planning department decides to release the land to developers - once

it has gone it has gone forever. There must be other land suitable to build more housing in the borough of St Helens where such development would make improvements rather than have a negative impact. The plans require the use of greenbelt land, which is also by the way, well farmed all year round by the local farmers, this is prime agricultural land. Local produce is in demand and now that we are getting closer to Brexit, I would have thought that farmers would be encouraged and indeed supported to continue farming and supplying local produce, sadly this does not appear to be the case in St Helens. This plan will ensure that more farmland is lost to greedy developers whilst we will have to rely on buying non-local produce, creating a larger carbon footprint than necessary.

On top of the above, and thinking ahead to this development being completed, how will Eccleston look with many more thousands of residents; where will their children be educated, where will the GPs surgeries, Dentists etc be, the pressure on our two local hospitals is already over capacity. There is already a great strain dealing with the current residents and most of us have to go outside of the area for our health care needs to be met? What will happen with the old country lanes that are at the heart of Eccleston and are part of the country charm? 01

Will the roads be sufficient to deal with many more thousands of cars on a daily basis? What are the plans for managing the increased traffic, What about the impact on the environment, does this not impact on sustainability?

Where will all the wildlife go? They have lived in this habitat and been safe for generations, are their needs not important? Is anyone considering the wider issues and impact on the environment and the community in the long term?

[REDACTED] The forever home we thought we had [REDACTED] is now like a bad dream and we will want to sell our property if this land is released for development. And so, our dreams of living in a beautiful, scenic and healthy neighbourhood in St Helens will be history and we will all be left devastated if this goes ahead, thanks to the decisions made about this land by people who do not live here. We will then be forced to move out of St Helens as there will be nowhere left to live that will provide a healthy quality of life that we have become accustomed to [REDACTED]. We are not the only people who are now having to consider moving away from St Helens, however I fear that sadly this will not be important to anyone else but ourselves.

I hope you read this letter in the sense in which it is written. We are pleading with you to make the right decision and keep Eccleston in the countryside for all of us to enjoy and cherish for future generations to come. I urge you to consider other land in the St Helens area and I am aware of land in the area (brownfield sites) that would not have such an impact on so many people, where neighbourhoods will change beyond all recognition and I do not know why on earth such a big development in any one area is even being considered in such a small town.

Obviously everyone understands that houses have to be built as the population is constantly growing but why do we have to use up beautiful parts of the valuable countryside where a good quality of life is being experienced by many people using the local footpaths which lead to some beautiful country walks. Eccleston has had, and is still undergoing, a major development at the Triplex site, Knowsley Road developments and Cunningham Grange only being completed in the last few years. Have we not done our fair share of development without completely changing the face of Eccleston? 02

My understanding of the key principles of the government with regards to protecting greenbelt land are -

PO3293



St.Helens Local Plan Submission Draft (LPSD)

Martyn Fenton

to:

planningpolicy@sthelens.gov.uk

11/03/2019 07:25



James Arthur Fenton
2 Walmesley Road
Eccleston
St Helens
WA10 5LA

11th March 2019

I submit my objection to the St Helens Local Plan in general with respect to building on greenbelt land and in particular to the reclassified land between the A580 Crantock Grove, Ecclesfield Road and Houghtons Lane 8HS land now reclassified as ^safeguarded^ - As such, the land being removed from the greenbelt when the Local Plan has been adopted and safeguarded only for future development when the Local Plan Period has ended or until the Local Plan is reviewed by Council - this in all likelihood will result in allowing developers to apply for planning permission to develop the site within a few years. It is vital to save this greenbelt land by removing it from the list of safeguarded sites in the Local Plan and for it to remain as greenbelt preserving it for future generations.

The use of Brownfield sites for housing purposes should be the priority over and above using greenbelt land, thus helping to regenerate and helping to sustain a vital core to our town centre. The Council has used inflated housing need in their Plan and this can be supported with evidence

Environmental issues should be taken seriously e.g., the extensive wildlife in the area, any increase in housing will result in unacceptable and severe impacts on our road networks. Extra traffic brings more pollution, noise and health concerns. The local infrastructure can barely cope at the moment. Local schools have little or no further capacity for pupils and Bleak Hill School is having to be extended to cope with EXISTING demand let alone coping with children of hundreds of new families.

Secondary education needs are also under increasing pressure. The local pharmacy has recently moved, shortly to be joined by the only GP service, to another site which the Local bus service doesn't cover - it is equally difficult to access local hospitals. The local fire station is also shortly to close.

The 8HS land is agricultural grade 1 and 2 land and for years has produced wheat and vegetable crops, why destroy this valuable asset?

The release of greenbelt land is only allowed under exceptional circumstances and St Helens Council at no time has demonstrated or provided evidence for this

PO3294



Objection to plans to build on Ecclestone/Windle Greenbelt land.

Gerard Banks

to:

planningpolicy@sthelens.gov.uk

11/03/2019 09:35



1 Attachment



Planning Objection.pdf

Dear Sir/Madam

Please find attached my objection to your plans to build on Ecclestone/Windle Greenbelt land.

Kind regards

Gerard Banks

54 Ecclesfield Road

Ecclestone



Mr & Mrs G Banks
54 Ecclesfield Road
Eccleston
St Helens
WA10 6BN
[REDACTED]

11 March 2019

Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens, Merseyside
WA10 1HP

Dear Sir or Madam

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan(2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

[REDACTED]

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over [REDACTED] years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on. 01

From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". 02 03

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land. 04

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term. 04

Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier.

As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:- 05

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more:

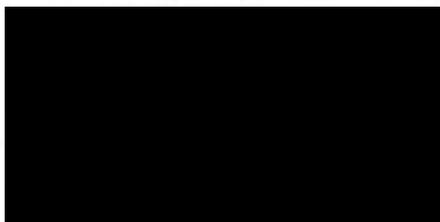
- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;
- Daily average speed will change by 10km/hr or more; and
- Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councillors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release. 06

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt. 07

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours faithfully



Gerard Banks

PO3295



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02

Cc:
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No []

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<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.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

This requirement is vague and it is unclear what is meant by expanded or enhanced infrastructure. It should therefore be removed given the policy and plan as a whole addresses infrastructure requirements adequately.

24

-
- 4.30. LPA05.1(3) require development proposals which only cover part of a Strategic House Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site.

25

-
- 4.31. Murphy Group are strongly promoting their land at Leyland Green Farm (site ref. 1HS) for residential development of up to 291 dwellings within the plan period. Therefore, Murphy Group are seeking that their safeguarded land for housing allocation is upgraded to a housing allocation, which can be delivered in the immediate term. The site is in one ownership and therefore does not suffer from the constraints or potential issues associated with land in multiple ownerships and potential delays in delivery as a result. The site is otherwise unconstrained (apart from existing Core Strategy Green Belt status). The St Helens land at Leyland Green Farm, combined with the Wigan land at Leyland Green Farm (indicative capacity of 210 dwellings), could deliver circa 501 dwellings in total.

26

- 4.32. Initial feasibility studies on sustainability, highways and landscaping indicate that the Leyland Green Farm site (Ref. 1HS) is available, suitable and deliverable and can come forward immediately within the plan period. We consider that it is not appropriate to safeguard this land for housing post 2035 when it can come forward for development within the plan period.

Policy LPA06: Safeguarded Land

- 4.33. Despite Murphy Group's desire for the Leyland Green Farm site (ie land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood) (site ref. 1HS) to be upgraded from safeguarded land for housing to a housing allocation, in the event that this does not occur, we strongly support the removal of the Leyland Green Farm site from the Green Belt and its allocation as safeguarded land for housing, as per Policy LPA06.1.

27

- 4.34. We support that the site is considered suitable for Green Belt release as it forms a natural extension to the settlement of Garswood. Development on the site will be a logical rounding off of the settlement when considered in context with the proposed housing allocation to the south (Site Ref. 1HA).

-
- 4.35. Table 4.8 identifies an indicative site capacity for 291 dwellings (based on an indicative 75% net developable area and 30 dwellings per hectare). Murphy Group have produced a draft indicative masterplan (contained within the Delivery Statement submitted alongside this representation) which indicates a capacity for 291 new dwellings. As such, this reflects the number of units which could be achieved based on known site constraints / opportunities tied into deliverability. Ensuring this yield on this safeguarded site will also reduce the pressure on the delivery of brownfield sites.

- 4.36. Murphy Group is keen to work with the local planning authority to bring forward development proposals for housing in the immediate term within the plan period (if allocation is upgraded), but in the event it does not, to ensure housing development is delivered beyond 2035. Murphy Group have their own house building division and therefore are equipped to begin house building straight away.

-
- 4.37. Appendix 7 of the local plan provides requirements for the site. We support the identification of site access via Leyland Green Road and Billinge Road. Murphy Group have instructed Vectos to undertake initial highways work and assess suitable site access locations. The initial transport work is contained within the supporting Delivery Statement submitted alongside this representation. Murphy Group are aware that the site will require a pedestrian and cycleway connections across the site and to connect the site to the wider area.

28

- 4.38. Murphy Group acknowledge that the ground conditions are not known at this stage as no ground investigation work has commenced. This would be commissioned prior to the planning application stage. However, the site is in arable use and ground conditions are expected to be similar to the land to the south that has been allocated for new residential development.
- 4.39. Policy LPA06.2 highlights that planning permission for development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment of safeguarded sites in the plan period will be refused. We request further clarity on when a full review of the will be triggered. 29
- 4.40. We object to this on the basis that if housing allocations are not coming forward in the timescales referred to in the local plan (at Table.45 'Sites allocated for new housing development' (either before 31.05.35 and after 31.05.35)), or development is stalled, safeguarded housing sites should be brought forward for development within the plan period. Waiting for the plan to be reviewed could be a lengthy delay during which the housing crisis is exacerbated further. It is therefore not appropriate to include a policy in the local plan which authorises the point-blank refusal of planning application on safeguarded housing land within the plan period. Such applications should be assessed at that time (which would inevitably be later in the plan period), on a case by case basis, and considering the wider context and planning balance (ie housing delivery/under delivery, five year housing land supply or lack of).
- 4.41. We support that safeguarded land should be developed before other Green Belt and greenfield sites. 30

Policy LPA07: Transport and Travel

- 4.42. We support that Policy LPA07.1.b. seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport. 31
- 4.43. Garswood offers a range of local services, facilities and public transport connections and is well positioned to accommodate growth. The St Helens Core Strategy confirms that improvements have been made to Garswood train station, offering journeys to both Wigan and Liverpool, whilst the town has good road linkages to areas across Merseyside.
- 4.44. Within Garswood and in context of the Leyland Green Farm site, there are a number of key amenities located within an appropriate walking distance of the site which would serve some of the day-to-day needs of future residents, including primary schools, healthcare facilities and local shops. The site is served by numerous bus routes however, which provide high frequency services to Ashton-in-Makerfield, therefore providing the potential for sustainable travel when undertaking general day-to-day activities.
- 4.45. The identification of a proposed housing allocation of land south of Billinge Road, East of Garswood Road and West of Smock Lane (site ref. 1HA), with an indicative capacity of 216 dwellings, demonstrates the settlement is a suitable and sustainable location, in transport terms, to accommodate development.
- 4.46. In the St Helens Emerging Local Plan Evidence Base Transport Impact Assessment, housing allocations are ranked in terms of their accessibility to local facilities. Whilst it does not refer directly to the Leyland Green Site, it assesses the land directly adjacent to the south of our site (ie land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood (site ref. HA2)). It is assessed as 'excellent' in terms of accessibility to the railway station by cycle, major food stores, primary schools and healthcare facilities. The Leyland Green Farm site (which adjoins the housing allocation to the north) shares similar accessibility ratings to the housing allocation and is therefore well connected to local services and facilities.
- 4.47. Policy LPA07(9) states that further details of the policy will be set out in a future review of the 32

PO3296

Site 2HS

EL0277

① - LPA06



Objections to the St Helens Council Local Plan 2020 - 2035

to:
planningpolicy
08/05/2019 21:39



Planning Section.

I wish to submit the following objections relating to the ^{2HS}HA7 proposal of the St Helens Borough Council Local Plan 2020 to 2035.

(I have been unable to use the form available on the planning web site as it is unfit for purpose.)

I wish to object specifically to Proposal sub part ^{now 2HS}HA7 (Removal of land off Vista Road from Green Belt for future development.)

My main objections to removing proposed area HA7 from Green Belt are as follows:

A) Local health infrastructure is crumbling around the HA7 proposed development area. It already takes me 3 weeks to get a GP appointment. Our local clinic has closed and been redeveloped. It is no longer possible to find a space on Newton Cottage Hospital car park on most days due to overdevelopment of our town.

Considering recent and on-going massive increases in housing development in our area, the town becoming increasingly overcrowded and congested which affects our quality of life.

B) Traffic congestion and pollution at peak times on VISTA road has already reached intolerable levels. The HA7 proposal would further overload the area and have an adverse effect and make it worse.

C) Domestic water pressure in the surrounding areas to proposal HA7 already regularly drops below satisfactory levels. It is not just the responsibility of the utility companies but also that of the Local council planning strategy.

D) Further destruction of Green Belt land for housing development when several hundreds of houses have already been built in the local area.

Regards

Malcolm Paget
66 Highmarsh Crescent
Newton le willows
Merseyside
WA12 9WF



Virus-free. www.avast.com

PO3297

Stne JHS

EL0279

① - LPA06



Representation on LPSD
calvert michael
to:
planningpolicy
09/05/2019 22:02



From:

Mr Michael Calvert, of
3 Hill School Road
St Helens
Merseyside
WA10 3BH

Email: [Redacted]

I STRONGLY OBJECT to the proposed LPSD and am writing this email because the jargon filled form you would prefer is unintelligible. There are many reasons, see below, for my objections, particularly to the proposed designation for housing on the Green Belt land, currently occupied by the Eccleston Park Golf Course.

1. It is very suspicious that since the site was acquired by the Cheshire based housing developer Mulbury Homes that the land is now being proposed to be taken out of the Green Belt, so that it can be used for housing. This smacks of corruption, and if the proposed plan is not changed to prevent development then I would suggest that an investigation needs to be carried out to ensure that any corrupt practices are brought to light.
2. It seems contrary to the need to tackle the obesity issue in St Helens to remove a space, which provides for healthy exercise in the outdoors. Where is the sense in this proposal?
3. If the proposal was to go ahead, who is going to deal with the Local Infrastructure issues, such as:
 1. The already severe congestion on the surrounding highways to which the development would add.
 2. The provision of health, education and other key services are already stretched, and would be tipped over the edge by the planned considerable increase in demand. How can this be called planning?
4. The release of Green Belt for housing development should as a matter of principle be a measure of last resort, otherwise we might as well just tarmac over the countryside, with all the ecological and environmental implications that has. Only once existing derelict land has

①

been utilised and defunct housing has been brought up to 21st Century standards should development on Green Belt be even contemplated.

J (1)

Please keep me informed of progress by email.

PO3298

Representor Details

Web Reference Number	WF0175
Type of Submission	Web submission
Full Name	mr steven ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	lpa6
Paragraph / diagram / table	3hs
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1. There's a declining population. There's no evidence presented supporting the need for additional housing, without any details where the additional home occupiers will come from. 01
2. Brown field will supply land for 5808, houses. there's no argument to justify removing greenbelt.
3. Declining industries in St Helens involves a lot of the existing population traveling outside the borough boundaries for employment. 02
4. Anyone moving into St Helens looking to purchase a property will need a salaried employment. inevitability that puts additional cars in the area 3HS where roads are cant cope with current level of traffic.
5. The 2 major roads supporting Rainhill, is A57 Warrington Rd and Rainhill Rd. These Roads are congested already. Any more traffic will put pressure on residential roads , which have seen increases significantly, to name but a few: Mill lane, Holt lane, Longton lane. 03
6. Any improvement works for Warrington rd, will need to overcome the Skewed Bridge. There's little scope to improve there.
7. Any traffic rises will lead to additional air pollution, increasing risks to health and pedestrian accidents.
8. 3HS area has got the infrastructure to support increase housing, Doctors, Dentists, school places these services will be accessed elsewhere, committing people to travel. 04

9. Any development in 3HS increase risk to existing properties, by not allowing the flood plain draining the land via the brook.
10. St Helens council hasn't provided Sport England a decision on their previous objection which should be rejected or upheld.
11. 3HS supports 13 species of protected flora and fauna
-

OK

7. Please set out modification(s) you consider are necessary

The council should withdraw this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not remove this land from green belt to place it as safeguarded

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 5:18:52 PM
---------------	----------------------

PO3299

①-LPA02 ②-LPA04 ③-LPA07 ④-LPA06
 ⑤-LPA08 ⑥-LPC12 ⑦-LPD07

Representor Details

Web Reference Number	WF0183
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	N/A
Address	8 Mallard Gardens St Helens WA9 5BL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The population has been declining and without knowing the impact of Brexit is it unclear why there is a requirement for additional housing on this land. 01

St Helens Council suggests availability for 84 units.

Declining business including industry has declined since the middle of the 1980s and the area proposed relies on employment outside of the area to be able to afford the houses. 02

This obviously has an impact on the traffic throughout the area and the current infrastructure is insufficient to cope with that and the additional pollution.

There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there. Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03

The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.

Add another 160 cars plus would add to congestion, pollution and noise levels.

This will also impact pedestrian safety to have increased traffic and again pollution levels.

I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough.

Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

03

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.

If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space.

04

If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road.

05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times.

03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.

At moment at least the water is near the farm land and does not always spread across the road.

If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented.

06

The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased.

07

7. Please set out modification(s) you consider are necessary

The council should not consider removing this land from green belt or open spaces to place in safe guarding.

I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 3:02:20 PM
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PO3300



St.Helens Borough Local Plan 2020-2035 - Group Representation
Adam Onyett

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:35



2 Attachments



St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards
Adam Onyett

- ① - LPA05 - TABLE 4-5
- ② - LPA05 - GEN
- ③ - LPA05 - 6HA
- ④ - LPA06
- ⑤ - LPA02
- ⑥ - LPA06 - 3HS
- ⑦ - TIA
- ⑧ - IDP
- ⑨ - para 1.7.2 - DEC.



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Adam	First name:
Last Name: Onyett	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 37 Wedgewood Gardens St Helens	Address:
Postcode: WA9 5GA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <input type="text" value="10/03/19"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Unsure	
Sound?		No
Complies with the Duty to Cooperate		No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the

①

②

recommendation being 482dpa. The 2016 based projections have a proposed figure of 383dpa (see paragraph 8.8 of the GL Hearn report). The Plan does not seem to justify why 486dpa has been determined and for this reason the Plan is not justified. There also appears to be some confusion on the required dpa; item 1. In the table of paragraph 4.16 suggests 486dpa, yet paragraph 4.18.4 suggests the figure is 468dpa. This confusion seems to throw some of the report in to doubt.

2

The site at Cowley Hill (6HA), is understood to have a potential of more than 1,000 dwellings which could be built on this site; well above the 816 suggested in the Plan. The proposed density (35 units per Ha) is potentially lower than the developer would wish for and certainly the 75% net developable area is below what any developer would propose for such a site. The cost of remediation of such a brownfield site would need a greater land usage and density in order to maximise the economic viability for cost of remediation. It also understood that a potential developer would want to complete the entire site within the 15 year period of the proposed Plan, again due to economic viability. So, the Plan is unsound delivering only 516 dwellings at this site over its period as opposed to the probable 1,000+ dwellings which will happen over the Plan period.

3

Under section 3.2.1 of the Plan (Strategic Aims & Objectives), within the table under item 6.2 & 6.3 the protection of the environment and enhancement of green space is promoted. Paragraph 4.24.1 offers no real justification against this Aim rendering the proposal not justified nor sound.

4

Section 4.5 of the Plan states that all strategic aims have been met, however, item 4 of Policy LPA02 releases green belt. This does not meet Strategic Aim item 6 'Safeguarding and Enhancing Quality of Life'.

5

The Plan does not identify specific measures to deal with the Infrastructure Delivery to be incorporated with the use of the 3HS site, nor is anything specific referred to in the Infrastructure Delivery Plan. The area surrounding 3HS suffers significant congestion throughout the day, specifically between 07:30-09:15, 14:30-16:00 and 17:00-18:30 on weekdays. The arterial route of Warrington Road (A57) is always busy being a main route between M62, Whiston hospital (constantly having ambulances traversing through) and Prescott. The junction of Warrington Road (A57) and Rainhill Road (at Skew Bridge) is a significant 'bottleneck' point on this route and, should there be development of 3HS, would serve to increase congestion issues. There is also pressure on Elton Head Road and where this meets the A570 Linkway. The ongoing roadworks are intended to alleviate this however, it is believed that by changing the roundabout to a traffic signalled junction will not significantly improve the situation.

6

Highway
&
Warrington

The traffic congestion concerns also lead the local community to concerns regarding our health. Contained within the Plan in paragraph 2.6.1 are the leading causes of death within our Borough. These are cancer and respiratory disease which can both be brought on by poor air quality. By the introduction of 3HS in the Plan, a significant green space, the local residents have genuine fear for our health with the introduction of at least 1,000 cars for any development on 3HS (not accounting for the added pollution throughout the construction phase). Coupled with the risk to health from congestion is the loss of trees from the 3HS site in which helps to offset some of the CO2 emissions.

6

The Transport Impact Assessment 2019 makes no reference to the 3HS site and has taken no account of the potential traffic increase from this site (or any of the other proposed 'safeguarded' sites) so, therefore, proves the Plan is not sound. As described above, the traffic situation is currently at breaking point and without a clear transport strategy considering the impacts of the 3HS site the proposals will have a detrimental effect on the road users within the wider area.

7

3HS
LHS

Foreman

1498

Contractor in the
the

supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

6

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

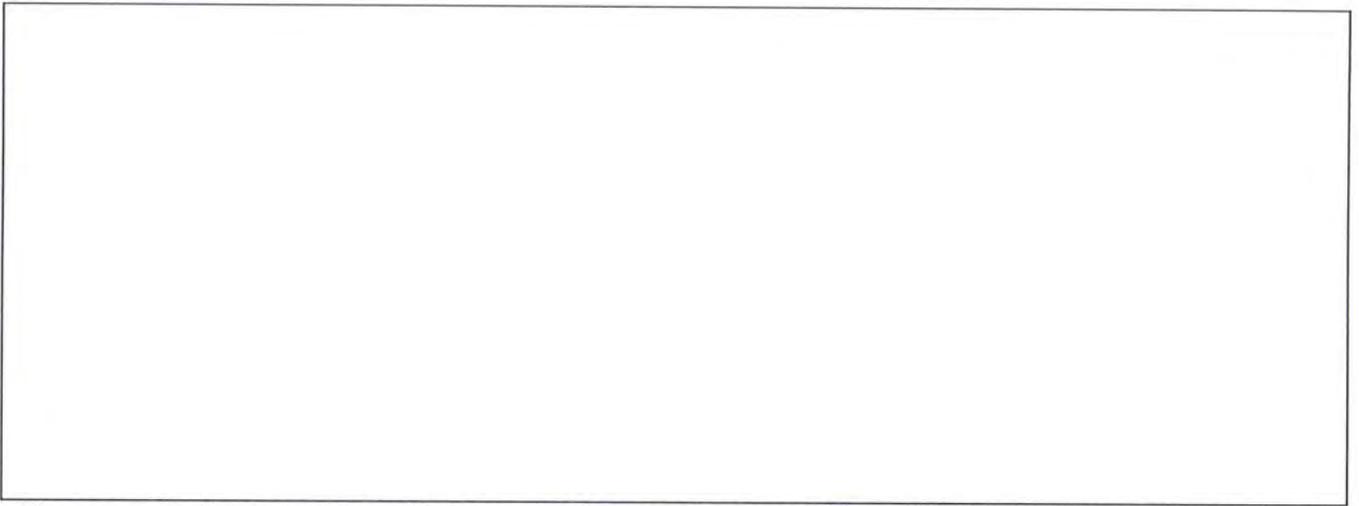
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**