



ST HELENS
BOROUGH COUNCIL

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

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

REPRESENTATION ORDER

RO1001 – RO1100

SEPTEMBER 2020

RO1001



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).

1182
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:	Title:
First Name: CONSTANCE	First name:
Last Name: KING	Last Name:
Organisation/company:	Organisation/company:
Address: 20A ELEPHANT LANE ST HELENS, MERSEYSIDE	Address:
Postcode: WARRINGTON	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: [REDACTED]

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.

RO1002

Representor Details

Web Reference Number	WF0025
Type of Submission	Web submission
Full Name	miss melanie king
Organisation	
Address	40 vicarage road haydock st helens wa11 0uj wa110uj
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	EA2
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.

I am massively concerned that the proposal for this land is 500 homes (simple math approx. 1000 people). The local roads are already at max capacity, the Haydock island/A580 junction is absolutely awful, additionally the increase of pollution/decrease in air quality. The plans for more houses/people PLUS the factories/logistics is going to make the roads almost unusable due to traffic generation. looking at the 500 houses/1000 new people - haydock will need a new GP practice, Haydock medical centre is always full/no appointments. my house looks out into fields/greenery, once the 500 houses are built (plus the factories) haydock is going to have no green area to enjoy - the green land that has been suggested to remain is no where near properties. I am concerned about the destruction of some beautiful trees and the local nature conservation of the destruction of the Green belt.

①

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

Haydock doesn't have train stations for commuters, even if I wanted to travel to work on public transportation I would have to drive to the station which defeats the point.

St Helens
MOJ

St helens should invest in good transportation links - trains/trams, better junctions on the a580.
Once this has been completed or commenced then look at houses.
There is plenty of Brown Belt land within st helens to be utilised and also empty wearhouses/vacant buildings (old Methodist Church)

} Sugar Inc
Moss.

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 9:38:59 PM
---------------	----------------------

RO1003



St. Helens
Council

232

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

Ref: LPSD

24 APR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>PAULINE</i>	First name:
Last Name: <i>KING-WILLIAMS</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>23 STIRLING DR. GARSWOOD</i>	Address:
Postcode: <i>WN4 0UG</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:	Date: <i>27.3.19.</i>
------------	-----------------------

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

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

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		
PA05					IHA					
Other documents (please name document and relevant part/section)										
(1)										

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

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

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

... 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 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma.

gh!

2009



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

PART B – YOUR REPRESENTATION

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

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

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

2

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	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

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. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1H.S This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma.

2H1

20A9.1

Please continue on a separate sheet if necessary

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

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

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

RO1004

3

Ref: LPSD

26 FEB 2019

(For official use only)



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DENNIS</u>	First name:
Last Name: <u>KIRKHAM</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>3 SELKIRK DRIVE</u>	Address:
<u>ECCLESTON</u>
<u>ST. HELENS</u>
Postcode: <u>WA10 5PD</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 21-02-19

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

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

Yes (via email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

DOES NOT SATISFY :-

- a) The requirement for sustainable development
- b) The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- c) Sustainable housing, targets proposed are based on aspirational employment growth predictions.
- d) Effective land use by concentrating on Green Space development over town centre development with higher densities
- e) Food security by ignoring Agricultural Land Quality

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1005

(26)

Ref: LPSD
26 FEB 2019
(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANN</u>	First name: _____
Last Name: <u>KIRZHAM</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 SELKIRK DRIVE</u> <u>ECCLESTON</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA10 5PD</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED] Date: 21.02.19

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

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

Yes (via email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>DOES NOT SATISFY :-</p> <ol style="list-style-type: none"> 1) The requirement for sustainable development 2) The requirement criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs 3) Sustainable housing, targets proposed are based on aspirational employment growth predictions 4) Effective land use by concentrating on Green Space development over town centre development with higher densities 5) Food security by ignoring Agricultural Land Quality.

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

Please continue on a separate sheet if necessary

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

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

RO1006



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.

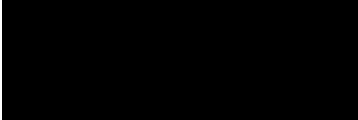
I trust this representation is duly made, and I would be grateful if you could confirm receipt of the attached.

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.



This message contains confidential information and is intended only for the recipient. If you are not the recipient you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.



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: 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

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	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"/> √

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

Introduction

WYG is acting on behalf of the Department of Health and Social Care who hold a legal interest in the former Eccleston Park Golf Club located off Rainhill Road, Eccleston. The former Golf Club with an 18-hole, 6,477 yard, golf course and its ancillary golf club buildings comprising 688sqm club house (6,800sqft) plus practice and greenkeeper's facilities were placed on the open market for sale and were purchased by [REDACTED] in 2014 who then resold it in 2017. The site was within the Green Belt and proposed to be allocated in the Local Plan Preferred Options stage in December 2016 but has now been recommended for release following the Green Belt Review (December 2018).

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.

Given that the site is no longer needed for a golf course, which was itself a relatively recent use, and is well located within the urban context, it is considered that it represents an excellent opportunity for St Helens Council to make a significant contribution to meeting its housing needs. We therefore request that the site is allocated for residential development as part of the current Local Plan process.

Planning context

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. The Department of Health and Social Care consider this restriction to be unfair and unreasonable in light of the national housing crisis where there remains an overall deficit in the provision of suitable and habitable housing in England. Furthermore, this situation would create a vacant site, incapable for any use, and effectively sterilising any further development until 2035. This would be detrimental to the local environment and does not represent sustainable use of land or best practice in planning.

Housing Requirement

The St Helens Strategic Housing Market Assessment (SHMA) Update (January 2019) post-dates the Green Belt Review, which was completed in December 2018.

The SHMA Update provides a series of economic based scenarios for household growth translated into annualised housing requirement. These range between 504-514 dwellings per annum under Economic Scenario 2, and 479 dwelling units per annum under Economic

01

02

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).

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.

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.

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.

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:

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

06

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.

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."

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."

In terms of its sustainability, the Eccleston Park Golf Club site is accessible to alternative modes of transport including Eccleston Park railway station where there are regular train and bus services at least every 15 minutes. The site is accessible to nearby schooling at Nutgrove Methodist Aided Primary School and Rainhill High School, and it lies in proximity to significant local services and shopping in Eccleston, as well as being only 2.9 miles from the main shopping centre in St Helens Town Centre and 3.9 miles from St Helens Central Railway Station.

Given the pattern, scale and proximity of nearby development, the site is therefore a sustainable

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.

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

capita ratio when compared with both its statistical neighbours and other Merseyside local authorities (equating to 962 adult residents per hole. Nonetheless, the Golf Course Addendum confirmed that by 2016 there was a trend of already significantly declining membership and usage of local golf courses in St Helens compared to the previous 5 years despite attempts by the clubs to make the sport more attractive. This is reflected in the national trend of declining participation in the number of golfers over the previous 8 years.

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:

“given the precarious financial stability of some clubs, it may be that they no longer become financially viable and close to the public.”

The closure of Eccleston Park Golf Club in June 2018 due to over-saturation and competition from other nearby establishments confirms that there is an over-provision of such facilities in the area. Against this very clear background of evidence, it is therefore unreasonable for the Council to remove the Eccleston Park Golf Club site as an allocation in the current Plan period where there is little prospect of the site returning to beneficial use as a golf club. The objection by Sport England to the allocation of the Eccleston Golf Club site referred to in the Green Belt Review is consequently also unreasonable and ill-founded and does not reflect the relevant evidence summarised above.

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.

The Eccleston Park Golf Club site was considered as part of the Council's Transport Impact Assessment (TIA) (scenario DS1) to support the Preferred Options Local Plan. The individual site assessment findings (Table 10 in the Forecasting Report) confirms that the Eccleston Park Golf Club site fairs no worse and in some criterion fairs better in terms of its accessibility to alternative modes of transport than the alternative former Green Belt sites allocated for the current Plan Period. The TIA (Main Report) also shows for those junctions (i.e. along the A57, A58 and A570) in proximity to the Eccleston Park Golf Club site that the committed and assumed highways improvements outlined in the TIA would largely mitigate for the impact of the increased traffic arising from the Preferred Options sites. Indeed, along the A57, the TIA states

“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

13

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

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

\sqrt

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 as a sustainable location compared against the other former Green Belt sites which have so far been proposed for allocation.

Our verbal evidence would be able to demonstrate that our alternative proposal to allocate Eccleston Park Golf Club site would instead result in a better distribution of development to achieve the growth strategy envisaged for St Helens.

We can also discuss the potential constraints that have been identified and outline how these can be overcome, meaning that they do not represent a significant impediment to prevent allocation of the site.

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.

RO1007



St. Helens Council

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

Ref: LPSD

24 APR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: Sophie	First name:
Last Name: Kirwan	Last Name:
Organisation/company: N/A (resident)	Organisation/company:
Address: 141 Billinge Rd, Garswood, Ashton-in-Makerfield, Wigan	Address:
Postcode: WN1 0XA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 01/04/2019

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		Paragraph / diagram / table		Policies Map	INA	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
PA05								
Other documents (please name document and relevant part/section)				①				

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
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



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for [REDACTED] There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. [REDACTED]

Am

2009



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 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		
MA06					INS					
Other documents (please name document and relevant part/section)				②						

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

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

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

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

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 [REDACTED] 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. [REDACTED]

241

2048


Please continue on a separate sheet if necessary


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

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

	
<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



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.**

RO1008



St. Helens Council

884

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

Ref: LPSD

24 APR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Includes fields for Title, Name, Organisation, Address, Postcode, Tel No, Mobile No, and Email.

Signature: [Redacted] Date: 01/04/19

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 [checked] (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 PA05	Paragraph / diagram / table	Policies Map IHA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

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

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

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

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

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End [REDACTED] There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. [REDACTED]

Am!

2009



Please continue on a separate sheet if necessary

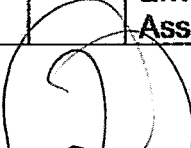
7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification 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 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	
L ^o A06					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"/>

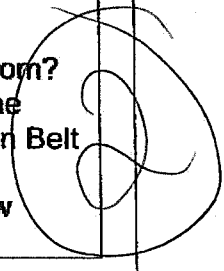
Please tick as appropriate

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 estate is very chaotic, with cars parked around the school

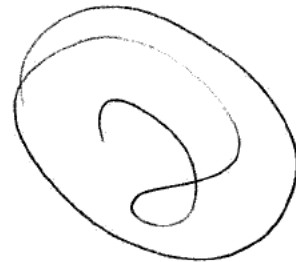


causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and 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. I have lived in Garswood/Simms Lane End [REDACTED] There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1H5 This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. [REDACTED]

2K1

30421



Please continue on a separate sheet if necessary

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

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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

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

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

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.**

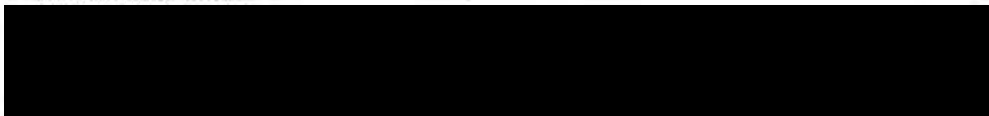
RO1009

ELOOS5



Local Plan Submission Draft
pat Kitto
to:
planningpolicy@sthelens.gov.uk
12/03/2019 12:14

SITE SH3
① - LINDS
② - DFC
③ - S. E.



My Names is Pat Kitto of 10 Rookery Lane, Rainford, St Helens, WA11 8EF and I wish to make the foillowing representation on the Local Plan Submission draft:

In respect of the overall figures in the Plan:

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

①
②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

SUB
WOP

Specific points on site HA8 (Rookery Lane)

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

③
①

Thank you for your consideration

Pat Kitto

RO1010

PF0491

①-LPA05 ②-Statement of Common Ground
③-LPA04 ④-Statement of Common Ground ⁵³⁸ 12 MAR 2019



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

Ref: LPSD
(For official use only)

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

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


This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>MARJORIE</u>	First name:
Last Name: <u>KLEINHANS</u>	Last Name:
Organisation/company: <u>LOCAL RESIDENT</u>	Organisation/company:
Address: <u>101 SPRINGFIELD PARK</u>	Address:
<u>HAYDOCK</u>
Postcode: <u>WA11 0XP</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 7.3.19.

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

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

Yes (via email) No

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

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy LPA05	LPA 05 - SITE QHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<ul style="list-style-type: none"> • This should not be released from the greenbelt as more than enough greenbelt has been build on locally - Florida Farm North. • The infrastructure in Haydock and surrounding area cannot cope with extra demand on school places, doctors surgeries etc. • Because of lack of facilities, more car use will be needed and the local roads will not cope. • The existing problems with flooding will be exacerbated and remediation to prevent this will spill over into Clipsey brook. • There is no statement of common ground with neighbouring authorities. 	

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

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

Please continue on a separate sheet if necessary

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

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

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

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



Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPA 04 S163 SEA SEA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

3

4

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

Delete this land from the proposed removal from the greenselt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1011



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Tillman Kleinhaus</u>	First name: _____
Last Name: <u>Kleinhaus</u>	Last Name: _____
Organisation/company: <u>Local Resident</u>	Organisation/company: _____
Address: <u>101 SPRINGFIELD PARK St Helens</u>	Address: _____
Postcode: <u>WA11 0XP</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No: _____	Mobile No: _____
Email:	Email: _____

Signature:

Date: 7/3/19

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>The release of Greenbelt will cause significant harm to the purposes of Greenbelt and it will not assist in urban regeneration by encouraging the recycling of derelict and other urban land.</p> <p>Access to the site is inadequate and any additional traffic would put more strain on the already overstretched infrastructure.</p> <p>Remedial action to overcome the flooding at this site would just cause even more water to flow into Clipsey Brook - just moving the problem.</p> <p>Extra housing isn't sustainable because of the lack of doctor's surgeries, school places, bus routes etc. This will encourage the use of cars to search out the missing facilities.</p>

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

Delete this land from the proposed removal of Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p><i>Not justified, the Council should be put to strict proof of the need for this type of development, in this development and on this scale.</i></p> <p><i>The council has already granted planning permission in the Green belt in respect of site 2EA - Florida Farm North.</i></p> <p><i>The risk of flooding further down the Clipsey Brook will be greatly exacerbated by development at this location.</i></p> <p><i>The high volumes of predicted traffic will add to the already over capacity on the roads in the vicinity.</i></p>

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1012

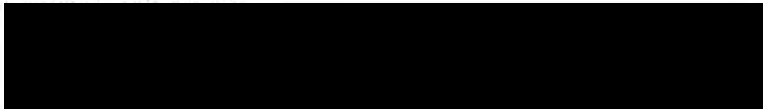
ELO102

SIX PHA

① - LPA05



Objection to Local Plan (specifically release of greenbelt)
MAKnights
to:
planningpolicy
12/03/2019 16:19



It's vital I object to this plan, despite it having undergone a rewrite the objections made to the initial plan.

In summary

There seem to be circumstances which would justify the local plan not using the standard method to calculate housing requirements, rather than the one used and as such the plan overestimates the quantity of land to be released from the green belt

} ①

Reasonable alternatives seem to have been rejected out of hand, or at the very least have not been properly pursued

} ①

St Helens local plan is intended to promote growth and employment and yet removal or farming land from the greenbelt for housing will cost jobs.

Specific to site (HA8) 8HA

Environmental impact, across the borough fertile, productive farmland is to be released from green belt to meet a housing need (which as stated above appears to be based on unsound reasoning).

By the councils own assessment HA8 is the least appropriate Green Belt site allocated for housing in Phase 1

There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land

} ①

Cutting food miles and the environmental impact that cars have are vital for the health and wellbeing of our communities, yet the proposal suggests building on farm land in areas where public transport provides insufficient reach to connect to areas of high employment, almost guaranteeing a significant increase in road traffic, and the pollution which goes with it. Coupled with sites in semi-rural communities where the roads are unsuitable for such increases in traffic it appears that retaining these green belt sites is the only option for a council who value the health and safety of their community and the children thereof.

} ①

The plan should be amended by removing green belt from the local plan, reducing the assesment of housing required, use more previously developed land. Consult more closely with other local authorities to ensure a joined up plan.

} suggestions
nos

--
Mark A. Knights
90 Lowbank Road
Ashton in Makerfield
Wigan
WN4 9RZ

RO1013



(519) (PF0348)

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

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MALCOLM</u>	First name: _____
Last Name: <u>KNIGHTS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>73 ROOKERY WANE</u> <u>RAINFORD ST. HELENS</u>	Address: _____
Postcode: <u>WA11 8RL</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

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.

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981.</p> <p>THE PROPOSED WARD IS GRADE 1 AGRICULTURAL ONCE ITS GONE IT CANNOT BE BROUGHT BACK. THE SEWERAGE SYSTEM CANNOT COPE WHEN WE HAVE HEAVY RAIN MANHOLE COVERS RAISE UP AND OVER FLOW. HEALTH CENTRES WILL NOT BE ABLE TO COPE, WITH WAITING TIMES NOW CAN BE UP TO 2 TO 3 WEEKS. SCHOOLS ARE FULL.</p> <p>THE BUS SERVICE TO AND FROM RAINFORD ONLY TO AND FROM ST HELENS AND ONLY 1 EVERY HOUR</p>

Please continue on a separate sheet if necessary

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

DELETE THIS LAND
FROM THE PROPOSED
REMOVAL FROM
GREEN BELT

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

- 1 INADEQUATE PARKING IN THE VILLAGE
- 2 FROM ROOKERY LANE THERE IS A BAD JUNCTION AT THE INTERSECTION OF ROOKERY LANE AND CHURCH ROAD
- 3 THE SITE IS NEXT TO EXISTING INDUSTRIAL ESTATE THERE HAS BEEN A CASE IN RECENT YEAR THAT THE RESIDENTS ON HIGHER LANE, ROOKERY LANE WON AN INJUNCTION AGAINST A MANUFACTURING UNIT WHICH CAUSED THE BUSINESS TO RELOCATE LOSING EMPLOYMENT TO THE AREA

4/ POLICE
THEY ARE SELLING THE POLICE STATION OFF
THERE WILL BE KNOW POLICE STATION

5/ FIRE SERVICE
THE NEAREST FIRE STATION IN ECCLESTON IS BEING RELOCATED TO THE CENTRE OF ST HELENS

6/
A RAINFORD CE
NO EXTENSION CAN BE MADE WITHOUT TAKING PLAYING FIELDS

B CORPUS CHRISTI
DITTO

C BROOK WODGE DITTO

D RAINFORD HIGH SCHOOL
CAN ONLY BE EXTENDED BY TAKING GRADE 1 AGRICULTURAL LAND

RO1014



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).

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: MISS	Title:
First Name: FAYE	First name:
Last Name: KNOCKTON	Last Name:
Organisation/company:	Organisation/company:
Address: 69, THE PASTURES BOLD	Address:
Postcode: WA9 4ZA	Postcode:
Tel No:	Tel No:
Mobile: [REDACTED]	Mobile No:
Email: [REDACTED]	mail:

Signature: [REDACTED] Date: 18/4/19

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

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

Yes (Via Email) No

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

RO1015



St. Helens
Council

663

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

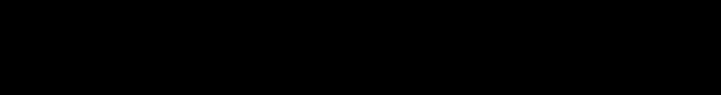
This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Mr.</u>	Title:
First Name: <u>COLIN</u>	First name:
Last Name: <u>KNOWLES</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
Address: <u>59 PORTICO LANE ECCLESTON PARK, PRESLOT</u>	Address:
Postcode: <u>L35 7JW</u>	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:

Signature:  Date: 12-3-19

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

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

Yes (Via Email) No

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPAC06	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: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	Yes <input type="checkbox"/>	Don't Know <input checked="" type="checkbox"/>	No <input type="checkbox"/> Don't Know <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>

Please tick as appropriate

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

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

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

IT IS MY BELIEF THAT GREENBELT LAND SHOULD BE PROTECTED AS LONG AS IS HUMANLY POSSIBLE. FURTHER AVENUES NEED TO BE EXPLORED WITH BROWNFIELD SITES AN OBVIOUS CHOICE FIRST. I GREW UP AROUND THIS GREENBELT LAND AND HAD HOURS + HOURS OF FUN DAY AFTER DAY, WHAT WILL THE CHILDREN OF THE FUTURE HAVE IF WE KEEP SELLING OUR GREENBELT FOR A FAST BUCK.... NOTHING...

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 GREENBELT, THEREFORE ABIDING WITH 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.

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

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

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

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

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

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

RO1016



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).

965

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: Mrs	Title:
First Name: Jane	First name:
Last Name: Knowles	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Hydrangea Way New Bold St Helens	Address:
Postcode: WA9 4FX	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 27/04/19

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

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

Yes (Via Email) No

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

RO1017



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).

966

13 MAY 2019

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, First Name, Last Name, Organisation/company, Address, Postcode, Tel No, Mobile No, Email.

Signature: [Redacted] Date: 26/04/19

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

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

RO1018

28 Lotus Gardens
Bold
St. Helens
WA9 4EB

Dear Sir / Madam,

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

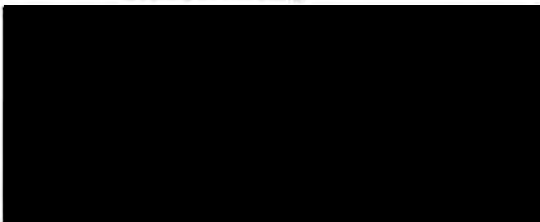
My rationale is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides countryside to the people. It has a huge environmental value. In the face of climate change it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015. Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to many of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA **2988 Houses** and LPSD 5HA **569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,



26 FEB 2019

RO1019

Representor Details

Web Reference Number	WF0213
Type of Submission	Web submission
Full Name	Miss Serena Kwan
Organisation	
Address	11 Beech Gardens WA11 8DJ
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	SHBPL
Paragraph / diagram / table	
Policies Map	HA8
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.

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

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

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

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

The Council should co-operate with other councils and publish any statement(s) of common ground

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 7:22:12 PM
---------------	----------------------

RO1020



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

(For official use only)

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

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


This form has two parts;

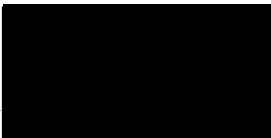
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>GLYN</u>	First name:
Last Name: <u>LACEY</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company: <u>/</u>
Address: <u>27 LEDBURY CLOSE</u>	Address:
<u>ECCLESTON, ST HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>WA10 5NY</u>	Postcode:
	Tel No:
	Mobile No: <u>/</u>
	Email:

Signature:  Date: 12/3/19

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

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

- Yes (via email)
- No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA 05 LPA 05	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW (2018)						

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>THE HOUSING NEED ASSESSMENT DOES NOT USE STANDARD METHODOLOGY, AND NO CASE FOR EXCEPTIONAL CIRCUMSTANCES HAS BEEN MADE.</p> <p>THE PLAN MAKES NO MENTION OF BROWNFIELD AND PREVIOUSLY DEVELOPED LAND (PDL) THAT IS NOT (YET) AVAILABLE OR INCLUDED ON THE BROWN FIELD REGISTER.</p> <p>THE BOROUGH HAS SIGNIFICANT LONG TERM AND INTRACTABLE PROBLEMS AT WINDLE ISLAND, BLEAKHILL 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)</p> <p>THE INCREASE IN TRAFFIC PROPOSED IN THE PLAN WILL HAVE A SIGNIFICANT IMPACT ON AIR QUALITY NOISE, TRANQUILITY AND GENERAL HEALTH. IT DOES NOT PROMOTE LESS VEHICLE DEPENDENCY WITH ITS PROPOSALS FOR EDGE OF TOWN DEVELOPMENTS.</p> <p>ADEQUATE REGIONAL AND CROSS BORDER COLLABORATION HAS NOT BEEN UNDERTAKEN.</p>

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

Please continue on a separate sheet if necessary

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

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

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

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.

RO1021



St Helens
Council

773

13 MAR 2019

Ref: LPSD

(For official use only)

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

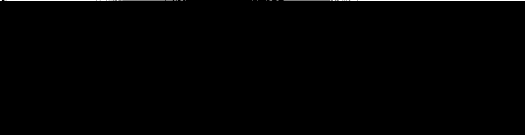
Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

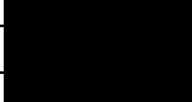
Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title: N/A
First Name: Angela	First name:
Last Name: Lacey	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 27 Ledbury Close Eccleston St Helens	Address:
Postcode: WA10 5NY	Postcode:
	Tel No:
	Mobile No:
	Email:

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	LPA05 LPA06	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 checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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

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

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

The Plan is based on flawed methodology and does not satisfy: the criteria for sustainable housing as the targets are based on aspirational growth; effective land use as it concentrates on Green Belt development over town centre development with higher densities; food security by ignoring agricultural land quality; the criteria for sustainable transport as it promotes increased car dependency remote from transport hubs. Also, the Plan appears to contain questionable elements.

PLEASE SEE ATTACHED SHEET.

Please continue on a separate sheet if necessary

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

The housing target figures be reduced; focus on the 15 years target and eliminate any requirement for safeguarding land for building; remediate and redevelop all brownfield sites and realistically apply the test of "exceptional circumstances" to ensure that precious green belt continues to serve its purpose for the future of our communities.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

The Plan is not positively prepared, justified, effective or consistent with national planning policy. It contains over ambitious growth targets based on flawed employment forecasts.

The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The latest ONS (2016) estimate predicts that 383 houses per year will be required to meet housing need in St Helens yet the Council are using an older forecast of 486. Using the later figure will reduce the requirement for building on the green belt.

No justification has been made for "exceptional circumstances" for removing land from Green Belt for building purposes. This land is extremely valuable for local food production, flood prevention and climate change mitigation. Site 8HS is 53 hectares of Grade 1 and 2 agricultural land which has been farmed since the 1850s, producing vegetable and wheat crops. Its proposed future development would introduce a significant amount of building onto land that is currently largely free from built structures, causing the countryside to become an endless vista of brick, cars and exhaust fumes - it is estimated that approximately 1,900 additional vehicles would be on the roads of Eccleston and surrounding areas as a result of this development. The Plan to remove land from Green Belt for house building in semi-rural communities will change the very character of the local areas forever and goes contrary to the Council's declaration of 'respecting and preserving our past'.

There should be no release from green belt of land for development until every available brownfield site has been identified and built on, including contaminated and remediated land. By releasing land from the green belt, the Council will be inviting pressure from housebuilders to expedite the development of this easier and more profitable option, which could prevent a proper approach to the regeneration of our viable brownfield sites and our town. Emphasis should be on brownfield sites and breathing new life into existing empty properties.

The Plan makes no mention of brownfield and Previously Developed Land (PDL) that is not yet available or included in the Brownfield Register. The Council states that 3,170 ha of the lowest priority contaminated land exists in the Borough. How is it even possible to contemplate the removal of land from Green Belt protection when this exists and could be remediated and brought back to usefulness. 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 plan period being considered. It has been proposed (but not seriously considered by the Council) that developers be made responsible for this remediation and offered this land as an alternative to Green Belt in order to assist in regenerating our Borough, improving our local environment and protecting our green belt for future generations to enjoy.

The Plan promotes unsustainable traffic growth causing severe traffic issues that will fail to satisfy the NPPF (2016). This traffic growth will be in the exact areas that the Borough already has significant and intractable problems. The IDP does not detail how these problems will be solved or funded.

Despite the trend away from diesel and petrol, the increase in traffic as a result of the proposed Plan will have a significant impact on air quality - which reports suggest lead to a higher incidence of asthma and dementia - noise, tranquillity, general health, quality of life. The Plan does not promote less vehicle dependency with its edge of town developments.

The IDP fails to explain clearly how the impact on healthcare will be managed and funded.

The Plan concentrates on house building and low skilled employment. Housing development on such a scale will have a detrimental impact on the local environment, including loss of wildlife and recreational space. We should support the farming industry, protect wildlife and preserve the countryside for future generations.

RO1022

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

RO1023



St. Helens Council

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

05 APR 2019

Ref: LPSD
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1370
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JUNE</u>	First name: _____
Last Name: <u>LAMB</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 PERCY ST</u> <u>SUTTON ST. HELENS</u>	Address: _____
Postcode: <u>WA9 3HR</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 27.3.2019

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO1024

- ① - LPA04 ② - LPA05 ③ - LPA05, 8HA
 ④ - GEN ⑤ - Statement of Common Ground

Representor Details

Web Reference Number	WF0281
Type of Submission	Web submission
Full Name	Mrs Jean Lamb
Organisation	
Address	13 Rookery Lane Rainford St Helens Merseyside WA11 8EE
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	Everything in the plan
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.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - 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 ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope. There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

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

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

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 7:10:32 PM
---------------	---------------------

RO1025

721

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



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>PETER</u>	First name: _____
Last Name: <u>LARGE</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>16 HERON GROVE, MANFORD</u>	Address: _____
Postcode: <u>WA11 8BD</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 5/3/19

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

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

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

Yes (via email) No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>WORRIES ABOUT LOSS OF V. GOOD FARMLAND. EXTRA EXITS ONTO HIGHWAY/ROOKLEY LANE. MEANING MORE TRAFFIC, AND POSSIBLE RISK TO PUBLIC.</p>

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1026

722

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



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>Helen Patricia</u>	First name:
Last Name: <u>Large</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>16 Heron Grove</u>	Address:
<u>Rainford</u>
<u>Merseyside</u>
Postcode: <u>WA11 8BD</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 4.3.19

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>I feel the proposal to be unsound on the grounds that they are going to use <u>Grade I</u> agriculture land, which has always produced many vegetables over the years. The amount of extra traffic will be enormous, adding to an already busy road.</p>

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1027



Housing
STEVEN LAWRENSON to: planningpolicy

05/03/2019 19:44

[REDACTED]

I live on Crawford street [REDACTED] [REDACTED] [REDACTED] bought my house with a view Ov fields and horses it is my [REDACTED] i don't want to live on a housing estate I so we move here, when u go out of out back door and then out of the back gate [REDACTED] in peace and tranquillity the view is great it's great belt wat right have the council to ruin peoples lives and take away the very land that has enhances our lives with wild life trees and tranquillity and greenery it is a total disgrace and you should rethink your policies about using green belt and start using brown belt this policy will be the down fall Ov labour

Sent from my iPad Steve

① - GEN ② - LPA05

Representor Details

Web Reference Number	WF0256
Type of Submission	Web submission
Full Name	Mr Steven Lawrenson
Organisation	Home
Address	12 Crawford street clockface St. Helens Wa94xq
Agent Details	None

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

I think this Proposed project this housing scheme be illegal as there is plenty of wildlife including bats frogs and there is other wildlife which live on and around the surrounding fields Ov Crawford Street, We have had no verbal or written communication between the local residents and the council know council leaders Have bothered To turned up at the meeting which is to be honest Is a total joke you're playing around with peoples lives we bought these houses because of the tranquillity and peace and the greenbelt area when I bought this house I was told that the forestry commission owned these fields and there would be no building home for over 50 years The roads and the local amenities would not cope with what is going on on your building project peoples lives will be severely affected i objects to this project this is not fair that people have sent a list of the people of Warrington and omega

②
①
②

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

Needs to have a positive tests on the wildlife protection local residents traffic and and roadways confirm with policies from St Helens 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	3/10/2019 3:38:52 PM
---------------	----------------------

RO1028

24 SIGNATURE

LP0020

3HS

13 MAR 2019

20



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).

①-LPA06

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: HENRY KENNETH	First name:
Last Name: LAWRENSON	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 86, FOXWOOD, ST HELENS, MERSEYSIDE	Address:
Postcode: WA9 5UJ	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 09th. 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 – 5:00pm)**



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	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is 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

(Page 1 of 4)

Please note that this signed representation Form has also been completed with the assistance of all those persons whose signatures are attached.

* We believe that area 3HS is a confirmed zone two and three flood zone with a very high water table. The land around this area will not be able to drain if the Flood zone were to be removed. A brook, which has historically existed in this area, will not be able to function and it is highly likely that existing properties in this area will be extensively flooded.

* We also believe that an increased number of vehicles in this area, and conservative estimates of there being in excess of 2,000 vehicles

safely attributable to area 3HS, will be detrimental to pedestrian safety as well as air pollution affecting the environment.

* Area 3HS clearly has an inadequate road system which borders this area.

There is one 'B' classified road, Rainhill Road (B5413), one 'C' classified unnumbered road, Portico Lane and one 'U' unclassified road, Two Butt Lane.

Currently, only Rainhill Road (B5413) has access to area 3HS and is in light use serving the existing private properties surrounding what was the golf course club house. This access point is a mile away from the main Warrington Road (A57) at the Rainhill (Skew Bridge) junction.

The classified unnumbered road, Portico Lane, does not have access to area 3HS.

The unclassified road, Two Butt Lane, could have access to 3HS but for more than a third of its length is narrow and little more than $1\frac{1}{2}$ vehicles wide. Some years ago it was considered necessary for single file chicanes to be installed along its length in an effort to prevent Road Traffic Accidents and subsequent vehicle damage as well as discouraging the use of this minor road by motorists who seek a "short cut" by using this road as a "rat run" in order to escape the very busy A57 main road which is half a mile away at this point.

Because this road is edged, on both sides, by newly built properties developed by different building companies there exists a clear, visual impact of the result of bad planning!

* It has been observed that existing traffic levels in the areas bordering 3HS are, even without further property development, at saturation point at this time.

At peak times travel in this area is all but impossible.

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

Existing, as well as ongoing property developments in this area, for example, the Scotchbarn Lane development as well as the planned Halsnead Garden Village proposed by the Liverpool City Regional Plan will further add to an excess of properties and further restrict both vehicle and pedestrian movement.

Heightened levels of pollution will lead to more illness in this area which is already blighted by being one of the most unhealthiest in the UK.

An extremely sad fact has emerged that death from respiratory disease, in this area alone, has averaged over 50 deaths per 100,000 people who were aged less than 75.

At this same time, 2015, the average was 33 deaths for the rest of the UK!

* It has been proved that area 3HS supports 59 different species of birds, mammals and flora and fauna and that 13 of these species are protected.

* It has also been discovered that there has been no statement of common ground with neighbouring authorities. Here, there has not been any discussions or agreements between St. Helens and Knowsley as to future plans or requirements.

If the development of area 3HS is allowed to progress and Knowsley's Scotchbarn Lane development is completed together with the creation of the new Halsnead Garden Village then the loss of greenbelt land would be catastrophic to the area and the balance between greenbelt and developed land would be lost. There would be one continuous area of urban dwellings.

As the road traffic network would be beyond saturation point and it will be impossible for essential services to complete their role. Police and ambulance as well as the Fire Service will be unable to complete their vital role in the community.

* It is our belief that green belt should only be released

(Page 4 of 4)

in exceptional circumstances and that planning law in this country supports that position.

That St. Helens Council seeks to release greenbelt land (area 3HS) rather than existing brownfield sites has revealed a flaw in planning. There is a requirement that St Helens Council should create and maintain a register of brownfield sites and, sadly, this had not been completed.

It is understood that there is a difficulty in creating a brownfield site register as there is a difficulty in establishing the many owners of these sites.

If St. Helens Council were to be able to develop the brownfield sites, all of which have existing road connections, then that would be ideal for our environment and a clear advantage for the future of St. Helens,

PLEASE NOTE THAT THERE ^{ARE} SHEETS ATTACHED WITH THE SIGNATURES OF 24 PEOPLE WHO SUPPORT THIS REPRESENTATION.

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 greenbelt, therefore abiding with the National Planning Policy Framework (2019)

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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.**

NAME Georgina Lawrence PRINT NAME GEORGINA LAWRENSEN

ADDRESS [REDACTED]

DATE 10/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Jayne Leyland PRINT NAME J LAYLAND

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Karen Taylor PRINT NAME

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME ALAN TAYLOR PRINT NAME

ADDRESS [REDACTED]

DATE 10-3-19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Daniel Taylor PRINT NAME DANIEL TAYLOR

ADDRESS [Redacted]

DATE 11/3/19

SIGNATURE [Redacted]

I give explicit permission for my name to be used in this response.

NAME Gill Carton PRINT NAME GILL CARTON

ADDRESS [Redacted]

DATE 11/3/19

SIGNATURE [Redacted]

I give explicit permission for my name to be used in this response.

NAME DUNCAN CARTON PRINT NAME DUNCAN CARTON

ADDRESS [Redacted]

DATE 11.03.19

SIGNATURE [Redacted]

I give explicit permission for my name to be used in this response.

NAME Aimee Marsh PRINT NAME Aimee Marsh

ADDRESS [Redacted]

DATE 11/3/19

SIGNATURE [Redacted]

I give explicit permission for my name to be used in this response.

NAME PRINT NAME DENISE MOFFITT

ADDRESS

DATE 12/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME PRINT NAME DAVID MOFFITT

ADDRESS

DATE 12/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME JANETTE JONES PRINT NAME

ADDRESS

[Redacted Address]

DATE 11.3.2019

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

NAME COLIN JONES PRINT NAME

ADDRESS

[Redacted Address]

DATE 11.3.2019

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

NAME MAT CHAMBERLAIN PRINT NAME

ADDRESS

[Redacted Address]

DATE 12/3/19

SIGNATURE ...

[Redacted Signature]

I give explicit permission for my name to be used in this response.

NAME Deb Pearce PRINT NAME

ADDRESS

[Redacted Address]

DATE 12/13/19

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

NAME Gordon O'Connor PRINT NAME GORDON O'CONNOR

ADDRESS



DATE 11-3-2019

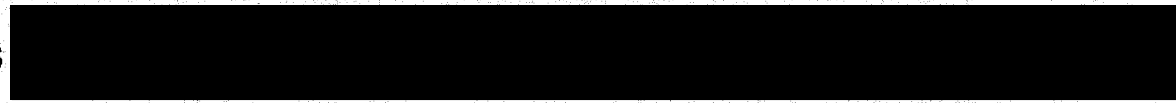
SIGNATURE



I give explicit permission for my name to be used in this response.

NAME Adam Case PRINT NAME Adam Case

ADDRESS



DATE 11/3/2019

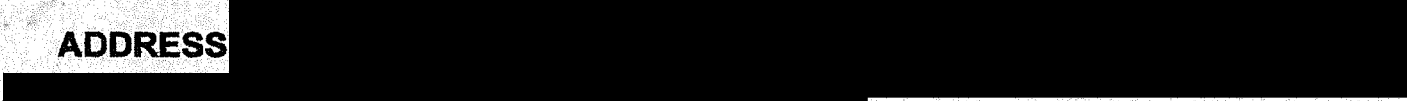
SIGNATURE



I give explicit permission for my name to be used in this response.

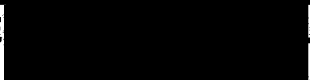
NAME Glynis Case PRINT NAME Glynis Case

ADDRESS



DATE 11.3.2019

SIGNATURE



I give explicit permission for my name to be used in this response.

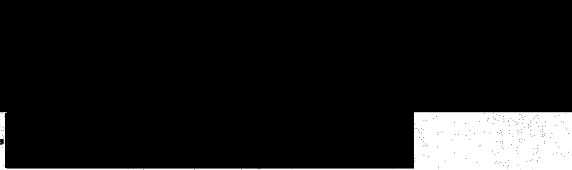
NAME Patricia O'Connor PRINT NAME PATRICIA O'CONNOR

ADDRESS



DATE 11/3/19

SIGNATURE



I give explicit permission for my name to be used in this response.

NAME John Love PRINT NAME JOHN CASE
~~CASE~~

ADDRESS [REDACTED]
[REDACTED] DATE 11/3/19
SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Colin Peden PRINT NAME COLIN PENDLEBURY

ADDRESS [REDACTED]
[REDACTED] DATE 11/3/19
SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Margaret Peden PRINT NAME MARGARET PENDLEBURY

ADDRESS [REDACTED]
[REDACTED] DATE 11/3/19
SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

NAME Alexandra Brown PRINT NAME Alex Brown

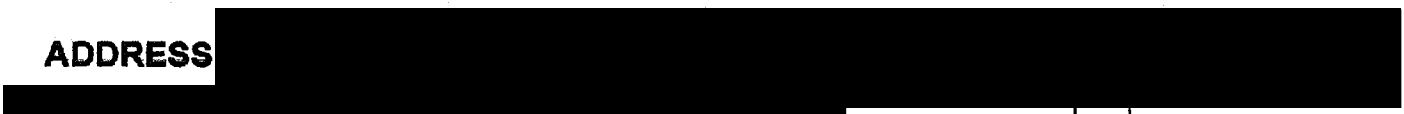
ADDRESS [REDACTED]
[REDACTED] DATE 11/03/19
SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

Dr Shahram Abasi Semnani
[REDACTED] 11/3/19 [REDACTED]

NAME MRS S.L. FOLLIS **PRINT NAME** SANDRA FOLLIS

ADDRESS



DATE 12/3/19

SIGNATURE



I give explicit permission for my name to be used in this response.

NAME **PRINT NAME**

ADDRESS

..... **DATE**

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME **PRINT NAME**

ADDRESS

..... **DATE**

SIGNATURE

I give explicit permission for my name to be used in this response.

NAME **PRINT NAME**

ADDRESS

..... **DATE**

SIGNATURE

I give explicit permission for my name to be used in this response.

RO1029

① - GEN ② - LPA05

Representor Details

Web Reference Number	WF0255
Type of Submission	Web submission
Full Name	Mrs Sharon Lawrenson
Organisation	Home
Address	12 Crawford street clockface St. Helens Wa94xq
Agent Details	None

Would you like to be kept updated of future stages of the St Helens Borough 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:

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 think this Proposed project this housing scheme be illegal as there is plenty of wildlife including bats frogs and there is other wildlife which live on and around the surrounding fields Ov Crawford Street, We have had no verbal or written communication between the local residents and the council know council leaders Have bothered To turned up at the meeting which is to be honest Is a total joke you're playing around with peoples lives we bought these houses because of the tranquillity and peace and the greenbelt area when I bought this house I was told that the forestry commission owned these fields and there would be no building home for over 50 years The roads and the local amenities would not cope with what is going on on your building project peoples lives will be severely affected i objects to this project this is not fair that people have sent a list of the people of Warrington and omega

②

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:

Response Date	3/10/2019 3:42:02 PM
---------------	----------------------

RO1030

442

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



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>BERNARD</u>	First name: _____
Last Name: <u>LAZENBURY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>203, GARSWOOD ROAD</u> <u>GARSWOOD</u> <u>ASTON-IN-MAKERFIELD LANC'S</u>	Address: _____
Postcode: <u>WN4 0XS</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED] Date: 5. 3. 19

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

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

Yes (via email) No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

The release of this green belt land for building purposes cannot be justified. With the decline in the population of St. Helens since 1981 it is arguable ~~whether~~ ^{where} people will come from to occupy them. It will also cause significant harm to the purposes of the Greenbelt.

Using Greenbelt land in this way goes against the objective of adopting urban regeneration and the recycling of derelict and other urban land.

A large housing development in this area is not sustainable regarding access to schools, doctors surgeries, bus routes and other services. People will have to use their cars to travel out of the area.

Traffic movement is already at an all time high.

The character of the village, already changed, will further deteriorate.

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

Delete this land from the proposed removal of the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

The local plan is not legally compliant and unsound. In St. Helens, there are already in excess of 3500 empty properties, in addition to brown field sites of various sizes which could be recycled and built on, helping to regenerate the town & like St. Helens which is struggling to survive. The area, overall is not attractive, but the areas of Greenbelt helps not only to soften the industrial landscape, but also mitigate and offset the large amount of redevelopment that has already occurred. There is evidence already of development 'creep' where even pockets of Greenbelt have been removed to create urban sprawl. Traffic in the past 10 years has increased beyond measure and roads are becoming inadequate. The infrastructure cannot cope with more people.

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

Delete this land from the proposed removal of the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

✓	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.

RO1031

Representor Details

Web Reference Number	WF0345
Type of Submission	Web submission
Full Name	Mr David Lea
Organisation	
Address	30 Villiers Crescent, Eccleston, St.Helens WA10 5HW
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.

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. Additionally there are pockets of land where development permission has previously been granted but where development has not been completed eg Burrows Lane, Eccleston (site of old Methodist church) and Adjacent to the Seven Stars public house. Also there were reported to be on average over the last decade approximately 1000 empty houses in St. Helens. The council appears to have made little progress in formulating a robust plan to bring these houses back into use. If there is a demand for housing within St. Helens then surely these homes would be fully occupied? Does this not indicate that the plan and its projections are fundamentally flawed? Development of green belt invariably leads to development in more affluent areas where the price of new homes will be more expensive thereby not meeting the targets to provide more affordable homes for first time buyers or social housing.

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

The council and its developer partners must ensure that all brownfield sites are fully utilised irrespective of the costs of decontamination. These areas cannot lie unused for perpetuity based on cost premises.

There remains potential that more former industrial sites may become due to a reduction in manufacturing within the UK which is likely to be compounded by the terms of our Brexit agreement assuming one is reached.

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 10:34:01 AM
---------------	----------------------

RO1032



St. Helens
Council

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

(For official use only)

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

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

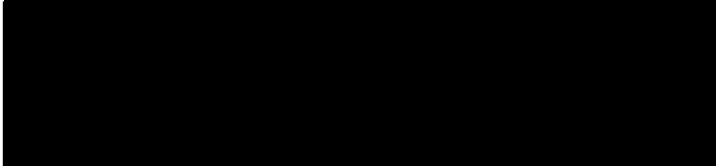
This form has two parts;

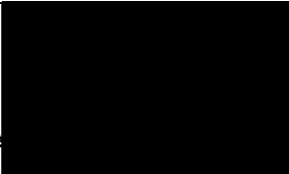
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>BARBARA</u>	First name:
Last Name: <u>HEATH</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>75, VICTORIA ROAD</u> <u>QARSWOOD</u> <u>WILKIN</u>	Address:
Postcode: <u>WN4 0SZ</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature 	Date: <u>12/3/2019</u>
---	------------------------

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

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

Yes (via email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Delete proposed 1a for removal
of greenbelt 1a

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1033

①-LPA05 ③-IDP ⑤-LPA04

ELO128

②-LPA06 ④-GEN



URGENT - Representation in response to Local Plan Submission Draft (LPSD)

Sue Lea-Jones to: planningpolicy

12/03/2019 20:28



1 attachment



objections.docx

Please find attached my Representation in respect of the above local plan.
Please acknowledge safe receipt as I note the deadline is 13th March 2019.

Many thanks

Mrs Lea-Jones

Susan Lea-Jones
32 Crantock Grove
Windle
St Helens
WA10 6EJ

11th March 2019

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. 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.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

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.

①

②

①

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

3

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

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.

4

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

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. The IDP does not address these issues.

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

3

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

5

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.

Yours Sincerely,

Mrs Susan Lea-Jones

RO1034

① - LPA05 ③ - IDP ⑤ - LPA04
② - LPA06 ④ - GEN

ELO137



Representation in response to local plan

Dave Twentyman

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:25



Please see below my representation in response to local plan. However, I would just like to express my disappointment in the presentation of the online form. The form is simply not practicable and the terminology used is a deliberate attempt to baffle, confuse and ultimately obstruct ordinary taxpayers from articulating their objections to this plan. It is quite obvious that this is an attempt to reduce the number of objections and no doubt will be quite successful in doing so.

David Lea-Jones

32 Crantock Grove

St Helens

Merseyside

WA10 6EJ

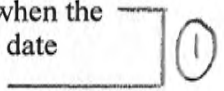
12th March 2019

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.



Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

①

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. 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.

②

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

①

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.

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

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

④

significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. 4

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

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. The IDP does not address these issues. 3

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs! 5

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.

Yours Sincerely,

David Lea-Jones

[Sent from Yahoo Mail for iPhone](#)

RO1035

Representor Details

Web Reference Number	WF0161
Type of Submission	Web submission
Full Name	Mrs Gillian Lea-Wilson
Organisation	
Address	1 Nicholl Rd Eccleston St Helens WA105LN
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	Submission draft of the 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

6. Please give details of why 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.

Less houses are needed than the predictions suggest as they are based on flawed historical data. The amenities in Eccleston of schools both primary and secondary are over subscribed at the present number of homes and provision is not being made for the increase in children that lots of new houses would attract.

People's health would suffer as the green belt is replaced with houses, more pollution and less space to enjoy being outside.

The land is excellent grade 1 and 2 agricultural land. We need that land so farmers can keep on producing carrots and potatoes and make a living.

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

The land should be kept as green belt as there is more than enough of the lowest priority contaminated land elsewhere in St Helens to meet the housing needs in our town.

Thank you for reading my objections and solution.

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

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

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

Response Date	3/12/2019 7:42:41 PM
---------------	----------------------

RO1036

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

RO1037

ELO214
SITE 8HA

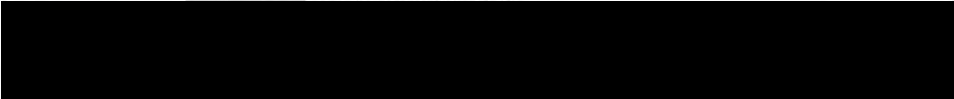
- ① - LPAOK
- ② - DEC
- ③ - S.A.



Local Plan Submission

to: planningpolicy

13/03/2019 15:44



To whom it may concern

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

Our reasons are as follows:

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

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

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

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

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

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

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

Warmest regards

Rebecca Leche, William Jones (15) and Louisa Jones (13)

7 Damson Grove Court
Damson Grove
Rainford
WA11 8GL

①

②

③

①

RO1038



Local Plan Representative Form

dunc.lee

to:

planningpolicy

12/05/2019 09:40



1 Attachment



representation-form (1).doc

Hi

Please find attached Representation Form St Helens LPSD

Regards

Duncan Lee



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: <u>Mr</u>	Title:
First Name: <u>Duncan</u>	First name:
Last Name: <u>Lee</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>30 Springfield Lane Eccleston St Helens</u>	Address:
Postcode: <u>WA10 5EP</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 12th May 2019

Formatted: Superscript

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	X	Habitats Regulation Assessment	X
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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"/> X (No)
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X (No)
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X (No)

Please tick as appropriate

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

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

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

The loss of Grade 1 & 2 agricultural land that comprises most of the allocated and safeguarded sites is not mentioned. Neither is the negative impact to farming and distribution jobs.

Increase in traffic proposed in “The Plan” will have a significant impact on air pollution, noise, tranquillity, general health and road safety. Having lived with “upgrade” to Windle Island over the past 6 months, the increase in traffic through the “rat runs” of Eccleston roads has been intolerable, increasing the risk to fellow road users and pedestrians, with the increase in traffic with the proposed plan, this would be on a permanent basis.

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 either missing or vague. There is no indication or reference to collaboration to the Hospital Trust, local CCGs or educational authorities. Local schools are already at capacity, not to mention the strain of the increase in population to the local area would have on doctor’s surgeries.

The Council are using old forecasts (2014) for predicted housing need of St Helens which was 486, in a more recent ONS prediction in 2016 it was 383 houses per year.

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.

There are enough Brownfield or Previously Developed Land sites spread across the borough to accommodate these housing requirements, rather than lumping them all within one area, which would remedy the strain on resources put oin one area.

Please continue on a separate sheet if necessary

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

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

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

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.

RO1039



Sent from my iPad

Begin

>

> Melanie Lee

> 25 Duxbury Close

> Rainford

> St Helens

> WA11 8JU

> I am writing my observations re plans for releasing Green Belt in Rainford re Rookery Lane and Higher Lane.

>

> There will be increased congestion in the village with extra cars, we are already struggling with parking and traffic from the cars and buses re the High schools. Windle Island improvement are going ahead re amount of traffic now if plans go ahead this will increase with more vehicles which have not been taken into account. We already have 2 black spots at the top and bottom of Mill Lane, and you are planning to release a field near by, The bottom of Mill Lane comes out on the Rainford By-pass where there has been a recent incident and the Parish Council have asked the highways to look at this junction.

>

> We are also going to loose prime agricultural land, which has supplied large chain stores in the area. At a time when we are threatened with shortage of vegetables with bad weather in Europe as stated on a news report on the BBC is this the right way to go forward to loose this land. It will also mean loss of livelihoods for local farmers and their workers.

>

> There will be a high risk of flooding which we also saw a few years ago on Boxing Day which caused damage to houses and roads. More building can only cause more problems.

>

> These plans will also have an impact on local wildlife, trees and woodland areas.

>

> There will be more demand on the doctors, the schools, and there are insufficient transport facilities. The train station is not convenient to the centre of the village and the small car park cannot take any increased number of vehicles for any one trying to commute outside of the village to Liverpool and Manchester.

>

> We are a large village in comparison to others villages in the north west, and we will loose our identity, we have a lot of heritage here that we are proud of and wish to keep it that way.

RO1040



St. Helens
Council

8

13 MAR 2019

Ref: LPSD

(For official use only)

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

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John Derek	First name:
Last Name: Lee	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 202 Two Butt Lane, Rainhill, Prescot, Merseyside	Address:
Postcode: L35 8PU	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date:

I have collaborated in this response and give my explicit permission for my name to be used
Pamela Lee [Redacted] 202 Two Butt Lane, Rainhill, L35 8PU 10/3/19

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

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

Yes (Via Email) No

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	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?	Yes <input type="checkbox"/> Don't Know <input type="checkbox"/>	No <input type="checkbox"/> Don't Know <input type="checkbox"/>
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 <input type="checkbox"/>
Justified?	X <input type="checkbox"/>
Effective?	X <input type="checkbox"/>
Consistent with National Policy?	X <input type="checkbox"/>

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

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

CONTINUED ON SEPARATE SHEET

Please continue on a separate sheet if necessary

CONTINUATION SHEET _ Section 7

The Plan has not sufficiently considered the impact of new housing recently constructed which has already affected the traffic throughout the area, this is before the proposed housing in the plan within St Helens Borough and the Halsnead Green Village Development already approved by Knowsley MBC under the Liverpool City Regional Development Plan.

- The A57 is the only A road through the area, being a single carriageway this road is almost gridlocked in the mornings and evenings, this forces traffic onto minor roads. Traffic calming measures in the form of chicanes, 20mph speed limits, peninsular bollards, extra traffic lights, pedestrian crossings, resident only access measures have already been implemented in acknowledgement of the already congested roads and in themselves increasing congestion further.
- Whiston Hospital is a major A&E facility for the region of St Helens, Knowsley, Halton and beyond. Ambulances, both outgoing and incoming must negotiate these single carriageway roads and further congestion will surely endanger lives because of the difficulty in negotiating standing and slow moving traffic. The B roads (Rainhill Road and Portico Lane) bounding 3HS are also used for emergency vehicles and extra traffic by development on this site will prevent the Health Service from achieving their target response times.
- The confined roads, in particular the pinch point of the listed *Skew Bridge* and Rainhill Village gives little or no scope for improving traffic flow and there is no opportunity for bye-passing these areas.
- Any incidents on the M57 or M62 motorways bounding the area already forces traffic through the area, further local development will prove an impossible situation.
- The St Helens MBC Cycle Routes Map shows the preferred route past the Eccleston Park Golf Course which will be adversely affected by traffic if this site were released for housing (Parcel 3HS)
- There has been insufficient consideration for pedestrians in the plan and increased housing development will have an impact not only for safety but the air pollution from vehicles.

There has not been sufficient consideration in the plan to already overstretched resources in St Helens MBC area and the adjoining Knowsley MBC which has already approved the Halsnead Green Village development , building currently in progress on Edmund Arrowsmith school site and playing fields and the BICC Social Club site which previously had football fields and bowling greens.

Schools

School	Maximum Places	Actual Numbers of pupils	Comments
St Anns	404	425	Over subscribed
Longton Lane	210	218	Over subscribed
St Barthomelew	312	313	Slightly over
St John Vianney	210	210	Full
St Lukes	235	213	Places
Prescot Primary	420	448	Over subscribed
St Mary & St Pauls	209	205	Almost full
Eccleston Lane Ends	245	243	Almost full
Evelyn	245	271	Over subscribed

Data obtained from <https://www.gov.uk/school-performance-tables>

Whiston Hospital Although outstanding in many areas, there have been failings for A&E waiting times and patient waits on trolleys. Consideration has not been made in the Local Plan for how the increased numbers of residents can be accommodated when this is newly built hospital cannot meet existing needs.

Doctors and Dentists Many surgeries in the immediate area are not accepting new patients, consideration has not been considered in the plan how resources can be provided for the increased number of people proposed in the area.

PARCEL 3HS (Eccleston Park Golf Course) Site Specifics

- Its current Green Belt status provides separation of the communities of Rainhill, Eccleston Park, Nutgrove and Whiston preventing merging and urban sprawl
- Sport England is a Statutory Government Consultee, however its objection at Local Plan Stage 1 that the status is being changed from EPGC from golf club has not yet been answered. Any objection from a statutory consultee must be resolved or upheld.
- The area is a confirmed two and three flood zone with a very high water table and is essential in draining the land and preventing flooding to properties alongside the brook.
- Housing development in close proximity to the high voltage power lines which cross the site in inappropriate and against the advice of National Grid.
- The main Vyrnwy to Prescot aqueduct crosses the site carry the Liverpool Water supply; housing on this site is therefore inappropriate.

Justification of the need for housing

- Declining industries in the area have caused a reduction in population in the area – Housing led expansion will only provide commuter residents rather than encouraging local businesses which will further exacerbate the traffic problem.
 - Park and ride or drop off at Eccleston Park stations is very poor and leads to further congestion with little possibility of improving the situation at either station.

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 removal from Green Belt of the parcel of land 3HS is inappropriate and not consistent with the National Planning Policy Framework (2019) and St Helens MBC own published policy and objectives and should therefore be deleted from the plan.

Safeguarding is not an appropriate alternative to Green Belt and should therefore not be considered for this parcel of land 3HS. Publicity by St Helens MBC is particularly misleading for the public in that we are led to believe that the Green Belt has been safeguarded rather than safeguarded for the alternative use.

The Green Belt status should not only be preserved but enhanced to the protecting its use for Recreational use only or conservation area to ensure the communities of Rainhill, Eccleston Park, Whiston and Nutgrove remain separate are not merged or the boundaries eroded.

Please continue on a separate sheet if necessary

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

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

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

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

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

***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.**

RO1041

225

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



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>NIGEL</u>	First name:
Last Name: <u>LEEMING</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>28, AVERY ROAD</u> <u>HAYDOCK</u>	Address:
Postcode: <u>WA11 0XA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 26th FEB 2019

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

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

Yes (via email) No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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 people coming from... The release of Greenbelt will cause significant harm to the purposes of green belt... Housing in this area is unsustainable - lack of schools, doctors, surgeries bus routes. Traffic through the village will be unsustainable - access to fire-police and ambulance services will be restricted. Access to the site is inadequate - The A580 will be a major traffic bottleneck in this area.

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.



St. Helens Council

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

Ref: LPSD

01 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>NIGEL</u>	First name:
Last Name: <u>LEEMING</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>28, AVERY ROAD</u> <u>HAYDOCK</u>	Address:
Postcode: <u>WA11 0XA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>26th FEB 2019</u>
-----------------------	---------------------------------------

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

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

Yes (via email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale.</p> <p>High volumes of predicted traffic will add to the already over capacity on the highways around the site.</p> <p>Local wild life will be massively impacted by this development.</p> <p>Infrastructure of existing flood plain already at capacity - further development will drastically impact Cipseys Lane brook all the way to Blackbrook - a known flood risk area !!</p>

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1042



St. Helens Council

226

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>REBECCA</u>	First name:
Last Name: <u>LEEMING</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>28, AVERY ROAD</u>	Address:
<u>HAYDOCK</u>
<u>ST HELENS</u>
Postcode: <u>WA10 0XA</u>	Postcode:
Tel No: 	No:
Mobile: 	Mobile No:
Email: 	ail:
Signature: 	Date: <u>26/2/19</u>

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

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

Yes (via email)

No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

DON'T KNOW

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>I have many concerns about the proposed development. These include the increase in traffic along the East Lanes Road and surrounding areas. I am also worried about the impact on local doctors and schools. It is difficult to get a doctors appointment at present.</p>

Please continue on a separate sheet if necessary

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

"Delete this land from the proposed removal from the greenbelt"

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.



St. Helens Council

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

227

Ref: LPSD

01 MAR 2019

(For official use only)

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

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.


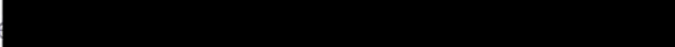
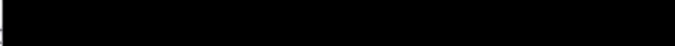
This form has two parts;

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>REBECCA</u>	First name:
Last Name: <u>LEEMING</u>	Last Name:
Organisation/company:	Organisation/company:
.....	
Address: <u>28, AVERY ROAD</u>	Address:
<u>HAYDOCK</u>	
<u>ST HELENS</u>	
.....	
Postcode: <u>WA11 0XA</u>	Postcode:
Tel No: 	No:
Mobile: 	Mobile No:
Email: 	Email:
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
.....	
Date: <u>26/2/19</u>	
.....	

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

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

Yes (via email) No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy LPAD4 SITES 2EA SEA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

I have many concerns about this development. These include the release of Greenbelt and this causing significant harm to the purposes of the Greenbelt. I am also concerned about there being an extremely high volume of traffic along the East lanes and surrounding areas, much of which I feel will be heavy goods vehicles.

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1043



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).

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: MRS	Title:
First Name: GILLIAN	First name:
Last Name: LEESE	Last Name:
Organisation/company:	Organisation/company:
Address: 1 AXBRIDGE AVENUE ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4NZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

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

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

Yes (Via Email) No

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

RETURN DETAILS

Please return your completed form to us by no later than **5pm on 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.

RO1044



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.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID	First name:
Last Name: LEESE	Last Name:
Organisation/company:	Organisation/company:
Address: 1 AXBRIDGE AVENUE ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4NZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

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

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

Yes (Via Email) No

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

RETURN DETAILS

Please return your completed form to us by no later than **5pm on 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.

RO1045



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).

1403
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: MISS	Title:
First Name: ADELE	First name:
Last Name: LEIGH	Last Name:
Organisation/company: Tonstalls Farm	Organisation/company:
Address: 2 CRAUSHAW AVE CLOCK FACE ST. HELENS	Address:
Postcode: WA9 4UR	Postcode:
Tel No:	Tel No:
Mobile: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 13/05/19

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 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.

RO1046

① - LPA04 ② - LPA05 ③ - LPA08

Representor Details

Web Reference Number	WF0466
Type of Submission	Web submission
Full Name	Mrs Sue Lemasurier
Organisation	Mrs
Address	72 Broadway Eccleston, WA105DH WA10 5DH
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	

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

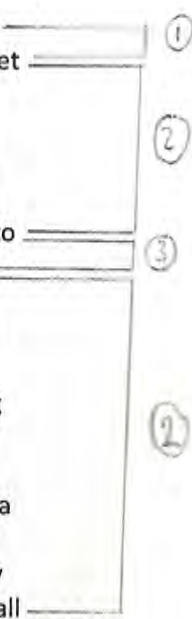
Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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 figures used to justify economic growth predictions are out of date and therefore the targets within the plan are not justified. The plan does not take account of Brownfield and PDL land not yet on the Brownfield Register, nor does it take account of land that is only mildly contaminated and could be made suitable for housing at relatively small expense - surely it makes sense to use such sites for housing before considering the use of green space, especially within the long term of the plan period. It seems to me the plan is more for the economic benefit of farmers and developers than it is for the population of the area. It is unclear how and where the necessary infrastructure to support such a large development will be provided and funded. As town centre shops become increasingly empty plans to develop housing within the town centre could go some way towards providing housing, for example through the provision of social housing for the elderly with ground floor retail provision thus freeing up existing family sized homes, and also through providing town centre apartments for first time buyers. I appreciate the need to provide housing and also to bring more money into the town but do not think a large edge of town estate will benefit the local community: instead it will deprive them of the countryside which together with relatively easy transport connections makes the area desirable - if the plan does proceed I think the result will be a decline in desirability of the local area and result in lower local spending for the town. I think the Council should ensure efficient use of its existing housing stock together with unused and unsightly sites in order to clean up the town and bring it into the current century, together with allowing small



select developments in order to attract people with higher incomes into the area since it is only by increasing average income levels locally that the town centre will have the potential to become an attractive place to live near.

--

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:

Response Date	2/21/2019 12:44:50 PM
---------------	-----------------------

RO1047



St. Helens
Council

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

Ref: LPSD

30 APR 2019

(For official use only)

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

Please ensure the form is returned to us **by no later than 5pm on 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).

914

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: MARJORIE	First name:
Last Name: LEWAHAW	Last Name:
Organisation/company:	Organisation/company:
Address: 5, DOUGLAS AVE, BOLD STHELENS	Address:
Postcode: WA9 4SZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 22-4-19.

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

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

Yes (Via Email)

No

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

RO1048



St. Helens
Council

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

Ref: LPSD

30 APR 2019

(For official use only)

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

Please ensure the form is returned to us **by no later than 5pm on 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).

915

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: TIM	First name:
Last Name: LENAHAN	Last Name:
Organisation/company:	Organisation/company:
Address: 257 Liverpool Rd Haydock	Address:
Postcode: WA11 9RT	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 22/4/19

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

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

Yes (Via Email) No

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

RO1049



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).

1049

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: MARK	First name:
Last Name: LINDEN	Last Name:
Organisation/company:	Organisation/company:
Address: 17 AGNES ST WOLK GARD	Address:
Postcode:	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 12.3.19

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

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

Yes (Via Email) No

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.

RO1050



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.

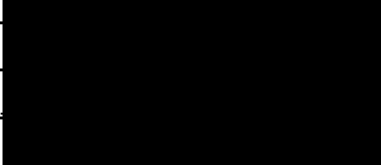
Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

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: <u>MR.</u>	Title:
First Name: <u>BARRY</u>	First name:
Last Name: <u>LESTER</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>TUNSTALLS FARM</u>	Address:
Postcode: <u>WA9 4QJ</u>	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	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input 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 type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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

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

Please continue on a separate sheet if necessary

RO1051



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).

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: Ms	Title:
First Name: Sharon	First name:
Last Name: Lever	Last Name:
Organisation/company: Tunstalls Farm	Organisation/company:
Address:	Address:
Postcode: WA9 4QJ	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
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

RO1052



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.

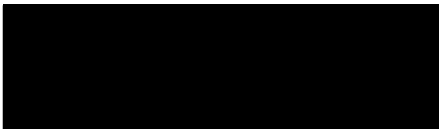
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

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: Mrs	Title:
First Name: Veronica	First name:
Last Name: Lever	Last Name:
Organisation/company: Tunstalls Farm	Organisation/company:
Address:	Address:
Postcode: WA9 4GS	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
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

RO1053



Emailing: St Helens Local Plan response 2019
Mark Lewis to: 'planningpolicy@sthelens.gov.uk'

12/03/2019 16:02

From: Mark Lewis [REDACTED]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 attachment



St Helens Local Plan response 2019.docx

EF0045

Hi,

My response to the St Helens 2019 local plan. Thanks. Mark Lewis.

Your message is ready to be sent with the following file or link attachments:

St Helens Local Plan response 2019

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled. This email is from Imagine Act and Succeed. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to, or used in any way by anyone other than the intended recipient. Any review, forwarding, dissemination or other use of this information by persons or entities other than the intended recipient is prohibited. If you received this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender immediately.



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: Mark	First name:
Last Name: Lewis	Last Name:
Organisation/company:	Organisation/company:
Address: 16 Cleveland Drive, Lowton.	Address:
Postcode: WA3 2EQ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 12/3/19
-----------------------	---------------

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

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

Yes (Via Email)

No

ie - e-mail is the Council's preferred method

-mail

e
is provided, we will contact you by your post

3.

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

→ 7EA + 8EA

Concern over the removal from Green Belt

Barn Owl is regulars on both Parkside East and West due to the grassland habitat which contains their food source, mice and voles. There has been for some years a protection scheme with the assistance of local farmers. Once very rare this beautiful and iconic species has gained a foothold in the area.

All five species of UK owls can be found on Parkside East and West along with approximately 120 species of bird, many mammals such as Roe Deer, Brown Hare, Foxes, Weasels, Stoats and

Evidence of badger is in the area with a dead badger found killed on Winwick Lane in 2015 in addition to sets found in nearby croft.

There are many species of insect including the rare black darter dragonfly and a number of rare plant species including the Marsh Gentian found in only two other places in the UK.

The area is popular with local wildlife enthusiasts and the public alike with much of the area public footpaths.

The area forms part of the greater Manchester bird recording area

(RODIS- Greater Manchester Local Record Centre) Particularly Barrow Lane and Highfield Moss which are within the greater Manchester recording area. The very popular Manchester Birding Website a regional website where rare bird sightings are posted every day by enthusiasts and county recorders has sections on both Barrow Lane and Highfield Moss in addition

① To the Winwick area around the site.

BIODIVERSITY PARKSIDE WEST AND EAST

Other than a brief period 1957 – 1992 where a small area of the land was used for mining for centuries the land on Parkside East and West has been either farmed or wild countryside.

It is protected green belt status and is alongside Highfield Moss SSSI one of the last mire marshlands in Lancashire. Highfield Moss SSSI is managed by natural England and Lancashire

Wildlife trust and in recent years both have undertaken substantial development to preserve the moss land by which drainage and hydrology is critical.

Parkside East and West effectively cover most of the green belt between Newton-Le-Willows, Kenyon and Winwick an area between three boroughs Warrington, Wigan and St Helens.

Endangered Brown Hare – Parkside East and West of the very few local areas where these can be found due to habitat loss in the region. Brown Hares are nationally protected.

RECOGNITION WITHIN LOCAL PLAN 2019 – effectively the local plan treats this as wasteland (concentrating on the relatively small area of what remains of the 1957 colliery) the rest an absolutely

Vast area several miles in circumference of woodland, scrub, marshland and grassland. The nature and scale of is not reflected in the local plan rendering the plan “ineffective” and not “Positively prepared” .

① LPA04

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.

Recommendations

- 1 – The draft local plan should be amended to reflection recognition of the area of Parkside East and West and its habitat and scope for local biodiversity. From context of “net gains for nature” and local Health and wellbeing.
- 2 – The adjusted local plan should have formal provision for future Biodiversity Planning in areas such as Parkside East and West where very large scale development is planned on sensitive countryside.

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:

[Empty rectangular box for response]

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

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

RO1054

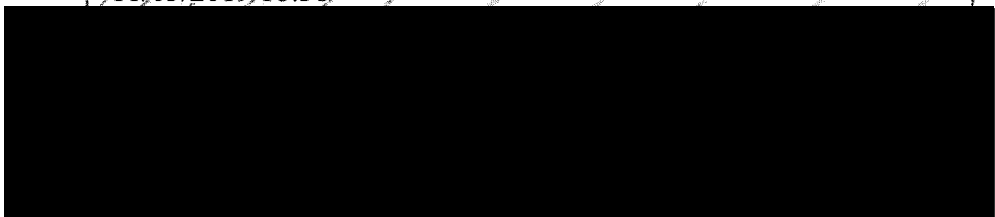
LE10066



Response to St Helens Borough Local Plan 2020-35 Submission Draft (LPSD) Respinse

Tony Lewis
to:
planningpolicy
11/03/2019 18:38

- ① LPA 04
- ② LPA 05
- ③ PARA 1.7.2



With respect to the St Helens Borough local plan 2020-2035 submission draft, we have the following comments :-

The submission, whilst an improvement on the 2016 draft proposals, is based on economic and demographic growth scenarios which are not substantiated either by historic data or the latest outputs from the Office of National Statistics (ONS).

①

In addition the government itself is questioning standard methodology for existing housing targets. Consequently the plan and its impact on the green belt etc is based on both data and methods which are being questioned. The so called "transformational strategy" is a high risk strategy rather than a more prudent strategy based on recent historic data particularly in terms of a slower economic growth which reflects what is actually happening.

The impact of a more conservative growth scenario in which new economic activity reflects actual growth rates has either seemingly been ignored or possibly not examined in depth by the council. This raises the suspicion that the proposed plan is based on untested "circular arguments" founded on hypothetical growth figures rather than one based on sound data and information reflecting actual growth, migration and demographics. The "economic Activity" consultancy report refers to the difficulty of forecasting 20-30 years into the future based on hypothetical changes. The Councils "transformational approach" leads to a high risk plan with detrimental consequences for land use, particularly, Green belt in the Borough. A more conservative approach is necessary.

①

A more conservative growth scenario, raises the possibility that Brownfield sites could meet the future land requirements for industry and domestic needs. This would be enhanced if further proposals are brought forward in the plan to deal with low-level contaminated land which represents a substantial area of the borough. This appears to be an opportunity missed by the council. The cost of any cleanup has to be measured against the permanent loss of good-quality land. Such a comparison is not evident in the plan.

②

Dealing with Brownfield/Contaminated land, as part of this plan, would significantly enhance the borough bringing benefit for all its residents.

It would also appear that the ambitious annual number of housing completions is not currently capable of being met by the construction industry based on historic data. This again calls into questions a growth scenario which results in loss of both valuable greenbelt land over the next 30 years. If there is a legal requirement to identify areas of land safeguarded for future development, why cannot these plots of land be left in the green belt for now and be re-examined nearer the relevant time, based on better data and information.

②

Changing the greenbelt is irreversible and should be based on accurate data and not on a risky growth scenarios which appears unrealistic in both the short and longer term.

Further questions are raised on the compatibility of the proposed St Helens plans with neighbouring councils plans. These councils will have equal aspirations for growth. Although part of the Liverpool city region, only limited evidence is provided of the degree of consultation with the adjacent councils in the City region and with the neighbouring councils of Wigan and Warrington. If all councils adopt

③ - Para 172 DofC

transformational strategic plans, the result will be an over supply of houses and a subsequent increase in brownfield sites with destruction of valued undeveloped land. 10

In addition, it is noticeable that around the borough, many small to medium housing sites begin development. They then stop for many years usually at the "footings" stage. Whilst in planning numbers terms houses are being built, in reality they are not. The council, within the plan, should be putting forward proposals to ensure housing completions if a complete nonsense is not to be made of the planning process.

Within the draft plan, Infrastructure and Environmental developments are indicated as being necessary but without detailing what types of improvement will be sought and whether realistically they can be funded. This represents a missed opportunity to make firm commitments to the residents of the borough in areas which impact them directly. As an example Eccleston Mere and the land around it represent a fantastic amenity with great potential for the Borough, provided accommodation can be reached with the owners - an area where the Council needs to take a lead coordinating role.

In conclusion, the draft plan as submitted is **unsound and not justifiable** for a number of reasons including those indicated. It needs to be **modified** to be based on realistic growth figures with maximum exploitation of sites of brownfield and contaminated land for development. No changes to the Greenbelt should be made to create Safeguarded sites at this point in time. The need for these sites should be re-examined, based on the latest historic data and trends, nearer the end date of the plan.

Tony Lewis/ Marjorie Lewis

12 Orchard Hey, Eccleston, St. Helens, Merseyside WA10 5AQ



RO1055

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



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>PATRICIA</u>	First name:
Last Name: <u>LEWIS</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:

	Postcode:
	Tel No:
Mobile No:	
Email:	

Signature:		Date: <u>March 10th 2019</u>
------------------	--	---

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><u>Justified</u> : It is not justified because it is based on flawed methodology.</p> <p><u>Effective</u> : It is not effective because it is not deliverable.</p> <p><u>Consistent</u> ... ; It is not consistent with National Policy because it does not comply with NPPF 2018.</p>

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

a) There are long term traffic problems at Wrindle Island / Bleak Hill Road. The current roadworks are supposed to solve current traffic flow. They are unrelated to the proposed domestic development to the west. What happens then? I understand that the land has recently been safeguarded for future rather than present development.

b) The LOP doesn't explain the impact on Health Care & Schools. Where would extra resources come from to fund all this?

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1056

361

PFO333



St. Helens Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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

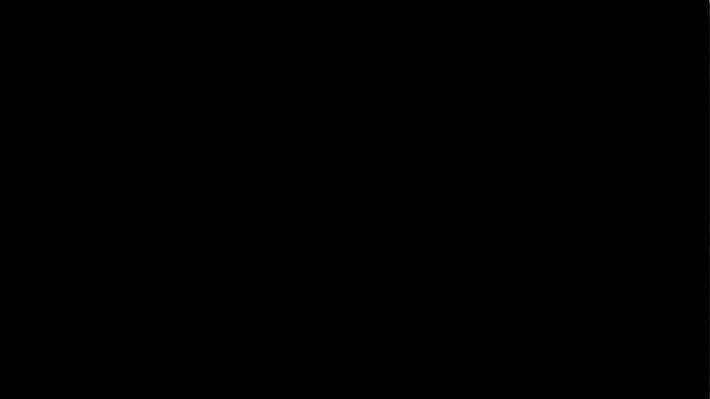
This form has two parts;

Part A - Personal Details


Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>PETER</u>	First name:
Last Name: <u>LEWIS</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:

	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>March 10th 2019</u>
--	------------------------------

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

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

Yes (via email) No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>I think that the plan is not justified because it is based on a flawed methodology, not effective because it is not deliverable and it does not comply with NPPF 2018. It jeopardises food security by removing valuable agricultural land when brownfield sites could be used. I also object to area SHS being 'safeguarded' for future use rather than as green belt.</p>

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

The Local Plan needs to explain how the increased need for healthcare provision and educational opportunities are to be met. It also needs to explain how the larger volume of traffic at the already very congested Windle Island is to be accommodated.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1057



St. Helens Council

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

273

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: 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)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	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>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The 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.

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

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

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

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

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

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

Please keep a copy for future reference.

RO1058

ELO117



Representations concerning the St Helens Borough Local Plan 2020-2035
 Greg Leyland
 to:
 planningpolicy
 12/03/2019 17:43
 Cc:

- ① GBR ④ LPA04 ⑦ LPA09 ⑩ LPA09
 ② LPA06 ⑤ LPA05 ⑧ LPB01 ⑪ S.A. ⑬ Sus. TIA
 ③ LPA03 ⑥ LPA07 ⑨ LPA09 ⑫ TIA
- STIC 4HS
REDS.



1 Attachment



St Helens Local Plan 2019 Review - Greg Leyland - 120319.pdf

Dear Sir

I have a number of comments concerning the Council's proposed 'Local Plan 2020 – 2035'.

I wish to object to the land referred to as Eccleston Park Golf Club (EPGC) having its 'Green Belt' status being changed to 'Safeguarded'.

'Safeguarding' the land will only *potentially* stop housing development for up to 15 years (to 2035), after which time it would likely be developed into a housing estate.

Below, I have cut and pasted various paragraphs from the documentation held on the St Helens Council website (accessible via <https://www.sthelens.gov.uk/localplan>), highlighted in yellow the aspect I wish to comment on, and provided my comments in red italics. I have also attached a pdf version to this email.

I trust you will give my objections consideration and take them into account as you continue to make plans.

Could you please acknowledge this email by return.

Yours faithfully

G Leyland
 6 Central Avenue
 Eccleston Park
 Prescot
 Merseyside
 L34 2QP

Extracted from: 'Greenbelt Review December 2018'

THE PURPOSES OF GREEN BELT

1.9 The NPPF establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

I have lived in or around Eccleston Park all my life and have always considered the fields now referred to as Eccleston Park Golf Club as the buffer and separator between Eccleston Park and Rainhill. I was bemused when the Golf Club was named 'Eccleston Park' since the land had always been considered to be in Rainhill.

10

However, the name didn't really matter – the main issue was that it continued to be the green belt area separating the two communities of Eccleston Park and Rainhill.

Before it became a golf course the land was used as grazing land for livestock and to grow crops. Even as a golf course it continues to provide an attractive feature to the area and helps to retain a semi-rural feel to Eccleston Park and the communities which are adjacent to it, down Portico Lane, off Delph Lane, Two Butt Lane and those in Rainhill. It also helps to retain character and identity for Rainhill and Eccleston Park, rather than the housing estates simply running into one another to create an anonymous urban sprawl. Losing this open space, whether in 15 or 50 years time, will affect the feel, character and attractiveness of the whole area, and impact the quality of life for all local residents.

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;

As stated above, the land currently does fulfil this role

2. to prevent neighbouring towns merging into one another;

The land at EPGC does fulfil this requirement. The communities / settlements in Eccleston Park and Rainhill have a strong 'sense of place' and separate identities.

3. to assist in safeguarding the countryside from encroachment;

The land at EPGC does fulfil this requirement. Despite being a golf course the land is still 'countryside' and is home to a host of species of birds, mammals and flora.

4. to preserve the setting and special character of historic towns; and

The character of both Eccleston Park and Rainhill is significantly influenced by their bordering onto green belt land. Eccleston Park is currently bordered by the fields behind St Helens Road to the North, and EPGC to the south. Rainhill is similarly characterized by EPGC to the north, fields behind Mill Lane stretching to the M62 in the south, and farmland to the east. The status of EPGC as green belt should be preserved to help maintain this.

5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Overall, the function and role of the land meets all the criteria to justify its current status as green belt.

THE NEED FOR A GREEN BELT REVIEW IN ST.HELENS

1.11 The NPPF sets out a presumption in favour of sustainable development under which local planning authorities should '*...positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change...*' and '*provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*'. The NPPF also confirms that '*...once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...*'. The Council considers, for reasons summarised below, that such circumstances exist in St.Helens.

I strongly disagree that there are any 'exceptional circumstances' to justify altering the EPGC green belt boundary / status. The review is flawed in many ways and does not provide adequate evidence to support the change in status to 'safeguarded'.

2.20 Green Belt Purpose 2 is to '*prevent neighbouring towns from merging into one another*'. Although the NPPF refers specifically to 'towns' the Council has also, in considering Purpose 2, taken some smaller settlements (including Rainhill, Rainford, Billinge and Garswood) into account. This is because, whilst these settlements are not regarded as 'towns', they each form separate communities with their own identities, character and range of community facilities and are identified in the Local Plan as the Borough's Key

Settlements. The Council, therefore, has assessed each parcel/sub-parcel according to the contribution that it makes in preventing the following settlements from merging with each other:

- St. Helens
- Haydock and Blackbrook
- Newton-le-Willows/Earlestown
- Prescott/Whiston/Rainhill
- Rainford
- Billinge
- Garswood
- Warrington
- Ashton-in-Makerfield
- Golborne

I note that the list provided does not include Eccleston Park (or Eccleston). Eccleston Park has very much its own identity and character, to the extent of having two landmark public houses, its own railway station, and several roads (Central Avenue, Elm Grove, Albany Avenue) being considered by St Helens Council as 'Residential Character Area' locations (ref: <https://www.sthelens.gov.uk/media/3189/residential-character-areas.pdf>). I consider this a major omission and flaw in the review, given that the Eccleston Park Golf Club land currently stops the distinct settlements / communities in Rainhill and Eccleston Park from merging into one another and creating a single community, and helps to avoid 'urban sprawl'.

At LPPO stage, Sport England objected to the allocation of the site for housing (proposed at that stage) on the basis that insufficient evidence concerning sporting needs had been provided. Whilst the golf course closed in summer 2018, there are a number of other golf courses in St. Helens and the Council did publish some evidence relating to this matter at LPPO stage, these points do not preclude the need for further evidence to be brought forward to meet the requirements of Sport England. This further evidence has not been obtained, meaning that the allocation of the site at present would conflict with national policy protecting sporting facilities from loss through new development.

I would contest that any consideration to changing the status from green belt to 'safeguarded' is premature, given the statement above concerning the need for further evidence.

A further constraint relates to the highway network in the surrounding area (both within St. Helens and in the neighbouring Knowsley Borough). A number of junctions in the area already experience capacity issues that are likely to be difficult to improve practicably or economically. In response to consultation at the LPPO stage, Knowsley Council (the relevant highway authority for some of the affected highways) raised objections to the allocation of the site. These constraints are considered likely, in the absence of evidence to the contrary, to at least substantially limit the residential capacity of this large parcel. In addition a number of physical constraints exist within the parcel itself.

Most households today have at least one car and many, two or three. Any development on EPGC land will certainly have a very bad effect on travelling in and around Eccleston Park, Rainhill and Prescott; we simply don't have the infrastructure to cope with any more traffic.

Previous developments around Rainhill and Prescott have had a massive impact on the volume of traffic generally in the Rainhill, Whiston and Prescott areas – but in particular on the whole of Warrington Road from Prescott, all the way through to the M62 junction at Rainhill Stoops. At many times of the day there are traffic queues, but during both morning and evening rush hours, Rainhill village is virtually gridlocked by traffic to/from the M62 and parents doing the school-run. The knock-on is to most roads joining Warrington Road; Delph Lane leading onto Warrington Road by the Hospital is particularly badly affected with queues sometimes stretching all the way back to the small roundabout at the convenience store on Portico Lane. Rainhill is already crying out for a some form of bypass, since the level of traffic on Warrington Road is continually growing at an unsustainable rate.

Similarly, particularly during the morning rush hour, traffic heading from St Helens to Prescot along St Helens Road (the A58) on the stretch between the Portico Lane and Burrows Lane junctions regularly backs-up from the traffic lights at the Burrows Lane junction to as far back as Central Avenue and beyond. This is several hundred yards. In the evening rush hour, the traffic returning from the direction of Prescot and the M57 regularly backs-up all the way from the St Helens Road/Burrows Lane lights all the way onto the Prescot bypass. Any additional traffic generated by a development on EPGC would have serious implications to the already congested roads around Eccleston Park.

In another potential future scenario, should an access road be created from a housing development on EPGC onto Portico Lane, this would have serious impact on all roads in the vicinity. For example:

- Delph Lane would see further traffic increases – and at rush hours it would be unable to cope
- The junction of Portico Lane and St Helens Road (at the Grapes pub) would become a significant bottleneck
- Central Avenue would become a cut-through for traffic heading onto St Helens Road and beyond
- The crossroads at St Helens Road and Burrows Lane (by the Wellington pub), which are themselves already horrendous at rush hour, would also be badly affected

These include a number of large electricity pylons that run through the parcel, alongside which a buffer would need to be provided to ensure satisfactory levels of amenity for occupiers of any new housing. An appropriate buffer zone would also need to be provided alongside the adjacent railway line to reduce the potential noise impact on occupiers of future dwellings within the parcel. A further buffer would be needed to protect the woodland to the north of the parcel. UU has also advised that a number of other major infrastructure assets run through the parcel including: various sewers; a trunk water main; the North Prescot Aqueduct; and Vyrnwy Aqueduct/pumping station. These physical constraints serve (particularly when viewed in combination) to fragment the developable areas within the parcel, thereby substantially limiting its NDA.

I would suggest that all these issues, when viewed in combination, further support the retention of the current green belt status of the EPGC land.

Extracted from: 'The Green Belt Review 2018 Appendices: Appendix C, Part 6'

STAGE 1B ASSESSMENT AGAINST GREEN BELT PURPOSES

Findings: GBP_087 The parcel borders the Liverpool to Manchester Northern Railway line to the north, a substantial protected woodland belt and residential dwellings to the north-east. Rainhill Road runs the length of the eastern boundary, with Two Butt Lane and the urban fringe of Rainhill on the southern boundary and the built-up area of Eccleston Park on the western boundary.

Please note that the railway to the north is the Liverpool to Wigan line, and not Manchester.

The parcel has strong boundaries and as such is considered to be well contained, and therefore would not lead to unrestricted sprawl.

I totally disagree that the development of the land would not lead to unrestricted sprawl. As I have explained above, the land currently provides a clear gap between the Rainhill and Eccleston Park settlements. If this gap becomes filled with houses, the identities of these settlements will be lost by merging them into one.

The parcel currently lies in a Green Belt 'gap' between Eccleston Park, West Park, *West Park does not border EPGC* Rainhill and Whiston *EPGC borders Whiston for a few yards only*. However, this gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it is

considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location.

The portion of EPGC land which borders Portico Lane provides a clear, well defined and important border between Eccleston Park and Rainhill. I would contest that it's role is not 'moderate to weak' given that it runs along a significant portion of Portico Lane and provides a wide gap between the two communities.

} ①

Although the parcel has an open aspect, it has strong permanent boundaries and is surrounded by residential development on three sides, so therefore lacks a sense of openness. The parcel is quite clearly a golf course and as such has a more recreational appearance than countryside character.

I would estimate that about a third of the perimeter of the EPGC land borders residential developments and it does not lack a sense of openness at all. I would also contest whether the function or use of the land (i.e. whether a golf course or simply 'countryside') is relevant to this review, particularly when the definition and function of 'green belt' land, as summarized above, is taken into account.

} ①

The parcel benefits from strong boundaries, and is encroached on almost all sides (*I would suggest about 60% of its perimeter is encroached on*) by urban development. The parcel plays a limited role in the prevention of merging any two settlements or built up areas.

As discussed above, I totally disagree with this statement. I also believe that the 'encroachment by urban development' has been exaggerated in order to support the Council's wish to remove EPGC's green belt status.

} ①

Extracted from: 'St Helens Borough Local Plan 2020 – 2035'

4.6.9 The Council will also give continued priority to the development of suitable and available sites within urban areas. However, due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2035. Some other sites have been removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2035. This will ensure that the changes to the Green Belt endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs.

For clarity, an explanation / definition of the use of the word 'safeguarded' should be included in the Glossary (Appendix 1). As it is, the term is vague and could be construed as misleading.

I do not understand any benefit of changing the status of land from Green Belt to 'safeguarded'. Similarly, the benefit of "avoiding the need for another Green Belt Review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs". No one can predict development requirements so far into the future, or account for factors such as immigration and migration, environmental & climate change, government legislation, the local & global economies etc. etc. I would propose that the current status should be retained until another Green Belt review post 2035.

✓ Notice
it is
now
in law
②

Policy LPA03: Development Principles

New development in St.Helens Borough will be required to support the following development principles where relevant:

1. Create sustainable communities with a strong sense of place.

Eccleston Park and Rainhill communities already have a 'strong sense of place'. Should a housing development occur on the EPGC land, this will be lost. Consequently, any plans to do this – and I consider changing the status of the land to 'safeguarded' simply a delay tactic – will fly in the face of

} ③

this principle.

5. c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments;

Developing the EPGC land, which is a natural environment for a host of wildlife and flora, for housing will not be in support of this principle.

d) Protecting and enhancing the quality of the Borough's natural resources including water, air, land and biodiversity; and...

Given that United Utilities has various underground facilities at EPGC, our water supplies and those further afield could be put at risk.

With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see <http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html>). Other studies now claim similar results.

Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

7. Promote healthy communities by improving access and opportunities for formal and informal recreation (including through the use of green infrastructure), improving cycling and walking routes, and minimising air, soil and water pollution.

Clearly the closure of the Eccleston Park Golf Club and the potential for it to be replaced sometime in the future by a housing estate does not support this principle.

4.12.5 The Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (2017) indicate that the Borough, due to its location on the M6 and M62 motorways, is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector. The ELNS suggests that whilst traditionally St. Helens Borough has been a manufacturing centre, with the largest land uses including class B2 (general industrial) operations, a strong shift to B8 (storage and distribution) uses is expected to occur during the Plan period.

As stated above I am extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

Policy LPA05: Meeting St. Helens Borough's Housing Needs

1. In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.

The housing requirements are not made clear in the plan since the figures quoted through the documentation are not consistent and do not now seem to be aligned with the latest central government recommendations. Also, the figures above are now 3 years out of date. What are the latest position & figures for housing provision and requirements?

5

4.18.5 A key disadvantage of relying on the standard method to identify housing need is that it does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development in Policy LPA04. *This is very vague and needs to be quantified.* This employment growth is likely to lead to increased housing need. *This is also very vague and needs to be quantified.* In addition, the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method.

In this paragraph alone, the word 'likely' is used three times. If these assumptions are incorrect the requirement for an increased number of houses will also be incorrect. Basing requirements on assumptions whose impacts will potentially affect the status of green belt land is not a valid approach.

5

4.18.6, 4.18.7, 4.18.8 and 4.18.9 try to explain / justify the plan's calculated requirement of 486 new dwelling completions per annum. However, these are based on 'scenarios' which may or may not come to fruition. I believe that green belt status should only be reassessed when genuine requirements can be supported by factual evidence – it is too important to get wrong.

4.25 Policy LPA07: Transport and Travel

1. The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:

a) Secure the delivery of new or improved road, walking, cycling, and / or bus infrastructure where required;

If EPGC is developed into a housing estate there is little scope to improve the road on Portico Lane in terms of capacity – it simply could not cope with the additional traffic generated by a large (500 – 900+ home) housing estate. I've already provided further comment in this area in an earlier comment.

With regards walking, very few people walk to the shops and even less to work. (This is borne out by the high levels of obesity in St Helens, which, incidentally, the plan does not seem to address.) Whilst I would encourage everyone to walk wherever possible, the plan doesn't make clear what 'improved walking' actually means or how it will be achieved in general but more specifically for the EPGC land. Similarly, the plan doesn't make clear what 'improved cycling' actually means or how it will be achieved. (I would note that there is an increasing trend for cyclists to ride on footpaths. This is dangerous and doesn't encourage anyone to walk for fear of being hit by a cyclist. Unfortunately neither the Council or the Police appear to take any interest in this.)

6

3. New development will only be permitted if it would:

a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network;

Should a housing development go ahead on the EPGC land, an additional c.1800 cars per day travelling in the Eccleston Park and Rainhill areas will cause severe harm to the highway network in terms of safety and efficiency. The Rainhill section of Warrington Road is particularly bad (over capacity) at most times of the day and St Helens Road in Eccleston Park is very busy during rush hours.

6

4.31 Policy LPA09: Green Infrastructure

Policy LPA09: Green Infrastructure

1. Green Infrastructure in St.Helens Borough comprises a network of multifunctional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and

countryside areas. This network is capable of delivering a wide range of environmental and quality of life benefits for local communities and forms an important element of the Liverpool City Region (LCR) Ecological Network.

2. The Council will work with other organisations where necessary to:

a) expand tree cover in appropriate locations across the Borough to improve landscape character, water and air quality and the value of trees to wildlife;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

] 7

b) strengthen and expand the network of wildlife sites, corridors and steppingstone habitats to secure a net gain in biodiversity;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

] 7

c) improve and increase the connectivity of the Greenway network;

d) increase the accessibility of open space within walking distance of housing, health, employment and education establishments to promote healthy lifestyles;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

] 7

4. Development that would contribute to or provide opportunities to enhance the function of existing green infrastructure and its connectivity from residential areas, town, district and local centres, employment areas and other open spaces, will be encouraged. Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.

This policy appears to be in direct conflict with the proposal to change the status of EPGC from 'Green Belt' to 'Safeguarded'.

] 7

The only exceptions to this will be where it has been demonstrated that: appropriate protection or retention of Green Infrastructure assets cannot be achieved;

I cannot imagine a scenario in which retention cannot be achieved if the Council has the will to retain it – unless the Council's wish to retain is overridden by a higher-authority (e.g. national government). It would be helpful if the plan could expand on this paragraph and state some examples of when protection or retention of Green Infrastructure assets cannot be achieved.

] 7

the development would bring benefits that would over-ride the resultant harm;

'Benefits' will always be subjective and a matter of opinion. The Council should adopt a policy of zero-tolerance to harming Green Infrastructure assets regardless of any perceived benefits.

] 7

and there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation and / or as a last resort compensatory provision will be required.

62

5.3.7 The Council's future aspirations to improve the offer of St.Helens Town Centre asset out within the Strategy include the provision of new retail and leisure floorspace, subject to the appropriate policy tests. It is considered that this approach, along with steps to encourage the reuse of vacant floorspace, will address the identified quantitative and qualitative needs of residents in the Borough.

I am concerned that the Council is proposing to provide new retail and leisure space when there are already 15.8% units vacant, and question whether any new space is actually required. In particular, if the Council is

] 8

proposing to use Council Tax money in order to do this, I have a major objection. Existing retail and leisure space must be made to work before considering diverting cash badly needed for education, health, roads, environmental cleanliness, police etc.etc.

What does the Council mean by 'encourage the reuse of vacant floorspace'? M&S and Tyrers, for example, were important shops for the town centre which are planning to leave, or have already left. The Council has not been encouraging enough for these businesses, so what has it learnt from their loss, and what does it intend to do for future 'encouragement'? Both aspects should be clarified to a level of detail in the plan, rather than simply stating aspirations.

Policy LPC09: Landscape Protection and Enhancement

1. Proposals for new development must, as appropriate having regard to their scale and nature:

a) seek to conserve, maintain, enhance and / or restore any landscape features that are important to the character of the local area;

The area known as Eccleston Park Golf Club provides separation between the communities in Eccleston Park and Rainhill. This separation ensures the two communities are not a single urban sprawl; it allows the two sets of residents to maintain a sense of belonging and 'sense of place'; it also helps to preserve, and is intrinsic to the character of the two settlements.

b) demonstrably form the best option for meeting the aims of the development whilst minimising impacts on the landscape and appearance of the area and respecting local distinctiveness;

Should a housing development go ahead at any time in the future on the EPGC land, the impact to both the Rainhill and Eccleston Park residents will be massive. Both areas will lose their local distinctiveness, and the current physical landscape will be lost and unrecognizable.

2. Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm. Where the development would (despite any such measures) cause significant harm but also bring significant benefits, suitable compensation measures may be sought. If significant harm cannot be avoided, suitably mitigated or compensated, planning permission will be refused unless the development would bring exceptional benefits that would outweigh the harm.

The visual character of EPGC and the surrounding areas will be significantly negatively impacted if the land loses its green belt status and is eventually build on. Consequently, would this mean that residents of both the Rainhill and Eccleston Park communities who have campaigned and objected to the change of status of Eccleston Park Golf Club from green belt, would be compensated?

7.15.1 The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

The EPGC land is a 'valued landscape'. It contributes to the character of the whole area by providing open space, greenery, trees, wildlife sanctuary, hedgerows and urban community separation and boundaries – all of which add to its local residents' quality of life. It should be protected by ensuring its greenbelt status is retained.

8.25 Policy LPD09: Air Quality

Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:

c) lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment, that would require a new AQMA to be created; or

With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result

in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see <http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html>). Other studies are now claim similar results.

Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

Extracted from the 'Sustainability Appraisal Non-Technical Summary' report:

14. Deprivation

St Helens is ranked as the 36th most deprived local authority in England. The relative position of the Borough has deteriorated since the 2010 Index of Deprivation.

The English Indices of Deprivation 2015 (30/9/15) places St Helens 25th. Why hasn't this statistic been stated (rather than 36th as per the 2010 report)? Note that the St Helens borough is also located next to Knowsley, which is ranked 2nd (with Liverpool 4th). Surely more focus needs to be given to improving facilities and services (e.g. education and health) to the St Helens residents, rather than generating further pressure on already inadequate and generally poor services through the development of additional housing estates?

In combination, the plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the Borough.

I cannot see how any part of the plan will have a significant positive effect upon health and wellbeing across the Borough. The plan should explain this in detail.

However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people.

I think this is an understatement, given the level of opposition from the residents of Rainhill and Eccleston Park to the proposed change of status of the EPGC land from green belt to 'safeguarded', and its subsequent future as a housing estate. The housing development would undoubtedly have an effect on the wellbeing of the people in both communities as a result of increased air pollution, increased traffic noise pollution, stress due to traffic congestion plus the impact on many services, some of which I focused on below.

Hospitals

The local hospital for Eccleston Park and Rainhill is Whiston, which has been expanded in recent years beyond recognition. However, increasing its size hasn't necessarily made anything better; waiting times in A&E are unacceptable, beds are in short supply, and the quality of care is already sub-standard. I have had first-hand experience of all these issues; an increase in population in the area will definitely reduce care levels at the hospital.

Another significant and negative impact due to the expansion of Whiston Hospital has been the increased traffic and overall congestion throughout the area due to patients, visitors and workers. There is also a constant stream of ambulances along Portico Lane, Delph Lane and St Helens Road (and all other main roads I imagine, though I can only speak from experience) with their sirens blaring day and night, causing further

congestion and noise pollution.

Doctors

My family and I, like many people I know, are registered with Park House Medical Centre in Prescot. This is always busy and it's difficult to obtain an appointment without waiting a week or more. Again, I speak from experience. Prescot itself is expanding rapidly, therefore I expect the practice's ability to cope with the number of patients demanding attention is being put under further pressure. I would envisage this will be a similar situation throughout the St Helens area. Furthermore, I can't think of one GP surgery in Eccleston Park - therefore Rainhill, Whiston, Prescot, Eccleston and St Helens would all feel the effect of an increased population in the area.

Dentists

I do not think there are any dentists near to where I live in Eccleston Park and consequently I go to a practice in Liverpool. My previous NHS dentist was in St Helens town centre, but I left there due to it being unclean and the place decrepit. As with the impact to the Doctors services outlined above, Dentist facilities will be impacted in a similar way as outlined above for Doctors, and people will be forced to travel further afield.

Extracted from: 'Transport Impact Assessment: Main Report'

7.8 A58 PRESCOT TO ST HELENS

Current Conditions

7.8.1. The A58 forms the main radial approach route to St Helens from the M57, Prescot and areas to the west. It is a dual carriageway, subject to a 40mph speed limit, with limited access points from the M57 to the roundabout junction with St Helens Road. Thereafter, the speed limit reduces to 30mph and the route becomes a single carriageway with frontage activity.

The assessment acknowledges that the junctions at both Burrows Lane and Portico Lane onto St Helens Road are either at, or are close to, capacity. However, it does not appear to take into account the very significant housing developments currently occurring in Prescot and other areas of Knowsley. I am concerned that once these developments are complete, there will be a significant increase in traffic using the A58 to access St Helens (particularly if the Council's employment development plans come to fruition) and the A580 (which also provides an onward route to the northbound M6) via Burrows Lane. As a result I envisage there will be major traffic increases at the Burrows Lane and St Helens Road crossroad traffic lights.

In addition to this, if the Green Belt status of the Eccleston Park Golf Club is removed and the land is built on at any time, this will also undoubtedly generate a significant increase in traffic volumes at both the Burrows Lane/St Helens Road and Portico Lane/St Helens Road junctions and on the A58 itself.

Extracted from: 'Sustainable Transport Impact Assessment Report'

4.11.1. Strategic Site Allocation HA8 is located in Rainhill, approximately 4 miles south west of St Helens town centre. The site is located on the western boundary of St Helen's borough, and is part of a larger and dense urban area shared with Prescot, a town in the neighbouring borough of Knowsley.

Further to my comments above concerning the physical location of the land known as 'Eccleston Park Golf Club', the paragraph above does actually acknowledge that it is in Rainhill.

I am concerned that several of the points in 4.11.5 to 4.11.15 are factually incorrect, inadequately researched or misleading. For example, the nearest train station is referred to as 'Eccleston' as opposed to 'Eccleston Park'; the author seems to have missed the fact that Whiston Hospital is just down the road; the town centre has 'numerous employment opportunities' is debatable. This leads me to believe that the review was written by someone with little or no local knowledge, who did not apply an adequate level of diligence to their information gathering or assessment; consequently, the analysis contained in this report is inaccurate and

flawed.

Comments / representations concerning St Helen's Council's St Helens Borough Local Plan 2020-2035

Written by:

Greg Leyland
6 Central Avenue
Eccleston Park
Prescot
Merseyside
L34 2QP

12th March 2019

Dear Sir

I have a number of comments concerning the Council's proposed 'Local Plan 2020 – 2035'.

I wish to object to the land referred to as Eccleston Park Golf Club (EPGC) having its 'Green Belt' status being changed to 'Safeguarded'.

'Safeguarding' the land will only *potentially* stop housing development for up to 15 years (to 2035), after which time it would likely be developed into a housing estate. ✓

Below, I have cut and pasted various paragraphs from the documentation held on the St Helens Council website (accessible via <https://www.sthelens.gov.uk/localplan>), highlighted in yellow the aspect I wish to comment on, and provided my comments in red italics.

I trust you will give my objections consideration and take them into account as you continue to make plans. I look forward to hearing from you soon.

Yours faithfully

G Leyland

Extracted from: 'Greenbelt Review December 2018'

THE PURPOSES OF GREEN BELT

1.9 The NPPF establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

I have lived in or around Eccleston Park all my life and have always considered the fields now referred to as Eccleston Park Golf Club as the buffer and separator between Eccleston Park and Rainhill. I was bemused when the Golf Club was named 'Eccleston Park' since the land had always been considered to be in Rainhill. However, the name didn't really matter – the main issue was that it continued to be the green belt area separating the two communities of Eccleston Park and Rainhill.

Before it became a golf course the land was used as grazing land for livestock and to grow crops. Even as a golf course it continues to provide an attractive feature to the area and helps to retain a semi-rural feel to Eccleston Park and the communities which are adjacent to it, down Portico Lane, off Delph Lane, Two Butt Lane and those in Rainhill. It also helps to retain character and identity for Rainhill and Eccleston Park, rather than the housing estates simply running into one another to create an anonymous urban sprawl. Losing this open space, whether in 15 or 50 years time, will affect the feel, character and attractiveness of the whole area, and impact the quality of life for all local residents.

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;

As stated above, the land currently does fulfil this role

2. to prevent neighbouring towns merging into one another;

The land at EPGC does fulfil this requirement. The communities / settlements in Eccleston Park and Rainhill have a strong 'sense of place' and separate identities.

3. to assist in safeguarding the countryside from encroachment;

The land at EPGC does fulfil this requirement. Despite being a golf course the land is still 'countryside' and is home to a host of species of birds, mammals and flora.

4. to preserve the setting and special character of historic towns; and

The character of both Eccleston Park and Rainhill is significantly influenced by their bordering onto green belt land. Eccleston Park is currently bordered by the fields behind St Helens Road to the North, and EPGC to the south. Rainhill is similarly characterized by EPGC to the north, fields behind Mill Lane stretching to the M62 in the south, and farmland to the east. The status of EPGC as green belt should be preserved to help maintain this.

5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Overall, the function and role of the land meets all the criteria to justify its current status as green belt.

THE NEED FOR A GREEN BELT REVIEW IN ST.HELENS

1.11 The NPPF sets out a presumption in favour of sustainable development under which local planning authorities should '*...positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change...*' and '*provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*'. The NPPF also confirms that '*...once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...*'. The Council considers, for reasons summarised

below, that such circumstances exist in St.Helens.

I strongly disagree that there are any 'exceptional circumstances' to justify altering the EPGC green belt boundary / status. The review is flawed in many ways and does not provide adequate evidence to support the change in status to 'safeguarded'.

①
②

2.20 Green Belt Purpose 2 is to '*prevent neighbouring towns from merging into one another*'. Although the NPPF refers specifically to 'towns' the Council has also, in considering Purpose 2, taken some smaller settlements (including Rainhill, Rainford, Billinge and Garswood) into account. This is because, whilst these settlements are not regarded as 'towns', they each form separate communities with their own identities, character and range of community facilities and are identified in the Local Plan as the Borough's Key Settlements. The Council, therefore, has assessed each parcel/sub-parcel according to the contribution that it makes in preventing the following settlements from merging with each other:

- St.Helens
- Haydock and Blackbrook
- Newton-le-Willows/Earlestown
- Prescot/Whiston/Rainhill
- Rainford
- Billinge
- Garswood
- Warrington
- Ashton-in-Makerfield
- Golborne

I note that the list provided does not include Eccleston Park (or Eccleston). Eccleston Park has very much its own identify and character, to the extent of having two landmark public houses, its own railway station, and several roads (Central Avenue, Elm Grove, Albany Avenue) being considered by St Helens Council as 'Residential Character Area' locations (ref: '<https://www.sthelens.gov.uk/media/3189/residential-character-areas.pdf>'). I consider this a major omission and flaw in the review, given that the Eccleston Park Golf Club land currently stops the

①

distinct settlements / communities in Rainhill and Eccleston Park from merging into one another and creating a single community, and helps to avoid 'urban sprawl'.

①

At LPPO stage, Sport England objected to the allocation of the site for housing (proposed at that stage) on the basis that insufficient evidence concerning sporting needs had been provided. Whilst the golf course closed in summer 2018, there are a number of other golf courses in St.Helens and the Council did publish some evidence relating to this matter at LPPO stage, **these points do not preclude the need for further evidence to be brought forward to meet the requirements of Sport England. This further evidence has not been obtained, meaning that the allocation of the site at present would conflict with national policy protecting sporting facilities from loss through new development.**

①
②

I would contest that any consideration to changing the status from green belt to 'safeguarded' is premature, given the statement above concerning the need for further evidence.

A further constraint relates to the highway network in the surrounding area (both within St.Helens and in the neighbouring Knowsley Borough). **A number of junctions in the area already experience**

capacity issues that are likely to be difficult to improve practicably or economically. In response to consultation at the LPPO stage, Knowsley Council (the relevant highway authority for some of the

affected highways) raised objections to the allocation of the site. These constraints are considered likely, in the absence of evidence to the contrary, to at least substantially limit the residential

capacity of this large parcel. In addition a number of physical constraints exist within the parcel itself.

Most households today have at least one car and many, two or three. Any development on EPGC land will certainly have a very bad effect on travelling in and around Eccleston Park, Rainhill and Prescot; we simply don't have the infrastructure to cope with any more traffic.

Previous developments around Rainhill and Prescot have had a massive impact on the volume of traffic generally in the Rainhill, Whiston and Prescot areas – but in particular on the whole of Warrington Road from Prescot, all the way through to the M62 junction at Rainhill Stoops. At many times of the day there are traffic queues, but during both morning and evening rush hours, Rainhill village is virtually gridlocked by traffic to/from the M62 and parents doing the school-run. The knock-on is to most roads joining Warrington Road; Delph Lane leading onto Warrington Road by the Hospital is particularly badly affected with queues sometimes stretching all the way back to the small roundabout at the convenience store on Portico Lane. Rainhill is already crying out for a some form of bypass, since the level of traffic on Warrington Road is continually growing at an unsustainable rate.

①
②

Similarly, particularly during the morning rush hour, traffic heading from St Helens to Prescot along St Helens Road (the A58) on the stretch between the Portico Lane and Burrows Lane junctions regularly backs-up from the traffic lights at the Burrows Lane junction to as far back as Central Avenue and beyond. This is several hundred yards. In the evening rush hour, the traffic returning

①
②

from the direction of Prescott and the M57 regularly backs-up all the way from the St Helens Road/Burrows Lane lights all the way onto the Prescott bypass. Any additional traffic generated by a development on EPGC would have serious implications to the already congested roads around Eccleston Park.

In another potential future scenario, should an access road be created from a housing development on EPGC onto Portico Lane, this would have serious impact on all roads in the vicinity. For example:

- Delph Lane would see further traffic increases – and at rush hours it would be unable to cope*
- The junction of Portico Lane and St Helens Road (at the Grapes pub) would become a significant bottleneck*
- Central Avenue would become a cut-through for traffic heading onto St Helens Road and beyond*
- The crossroads at St Helens Road and Burrows Lane (by the Wellington pub), which are themselves already horrendous at rush hour, would also be badly affected*

These include a number of large electricity pylons that run through the parcel, alongside which a buffer would need to be provided to ensure satisfactory levels of amenity for occupiers of any new housing. An appropriate buffer zone would also need to be provided alongside the adjacent railway line to reduce the potential noise impact on occupiers of future dwellings within the parcel. A further buffer would be needed to protect the woodland to the north of the parcel. UU has also advised that a number of other major infrastructure assets run through the parcel including: various sewers; a trunk water main; the North Prescott Aqueduct; and Vyrnwy Aqueduct/pumping station. These physical constraints serve (particularly when viewed in combination) to fragment the developable areas within the parcel, thereby substantially limiting its NDA.

I would suggest that all these issues, when viewed in combination, further support the retention of the current green belt status of the EPGC land.

Extracted from: 'The Green Belt Review 2018 Appendices: Appendix C, Part 6'

STAGE 1B ASSESSMENT AGAINST GREEN BELT PURPOSES

Findings: GBP_087 The parcel borders the **Liverpool to Manchester Northern Railway line to the north**, a substantial protected woodland belt and residential dwellings to the north-east. Rainhill Road runs the length of the eastern boundary, with Two Butt Lane and the urban fringe of Rainhill on the southern boundary and the built-up area of Eccleston Park on the western boundary.

Please note that the railway to the north is the Liverpool to Wigan line, and not Manchester.

The parcel has strong boundaries and as such is considered to be well contained, **and therefore would not lead to unrestricted sprawl.**

I totally disagree that the development of the land would not lead to unrestricted sprawl. As I have explained above, the land currently provides a clear gap between the Rainhill and Eccleston Park

settlements. If this gap becomes filled with houses, the identities of these settlements will be lost by merging them into one.

] ①

The parcel currently lies in a Green Belt 'gap' between Eccleston Park, **West Park**, **West Park does not border EPGC** Rainhill and **Whiston EPGC borders Whiston for a few yards only**. However, this gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, **the parcel provides only a moderate to weak role in preventing further merging**. Therefore it is considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location.

✓ NOTED

The portion of EPGC land which borders Portico Lane provides a clear, well defined and important border between Eccleston Park and Rainhill. I would contest that it's role is not 'moderate to weak' given that it runs along a significant portion of Portico Lane and provides a wide gap between the two communities.

] ①

Although the parcel has an open aspect, it has strong permanent boundaries and **is surrounded by residential development on three sides, so therefore lacks a sense of openness**. The parcel is quite clearly a golf course and as such has a more recreational appearance than countryside character.

I would estimate that about a third of the perimeter of the EPGC land borders residential developments and it does not lack a sense of openness at all. I would also contest whether the function or use of the land (i.e. whether a golf course or simply 'countryside') is relevant to this review, particularly when the definition and function of 'green belt' land, as summarized above, is taken into account.

] ①

The parcel benefits from strong boundaries, and is **encroached on almost all sides (I would suggest about 60% of its perimeter is encroached on)** by urban development. **The parcel plays a limited role in the prevention of merging any two settlements or built up areas.**

As discussed above, I totally disagree with this statement. I also believe that the 'encroachment by urban development' has been exaggerated in order to support the Council's wish to remove EPGC's green belt status.

] ①

Extracted from: 'St Helens Borough Local Plan 2020 – 2035'

4.6.9 The Council will also give continued priority to the development of suitable and available sites within urban areas. However, due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2035. **Some other sites have been removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2035. This will ensure that the changes to the Green Belt endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, and giving a clear**

indication of the potential location of future development and associated infrastructure needs.

For clarity, an explanation / definition of the use of the word 'safeguarded' should be included in the Glossary (Appendix 1). As it is, the term is vague and could be construed as misleading.

I do not understand any benefit of changing the status of land from Green Belt to 'safeguarded'. Similarly, the benefit of "avoiding the need for another Green Belt Review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs". No one can predict development requirements so far into the future, or account for factors such as immigration and migration, environmental & climate change, government legislation, the local & global economies etc. etc. I would propose that the current status should be retained until another Green Belt review post 2035.

Notes - This Has Been Added

2

Policy LPA03: Development Principles

New development in St. Helens Borough will be required to support the following development principles where relevant:

1. Create sustainable communities with a strong sense of place.

Eccleston Park and Rainhill communities already have a 'strong sense of place'. Should a housing development occur on the EPGC land, this will be lost. Consequently, any plans to do this – and I consider changing the status of the land to 'safeguarded' simply a delay tactic – will fly in the face of this principle.

3

5. c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments;

Developing the EPGC land, which is a natural environment for a host of wildlife and flora, for housing will not be in support of this principle.

3

d) Protecting and enhancing the quality of the Borough's natural resources including water, air, land and biodiversity; and...

Given that United Utilities has various underground facilities at EPGC, our water supplies and those further afield could be put at risk.

With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see

3

<http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html>). Other studies now claim similar results.

Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

③

7. Promote healthy communities by improving access and opportunities for formal and informal recreation (including through the use of green infrastructure), improving cycling and walking routes, and minimising air, soil and water pollution.

Clearly the closure of the Eccleston Park Golf Club and the potential for it to be replaced sometime in the future by a housing estate does not support this principle.

4.12.5 The Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (2017) indicate that the Borough, due to its location on the M6 and M62 motorways, is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector. The ELNS suggests that whilst traditionally St. Helens Borough has been a manufacturing centre, with the largest land uses including class B2 (general industrial) operations, a strong shift to B8 (storage and distribution) uses is expected to occur during the Plan period.

As stated above I am extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

④

Policy LPA05: Meeting St. Helens Borough's Housing Needs

1. In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.

The housing requirements are not made clear in the plan since the figures quoted through the documentation are not consistent and do not now seem to be aligned with the latest central government recommendations. Also, the figures above are now 3 years out of date. What are the latest position & figures for housing provision and requirements?

⑤

4.18.5 A key disadvantage of relying on the standard method to identify housing need is that it does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development in Policy LPA04.

This is very vague and needs to be quantified. This employment growth is likely to lead to increased housing need. *This is also very vague and needs to be quantified.* In addition, the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method.

⑤

In this paragraph alone, the word 'likely' is used three times. If these assumptions are incorrect the requirement for an increased number of houses will also be incorrect. Basing requirements on assumptions whose impacts will potentially affect the status of green belt land is not a valid approach.

4.18.6, 4.18.7, 4.18.8 and 4.18.9 try to explain / justify the plan's calculated requirement of 486 new dwelling completions per annum. However, these are based on 'scenarios' which may or may not come to fruition. I believe that green belt status should only be reassessed when genuine requirements can be supported by factual evidence – it is too important to get wrong.

5

4.25 Policy LPA07: Transport and Travel

1. The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:

a) **Secure the delivery of new or improved road, walking, cycling, and / or bus infrastructure where required;**

If EPGC is developed into a housing estate there is little scope to improve the road on Portico Lane in terms of capacity – it simply could not cope with the additional traffic generated by a large (500 – 900+ home) housing estate. I've already provided further comment in this area in an earlier comment.

With regards walking, very few people walk to the shops and even less to work. (This is borne out by the high levels of obesity in St Helens, which, incidentally, the plan does not seem to address.) Whilst I would encourage everyone to walk wherever possible, the plan doesn't make clear what 'improved walking' actually means or how it will be achieved in general but more specifically for the EPGC land. Similarly, the plan doesn't make clear what 'improved cycling' actually means or how it will be achieved. (I would note that there is an increasing trend for cyclists to ride on footpaths. This is dangerous and doesn't encourage anyone to walk for fear of being hit by a cyclist. Unfortunately neither the Council or the Police appear to take any interest in this.)

6

3. New development will only be permitted if it would:

a) **maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network;**

Should a housing development go ahead on the EPGC land, an additional c.1800 cars per day travelling in the Eccleston Park and Rainhill areas will cause severe harm to the highway network in terms of safety and efficiency. The Rainhill section of Warrington Road is particularly bad (over capacity) at most times of the day and St Helens Road in Eccleston Park is very busy during rush hours.

6

4.31 Policy LPA09: Green Infrastructure

Policy LPA09: Green Infrastructure

1. Green Infrastructure in St. Helens Borough comprises a network of multifunctional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside areas. This network is capable of delivering a wide range of environmental and quality of life benefits for local communities and forms an important element of the Liverpool City Region (LCR) Ecological Network.

2. The Council will work with other organisations where necessary to:

a) expand tree cover in appropriate locations across the Borough to improve landscape character, water and air quality and the value of trees to wildlife;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

b) strengthen and expand the network of wildlife sites, corridors and steppingstone habitats to secure a net gain in biodiversity;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

c) improve and increase the connectivity of the Greenway network;

d) increase the accessibility of open space within walking distance of housing, health, employment and education establishments to promote healthy lifestyles;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

4. Development that would contribute to or provide opportunities to enhance the function of existing green infrastructure and its connectivity from residential areas, town, district and local centres, employment areas and other open spaces, will be encouraged. Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.

This policy appears to be in direct conflict with the proposal to change the status of EPGC from 'Green Belt' to 'Safeguarded'.

The only exceptions to this will be where it has been demonstrated that: appropriate protection or retention of Green Infrastructure assets cannot be achieved;

I cannot imagine a scenario in which retention cannot be achieved if the Council has the will to retain it – unless the Council's wish to retain is overridden by a higher-authority (e.g. national government). It would be helpful if the plan could expand on this paragraph and state some examples of when protection or retention of Green Infrastructure assets cannot be achieved.

the development would bring benefits that would over-ride the resultant harm;

Benefits' will always be subjective and a matter of opinion. The Council should adopt a policy of zero-tolerance to harming Green Infrastructure assets regardless of any perceived benefits.

7

and there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation and / or as a last resort compensatory provision will be required.

5.3.7 The Council's future aspirations to improve the offer of St.Helens Town Centre asset out within the Strategy include **the provision of new retail and leisure floorspace**, subject to the appropriate policy tests. It is considered that this approach, **along with steps to encourage the reuse of vacant floorspace**, will address the identified quantitative and qualitative needs of residents in the Borough.

I am concerned that the Council is proposing to provide new retail and leisure space when there are already 15.8% units vacant, and question whether any new space is actually required. In particular, if the Council is proposing to use Council Tax money in order to do this, I have a major objection. Existing retail and leisure space must be made to work before considering diverting cash badly needed for education, health, roads, environmental cleanliness, police etc.etc.

What does the Council mean by 'encourage the reuse of vacant floorspace'? M&S and Tyrers, for example, were important shops for the town centre which are planning to leave, or have already left. The Council has not been encouraging enough for these businesses, so what has it learnt from their loss, and what does it intend to do for future 'encouragement'? Both aspects should be clarified to a level of detail in the plan, rather than simply stating aspirations.

Policy LPC09: Landscape Protection and Enhancement

1. Proposals for new development must, as appropriate having regard to their scale and nature:

a) **seek to conserve, maintain, enhance and / or restore any landscape features that are important to the character of the local area;**

The area known as Eccleston Park Golf Club provides separation between the communities in Eccleston Park and Rainhill. This separation ensures the two communities are not a single urban sprawl; it allows the two sets of residents to maintain a sense of belonging and 'sense of place'; it also helps to preserve, and is intrinsic to the character of the two settlements.

b) **demonstrably form the best option for meeting the aims of the development whilst minimising impacts on the landscape and appearance of the area and respecting local distinctiveness;**

Should a housing development go ahead at any time in the future on the EPGC land, the impact to both the Rainhill and Eccleston Park residents will be massive. Both areas will lose their local distinctiveness, and the current physical landscape will be lost and unrecognizable.

2. **Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm. Where the development would (despite any such measures) cause significant harm but also bring significant benefits, suitable compensation measures may be sought. If significant harm**

8

9

2

cannot be avoided, suitably mitigated or compensated, planning permission will be refused unless the development would bring exceptional benefits that would outweigh the harm.

The visual character of EPGC and the surrounding areas will be significantly negatively impacted if the land loses its green belt status and is eventually build on. Consequently, would this mean that residents of both the Rainhill and Eccleston Park communities who have campaigned and objected to the change of status of Eccleston Park Golf Club from green belt, would be compensated?

7.15.1 The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

The EPGC land is a 'valued landscape'. It contributes to the character of the whole area by providing open space, greenery, trees, wildlife sanctuary, hedgerows and urban community separation and boundaries – all of which add to its local residents' quality of life. It should be protected by ensuring its greenbelt status is retained.

8.25 Policy LPD09: Air Quality

Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:

c) lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment, that would require a new AQMA to be created; or

With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see <http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html>). Other studies are now claim similar results.

Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

Extracted from the 'Sustainability Appraisal Non-Technical Summary' report:

14. Deprivation

St Helens is ranked as the 36th most deprived local authority in England. The relative position of the Borough has deteriorated since the 2010 Index of Deprivation.

The English Indices of Deprivation 2015 (30/9/15) places St Helens 25th. Why hasn't this statistic been stated (rather than 36th as per the 2010 report)? Note that the St Helens borough is also located next to Knowsley, which is ranked 2nd (with Liverpool 4th). Surely more focus needs to be given to improving facilities and services (e.g. education and health) to the St Helens residents, rather than generating further pressure on already inadequate and generally poor services through the development of additional housing estates?

In combination, the plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the Borough.

I cannot see how any part of the plan will have a significant positive effect upon health and wellbeing across the Borough. The plan should explain this in detail.

However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people.

I think this is an understatement, given the level of opposition from the residents of Rainhill and Eccleston Park to the proposed change of status of the EPGC land from green belt to 'safeguarded', and its subsequent future as a housing estate. The housing development would undoubtedly have an effect on the wellbeing of the people in both communities as a result of increased air pollution, increased traffic noise pollution, stress due to traffic congestion plus the impact on many services, some of which I focused on below.

Hospitals

The local hospital for Eccleston Park and Rainhill is Whiston, which has been expanded in recent years beyond recognition. However, increasing its size hasn't necessarily made anything better; waiting times in A&E are unacceptable, beds are in short supply, and the quality of care is already sub-standard. I have had first-hand experience of all these issues; an increase in population in the area will definitely reduce care levels at the hospital.

Another significant and negative impact due to the expansion of Whiston Hospital has been the increased traffic and overall congestion throughout the area due to patients, visitors and workers. There is also a constant stream of ambulances along Portico Lane, Delph Lane and St Helens Road (and all other main roads I imagine, though I can only speak from experience) with their sirens blaring day and night, causing further congestion and noise pollution.

Doctors

My family and I, like many people I know, are registered with Park House Medical Centre in Prescot. This is always busy and it's difficult to obtain an appointment without waiting a week or more. Again, I speak from experience. Prescot itself is expanding rapidly, therefore I expect the practice's ability to cope with the number of patients demanding attention is being

put under further pressure. I would envisage this will be a similar situation throughout the St Helens area. Furthermore, I can't think of one GP surgery in Eccleston Park - therefore Rainhill, Whiston, Prescot, Eccleston and St Helens would all feel the effect of an increased population in the area.

Dentists

I do not think there are any dentists near to where I live in Eccleston Park and consequently I go to a practice in Liverpool. My previous NHS dentist was in St Helens town centre, but I left there due to it being unclean and the place decrepit. As with the impact to the Doctors services outlined above, Dentist facilities will be impacted in a similar way as outlined above for Doctors, and people will be forced to travel further afield.

11
+
2

Extracted from: 'Transport Impact Assessment: Main Report'

7.8 A58 PRESCOT TO ST HELENS

Current Conditions

7.8.1. The A58 forms the main radial approach route to St Helens from the M57, Prescot and areas to the west. It is a dual carriageway, subject to a 40mph speed limit, with limited access points from the M57 to the roundabout junction with St Helens Road. Thereafter, the speed limit reduces to 30mph and the route becomes a single carriageway with frontage activity.

The assessment acknowledges that the junctions at both Burrows Lane and Portico Lane onto St Helens Road are either at, or are close to, capacity. However, it does not appear to take into account the very significant housing developments currently occurring in Prescot and other areas of Knowsley. I am concerned that once these developments are complete, there will be a significant increase in traffic using the A58 to access St Helens (particularly if the Council's employment development plans come to fruition) and the A580 (which also provides an onward route to the northbound M6) via Burrows Lane. As a result I envisage there will be major traffic increases at the Burrows Lane and St Helens Road crossroad traffic lights.

In addition to this, if the Green Belt status of the Eccleston Park Golf Club is removed and the land is built on at any time, this will also undoubtedly generate a significant increase in traffic volumes at both the Burrows Lane/St Helens Road and Portico Lane/St Helens Road junctions and on the A58 itself.

12

Extracted from: 'Sustainable Transport Impact Assessment Report'

4.11.1. Strategic Site Allocation HA8 is located in **Rainhill**, approximately 4 miles south west of St Helens town centre. The site is located on the western boundary of St Helen's borough, and is part of a larger and dense urban area shared with Prescot, a town in the neighbouring borough of Knowsley.

Further to my comments above concerning the physical location of the land known as 'Eccleston Park Golf Club', the paragraph above does actually acknowledge that it is in Rainhill.

13

I am concerned that several of the points in 4.11.5 to 4.11.15 are factually incorrect, inadequately researched or misleading. For example, the nearest train station is referred to as 'Eccleston' as opposed to 'Eccleston Park'; the author seems to have missed the fact that Whiston Hospital is just down the road; the town centre has 'numerous employment opportunities' is debatable. This leads me to believe that the review was written by someone with little or no local knowledge, who did not apply an adequate level of diligence to their information gathering or assessment; consequently, the analysis contained in this report is inaccurate and flawed.

13

RO1059



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

RO1060

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

13 MAR 2019

42 Ecclesfield Road
Eccleston
St. Helens
WA10 5NB

13 March 2019

Dear Sir or Madam,

I am writing to object to the St Helens Council Local Plan Submission Document (LPSD). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

You say that "the plan should be based on a wide range of evidence covering matters such as; need for employment and housing development; land availability; town centres and shopping; environmental issues; and other various matters". However, I do not believe that this is what is happening.

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. I do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". It is inappropriate for St Helens Council to use out of date and/or incorrect figures in order to satisfy their own ends.

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.

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.

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 any WHY do St Helens Council appear to be ignoring this.

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. It seems inappropriate to dispense with grade 1 farming land, currently in use for farming and recreation, in order to build upon when there are other sites available.

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:-

"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 fully 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.

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.

For these reasons I would suggest that the Local Plan (2018) and therefore the LPSD 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.

I trust that my views will be seriously considered by the members of St. Helens Council.

Yours faithfully


Jane Leyland (Mrs.)

RO1061



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).

1086

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: MRS.	Title:
First Name: GHADYS	First name:
Last Name: LIGHTFOOT	Last Name:
Organisation/company:	Organisation/company:
Address: 547 Clock Face Road ST. HELENS	Address:
Postcode: WA9 4UQ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: 23 March 19

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

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

Yes (Via Email) No

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

RO1062

① - LPA05

② - Statement of Common Ground

PF0695

759

13 MAR 2019

Ref: LPSD

(For official use only)



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>S. Lilley Mrs</u>	Title:
First Name: <u>Sheila</u>	First name:
Last Name: <u>LILLEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>331 Liverpool Road</u>	Address:
<u>Haydock</u>
<u>N7, St Helens</u>
Postcode: <u>WALL 0UN</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 25/2/19

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

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

Yes ~~()~~ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

SHEILA WILLEY

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LP05 SITE 2 HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- 1) Not justified - the Council should be put to strict proof of this population estimates. The population of St Helens has been in decline since 1981.
- 2) Brownfield & derelict land should always be developed before Greenbelt.
- 3) No exceptional circumstances for development on Greenbelt.
- 4) The highways are already overstretched and more traffic will lead to chaos.
- 5) Overdevelop in this area and who ~~would~~ want a house facing massive warehouses anyway?
- 6) Lack of infrastructure - schools, medical centres, dentists.
- 7) Excessive flooding problems on this site.

①

Please continue on a separate sheet if necessary

② See attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<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.

Sheila Litley

Florida Farm 2HA

Haydock is a mess, traffic is horrendous, gridlocked, cars parked everywhere on the main road through Haydock, parked on pavements, right up to traffic lights. Buses can't get through easily, it's like being on the Dodgem cars going through Haydock.

And all this even before these Huge Warehouses are even running. It's a disgrace, Haydock is being dumped on from all sides, there is disruption everywhere, there are no school places, there is not the infrastructure for any more houses, what about Medical centers Doctors Dentists etc etc.

I shudder to think what the roads around Haydock will be like when the eyesore Warehouses are operating, you won't be able to move in Haydock, or the East lanes road, or Liverpool Rd, Millfield Lane etc etc etc

Everyone I speak to shake their heads and say
Not more Houses that means more Cars !!!!!

ENOUGH IS ENOUGH

Ref: LPSD
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

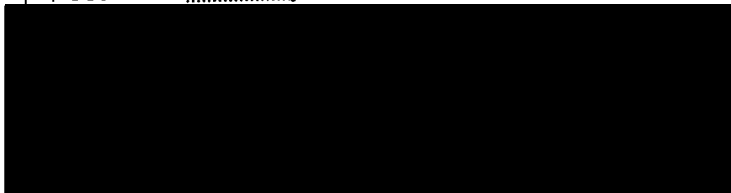
This form has two parts;

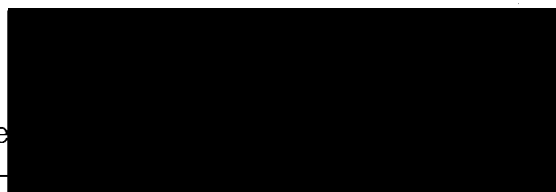
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>S. Hilley Mrs</u>	Title:
First Name: <u>Sheila</u>	First name:
Last Name: <u>Hilley</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>331 Liverpool Rd</u>	Address:
<u>Haydock</u>
<u>N St Helens</u>
Postcode: <u>W11 0W</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via ~~email~~)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>L.P A04 Site 2 EA SEA</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p><i>Not justified -</i></p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green belt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(This area is currently blank for the respondent to provide their reasons for wanting to participate at the oral examination.)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Continuation sheet.

Shelda Lilley. SITRS - 2EA SEA + 6EA.
LPA04.

See attached overleaf

Haydock is being dumped on yet again -

The Scale of these giant Warehouses is horrendous, when they are operating the traffic will be at a standstill, it's already Chaos now, all roads surrounding the Warehouses will be gridlocked. We will have more pollution and the NOISE will be intolerable

Everyone in the area are tired and weary of being dumped on from all sides, and feel very strongly at what is going on, they say the TRAFFIC will be at Breaking point. Haydock can't cope any more in all areas

AGAIN ENOUGH IS ENOUGH!!!

RO1063



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.

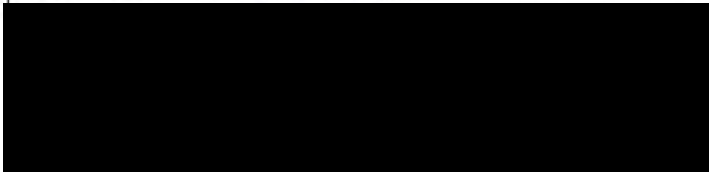
This form has two parts;


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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>KATIE</u>	First name: _____
Last Name: <u>LINDLEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 JASMINE GARDENS</u>	Address: _____
<u>NEW BOLD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 4ZL</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 8/5/19

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.

13 MAY 2019

961

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
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO1064



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

962

13 MAY 2019

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: GAYNOR	First name:
Last Name: LINDLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 3 SASSMINE GARDENS NEW BOLD ST HELENS	Address:
Postcode: WA9 4ZL	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 28/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on 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.

RO1065



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.

1379
13 MAY 2019

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: ANTONY LINDLEY	First name:
Last Name: LINDLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 3 JASMINE GARDENS NEW BOLD ST HELENS	Address:
Postcode: WA9 4ZL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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.

RO1066

① - LPD01 ② - LPC14



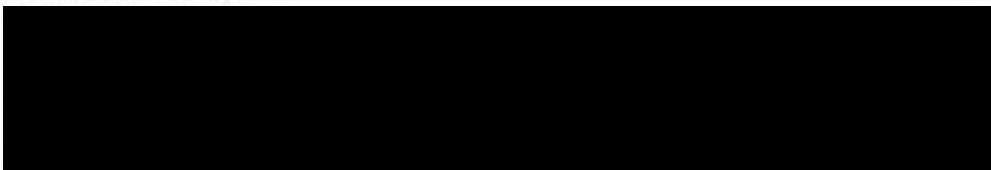
St Helens Local Plan Submission Draft

Melanie Lindsley

to:

planningpolicy@sthelens.gov.uk

11/03/2019 13:18



2 Attachments



St Helens Local Plan Submission Draft Representations Form. DEV.doc




St Helens Local Plan Submission Draft Representations Form.doc MIN.doc

Dear Sir/Madam

Please find attached the comments of the Coal Authority on the completed response forms.

Regards

Melanie

 The Coal Authority

Melanie Lindsley BA(Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Development Team Leader



[W : gov.uk/government/organisations/the-coal-authority](http://www.gov.uk/government/organisations/the-coal-authority)

Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>



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: Melanie	First name:
Last Name: Lindsley	Last Name:
Organisation/company: The Coal Authority	Organisation/company:
Address: 200 Lichfield Lane, Mansfield, Notts	Address:
Postcode: NG18 4RG	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Sign [Redacted Signature] Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.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	Policy LDP01	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input checked="" 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 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 type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Coal Authority is pleased to see that Policy LDP01 requires consideration of ground stability issues as part of development proposals.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input 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.**



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: Melanie	First name:
Last Name: Lindsley	Last Name:
Organisation/company: The Coal Authority	Organisation/company:
Address: 200 Lichfield Lane, Mansfield, Notts	Address:
Postcode: NG18 4RG	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <input type="text" value="11 March 2019"/>
------------------------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <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	LPC14	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes	X	No <input type="checkbox"/>
Sound?	Yes	X	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes	X	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Coal Authority supports the inclusion of Policy LPC14: Minerals which sets out criteria against which proposals within the MSA will be considered. We are pleased to see that coal is one of the minerals identified within this defined area.

This policy also sets out criteria against which proposals for mineral extraction will be assessed and includes a framework for consideration of hydrocarbons, which is welcomed.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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.**

RO1067



St Helens Borough Local Plan 2020-2035 (Submission Draft)

Angela Liptrot

to:

planningpolicy@sthelens.gov.uk

10/03/2019 16:51

[Redacted address block]

My name is Angela Liptrot and I live at 16 Eagle Crescent, Rainford, StHelens, WA11 8BG; Telephone number [Redacted]

I would like to submit my objections/representations to you regarding the St Helens Borough Local Plan 2020-2035 (Submission Draft), in particular relating to the proposed residential building planned for site HA8 Rookery Lane.

I am also making representation on behalf of my husband , Ronald Liptrot, and son, Daniel Liptrot who live at the same address.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statements of common ground

01

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

I [Redacted] and am very familiar with the are and the potential impact of this level of development on the surrounding community , landscape and infrastructure.

[Redacted] and I fear for their safety and the future of the environment we all live in were this development to proceed when I believe need has not been proven and alternatives not

explored.

Kind regards

Angela Liptrot Dip PFS CeMAP
Financial Adviser



Alexander House Associates LTD
117 Higher Parr Street, Fingerpost, St Helens, Merseyside, WA9 1AG

Alexander House Associates Ltd., Registered in England number: 4605461
Registered Office: 30 Hamilton Road, Wigan, Lancashire, WN4 0SU

We choose to be part of Openwork, an award-winning network:



RO1068

2020 - 2025
plans

per person
2

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1001

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title:
First Name: <u>Bryony</u>	First name:
Last Name: <u>Liptrot</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>53 GORSEY LANE</u> <u>STHELENS</u>	Address:
Postcode: <u>WA9 4XA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 11.3.18

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO1069



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.

1002 13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ANNE-MARIE	First name:
Last Name: LIPNOTT	Last Name:
Organisation/company:	Organisation/company:
Address: 53 GORSEY CANE STHELENS	Address:
Postcode: WA9 4XA	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 11-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough 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.

RO1070



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

1003

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DAMIEN PETER</u>	First name:
Last Name: <u>LIPTROTT</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>53 GORSEY LANE</u> <u>STHELENS</u>	Address:
Postcode: <u>WA9 4XA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 11.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO1071



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).

1019 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: MISS	Title:
First Name: FERN FRANCES	First name:
Last Name: LIPTROTT	Last Name:
Organisation/company:	Organisation/company:
Address: 53 GORSEY CAWN ST HELENS	Address:
Postcode: WA9 4XA	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 11.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough 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.

RO1072

①-LPA04 ②-LPA06

ELOO55



Planning objection re Haydock

avril littler to: planningpolicy@sthelens.gov.uk

11/03/2019 13:14

I wish to object to the St. Helens local plan as it relates to the following proposals:

- a) 2ES Land to the east of M6 Jt 23 Haydock. 2
- b) 4EA Land south of Penny Lane, Haydock. 2
- c) 6EA Land west of Millfield Lane and south of Liverpool Road. 1
- d) 5EA Land west of Haydock. 1

I live in Ashton-in-Makerfield which is going to be severely affected by these proposals. The roads of Ashton are severely congested at peak times now especially the A49, the Haydock island area and Jt 23 M6. If all these developments go ahead these roads are going to congested all day long. The air quality can only be impacted negatively by queuing traffic. There are two high schools on the A49 close to one of the proposed developments the impact of falling air quality in these areas can only be detrimental to the pupils attending the schools.

It seems to me that the residents of St Helens will not be affected by these developments as they are not in St Helens residential areas but ARE adjacent to residential areas of Ashton-in-Makerfield.

Regards, Avril Littler.

Avril Littler
54 St Oswalds Road
Ashton-in-Makerfield
Wigan
WN4 9NU

Sent from my iPad

1 and 2

RO1073



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

122

Ref: LPSD
01 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>M.R.</u>	Title:
First Name: <u>WILLIAM</u>	First name:
Last Name: <u>LIVESEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>48 SMOCK LANE</u>	Address:
Postcode: <u>W14 0SN</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
LPA05 SITE IHA		✓		✓			✓			
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Not sound	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
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>FIELD FULL OF MINE SHAFTS.</p> <p>48 SMOCK LANE HAD A SINKING GARDEN^{ED}. IN C.B. INFORM^{ED}, FILLED IN STILL SINKING HOLE</p> <p>SCHOOL OVER SUBSCRIBED NOW! SO. CHILDREN COULD NOT GO THERE WITH MORE HOUSE TRAFFIC ALREADY BAD. MORE HOUSES MORE CARS NOT WANTED</p> <p>WHEN RAINING DRAINS ARE NOT ABLE TO TAKE EXCESS WATER AWAY IN SMOCK LANE</p> <p>IN SITE IHA A STREAM PASSES THROUGH. FIELD</p> <p><u>NO</u> WAY LITAGE LOADIES SHOULD BE PASSING DOWN SMOCK LANE</p> <p>DOCTORS ALWAYS FULL 2-3 WEEK APPOINTMENT WAIT</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

WATCH FOR THE LOCAL ELECTIONS
(OUT)

TRY FOR YOUR LOCAL PEOPLE
PLEASE!!

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1074



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>IRENE LILIAN</u>	First name: _____
Last Name: <u>SIMMONS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>8, GORDON AVE</u> <u>ASHTON-IN-MAKERFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0QA</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile:	Mobile No: _____
Email: _____	Email: _____

Signature:	Date: <u>27/02/2019</u>
------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy <i>LPA06</i>	<i>SITE</i> <i>IHS</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
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>NOT JUSTIFIED</i></p> <p><i>STHELENS POPULATION IN DECLINE SINCE 1981, WHERE ARE PEOPLE COMING FROM TO JUSTIFY THESE HOUSES</i></p> <p><i>A PURPOSE OF GREENBELT IS TO ASSIST URBAN REGENERATION. HOWEVER GREENBELT DOES NOT ENCOURAGE URBAN REDEVELOPMENT</i></p> <p><i>RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF GREENBELT - LEISURE, CLEAN AIR, GOOD HEALTH ETC</i></p> <p><i>HOUSING IN THE AREA ISN'T SUSTAINABLE DUE TO LACK OF SCHOOLS, MEDICAL FACILITIES, TRANSPORT LINKS - USE OF CARS IS BEING ENCOURAGED BY THIS PROPOSAL</i></p> <p><i>NO STATEMENT OF COMMON GROUND WITH OTHER NEIGHBOURING AUTHORITIES, ACCESS TO SITE WHOLLY INADEQUATE</i></p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETION OF THIS LAND FROM PROPOSED
REMOVAL OF GREEN BELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1075

23 SIGNATURES

LP0006

6

3HS

①-LPA06

13 MAR 2019



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
(For official use only)

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: IAN	First name:
Last Name: LOMAX	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 30 GONSETT RD NUTCRONE ST. HELENS	Address:
Postcode: WA9 5LA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[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.

Would you like to be kept updated of future stages of the St Helens Borough 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 – 5:00pm)

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	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

THIS COUNCIL HAS MISMANAGED THIS TOWN FOR GENERATIONS THEY HAVE ALWAYS BEEN 30 YRS BEHIND OUR SURROUNDING BOROUGHS AND NOW SEEK TO COVER UP THEIR INCOMPETANCE BY BUILDING THEIR WAY OUT OF IT.

WE IN NOTLDRE HAVE BEEN BUILT ON ON THREE SIDES, RAINMILL HOSPITAL DEMOLISHED AND BUILT ON. IBSTOCK BRICK WAS DEMOLISHED AND THREE GREENFIELD SITES WERE DESTROYED AND MINED FOR COAL THEN THE IRBADS ESTATE WAS BUILT. ELTON HEAD RD LINKS THESE SITES AND AT ARRIVAL HOME TIME AT ST. JOHN VIANNAY SCHOOL CAUSES GRID LOCK. ELTON HEAD RD WOULD ALSO BE THE MAIN LINK FOR LPA06 / 3HS TO THE LINKWAY AND M62.

COMBINE THAT WITH FURTHER PROPOSED BUILDINGS ON ELTON HEAD ROAD WILL BE CHAOS.

RAINMILL VILLAGE WILL BE THE OTHER MAIN ACCESS TO M62. RAINMILL ROAD HAS TERRACED HOMES ALL CARS ARE PARKED ON THE ROAD ON BOTH SIDES 2 BUSES OR EVEN SMALL VANS CANNOT PASS EACH OTHER. OUR SCHOOLS ARE FULL, WAITING TIME FOR APPOINTMENTS AT DOCTORS IN TRAFFIC HEALTH CAN BE FIVE WEEKS!

ST. HELENS IS A DIERING TOWN ITS IDENTITY HAS BEEN DESTROYED THE PEOPLE WHO BUY THESE HOMES DON'T USE ST. HELENS. WHAT WE NEED IS NEW INDUSTRY NOT DOLLS HOUSES BUILT ON PRECIOUS GREEN BELT. THIS SO CALLED SAFEGUARDING HAS BEEN EXPLAINED TO ME. IT IS A SHAMEFUL CON!

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 greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

A CLOSE FRIEND WHOSE ONLY PLEASURE WAS GOLF AT ECCLESTON PARK NO LONGER PLAYS AS IT WAS A FLAT COURSE AND EASIER TO WALK AT HIS AGE. HE NO LONGER PLAYS. HOW MUCH POLLUTION WILL THIS ADD? NO BODY CAN SAY BUT IT CAN ONLY GO UP AND NOT DOWN. ST. HELENS IS ALREADY KNOWN FOR ITS HIGH MORTALITY RATES.

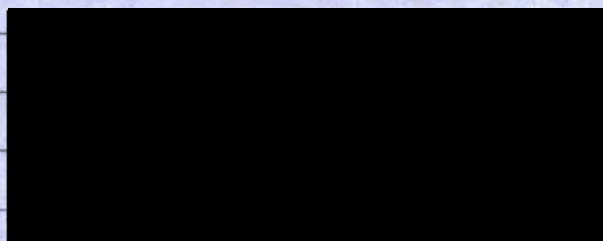
THE PURPOSE OF GREEN BELT IS TO STOP SPRAWL SO WHY BUILD ON IT ON SUCH A VAST DESTRUCTIVE SCALE COULD SMALL OR RIBBON DEVELOPMENTS BE SPREAD ACROSS THE BOROUGH WHICH COULD BE MORE AFFORDABLE TO FIRST TIME BUYERS?

THE DAMAGE TO ESTABLISHED WILD LIFE WOULD BE A DISGRACE WHERE COULD IT MIGRATE TO IN THE BOROUGH? ELTON HEAD ROAD AND LOWFIELD LANE WHICH ~~HAS~~ ^{HAS} NOW BEEN DEVELOPED ON BOTH SIDES, EVEN THE SLIGHTEST RAIN CAUSES MAJOR FLOODING WITH CARS HAVING TO MOUNT THE PAVEMENT TO GET THROUGH.

LPA06/3HS HAS ALWAYS BEEN KNOWN FOR FLOODING WHERE WILL THE RUN OFF FROM HERE GO?

THIS SITE IS ALL THAT IS LEFT BETWEEN WHISTON/PRESCOT AND NUTGROVE THAT HEATH PREVENTING US MERGING INTO ONE ESTATE OF POORLY INSULATED INEFFICIENT DOLLS HOUSES OF WHICH WE HAVE SEEN ENOUGH.

IN CONCLUSION OUR ROADS CAN'T COPE, OUR SCHOOLS AND OTHER SERVICES INCLUDING A+E CANNOT COPE, OUR HEALTH CANNOT COPE. DEVELOPMENT OF THIS AND OTHER SITES IN ITS VICINITY WOULD BE A CRIME.



Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No , I do not wish to participate at the oral examination		
--	--	--

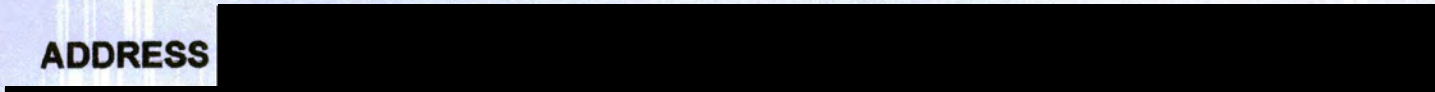
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

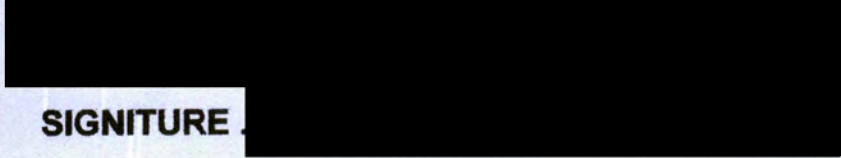
1. NAME FREDA LEYLAND PRINT NAME FREDA LEYLAND

ADDRESS



DATE 5-3-2019

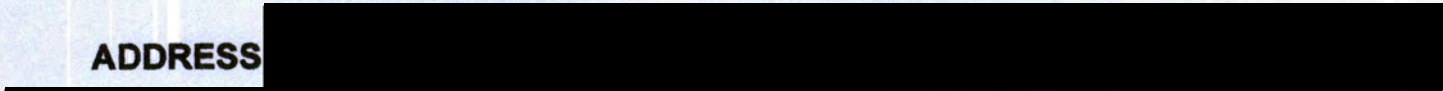
SIGNATURE



I give explicit permission for my name to be used in this response.

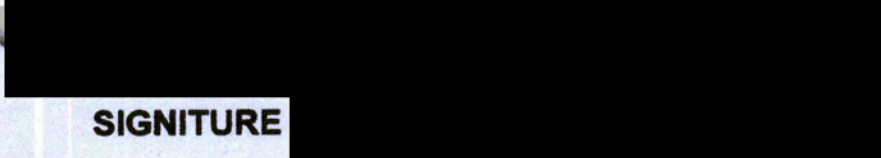
2. NAME KAREN RHODES PRINT NAME K. Rhodes

ADDRESS



DATE

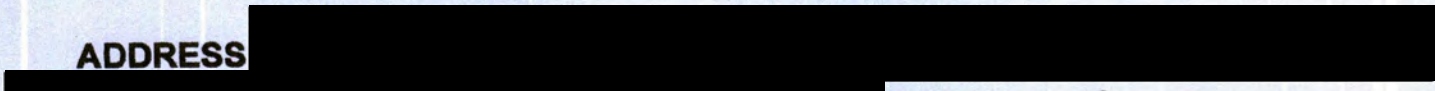
SIGNATURE



I give explicit permission for my name to be used in this response.

3. NAME MURIS MORRIS PRINT NAME MURIS MORRIS

ADDRESS



DATE 7-3-2019

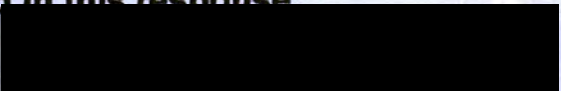
SIGNATURE



I give explicit permission for my name to be used in this response.

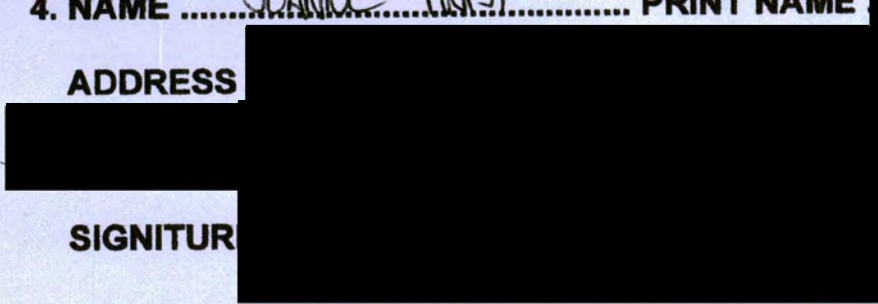
4. NAME JOANNE TWIST PRINT NAME

ADDRESS



DATE 7/3/2019

SIGNATURE



I give explicit permission for my name to be used in this response.

1. NAME A. Ashton..... PRINT NAME ANNE ASHTON.....

ADDRESS

DATE 5-3-19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

2. NAME I. Harden..... PRINT NAME Isabel Harden.....

ADDRESS

DATE 5.3.19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

3. NAME GEORGE HARDEN..... PRINT NAME GEORGE HARDEN.....

ADDRESS

DATE 6-3-019.....

SIGNITURE

I give explicit permission for my name to be used in this response.

4. NAME Stuart Legg..... PRINT NAME STUART LEGG.....

ADDRESS

DATE 5-3-19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

1. NAME Anthony..... PRINT NAME Unsuonim.....

ADDRESS

DATE 5/3/2019.....

SIGNITURE

I give explicit permission for my name to be used in this response.

2. NAME Paul Standish..... PRINT NAME

ADDRESS

DATE 5,3,19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

3. NAME William John Chorley..... PRINT NAME CHORLEY.....

ADDRESS

DATE 5-3-19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

4. NAME June Porrino..... PRINT NAME JUNE PORRINO.....

ADDRESS

DATE 5/3/19.....

SIGNITURE

I give explicit permission for my name to be used in this response.

1. NAME *T Leigh*..... PRINT NAME *T LEIGH*.....

ADDRESS [REDACTED]

DATE *5-3-19*.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME *JANE ELIZABETH REID*..... PRINT NAME *JANE E REID*.....

ADDRESS [REDACTED]

DATE *05/03/19*.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME *WILLIAM REID*..... PRINT NAME *WILLIAM REID*.....

ADDRESS [REDACTED]

DATE *05-05-19*.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME *ROBERT LEYLAND*..... PRINT NAME *ROBERT LEYLAND*.....

ADDRESS [REDACTED]

DATE *5-03-2019*.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

1. NAME E Ashurst..... PRINT NAME Eva Ashurst.....

ADDRESS .



DATE 07/03/19.....

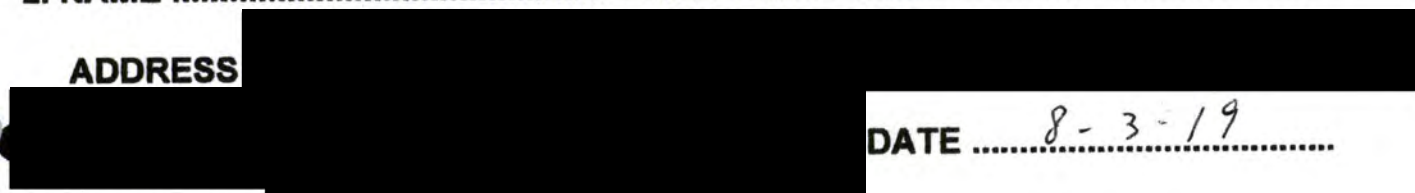
SIGNITURE



I give explicit permission for my name to be used in this response.

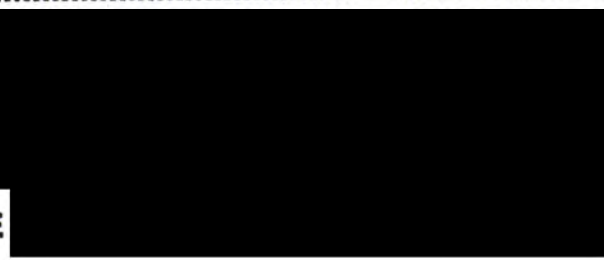
2. NAME Mrs B SUTCH..... PRINT NAME B SUTCH.....

ADDRESS



DATE 8-3-19.....

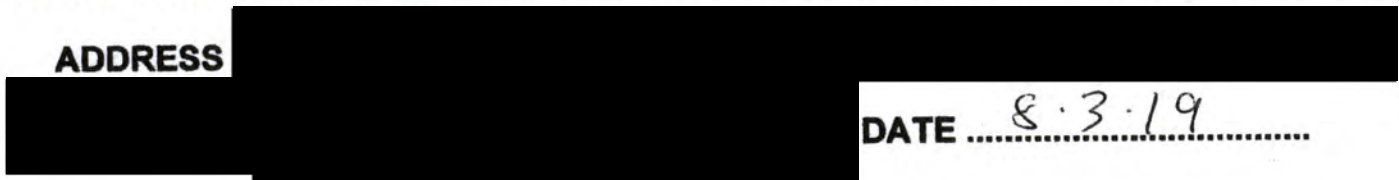
SIGNITURE



I give explicit permission for my name to be used in this response.

3. NAME D Winstanley..... PRINT NAME D WINSTANLEY.....

ADDRESS



DATE 8.3.19.....

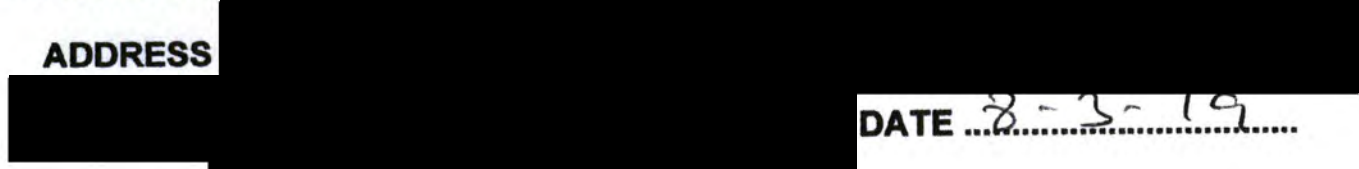
SIGNITURE



I give explicit permission for my name to be used in this response.

4. NAME K Evanson..... PRINT NAME K EVANSON.....

ADDRESS



DATE 8-3-19.....

SIGNITUR



I give explicit permission for my name to be used in this response.

1. NAME U. JONES..... PRINT NAME MARY JONES.....

ADDRESS [REDACTED]
[REDACTED] DATE 8.3.19.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME CLIVE LOMAX..... PRINT NAME Clive Lomax.....

ADDRESS [REDACTED]
[REDACTED] DATE 9/8/19.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME S. ANDERSON..... PRINT NAME S ANDERSON.....

ADDRESS [REDACTED]
[REDACTED] DATE 12/3/19.....

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME

ADDRESS

..... DATE

SIGNITURE

I give explicit permission for my name to be used in this response.



St. Helens
Council

7HS

**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).

946

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:	Title:
First Name: IAN	First name:
Last Name: LOMAX	Last Name:
Organisation/company:	Organisation/company:
Address: 30 CONSETT RD NUTGROVE ST. HELENS	Address:
Postcode: WA9 5LA	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: 12/5/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP066	Paragraph / diagram / table	THS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				PICTURES AND SIGNATURES OPPOSING SITE					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	Don't Know <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

INCREASED POLLUTION AT SCHOOL. DEVELOPMENT HERE WILL ADD TO SPRAWL TOWARDS NOTGROVE
 VAST AMOUNT OF GREENBELT ALREADY DESTROYED IN THIS AREA
 NEW AND INCREASING FLOODING
 ST. HELENS MNU HAS A COMPLETE BROWNFIELD LIST THIS SHOULD BE USED FIRST
 WE HAVE DECLINING POPULATION
 350+ HOMES TO BE BUILT 200M UP ROAD.
 ACCESS TO TRAFFIC HEATH IS DUE TO CONGESTED ROADS
 LEA GREEN STATION CAR PARK IS ALWAYS FULL
 350 HOMES TO BE BUILT OPPOSITE SUTTON ACADEMY
 SO NEARLY 1000 HOMES WITHIN 1/4 KM = BAD PLANNING!

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input 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.**

7HS

1. NAME Joshua Whitley..... PRINT NAME [REDACTED].....

ADDRESS [REDACTED]

DATE 28/04/2019.....

SIGNATURE [REDACTED]..

I give explicit permission for my name to be used in this response.

2. NAME Pete Roberts..... PRINT NAME Pete Roberts.....

ADDRESS [REDACTED]

DATE 28.4.19......

SIGNATURE [REDACTED].

I give explicit permission for my name to be used in this response.

3. NAME B. Roberts..... PRINT NAME BARRY ROBERTS.....

ADDRESS [REDACTED]

DATE 28.4.19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME MR + MRS S. CURTIN..... PRINT NAME MRS S. CURTIN.....

ADDRESS [REDACTED]

DATE 28/4/19......

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

745

1. NAME Mrs. Margaret Fitzhenry PRINT NAME Margaret Fitzhenry

ADDRESS [REDACTED]

DATE 28.4.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Mark Ellis PRINT NAME MARK ELLIS

ADDRESS [REDACTED]

DATE 4/5/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME CARLA PRINT NAME ELLIS

ADDRESS [REDACTED]

DATE 4/5/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME NEIL PRINT NAME ATHEISTON

ADDRESS [REDACTED]

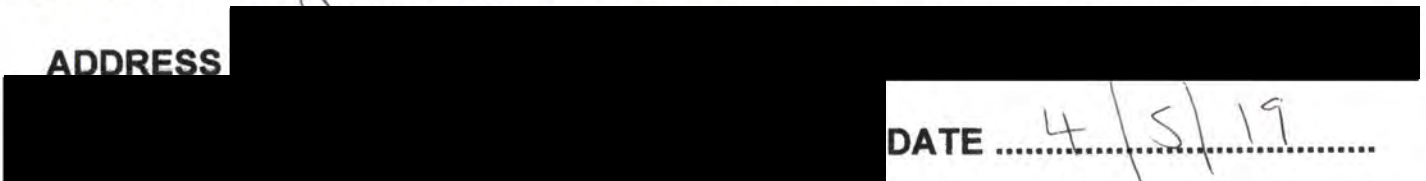
DATE 4/5/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

1. NAME Jaune Atherton PRINT NAME J E ATHERTON

ADDRESS



DATE 4/5/19

SIGNATURE



I give explicit permission for my name to be used in this response.

2. NAME OLIVE PRESLOTT PRINT NAME OLIVE FRESCOTT

ADDRESS



DATE 4-5-19

SIGNATURE



I give explicit permission for my name to be used in this response.

3. NAME MRS LOWN BOROUGH PRINT NAME RITA LOWN BOROUGH

ADDRESS



DATE 11-5-2019

SIGNATURE



I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.



THESE TREES WILL BE LOST AND THIS PART
OF ROAD WILL BE DEVELOPMENT ACCESS
FORCING MORE SIDE ST PARKING.

DANGEROUS PARKING / HOMES TO RIGHT BUILT ON GREENBELT



EXISTING HEAVY TRAFFIC



MILK STOVERS CAUSED THIS FLOODING IN LOWFIELD LANE
WHICH EVENTUALLY SPILLED INTO SALES OFFICE CAR PARK
CARS TRY TO MOUNT PAVEMENT TO PASS
HOMES NEXT TO SCHOOL WILL MAKE THIS WORSE



TRAFFIC ON LOWFIELD LANE HEADING UP TO BOARS HEAD JUNCTION



SIDE STREET CONGESTION





St. Helens
Council

645

**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).

945

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:	Title:
First Name: IAN	First name:
Last Name: LOMAX	Last Name:
Organisation/company:	Organisation/company:
Address: 30 CONSETT RD NUTGROVE ST. HELENS	Address:
Postcode: WA9 5LA	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: 12/5/19
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LP06	Paragraph / diagram / table	6HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	NO, I KNOW	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

SIDE ACCESS WILL BE VIA EXISTING SIDE ROADS ALREADY CONCEDED AS SITE IS HEMMED IN BY WOODLAND AND EXISTING HOMES CHAPEL LANE IS TOO NARROW
 ST. HELENS HAS DECLINING POPULATION
 NO SERVICES EG DOCTOR-CHEMIST IN NEARBY CLOCK FACE
 SPEED CALMING ALREADY IN PLACE ON FOREST RD
 FIELD ON OTHER SIDE OF CHAPEL LANE HAS BEEN LEFT FALLOW SO IS ALSO BOUND TO BE DEVELOPED AGAIN LINKING UP THE SPURRAL. THIS IS AN ESSENTIAL PART OF GREENBELT BARRIER TO M62 @ AND LINK ROAD
 THIS WILL ADD TO IMPACT OF DEVELOPMENTS PROPOSED IN BOLD

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input 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.**

RO1076



St. Helens
Council

690

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)


Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

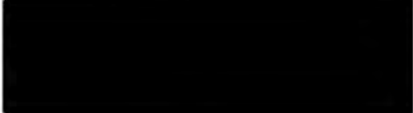
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mrs</i>	Title:
First Name: <i>JULIE</i>	First name:
Last Name: <i>LOMAX</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>26/02/19</i>
--	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St.Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. 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 as it does not make effective use of land. 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 available for development.

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 numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding 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 reach 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 guestimate figures bear no resemblance to this fact.

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 means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am 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.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this 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. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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"/>	<input type="checkbox"/>
-------------------------------------	--	--------------------------	--------------------------

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.**

RO1077



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).

13 MAY 2019
1289

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: Karis	First name:
Last Name: low	Last Name:
Organisation/company:	Organisation/company:
Address: Tunstalls farm	Address:
Postcode: WA9 4QT	Postcode:
Tel No:	Tel No:
Mobile: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: [REDACTED]

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
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

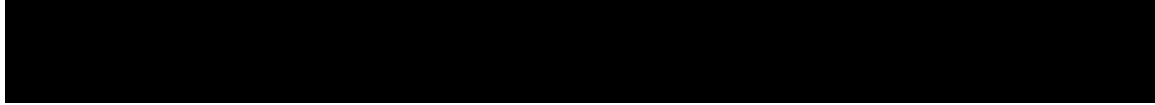
5. If you consider the Local Plan is <u>unsound</u>, is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please continue on a separate sheet if necessary

RO1078



I have the following points to make on the plan overall:

I think the economic analysis is flawed and based on over-optimistic assumptions

Why build on a Green Belt site when there is other areas more suited?

Do we really need more homes in the area, when there is so many empty

The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142

The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

I don't believe there has been any consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Many thanks,

Sandra Lowe
22 Stanley Avenue
Rainford
St Helens
WA11 8HU

RO1079

① - LPA06
② - Statement of Common Ground

192

Ref: LPSD
01 MAR 2019
(for official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: <u>KEITH</u>	First name:
Last Name: <u>LOWE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 SEVIER AVENUE</u>	Address:
<u>GARSWOOD</u>
Postcode: <u>WN4 0UF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LAP06 SITE IHS	Paragraph/ diagram/ table		Policies Map SITE IHS		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED the council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area is not suitable because of the lack of school places doctors surgeries, bus routes and other services. The use of cars being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

① - LPAOS
② - Statement of Common Ground 195

Ref: LPSD
01 MAR 2019
(For official use only)



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title:
First Name: <u>KEITH</u>	First name:
Last Name: <u>LOWE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 SENKAL AVENUE.</u>	Address:
<u>GARSWOOD,</u>
Postcode: <u>WV4 0UF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPAOS IHA	Paragraph/ diagram table		Policies Map SITE IHA		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1 Not Justified "the council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of domestic and other urban land. Using greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area is not sustainable because of the lack of school places doctors surgeries bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to site on either Billings Road or Garwood Rd would be inadequate, any necessary highway works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities." 2</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1080

PF0173

① - LPA06
② - Statement of Common Ground 193



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
01 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title:
First Name: <u>SHIRLEY</u>	First name:
Last Name: <u>LOWE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 BELKIN AVE</u>	Address:
<u>GARSWOOD</u>
Postcode: <u>WN4 0UF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LAP06 SITE 1 HS	Paragraph/ diagram table		Policies Map SITE 1 HS		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:	
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness	
Legally Compliant?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>NOT JUSTIFIED</u> - the council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of developed and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't suitable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposal removed from the greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PF0174

① - LPA05
② - Statement of Common Ground 1914

Ref: LPSD
01 MAR 2019
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>SHIRLEY</u>	First name:
Last Name: <u>LOWE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 BELKIRK AVE</u>	Address:
<u>GARSWOOD</u>
Postcode: <u>WN4 0UF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 20/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA05 IHA	Paragraph/ diagram table		Policies Map SITE IHA		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>NOT JUSTIFIED</u> - The Council should be put to strict proof of its population estimates. The population of St-Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt-land to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>Housing in this area is not sustainable because of the lack of schools, doctors surgeries bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>The access to the site on either Billinge Road or Garswood Rd would be inadequate. Any necessary highway works must be funded by the developer and not the Council Tax payers.</p> <p>There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1081

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
---------------	----------------------

RO1082

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
---------------	----------------------

RO1083



St. Helens
Council



13 MAR 2019

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

3HS
①-LPA06

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: ANNE	First name:
Last Name: LUNT	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 2 THE ORCHARD, BROOKFIELD AVE. RAINHILL, PRESCOT, MERSEYSIDE Postcode: L35 4PX	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 12.03.2019
------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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	LP A06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/> DONT KNOW	No <input type="checkbox"/> <input checked="" type="checkbox"/> DONT KNOW
Sound?	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <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

- We believe 3HS is a confined flood zone. Houses built on the golf course would affect the ability of the land to drain. The brook rises high during heavy rainfall and we are worried properties along the brook ^{would be} at risk of flooding.
- We believe and have found Rainhill Road are not able to cope with the current level of traffic. Especially during busy times.
- In our experience minor roads in the area are used to avoid the A roads during busy times. An increase in traffic if the building goes ahead will increase the traffic in these areas.
- We believe major road works would be needed at the junction of Warrington Rd and Rainhill Rd causing significant delays.

Please continue on a separate sheet if necessary

PART B 6 Cont.

- We believe an increase in traffic will be a danger to pedestrians. Especially children travelling to and from school.
- In our experience local doctors and dentists are over subscribed. A+E at Whiston hospital and the Walk in Centre in St. Helens are very busy places causing long waiting times.
- We believe the plants and animals seen around the greenbelt that is the golf course will be at risk of disappearing. There have been sightings of an owl, a woodpecker and wild flowers.
- We have found that after heavy rain the brook water level rises significantly. Nos 1 and 2 The Orchard are very close to the brook. No 2 is about 3 metres from the bank and No 1 is much closer to the bank.
- We believe No 1 and 2 The Orchard are at a high risk of flooding. Putting us in a position of being unable to insure our properties if this happens.
Number 15 Brookfield Avenue already experiences flooding from the brook

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

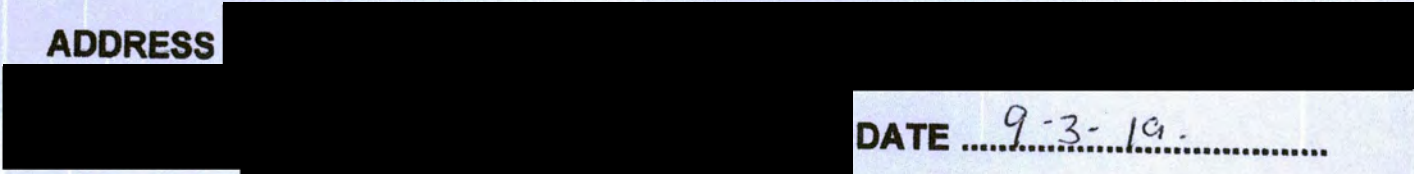
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

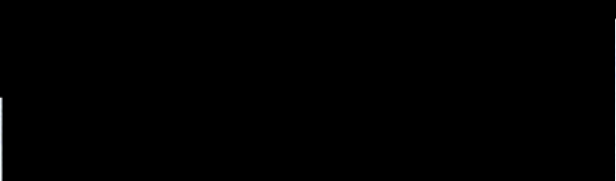
1. NAME JOYCE WARE PRINT NAME

ADDRESS



DATE 9-3-19

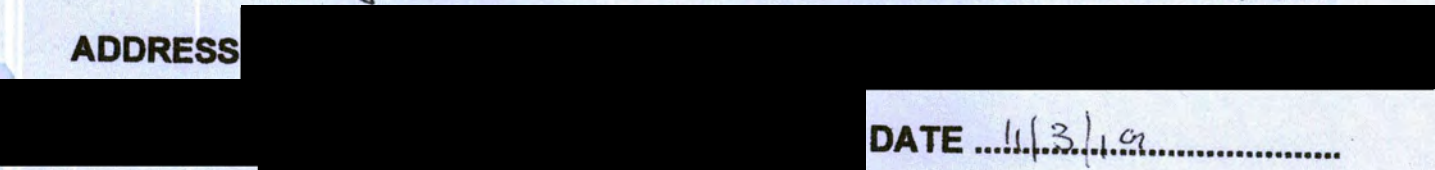
SIGNATURE



I give explicit permission for my name to be used in this response.

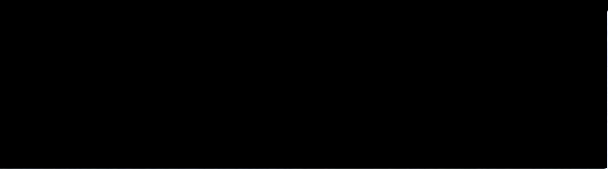
2. NAME A. Keyland PRINT NAME AMY KEYLAND

ADDRESS



DATE 11/3/19

SIGNATURE



I give explicit permission for my name to be used in this response.

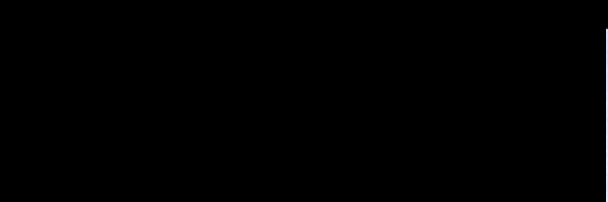
3. NAME D. Keyland PRINT NAME DAVID KEYLAND

ADDRESS



DATE 11/3/19

SIGNATURE



I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together



1. NAME JANET HARSMAN PRINT NAME

ADDRESS [REDACTED]

[REDACTED] DATE Mar 12/2019

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME MICHAEL HARSMAN PRINT NAME

ADDRESS [REDACTED]

[REDACTED] DATE Mar 12/2019

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME PAM GORE PRINT NAME

ADDRESS [REDACTED]

[REDACTED] DATE 12/3/2019

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME RAY GORE PRINT NAME

ADDRESS [REDACTED]

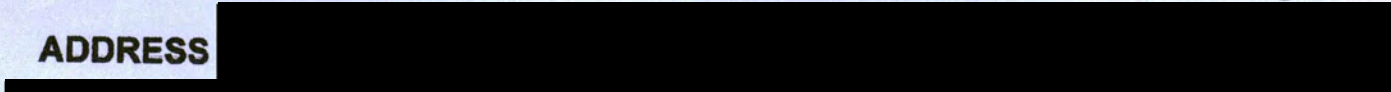
[REDACTED] DATE 12/3/2019

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

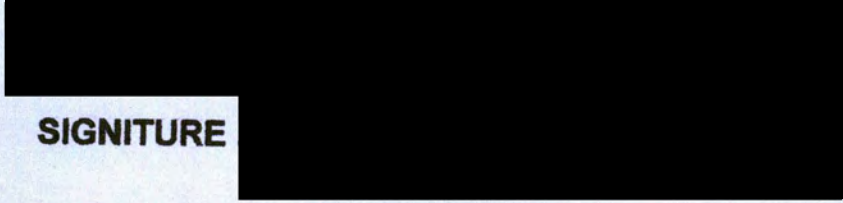
1. NAME CAROLE BAYLISS PRINT NAME CAROLE BAYLISS

ADDRESS



DATE 9.3.2019

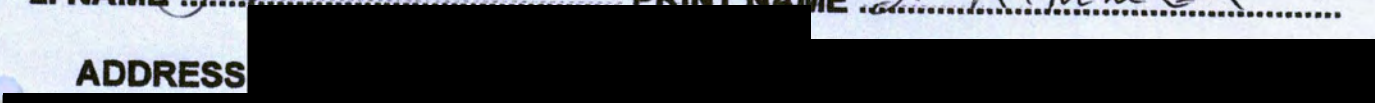
SIGNATURE



I give explicit permission for my name to be used in this response.

2. NAME J. Rimmer PRINT NAME J. RIMMER

ADDRESS



DATE 9.3.19

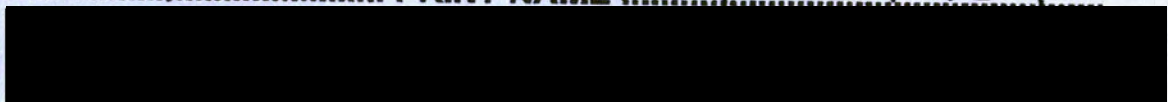
SIGNATURE



I give explicit permission for my name to be used in this response.

3. NAME R RIMMER PRINT NAME ROY RIMMER

ADDRESS



DATE 9.3.19

SIGNATURE



I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME *Tom Smith* PRINT NAME *TOM SMITH*

ADDRESS



DATE *10.03.19*

SIGNATURE



I give explicit permission for my name to be used in this response.

2. NAME *Vincent Hessey* PRINT NAME *VINCENT HESSEY*

ADDRESS



DATE *10.03.19*

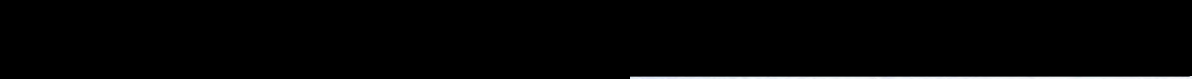
SIGNATURE



I give explicit permission for my name to be used in this response.

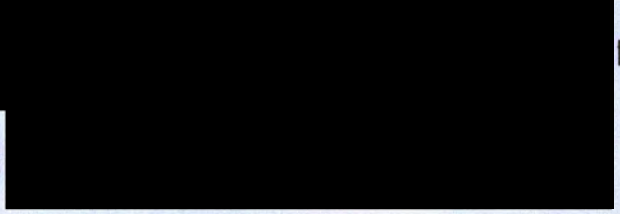
3. NAME *Amelia Hessey* PRINT NAME *AMELIA HESSEY*

ADDRESS



DATE *10.03.19*

SIGNATURE



I give explicit permission for my name to be used in this response.

4. NAME *Terry Hessey* PRINT NAME *TERRY HESSEY*

ADDRESS



DATE *10.03.19*

SIGNATURE



I give explicit permission for my name to be used in this response.

1. NAME Craig Hesse PRINT NAME CRAIG HESSEY

ADDRESS

[Redacted Address]

DATE 09/03/19

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

2. NAME Alice Hesse PRINT NAME ALICE HESSEY

ADDRESS

[Redacted Address]

DATE 10.03.19

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

3. NAME Jeff Smith PRINT NAME JEFF SMITH

ADDRESS

[Redacted Address]

DATE 10.03.19

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

4. NAME Val Smith PRINT NAME VAL SMITH

ADDRESS

[Redacted Address]

DATE 10.03.19

SIGNATURE

[Redacted Signature]

I give explicit permission for my name to be used in this response.

1. NAME Colette Leyland..... PRINT NAME COLETTE LEYLAND.....

ADDRESS [REDACTED]

..... DATE 11-3-19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME R. Anderson..... PRINT NAME R. ANDERSON.....

ADDRESS [REDACTED]

..... DATE 11.3.19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME G. Massey..... PRINT NAME G. MASSEY.....

ADDRESS [REDACTED]

..... DATE 11.3.19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME Georgia Massey..... PRINT NAME GEORGIA MASSEY.....

ADDRESS [REDACTED]

..... DATE 11.3.19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME S Glover PRINT NAME STUART Glover

ADDRESS [REDACTED]

DATE 11-3-19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME SARAH SIMPSON PRINT NAME S. SIMPSON

ADDRESS [REDACTED]

DATE 11.3.19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME SAMANTHA CUNLIFFE PRINT NAME

ADDRESS [REDACTED]

DATE 11.3.19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME PATRICIA CUNLIFFE PRINT NAME

ADDRESS [REDACTED]

DATE 11.3.19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME Michele Shimmin PRINT NAME

ADDRESS .

DATE 9/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME STUART SHIMMIN PRINT NAME

ADDRESS

DATE 9th march 19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME P. McLaughlin PRINT NAME PAUL S MCLAUGHLIN

ADDRESS

DATE 09/07/19

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME Mrs m casey PRINT NAME MICHELE CASEY

ADDRESS

DATE 9/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME Faye Middleton PRINT NAME FAYE MIDDLETON

ADDRESS [REDACTED]

DATE 09.03.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Colette McLaughlin PRINT NAME Colette McLaughlin

ADDRESS [REDACTED]

DATE 09.03.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME A. Burgess PRINT NAME Andrew Burgess

ADDRESS [REDACTED]

DATE 9.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME K Phillipson PRINT NAME K Phillipson

ADDRESS [REDACTED]

DATE 9/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME Swire PRINT NAME L. Swire

ADDRESS [REDACTED] DATE 9 MARCH 2019

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME I. SANDRAULT PRINT NAME Ian SANDRAULT

ADDRESS [REDACTED] DATE 9/13/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME E BURGESS PRINT NAME Elena BURGESS

ADDRESS [REDACTED] DATE 9/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME H Caddock PRINT NAME HELEN CADDOCK

ADDRESS [REDACTED] DATE 9.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

we have worked on this submission together

1. NAME Sandra Ince PRINT NAME SANDRA INCE

ADDRESS

DATE 9/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME GARY INCE PRINT NAME GARY INCE

ADDRESS

DATE 9.3.19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME Ann Ellis PRINT NAME ANN ELLIS

ADDRESS

DATE 9.3.19

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME Ann Bridge PRINT NAME ANN BRIDGE

ADDRESS

DATE 9-3-19

SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together

1. NAME Paul Gordon PRINT NAME Paul Gordon

ADDRESS [REDACTED]

DATE 9.03.19

SIGNI [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Liz Hunt PRINT NAME

ADDRESS [REDACTED]

DATE Liz Hunt

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME EWAL BJORKHANG PRINT NAME E. BJORKHANG

ADDRESS [REDACTED]

DATE 9/3/19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME Jane Blackburn PRINT NAME J. BLACKBURN

ADDRESS [REDACTED]

DATE 9/3/19

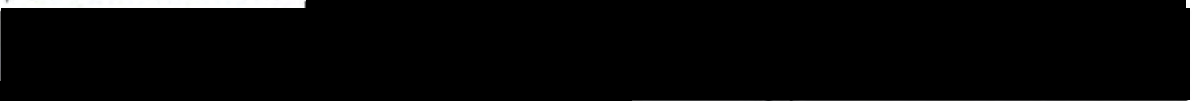
SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have worked on this submission together

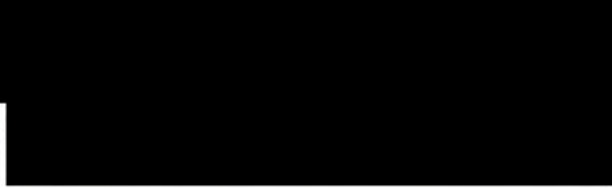
1. NAME AGNES..... PRINT NAME PARLESS.....

ADDRESS



DATE 9-3-2020.....

SIGNITURE



I give explicit permission for my name to be used in this response.

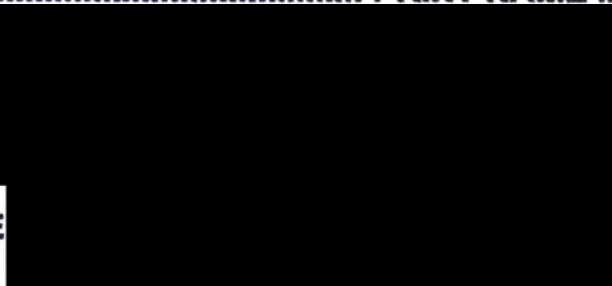
2. NAME IAN..... PRINT NAME LOMAX.....

ADDRESS



DATE 9-3-2019.....

SIGNITURE



I give explicit permission for my name to be used in this response.

3. NAME James + Mary..... PRINT NAME Bowden.....

ADDRESS



DATE 9-3-2019.....

SIGNITURE



I give explicit permission for my name to be used in this response.

4. NAME James..... PRINT NAME Bowden.....

ADDRESS



DATE 9-3-2019.....

SIGNITURE



I give explicit permission for my name to be used in this response.

We have worked on this submission together

We give our explicit permission for our names to be attached to this submission

④

1. NAME GERALD LUNT..... PRINT NAME GERALD LUNT.....

ADDRESS [REDACTED]

DATE 9. 3. 2019.....

SIGN [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME IAN GLAISTER..... PRINT NAME IAN GLAISTER.....

ADDRESS [REDACTED]

DATE 9 3 2019.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME Lisa Jones..... PRINT NAME LISA JONES.....

ADDRESS [REDACTED]

DATE 09/03/2019.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME CALL JONES..... PRINT NAME CALL JONES.....

ADDRESS [REDACTED]

DATE 09/03/19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have worked on this submission together

RO1084



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: GERALD	First name:
Last Name: LUNT	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 8 FRANCIS CLOSE RAINHILL, MERSEYSIDE	Address:
Postcode: L35 8PJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	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

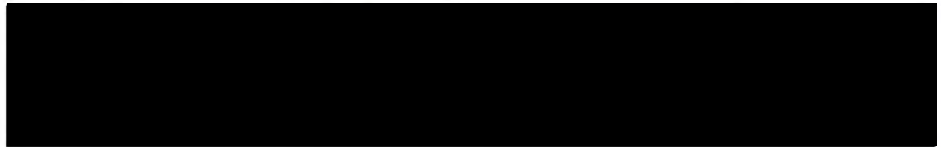
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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 – 5:00pm)**



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	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE SEE FOLLOWING PAGE.

WE BELIEVE THAT:-

- INCREASING HOUSING IN THE VICINITY OF RAINHAM IS UNSUSTAINABLE DUE TO THE FACT THAT LOCAL SCHOOLS ARE ALREADY OVERSUBSCRIBED, LOCAL DOCTORS SURGERIES AND DENTIST SURGERIES ARE FULLY SUBSCRIBED. THIS ENCOURAGES THE USE OF CARS TO REACH AVAILABLE SERVICES.
- RELATED TO THE ABOVE, LOCAL ROADS ARE ALREADY WORKING AT CAPACITY OR ABOVE CAPACITY. TRAFFIC CONGESTION AND POLLUTION IS A PROBLEM ON A DAILY BASIS.
- THE LOCAL AREA ONLY HAS ONE "A" ROAD, A57 WARRINGTON ROAD, TO SERVE THE AREA UNDER CONSIDERATION, PLUS ADDITIONAL DEVELOPMENTS IN THE NEIGHBOURING KNOWLEDGE UNDER THE LIVERPOOL CITY REGIONAL PLAN.
- THE BOROUGH ALREADY HAS MUCH HIGHER RATES OF DEATH FROM RESPIRATORY DISEASE THAN THE REST OF THE NORTH WEST, AND THE REST OF ENGLAND. THE INCREASED TRAFFIC CONGESTION WILL ONLY MAKE THIS BAD SITUATION WORSE.

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 greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

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"/>	<input type="checkbox"/>
--------------------------	--	--------------------------	--------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

1. NAME L. E. Lunt PRINT NAME LISA. E. LUNT

ADDRESS [REDACTED]

DATE 12-3-19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME [REDACTED] PRINT NAME Rosie. E. Lunt

ADDRESS [REDACTED]

DATE 12/3/19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME LYNDA MOSS PRINT NAME LYNDA MOSS

ADDRESS [REDACTED]

DATE 12/3/19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME KEITH MOSS PRINT NAME KEITH MOSS

ADDRESS [REDACTED]

DATE 12/3/19

SIGNITURE [REDACTED]

I give explicit permission for my name to be used in this response.

RO1085

408

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>ERROL</u>	First name:
Last Name: <u>LYNCH</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>47 REGAL DRIVE</u>	Address:
<u>WINDLE ST - HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>WA10 6BJ</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 11/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
✓									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO BASED ON FLAWED METHODOLOGY.
Effective?	<input checked="" type="checkbox"/> NO THE PLAN IS NOT DELIVERABLE.
Consistent with National Policy?	<input checked="" type="checkbox"/> NO IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Why use GREEN BELT when there is no much BROWNFIELD LAND available? To develop housing in the past, remediation has been required i.e. The Shires, Providence Hospital E.T.C. BUT IT WAS DONE. Why use our heritage of GREEN BELT for developers profits. Also KNOWSLY developed the B.I.C.C. site (contaminated land) IT CAN BE DONE. The loss of G/BELT + Building out of town, causes unsustainable congestion, air quality, + general health issues. Local services i.e. doctors, hospitals, schools, It does not promote less use of cars, as they are edge of town' developments.

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.

Keep all GREEN BELT for future generations. Re-develop BROWNFIELD it can be done, plenty of examples in the town and neighbouring areas.

The impact on farming for the future after leaving the E.U. has not been considered, we will need land to grow crops F.T.C. Economic growth predictions are based on flawed data.

The traffic congestion at Winkle Island and parking round roads near schools is already a major problem which will be made much worse.

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.

RO1086



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

409

Ref: LPSD

12 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>KATHLEEN</u>	First name: _____
Last Name: <u>LYNCH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>47 REGAL DRIVE</u>	Address: _____
<u>WINDLE,</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6BJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 11/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
✓										
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No Based on flawed methodology
Effective?	<input checked="" type="checkbox"/> NO plan not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> NO. plan does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>From available information the plan makes no mention of Brownfield and previously developed land, that is not yet available or included in the Brownfield register. To develop housing on Brownfield sites remediation is required. But it has been done. I.e. The Shires, Providence Hospital, also in Knowsley on the B.I.C.C. site.</p> <p>This plan will have an impact on local communities. Building 1,000 Homes. will increase traffic seeking access to the A580. Also parking. Key services, hospitals, Doctors, Dentists, + schools.</p> <p>Some green belt land is farmland which may be badly needed. also it gives a quality to life, and space between increasing developments. Keep our Green Belt land yes, but not for further developments.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Keep all Green Belt Land for future generations. its their heritage.

There is proof Brownfield sites can be developed. Maybe at a cost. But to lose our Green Belt land would come at a greater cost to the environment and ourselves.

Traffic congestion at Winkle Island and parking in the surrounding area is a major problem.

There will be an impact on key services, which are already stretched. Schools, hospitals, Doctors, Dentists

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
----------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1087



St Helens Borough Local Plan 2020-2035 Representation

sue lyon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:12



1 Attachment

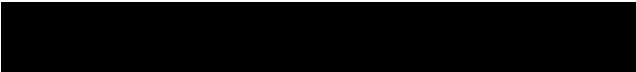


St Helens Borough Local Plan 2020-2035 Representation.pdf

Please find attached completed representation form, can you please confirm receipt.

Very Best regards

Sue Lyon





St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SUE

Last Name: LLOYD

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 9/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
			✓	✓

Other documents (please name document and relevant part/section)

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

• Doesn't meet areas needs because there is no infrastructure in place - There is no need for the houses - There are no exceptional circumstances to use greenbelt Land.

• Although we have a train station there are no parking facilities, Disability or Child Friendly facilities. To go to the other side of the station you have to travel to Brynna + Double back.

• Extra traffic will increase the commute giving less time/worklife balance, additional pollution + the detrimental effect to wildlife.

• Reduce Garwood Residents Quality/Standard of living - No infrastructure extra pollution + Extra travelling time.

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 plan would be fairer if NO Greenbelt land was developed until all Brownfield has been used first, as the manifesto states that all greenbelt should be protected.

Urban Sprawl - Greenbelt land is meant to separate towns + villages

There would be no financial benefit for the council as the money they raise in council tax they will ultimately lose in the costs involved in sending the children to Wigan schools

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1088



St Helens Borough Local Plan 2020 Representation Form.

Laura Lyon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:46



1 Attachment



Laura St Helens Borough Local Plan 2020-2035 Representation.pdf

I have attached the St Helens Borough Local Plan 2020 - 2035 Form.

Kind Regards,

Laura



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.** Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: LAURA

Last Name: LYON

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 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 (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- No exceptional circumstances to build on greenbelt with St Helens population declining.
- Does not meet the needs as there is no infrastructure in place to cope with extra housing, we have no dentists, doctors, schools etc full.
- Will increase the size of the village by 1/3rd, which is excessive.
- Will create more pollution with extra traffic and with Florida farm around the corner, it will affect residents health.
- It is a good area for local residents to walk their dogs in the 'countryside' with relative safety if this is built on the only other places are footpaths which are isolated.
- Damage to wildlife.

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.

Build on Brownfield land first and no building on green belt land until all brownfield has been built on in line with the manifesto to protect the greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--	--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1089

① - LPA05
② - LPA06

PF0393

431

Ref: LPSD

12 MAR 2019

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title:
First Name: <u>Beth</u>	First name:
Last Name: <u>Lyon</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>15 Peebles Close</u>	Address:
<u>Ashton-in-Makerfield</u>
<u>Wigan</u>
Postcode: <u>WN4 0SP</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>12/03/19</u>
-----------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
See separate sheet attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

①

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
See separate sheet attached

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green Belt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

RO1090



① - LPA05
② - LPA06

432

PF0394

Ref: LPSD

12 MAR 2019
(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Stephen</u>	First name: _____
Last Name: <u>Lyon</u>	Last Name: _____
Organisation/company: <u>MMS</u>	Organisation/company: _____
Address: <u>15 Peebles close Ashton-in-Makerfield. Wigan</u>	Address: _____
Postcode: <u>WM4 0SP</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>12/03/19</u>
------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u> If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
See separate sheet attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

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 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.

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out your comments.</u>
See separate sheet attached

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removed from the Green Belt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

2

RO1091



St. Helens Council

457

12 MAR 2019

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>BETTY</u>	First name: _____
Last Name: <u>LYON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>589 GARSWOOD RD</u> <u>NORTH ASHTON, WIGAN</u> <u>LANCS</u>	Address: _____
Postcode: <u>WN4 0XH</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____ Date: 10-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See separate sheet attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<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.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	PA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See separate sheet attached

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

RO1092

563

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

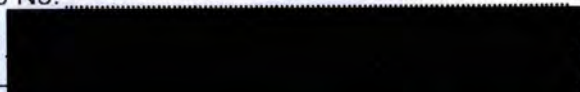
This form has two parts;

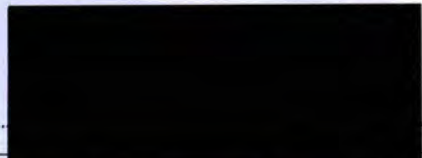
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DAVID</u>	First name:
Last Name: <u>LYON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>100 BILLINGE ROAD</u>	Address:
<u>ASHTON IN MAKERFIELD</u>
<u>WIGAN</u>
Postcode: <u>WN4 0XD</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: 	Email:

Signature:  Date: 10/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.
1 view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.
See separate sheet attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
See separate sheet attached

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

2

LPA05 – SITE 1HS

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

RO1093



St. Helens
Council

741

13 MAR 2019

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

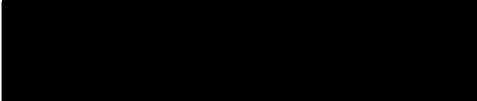
Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>MAUREEN</u>	First name:
Last Name: <u>CHORLEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>8 SPINNEY GREEN</u>	Address:
Postcode: <u>WA10 5AH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>12/3/19</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	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment				
		8H5	✓					
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Increased traffic from extra housing.
Windle island is being improved but access to it will become even more congested.
Agricultural land should be the final option for removal for 'Green Belt' land.

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 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 UK needs to keep its agricultural land and not be dependant on unnecessary imports. Despite the increased cost of preparing contaminated land this should be a first option to releasing land. Developers should share in these costs.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1094

305

Ref: LPSD
06 MAR 2019
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

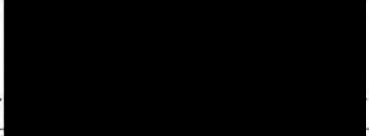
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>LYONS</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>8, BRENTWOOD CLOSE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 5NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 28/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>As set out in box 5</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Use brownfield sites before using green belt land

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination	✓	Yes, I wish to participate at the oral examination
--	--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1095

306

Ref: LPSD

06 MAR 2019

(For official use only)



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SARAH</u>	First name: _____
Last Name: <u>LYONS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24, Hamilton Road</u> <u>Windle</u> <u>St. Helens</u>	Address: _____
Postcode: <u>WA10 6HG</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>28/2/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p style="text-align: center;">See Box 5</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

use brownfield sites before
using green belt land

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1096

307

Ref: LPSD
06 MAR 2019
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>ANDREW</u>	First name:
Last Name: <u>LYONS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>24 HAMILTON ROAD</u>	Address:
<u>WINDLE</u>
<u>ST. HELENS</u>
Postcode: <u>WA10 6HG</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 28/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input 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"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
See Box 5

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.

Use brownfield sites before using greenbelt land

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	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.

RO1097

308



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

06 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

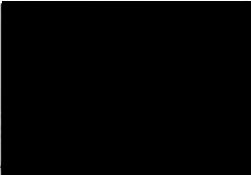
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DAVID</u>	First name:
Last Name: <u>LYONS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5, GUNNING AVE</u>	Address:
<u>ECCLESTON</u>
<u>ST. HELENS</u>
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date: 28/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email) No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input 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"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p style="text-align: center;">See Box 5</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Ensure all brownfield sites are given priority over greenbelt land

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	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.

RO1098

Representor Details

Web Reference Number	WF0384
Type of Submission	Web submission
Full Name	Miss Alison Macdonald
Organisation	
Address	181 Billington Avenue Newton-le-Willows Merseyside WA12 0AU
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	The Green Belt Review 2018 Appendices B&C Part 3
Policies Map	GBP_053_C
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	GBP_053_C

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.

The plan considers removing green belt land for development.

The plan with reference to GBP_053_C, is identified as making only a moderate contribution to preventing two settlements merging. However what it does not recognise is this is productive arable land, producing annual food crops.

Government data states the UK produces less than 50% of its food.

We therefore should not be removing our ability to continue using this valuable resource.

Additional to this, any development on the specified site will have an impact on the natural habitat and food sources of the wildlife in the area, including but not limited to birds of prey and bats that roost in the area and that are seen on a regular basis.

7. Please set out modification(s) you consider are necessary

To only use brown field sites and sites that will have only limited impact on food-producing resources and limited impact of local wildlife, their habit and food-chains.

Do not include farmland that is currently in use or can be utilised again in the future.

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 1:48:28 PM
---------------	---------------------

RO1099



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).

1209

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>KOSWITHA</i>	First name:
Last Name: <i>MACKEY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2 Frenchfields Crescent Clock Face St. Helens</i>	Address:
Postcode: <i>WA9 4FZ</i>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

N/A

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.

RO1100

①-LPA05 ②-GEN ③-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0253
Type of Submission	Web submission
Full Name	Mrs Susan Mackenzie
Organisation	
Address	29 Seddon Close, St Helens Merseyside 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	
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:

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

③

①

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 acheived 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.

②

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	3/10/2019 4:50:40 PM
---------------	----------------------