



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO1801 – RO1900

SEPTEMBER 2020

RO1801



St. Helens
Council

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>SAUNDRA</u>	First name: _____
Last Name: <u>WALKER</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>5 WHITBURN CLOSE</u> <u>GARRWOOD</u>	Address: _____
Postcode: <u>WN4 0RL</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	mail: _____

Signature: [REDACTED]	Date: <u>9/3/2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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RETURN DETAILS

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post to:

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Town Hall
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St Helens
WA10 1HP**

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Telephone: **01744 676190**

NEXT STEPS

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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>USING GREEN BELT LAND INSTEAD OF BROWN POLLUTION OF AREA LOSS OF WILDLIFE TRAFFIC CONGESTION NOT ENOUGH SCHOOL PLACES OVER STRETCHING DOCTORS</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 BROWN BELT LAND INSTEAD OF GREEN
WE NEED OUR FARM LAND EVEN MORE
WHEN WE LEAVE E.U.

Please continue on a separate sheet if necessary

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

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

NO

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.

RO1802



St. Helens
Council

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

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Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>WALKER</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>5 WHITBURN CLOSE</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>W014 0RL</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>9/3/2019</u>
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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	✓		✓		✓		✓		✓
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"/>

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>TRAFFIC IN BAD ENOUGH NOW HARD TO GET OUT OF GARWOOD.</p> <p>POLLUTION</p> <p>ROADS NEED REPAIRING NOW BUT WOULD GET WORSE.</p> <p>GREEN BELT SHOULD BE USED FOR FARMING WHY NOT USE</p> <p>BROWN</p> <p>LOCAL WILDLIFE WILL BE KILLED</p> <p>DOCTORS + SCHOOLS OVER STRETCHED</p>

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

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WE NEED OUR FARM LAND EVEN MORE
WHEN WE LEAVE THE EU.

Please continue on a separate sheet if necessary

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X

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

Yes, I wish to participate at the oral
examination

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

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

Please keep a copy for future reference.

62 MILLBROOK LANE

ECCLESTON

ST HELENS. WA10 4QY

11. MARCH 19.

DEAR SIR/S

ST HELENS BOROUGH LOCAL PLAN.

I ENCLOSE COMPLETED COMMENT FORM.

YOURS FAITHFULLY

T. GAWKIN.

LOCAL PLAN

ST HELENS COUNCIL

TOWN HALL

VICTORIA SQUARE

ST HELENS

WA10 1HP.

Copy File.

RO1803



St. Helens
Council

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

Ref: LPSD

30 APR 2019

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

Part A – Personal Details

Part B – Your Representation(s).

899

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: laura	First name:
Last Name: Walker	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Pool End Parr St Helens	Address:
Postcode: WA9 3RE	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 23/4/19.
-----------------------	----------------

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

Yes ☐ (Via Email)

No ☐

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

RO1804



St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of the Knowsley Estate
Olivia Hewitt/GBR

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:05

① - LPA05

② - LPA06

③ - TABLE 4-6

2 Attachments



lpsd-representation-form_The Knowsley Estate_Bushey Lane.pdf



Land at Bushey Lane - St Helens - Reps - FINAL.pdf

④ - LPA02

⑤ - GREEN BELT REVIEW

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of The Knowsley Estate with regards to land at Bushey Lane.

I would be grateful if you could confirm receipt of this email and the attachments, and keep us updated on the progress of the Local Plan.

Please don't hesitate to let me know should you have any queries.

Kind Regards,

Olivia

Olivia Hewitt MRTPI
Consultant - Manchester
Development and Planning



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WAKEFIELD**

1 Marsden St | Manchester M2 1HW | UK

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St.Helens
Council

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

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Miss
First Name: Simon	First name: Claire
Last Name: Waller	Last Name: Pegg
Organisation/company: The Knowsley Estate	Organisation/company: Cushman & Wakefield
Address: The Estate Office, Knowsley Park Prescot Merseyside Postcode: L34 4AG	Address: 1 Marsden Street Manchester Postcode: M2 1HW

Signature: [Redacted]

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.

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Yes ☒ (Via Email)

No ☐

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

Policy	LPA02; LPA05; LPA06;	Paragraph / diagram / table		Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review					

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

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

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

Please tick as appropriate

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

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

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

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

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

Please see accompanying statement of representations.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

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

To assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, The Knowsley Estate would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the sites to the north and south of Bushey Lane, Rainford. The Knowsley Estate do not consider that this can be achieved by relying on the submitted written representations alone.

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 St. Helens Borough Local Plan 2020-2035 Submission Draft

KNOWSLEY ESTATE

March 2019

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Disclaimer

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1.0 Introduction

- 1.1 These representations have been prepared by Cushman & Wakefield on behalf of the Knowsley Estate to the St. Helens Borough Local Plan 2020-2035 Submission Draft.
- 1.2 This document promotes approximately 69.5 acres (28.1 hectares) of land at Bushey Lane, Rainford, split into two parcels to the north and south of Bushey Lane as shown at Figure 1 below. The northern plot extends to approximately 31.3 acres (12.6 hectares), whilst the southern plot of land extends to approximately 38.2 acres (15.5 hectares).



Figure 1: Site boundary

- 1.3 The site lies adjacent to the western edge of Rainford Junction, and adjoins Bawdy Brook to the north, residential dwellings to the east and the Manchester to Kirkby rail line to the south. Residential dwellings adjoin to the west, beyond which is the A570 / Rainford Road.
- 1.4 The Knowsley Estate owns the freehold of the land shown in Figure 1.

- 1.5 The Knowsley estate comprises a significant single land holding in the sub-region including Knowsley Hall and Knowsley Safari Park. The Estate is a key stakeholder in the growth and development of the area and given the growth and employment opportunities, considers it clear that there is a real need for additional housing in the area to enable reinvestment.
- 1.6 Land south of Bushey Lane was previously allocated in the draft Local Plan as safeguarded housing land (ref. HS19), however the allocation has been removed in the Submission Draft with the land to remain as Green Belt. The justification for the removal of this allocation is contained in the Green Belt Review.
- 1.7 We strongly disagree with the Council's reasoning for and conclusion that the allocation should be removed and have set out these areas of disagreement throughout these representations. We have sought to demonstrate that the land south of Bushey Lane should be retained as an allocation, and further that it is suitable for delivery of housing in the short-term.
- 1.8 This report also demonstrates that the wider site, including land north of Bushey Lane is suitable, available, developable and immediately deliverable for the delivery of new housing.

Previous Representations

- 1.9 Land south of Bushey Lane has previously been promoted on behalf of The Knowsley Estate, with representations made in support of the proposed allocation to earlier stages of the Local Plan.

Report Structure

- 1.10 This document is structured as follows:
- Section 2 – Proposed Housing Requirement and Allocations
 - Section 3 – Green Belt Review
 - Section 4 – Site Opportunity
 - Section 5 – Conclusion

2.0 Proposed Housing Requirement and Allocations

Housing Requirement

- 2.1 We note that Policy LPA05 of the Submission Draft proposes a housing requirement of at least 9,234 dwellings over the plan period, equivalent to 486 dwellings per annum (dpa). This is a decrease from 570 dpa set out in the previous draft of the Local Plan. No explanation is provided for this decrease.
- 2.2 It is recognised that the housing requirement has utilised the standard methodology for assessing housing need (including the 2014-based household projections) and that this gave a starting point of 482 dpa.
- 2.3 The PPG¹ is clear that the standard method provides a minimum figure and should be uplifted where for example, growth strategies are proposed, as this will result in an increase in housing need likely to exceed past trends.
- 2.4 The submission draft of the Local Plan is clear that the LPA aspires for significant economic growth, with Policy LPA04 proposing to allocate 215.4 ha of land for employment development. Policy LPA03 states that the Council seeks to retain and grow their population and thus there are clear growth strategies proposed.
- 2.5 An uplift of 4 dpa from the minimum figure calculated is not considered to align with this economic growth strategy and it is thus strongly considered that a more significant uplift should be included for within the Council's housing need.
- 2.6 The January 2019 SHMA Update explored two economic growth scenarios, which resulted in forecasts of 479 and 514 dpa (Economic Scenario 3 and 2 respectively). Given 479 dpa is below the figure calculated by the standard method and the Council's housing need should account for growth, we therefore consider Economic Scenario 2 to be more realistic and the housing requirement should be uplifted accordingly.

Safeguarded Land

- 2.7 The Submission Draft of the Local Plan identifies proposed allocations for housing within two categories – Strategic Housing Sites (Policy LPA05.1) and Safeguarded Land (Policy LPA06).
- 2.8 Land south of Bushey Lane was previously allocated within this latter category under allocation ref. HS19, however this has been removed in the Submission Draft of the Local Plan.
- 2.9 Safeguarded Land is identified in the draft Local Plan as required to meet *"longer term development needs well beyond the Plan period ... [and] planning permission ... will only be granted following a future Local Plan review that proposes such development"*.
- 2.10 The current wording of Policy LPA06 does not explicitly identify when a Local Plan review will be undertaken. Policy LPA06 should be revised to clearly identify a review mechanism of at least once every 5 years to accord with paragraph 33 of the NPPF and allow safeguarded sites to be brought forward earlier in the plan period should the review confirm that the Council are failing to meet their housing needs.

Proposed Housing Allocations

- 2.11 We note that in assuming the capacity of the proposed housing allocations, the Council has assumed a blanket net developable area (NDA) of 75% of the gross area across each allocation. This assumption lacks evidence with paragraph 3.45 of the 2017 SHLAA simply stating this reflects the

¹ Paragraph: 010 Reference ID: 2a-010-20190220

Economic Viability Assessment (EVA); and paragraph 3.30 of the EVA merely stating this reflects the 2017 SHLAA.

- 2.12 No evidence is provided in either document as to how this 75% gross to net ratio has been determined as appropriate, whether this reflects the local situation or whether this is appropriate to be blanket applied to every allocation.
- 2.13 The minimum density varies from between 30 to 42 dwellings per hectare. No justification is provided as to how or why some sites are capable of achieving these higher densities. This range in densities is not consistent with the 2017 SHLAA which suggests density assumptions of 25, 30, 40 or 50 dph only.
- 2.14 Within this context and with reference to the site profiles contained at Appendix 5 of the Local Plan, we have commented below against some of the proposed allocations to highlight site-specific issues and why for these sites the NDA should therefore be reduced below 75% (notwithstanding our above comments):
- **Site ref. 4HA** – The site profile states that the site requires “extensive green links through and around the site”, as well as new tree planting. and new tree cover. On-site education provision is required.
 - **Site ref. 5HA** – We note that a higher minimum density is proposed of 35 dwellings per hectare (dph), however no justification for this is provided. This contradicts with the site profile which states “development should integrate well into the Bold Forest Park setting” which will naturally require a lower density or NDA.
 - **Site ref. 6HA** – The site profile states that a green corridor should be provided, as well as measures to slow the flow and enhance biodiversity along the culvert. Measures, which could include a buffer, will be required to attenuate noise. Furthermore, the profile notes that 4ha of B1 employment use is required. It is not clear whether this is already excluded from the gross area.
 - **Site ref. 7HA** – The site profile makes clear that mitigation measures will be required for a range of issues including flooding, noise and the consideration of existing protected trees.
- 2.15 These observations highlight a range of issues with some of the proposed allocation sites. Whilst we do not dispute whether these issues may be capable of being overcome, it is clear that they will reduce the NDA below the typical level currently being assumed. This will therefore reduce the minimum dwelling capacity of these sites, reducing the overall capability of the Council to meet its OAN making it imperative that the Council considers additional sites for allocation.
- 2.16 We note from Table 4.6 of the draft Local Plan that the Council have included for varying allowances for non-delivery of sites, including a 15% reduction in SHLAA capacity for non-delivery and a 20% allowance on Green Belt sites for non- or delays in delivery.
- 2.17 This inconsistency is not considered sound and a 20% allowance for non- or stalled delivery should be applied to both SHLAA and Green Belt sites. SHLAA sites, particularly those not within the 5-year supply, are not considered less likely to face issues with delivery. Applying a consistent allowance for non- or stalled delivery will further require additional sites to be allocated or at least safeguarded for housing delivery.
- 2.18 In summary, we consider that there has been no substantial justification provided for the downward adjustment of the housing requirement with a key issue around the housing requirement not aligning with the Council's significant economic growth aspirations. The housing allocations do not allow for sufficient variety and flexibility in the delivery of land to prevent against under-delivery.

3.0 Spatial Distribution of Development

- 3.1 As part of the Local Plan evidence base, the Council has undertaken a review of the Green Belt (GB). The methodology and assessment results are set out in the Green Belt Review, December 2018. ✓
- 3.2 The draft Local Plan recognises that a number of sites must be released from the GB for the Council to meet its housing and employment needs. ✓
- 3.3 Paragraph 4.18.11 of the draft Local Plan acknowledges that the GB Review methodology has resulted in some key settlements not having had any suitable sites identified within or near to them. ✓
- 3.4 This is particularly the case for Rainford, which Policy LPA02 identifies as a Key Settlement, where sustainable regeneration and growth will be focussed. The supporting text to Policy LPA02 states that land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements. ✓
- 3.5 Paragraph 4.63 of the draft Plan identifies Rainford Junction as a "satellite settlement" but recognises the close relationship between Rainford and Rainford Junction with Rainford acting as a service centre for Rainford Junction, whilst the latter provides a valuable train link. ✓
- 3.6 Further, the Spatial Vision sets out the Council's aspiration for the "balanced regeneration and sustainable growth of its built-up areas". ✓
- 3.7 It is significant that just one housing allocation (ref. 8HA) is proposed in, adjoining or even close to Rainford and it is therefore clear that the GB Review process conflicts with the aspirations of Policy LPA02, the Spatial Vision and Strategic Objectives.] (4)
- 3.8 Paragraph 8.19 of the January 2019 SHMA Update identifies barriers to owner-occupation in St Helens due to access to capital for deposits. The SHMA notes that schemes such as Help-to-Buy can assist with this, alongside other affordable housing products. New build developments on greenfield or GB sites are best placed to meet this affordable housing need as they do not face the same viability issues as smaller, technically constrained or brownfield sites.] (4)

4.0 Green Belt Review

- 4.1 This chapter comments specifically on the assessments undertaken in the Green Belt (GB) Review of the relevant GB parcels and sub-parcels.
- 4.2 Land north of Bushey Lane is contained in Green Belt Parcel (GBP) 001, specifically sub-parcel GBP_001_A, with land south of Bushey Lane contained in GBP_002. There are no sub-parcels for GBP_002. Figure 2 below comprises an extract from Appendix A (North Map) of the GB Review.

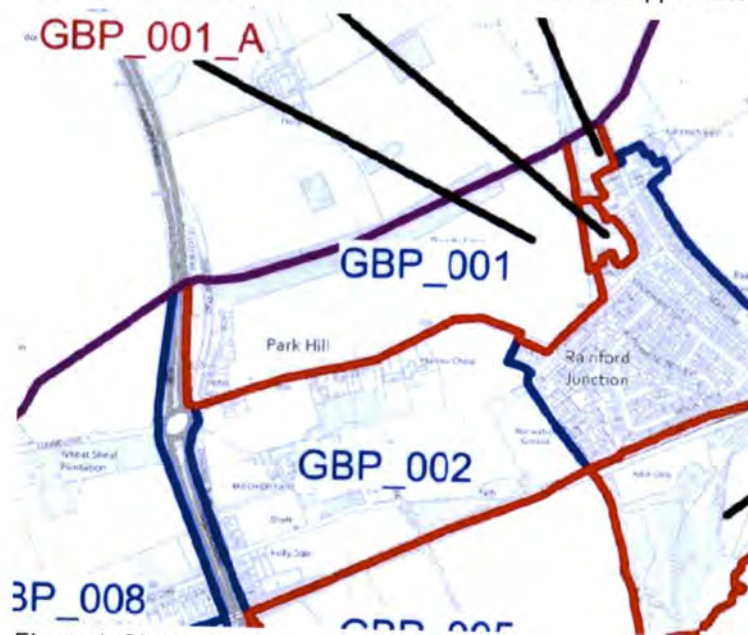


Figure 1: Site boundary

Stage 1B Assessment

- 4.3 We now turn to the Stage 1B assessment of the GB parcels within which the site is located.
- 4.4 Sub-parcel GBP_001_A scored medium at Stage 1B, with parcel GBP_002 scoring low.
- 4.5 The detailed sub-parcel assessments are contained at Appendix C of the GB Review. We do not disagree with the scoring for GBP_002 but consider the assessment for GBP_001_A to be incorrect and have undertaken a reassessment as set out in the table on the following page.
- 4.6 When discussing the boundary features, we have referred to Table 2.1 of the GB Review which explicitly states protected woodlands greater than 20m in width should be considered strong boundary features.

We have also considered paragraph 2.18 of the GB Review which defines "sprawl" as an untidy or irregular spread [of development]. Paragraph 2.19 then states that in determining the extent to which sprawl may occur, the sub-parcel size, degree to which it is contained by the edge of the existing urban area and other strong physical features should be considered.

Green Belt Purpose	Council Assessment/ Score	C&W Assessment/ Score
1. To check the unrestricted sprawl of large built-up areas.	The sub-parcel is contained to an extent with strong physical boundaries in the form of the railway line to the east, Bushey Lane to the south, and Rainford Road (A570) to the west. The sub-parcel does not directly adjoin or lie in	The sub-parcel is well-contained with strong physical features along its boundaries. Bawdy Brook and an associated area of woodland approximately 60m deep adjoin the site along its northern boundary, Rainford Road (A570)

	<p>close proximity to an identified large built-up area. Although it is recognised the parcel is sizeable relative to existing development at Rainford Junction, it is unlikely to lead to substantial sprawl in its own right if released from the Green Belt for development.</p> <p>Score: Medium</p>	<p>adjoins to the west, the railway line and Rainford Junction to the east and Bushey Lane to the south.</p> <p>We concur with the Council's assessment that the development of the parcel will not lead to sprawl if released from the Green Belt.</p> <p>Score: Low</p>
2. To prevent neighbouring towns merging into one another	<p>The sub-parcel does not lie adjacent to an identified settlement and provides limited contribution in itself toward preserving a strategic gap between identified settlements.</p> <p>Score: Low</p>	<p>Agreed</p> <p>Score: Low</p>
3. To assist in safeguarding the countryside from encroachment	<p>The sub-parcel is predominantly an agricultural field although some forms of inappropriate development are present, notably a string of several residential dwellings and pub/restaurant to toward the western boundary off Ormskirk Road. There are also intermittent residential dwellings and a garage adjacent to the south along Bushey Lane.</p> <p>The sub-parcel is relatively well enclosed by the existing treelines to the north and east; although it does retain a sense of openness facing west.</p> <p>Score: Medium</p>	<p>As per the comments made against the first GB purpose above, we consider the sub-parcel is strongly enclosed by strong boundary features.</p> <p>These strong boundary features contribute to a relatively limited sense of openness. We do not consider there to be a sense of openness facing west as this is obstructed by a string of residential dwellings and the A570.</p> <p>Whilst the majority of the sub-parcel comprises an agricultural field, inappropriate development has encroached on its western boundaries.</p> <p>Score: Low</p>
Summary	<p>The sub parcel's role in preventing sprawl is moderate although its role in preventing merger is limited. It maintains a moderate degree of countryside character and openness.</p> <p>Score: Medium</p>	<p>The sub-parcel is well-contained and bound by strong physical features on all sides.</p> <p>The sub-parcel is considered to have strong potential for development and the development would not result in urban sprawl.</p> <p>Score: Low</p>

- 4.7 As set out above, we consider both sub-parcels should have had their overall contribution to the GB assessed as 'low'.

Stage 2A Assessment

- 4.8 We concur with the Council's assessment that neither parcel/ sub-parcel has 'prohibitive' constraints present.

Stage 2B Assessment

- 4.9 Both parcel GBP_001_A and GBP_002 were assessed in Stage 2B as having limited development potential. We do not agree with this assessment and consider both sites to have good potential for residential development within the plan period (to 2035) and they should be at least safeguarded for development.
- 4.10 The GB Review does not clearly set out how the assessment of a site against the list of constraints (Table 2.7), transport accessibility and ownership and viability has resulted in a score of good, medium or limited development potential for Stage 2B.
- 4.11 The lack of transparency in this stage of the GB assessment coupled with a lack of proformas for

those sites which were assessed at Stage 2B has rendered it impossible to undertake a comparable and fair Stage 2B assessment of GBP_001_A and GBP_002.

- 4.12 Nonetheless we have briefly considered the parcels against both the Stage 2B criteria below and the comments made in Table 5.4 of the GB Review when considering whether the parcel/sub-parcel should be allocated, safeguarded or discounted.
- 4.13 For ease of comparison to the Council's comments made in Table 5.4, we have set this out in a table to allow for a side-by-side commentary on the assessment.

GBP_001_A

Council Assessment (contained in Table 5.4 of the GB Review)	C&W Assessment
<p>There are significant constraints which affect this sub-parcel that impact on its developability. The sub-parcel comprises of Grade 1 agricultural land.</p>	<p>We do not consider there to be any significant or insurmountable constraints to development at the sub-parcel. Whilst we acknowledge that the site is currently Grade 1 agricultural land, we would comment that the vast majority of Green Belt land in St Helens comprises Grade 1, 2 or 3 agricultural land.</p> <p>Whilst it is therefore inevitable that some 'best and most versatile' (BAMV) land will be lost for housing, this will unlikely have a significant impact and should be balanced against the significant amount of BAMV land that will remain in the Borough.</p>
<p>It is also a considerable distance from the nearest local centre (Rainford) and key local amenities (including the nearest primary school).</p>	<p>Primary schools, high schools and a college are located close by in Rainford which is not considered to be an unreasonable distance from the site. Further, the proposed residential development at Rainford Junction could create sufficient population growth to support a primary school in Rainford Junction itself, ensuring a sustainable pattern of development across St Helens.</p> <p>The Council's assessment fails to consider that there is a convenience store within 800m of the eastern edge of the site (located on Kendall Drive), the route to which could be upgraded as part of any development at the parcel, subject to viability.</p> <p>Similarly, the Council fails to consider that the edge of the sub-parcel is within 750m walking distance of Rainford train station and is close to bus stops along Bushey Lane.</p>

<p>Its development for housing would not be focussed on any Key Settlement and would therefore not support the spatial strategy of the Plan. Development of the sub-parcel would also result in the disproportionate growth of Rainford Junction.</p>	<p>The draft Plan identifies Rainford Junction as a "satellite settlement" but recognises the close relationship between Rainford and Rainford Junction with Rainford acting as a service centre for Rainford Junction, whilst the latter provides a valuable train link.</p> <p>Development at Rainford Junction would be consistent with the spatial vision and strategic objectives to deliver sustainable and balanced growth and regeneration in a location that is well enclosed on all sides thus resulting the impact on the wider Green Belt.</p> <p>Furthermore, the site is a sustainable location for growth with a railway station, bus services and close proximity to a key settlement.</p>
<p>A Local Wildlife Site (LWS; Bawdy Brook) runs along the northern boundary, alongside which any development would require a considerable buffer.</p>	<p>Whilst we acknowledge the presence of an LWS to the north, the site is sufficiently large that a suitable buffer can be incorporated into any development at the site and likely to be able to contribute to enhancing the LWS.</p>
<p>Also, as the sub-parcel is believed to provide functionally linked habitat connected to European sites in the wider area (likely to be used by Pink Footed Geese), any development proposal would need to be accompanied by a suitable ecological study informed by the findings of a wintering bird survey. It would also need to include an appropriate mitigation strategy to address any loss of or harm to the habitat.</p>	<p>The Council comments that the site "<i>is believed to</i>" provide a linked habitat to nearby European sites. This comment appears unfounded and not based on any up-to-date ecology surveys.</p> <p>Nonetheless, the Council also recognise that a mitigation strategy could be prepared to ensure there is no significant adverse impact.</p> <p>The Knowsley Estate are prepared to undertake these surveys to identify any necessary mitigation measures.</p>
<p>When the constraints associated with the parcel are considered cumulatively it is clear that it would not be suitable as a potential development site to be released from Green Belt. Development here would not support a sustainable spatial approach to meeting future housing needs.</p>	<p>The Council does not afford any consideration to there being no highway or access issues that could restrict delivery of development at the site. The sub-parcel adjoins the adopted highway, whereby safe and convenient vehicular access can be provided from Bushey Lane. Bushey Lane then connects nearby to the A570, which is in turn a <5-minute drive to the M58.</p> <p>Further, the Council does not recognise that the site is in a single ownership and there are no ransom issues to prevent development.</p> <p>Development at this location would support the sustainable growth of Rainford Junction, potentially reduce its role as a satellite settlement and its reliance on Rainford and enable a more diverse spatial distribution of new development in accordance with the Council's strategic objectives.</p>

- 4.14 Paragraph 2.39 of the GB Review identifies that the "*Preferred Development Type, Developable Area and Notional Development Capacity*" are also considered in the Stage 2B assessment. In that regard, we can confirm that the land being promoted by The Knowsley Estate has an area of approximately 31.3 acres (12.6 hectares) and a potential capacity of up to 378 new homes (when applying 30 dph to the gross development area).
- 4.15 In conclusion, we acknowledge the presence of the LWS and the current lack of schooling in Rainford Junction, however these are not considered insurmountable constraints to development and indeed

the development of new residential development at Rainford Junction could result in sufficient population to support a new school(s) in the settlement. The site is well-located with good access to public transport and no technical constraints to development.

- 4.16 Hence, we consider the sub-parcel should have been concluded as having **good** potential for development, afforded an **overall score of 6** and **allocated for residential development** in the draft Local Plan, or at least safeguarded for development.

GBP_002

Council Assessment (contained in Table 5.4 of the GB Review)	C&W Assessment
<p>Although proposed by the Council for safeguarding at LPPO stage there are a number of constraints that affect the deliverability of development within this parcel. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this sub-parcel.</p> <p>The land is classed as Grade 1 agricultural land.</p>	<p>We do not consider there to be any significant or insurmountable constraints to development at the sub-parcel. Whilst we acknowledge that the site is currently Grade 1 agricultural land, we would comment that the vast majority of Green Belt land in St Helens comprises Grade 1, 2 or 3 agricultural land.</p> <p>Whilst it is therefore inevitable that some 'best and most versatile' (BAMV) land will be lost for housing, this will unlikely have a significant impact and should be balanced against the significant amount of BAMV land that will remain in the Borough.</p>
<p>Development within the parcel would not be focussed on any Key Settlement and would be affected by significant transport sustainability issues.</p>	<p>We strongly disagree with the Council's comment that the site has "significant transport sustainability issues. The edge of the sub-parcel is within 750m walking distance of Rainford train station and is close to bus stops along Bushey Lane. These important public transport options are absent from the Council's assessment of the site in Table 5.4.</p>
<p>It lies outside an 800m safe and convenient walking distance of the nearest identified local centre (Rainford), which lies approx. 1.4km away (as the crow flies).</p> <p>Whilst the eastern part is within 800m of a convenience shop (located on Kendall Drive), the existing road and pathway between the parcel and this shop is narrow and poorly lit, so is not considered safe and convenient.</p>	<p>The Council's assessment acknowledges that there is a convenience store within 800m of the eastern edge of the site (located on Kendall Drive), the route to which could be upgraded as part of any development at the parcel, subject to viability.</p> <p>Whilst the site is not within close walking distance of a larger local centre, as mentioned above, it is in close proximity to a train station and bus stops, with regular connections to key settlements, including Rainford which the draft Plan identifies Rainford Junction as being a satellite settlement for.</p>
<p>The parcel is also located outside a safe and convenient walking distance of a primary school.</p>	<p>Primary schools, high schools and a college are located close by in Rainford which is not considered to be an unreasonable distance from the site. Further, the proposed residential development at Rainford Junction could create sufficient population growth to support a school(s) in Rainford Junction itself, ensuring a sustainable pattern of development across St Helens.</p>

<p>The parcel also contains playing fields (Rainford North End), natural and semi natural greenspace (Red Delph Wood) and a children's play area, with no identified surplus of these greenspace typologies within the vicinity.</p>	<p>Whilst the wider parcel does contain playing fields, Red Delph Woods and playing fields, the land herein being promoted and indeed, the boundary of the previous allocation ref. HS19 boundary, does not propose to remove these features.</p> <p>The Council's inference therefore that development in the parcel will result in their removal is incorrect.</p> <p>Further, the parcel is of sufficient size that it can be developed to include a suitable buffer to any sensitive features, such as the woodland.</p>
<p>There are potential access and highway issues; Red Delph Lane is a single track road with residential dwellings on both sides. Opportunities to widen the highway are therefore limited and at its current standard it would not be suitable to support further residential development.</p>	<p>As shown in Figure 1, the parcel adjoins the adopted highway with the promoter's land ownership fronting onto 2 long stretches of Bushey Lane to the north of the parcel as well as Ormskirk Road to the west.</p> <p>Safe and convenient vehicular access can certainly be provided into the parcel and we therefore strongly disagree with the Council's comment that the only access option is from Red Delph Lane.</p> <p>Bushey Lane and Ormskirk Road then connect nearby to the A570, which is in turn a <5-minute drive to the M58.</p>
<p>Not all of the land has been submitted for development, and there could therefore be at least a delay in any development coming forward.</p>	<p>The vast majority of the parcel is in a single ownership (see Figure 1) and a comprehensive and sensitive development of the site is therefore achievable, with housing capable of being delivered within the short term.</p> <p>We therefore strongly disagree with the Council's comments.</p>
<p>The SA report for this parcel concluded that its allocation for development would have a mixed impact on the achievement of SA objectives.</p> <p>When the constraints and issues with the parcel are considered cumulatively it is clear that this parcel would not be suitable as a potential development site to be released from Green Belt. Development here would result in the disproportionate growth of Rainford Junction and would not support a sustainable spatial approach to meeting future housing needs.</p>	<p>The Council does not afford any consideration to there being no highway or access issues that could restrict delivery of development at the site. The sub-parcel adjoins the adopted highway, whereby safe and convenient vehicular access can be provided from Bushey Lane. Bushey Lane then connects nearby to the A570, which is in turn a <5-minute drive to the M58.</p> <p>Similarly, the Council does not recognise that the site is in a single ownership and there are no ransom issues to prevent development.</p> <p>Development at this location would support the sustainable growth of Rainford Junction, potentially reduce its role as a satellite settlement and its reliance on Rainford and enable a more diverse spatial distribution of new development in accordance with the Council's strategic objectives.</p>

- 4.17 Paragraph 2.39 of the GB Review identifies that the "*Preferred Development Type, Developable Area and Notional Development Capacity*" are also considered in the Stage 2B assessment. In that regard, we can confirm that the land being promoted by The Knowsley Estate has an area of approximately 38.2 acres (15.5 hectares) and a potential capacity of up to 465 new homes.
- 4.18 **Conclusion** – Whilst we acknowledge the presence of Red Delph Woods and the current lack of schooling in Rainford Junction, these are not considered insurmountable constraints to development and indeed the development of new residential development at Rainford Junction could result in

sufficient population to support a new school(s) in the settlement.

- 4.19 A number of the comments made by the Council in Table 5.4 are incorrect or not appropriately evidenced and hence, we consider the parcel should have been concluded to have **good** potential for development, afforded an **overall score of 6** and **allocated for residential development** in the draft Local Plan, or at least safeguarded for development.

5

5.0 Site Opportunity

Vision

- 5.1 The Knowsley Estate's vision for the sites is underpinned by the following principles:
- Delivery of high-quality new homes, sensitive to the character of the area;
 - Securing new market and affordable homes, addressing the recognised need for new affordable dwellings;
 - Investing in the community through attracting new economically active residents who will spend in the local area;
 - Strengthening the Council's spatial distribution of development, contributing to sustainable and equitable development across the Borough;
 - Creating a safe, desirable place to live;
 - Providing biodiversity enhancements through new planting and strengthened boundaries;
 - Incorporating environmental and sustainability measures;
 - Working in partnership with local residents and key stakeholders; and
 - Enhancing the profile and western gateway to Rainford Junction.

Sustainable Development

- 5.2 The 2019 NPPF states that *"to be considered deliverable, sites for housing should be available, be a suitable location for development and be achievable for housing to start being delivered on site within 5 years."*

Suitable

- 5.3 **Planning Policy** – Notwithstanding our earlier comments on the Green Belt Review, the sites are currently allocated as Green Belt with the sites located adjacent to the western edge of the settlement boundary. The Council are not considered to have a sufficiently robust supply of housing land and it is clear that further sites will need to be released from the Green Belt, close to Rainford specifically, to ensure the Local Plan is in accordance with national planning policy and thus capable of being found sound.
- 5.4 **Popular market** – The site is located within an existing and popular residential area. Demand for sites in this location is strong and The Knowsley Estate is confident the site would attract strong interest from residential developers.
- 5.5 **Accessible and sustainable location** – The site is incredibly well-located for access to public transport opportunities, the strategic highway network and local amenities and facilities.
- 5.6 **Unconstrained** – The desktop review of the site has not identified any insurmountable technical constraints to development at the site. A full range of technical studies will be procured to fully inform the proposed design and layout of the site and any required mitigation will be accommodated within the final layout.
- 5.7 **Landscape and visual character** – The sites have strong defensible boundaries to all directions, with clear landscape features preventing any perception of sprawling development. Further, in terms of the landscape impact, the sites are inherently more suitable for development than other sites proposed to be released from the Green Belt for residential development.

Available

- 5.8 The Knowsley Estate own the freehold of the vast majority of GBP_001_A and GBP_002. There are no known legal or ownership issues which could impact the delivery of new homes at the site.

Developable

- 5.9 The NPPF states that for sites "to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."
- 5.10 As demonstrated above, the sites are considered to be in a suitable location and are available for development.
- 5.11 The site should thus be considered developable.

Deliverable

- 5.12 As an experienced landowner with experience in disposing of sites for residential development, the Knowsley Estate have the resources available to them to ensure that the site can be brought forward for development.

Benefits of Development

- 5.13 The delivery of approximately 843 new homes in Rainford will generate significant socio-economic benefits associated with both the construction of the scheme and occupation of the new homes. The associated socio-economic benefits can be summarised as follows:
- **Construction related benefits** – The scheme will create a significant number of direct and indirect jobs within the local economy. A local labour plan will seek to reduce local levels of unemployment and increase economic activity.
 - **Population benefits** – The scheme could increase the local population by approximately 843 new households. The scheme will comprise family dwellings, and the introduction of economically active households with children will help to sustain and support new essential local services in Rainford and Rainford Junction.
 - **Spending power** – The new households will generate additional expenditure within the local economy, supporting local shops and businesses.
 - **Affordable Housing** – The development could include affordable housing subject to viability, meeting an identified local need for affordable housing.
 - **Council Tax revenue** – The scheme will create additional Council Tax revenue for the local authority.

Summary

- 5.14 The above has demonstrated that the land north and south of Bushey Lane is suitable, available and developable.
- 5.15 The desktop appraisal has shown the site is not subject to any insurmountable significant technical constraints that prevent it being realised for housing.
- 5.16 The allocation of the sites for housing or identification for safeguarding will assist the Council in being able to demonstrate a robust and deliverable supply of housing land.
- 5.17 Both sites should therefore be released from the Green Belt and allocated for the delivery of housing

or at least safeguarded for residential development.

6.0 Conclusion

- 6.1 These representations have demonstrated that there is a clear case for considering supporting the release of the land identified in Figure 1 from the Green Belt and allocating, or safeguarding, for residential development.
- 6.2 The delivery of up to 843 new homes at the site would make a significant and necessary contribution towards the Council's housing need, which as set out in Section 2, should be significantly higher to account for the Council's significant economic growth aspirations.
- 6.3 Policy LPA06 should be revised to clearly identify a review mechanism of at least once every 5 years to accord with paragraph 33 of the NPPF and allow safeguarded sites to be brought forward earlier in the plan period should the review confirm that the Council are failing to meet their housing needs. ②
- 6.4 The development of the site would also assist in supporting Rainford as a key settlement and Rainford Junction as a satellite settlement to Rainford, ensuring a fair and balanced distribution of new development in St Helens in accordance with the Spatial Vision and settlement hierarchy set out in Policy LPA02. ③
- 6.5 The land presents appropriate and logical locations for development, adjacent to the settlement edge, without causing harm to the wider landscape or threatening the wider Green Belt.
- 6.6 We consider that the Council incorrectly scored the sites at Stage 2B of the GB Review and should not have discounted the sites at Stage 3. Our own assessment of the parcels demonstrates their capacity for development and as a minimum, that they should be identified as safeguarded housing land. ⑤
- 6.7 We consider that the release of the site from the Green Belt is wholly justified as the scheme will deliver a high-quality residential environment, with significant associated socio-economic benefits. The development has a willing landowner, with experience and expertise of partnering with willing developers to bring forward the delivery of new homes.
- 6.8 In summary:
- The site is extremely well-located for access to a range of public transport options;
 - The site is not subject to any significant technical constraints;
 - The development will deliver high-quality market and affordable homes;
 - The development would contribute towards meeting the Council's housing land supply, at a time when there is an identified requirement to release land from the Green Belt;
 - The proposed development would deliver economic benefits through increased local spend from new residents; job creation during the construction phase; and monies to the Council through Council Tax;
 - The release of the sites from the Green Belt would not prejudice the preservation of the wider parcel as they are well-enclosed with strong defensible boundaries to all directions; and
 - The land owner is willing and available to deliver homes in the short, medium and long term.
- 6.9 The development of the land parcels is strongly considered to comprise sustainable development and accord with national and local planning policy. Development can be sensitively designed and mitigated to ensure there are no significant adverse impacts and the desktop review has not identified any insurmountable technical constraints to the delivery of housing. The sites are available, suitable and

achievable for residential development and we therefore ask the Council to afford strong consideration to the release of these sites from the Green Belt, either for an allocation or safeguarding. ✓

RO1805

27 FEB 2019

Mrs F Waller
32 Lynton Way
Windle
St Helens
Merseyside
WA10 6EQ

Dogs Trust



Dear Sir,

I oppose the council's local plan for the following reasons.

1. It does not satisfy the requirements for sustainable development.
 2. The increased use of cars. Lynton Way would become a rat run and the road is very narrow.
 3. It is only a projection about the number of houses necessary and the employment they would need. The cost of the proposed houses would be outside the resources of many couples and families.
 4. We have more than enough brown field sites without using green belt.
 5. In these uncertain times farmland is vital so we can continue to grow our own crops.
 6. I believe that all parish councils are entitled to have a dedicated amount of green space. Windle only has the Lynton Way playground. Parish church field was once part of this space. It was built on with very expensive houses.
 7. With the increased traffic Lynton Way would become a rat run. It is a very narrow road.
- yours faithfully,
F. M. Waller

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

Ref: LPSD

27 FEB 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>FLORENCE MARGARET</u>	First name: _____
Last Name: <u>WALLER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32 LYNTON WAY</u> <u>WINDLE ST. HELENS</u>	Address: _____
Postcode: <u>WA10 6EP</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>24th Feb '19</u>
------------------------------	---------------------------

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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.

RO1806



St. Helens
Council

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

Ref: LPSD

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

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mrs.</i>	Title:
First Name: <i>MARGARET.</i>	First name:
Last Name: <i>WALSH.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>57 Budworth Ave.</i>	Address:
Postcode: <i>WA9 4DJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 

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.

RO1807

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

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

13 MAY 2019
12:15

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>WALSH John</u>	First name: _____
Last Name: <u>WALSH</u>	Last Name: _____
Organisation/company: <u>TUNSTALLS FARM</u>	Organisation/company: _____
Address: _____	Address: _____
Postcode: <u>WA9 4QJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>13 May 2019</u>
------------------	--------------------------

Please be aware that any comments received after the deadline cannot be accepted and that in order for your comments to be considered you MUST include your details above.

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

PART B - YOUR REPRESENTATION

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

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

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

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

RO1808

Representor Details

Web Reference Number	WF0301
Type of Submission	Web submission
Full Name	mrs gillian walsh
Organisation	
Address	93 springfield park Haydock St Helens WA110XP
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05 SITE 2HA
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.

Dont agree with the Councils population figures and the number of houses needed. Population is reducing and has been in decline since early 1980.

The site access from ELR is dangerous and inadequate due to the high volume and speed of traffic. The additional entrance being created from Vicarage Road will cause further problems with an area that is already overstretched with traffic. Adding a further 1,000+ journeys will be detrimental to the area.

Schools in the area are nearly at full capacity alongwith other services and no additional resources being put into the area.

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

Delete this land from the proposed removal from the greenbelt

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

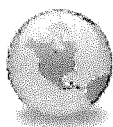
No, I do not wish to participate at the oral examination

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

Response Date	3/8/2019 2:30:31 PM
---------------	---------------------

RO1809

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [REDACTED]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [REDACTED]
[REDACTED]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

1, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EF0059

01-25



Re: PAG Response to Local Plan Draft Submission

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

Hide Details

From: [REDACTED]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [REDACTED]

3 Attachments



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



lpsd-representation-form R.Ward PAG Response.pdf



R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

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3. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.



St Helens
Council

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
-----------------------	------------------

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St. Helens
Council

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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	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 ☐

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

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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?	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 documents:	
1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)	
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)	

Please continue on a separate sheet if necessary

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

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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	X	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:

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA04.1, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD09~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019

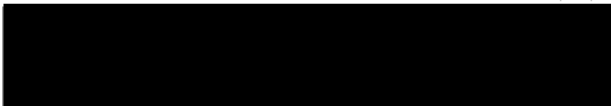


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1. Purpose

1.1 This document provides a Planning Context Response to the St Helens Local Plan Submission Draft January 2019.

2. Introduction

I, Richard Ward, of Hermitage Green Lodge, Hermitage Green Lane, Winwick, Warrington, WA2 8SJ, email address: richard_h_ward@compuserve.com, am a member of the Parkside Action Group.

Parkside Action Group is an organisation that is a local voice for those concerned local people who are conscious on how to shape their surroundings in particular in and around the former Parkside colliery.

I am a member of "The Battlefields Trust" and a member of "The Open Spaces Society".

To which I apply to be on the examination panel before the inspector.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

3. NPPF February 2019

The National Planning Policy Framework was introduced in March 2012 (NPPF 2012) where changes were created to simplify the previous Unitary Development Plan (UDP). The NPPF 2012 allowed the Local People to become more involved in their surroundings under the new vision for their area under a Local Plan as detailed in paragraph 1,

In July 2018, a revision of the NPPF 2012 was published, revised February 2019 (NPPF), which addresses several issues, but only referenced the involvement of Local People once and only as a part of the Plan-making procedure. But in doing so, it raises the importance of the Local People over and above the Local Planning Authority. Paragraph 15 of the NPPF states under

"3. Plan-making

15 *"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."*

This crucial change at the start of the Plan-making process, that an up-to-date plan is purely and correctly placed upon the shoulders of the Local People and not the Local Planning Authority (or "their accountable councils" NPPF 2012). This clearly is a change for the better for the local people.

The header from NPPF paragraph 11 states:

"The presumption in favour of sustainable development"

Paragraph 11 itself makes a distinction between plan-making and decision-taking.

*"For **plan-making** this means that:*

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

⁵ As established through statements of common ground (see paragraph 27).

⁶ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change."

Paragraph 11 of the NPPF is now the heart of the NPPF: plan making is now in the hands of the local people.

This paragraph gives the local people a strong reason for restricting the overall scale, type or distribution of development in the plan area.

This is a very important legal clause to protect the policies referred to are those in this Framework under footnote 6. This means the development plan and any application can not destroy those areas of importance to the character, essence and shape of the local peoples surroundings once the local people approve the restriction in the Local Plan.

One thing must be pointed out in the Judgment **[Forest of Dean]** [2016] EWHC 421 (Admin) Case No: CO/4852/2015 where THE HON MR JUSTICE COULSON stated in paragraphs 21 and 22:

21. However, before coming to that, I think it is worth giving one example of a policy which is expressly referred to in footnote 9, and which may therefore be regarded as a policy restricting development within the definition of Limb 2. That concerns the Heritage Coast. Although this is a policy referred to in footnote 9, the only express reference to the Heritage Coast in the body of the NPPF comes in the second bullet point of paragraph 114. This provides that:

"Local planning authority should...maintain the character of the undeveloped

coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to an enjoyment of the coast."

01 22. *I accept Mr Wadsley's submission that this is a very general statement of policy. But its inclusion in footnote 9 indicates that the policy is considered to be, even in those general terms, restrictive. In my view, it can be regarded as a policy indicating that "development should be restricted" only because the general presumption in favour of development may not apply in areas defined as Heritage Coast, in consequence of the operation of paragraph 114. I note, as Mr Wadsley did, that Mr Elvin did not address this point, although it was expressly raised in Mr Wadsley's opening submissions.* 01

This judgment states that any reference that is only stated once (in the NPPF) with no other qualification, that reference becomes a policy in its own right.

Therefore as paragraph 11 above stands as a separate statement in plan-making, and due to the grammar separation of "," and "and", all three must be satisfied for a Plan to be signed-off as a current and adopted local plan.

This means that when a plan has been found sound it is then up to the "Local People" who must approve after the inspector's report and not the local planning authorities as paragraph 15 does not mention local planning authorities.

It also means that not only the local planning authority can propose a local plan but the Local People can also propose a local plan as well. This also indicates the Local People as decision-takers by default and it is to the Local People who must also adjudicate decisions and not just the local planning authority at the decision stage. Else how can the local people control: "to shape their surroundings"?

4. Grounds for objections

a. Registered Battlefield

In October 2017 the National Planning Authority Heritage England (HE) submitted the planning application proposal for the Battle of Winwick Pass (also known as Red Bank) to be a designated Heritage Asset Registered Battlefield. In the legally recognised Aarhus Convention for public participation St Helens Council (SHC) and the SHC and Langtree Plc Venture Group (VG) separately objected to the battlefield registration in part of the area known as the former Parkside Colliery in Newton park.

The submitted objections were considered by HE. On 31 January 2018 HE published the decision: HE granted the Battle of Winwick Pass as a Designated Heritage Asset - Registered Battlefield.

The Aarhus Convention gives the opportunity to those who objected, to challenge the decision. Neither SHC or VG took the Aarhus Convention route to challenge the decision in court.

Consequences

i. A consequence of their decision not to challenge the decision in court is that SHC and VG have accepted the HE grant of registration of the Battle of Winwick Pass inclusion of the former Parkside Colliery Site in Newton Park as a part of the Registered Battlefield location.

ii. Another consequence is that SHC Local Plan is since 31 January 2018 no longer up-to-date.

iii. The third conclusion is that when a further planning application situated on the Registered Battlefield Site concerns the same objections as submitted to the National Planning Authority HE registration planning process, the further planning application cannot be overridden by a local authority, but must be assessed at National level.

iv. Since 24 July 2018 the NPPF is revised, latest update 19 February 2019. This means that applications have to follow the revised version of the NPPF, especially when it regards paragraph 11b)i, footnote 6.

Conclusion

The local people consider the preservation of the irreplaceable designated heritage asset registered battlefield in order for the existing and future generations to enjoy as stated in the NPPF paragraph 184 as a platform for the local people to shape their surroundings.

03
LPA10
7EA ~ 8EA

b. The development is of national significance

The NPPF Introduction paragraph 5 states:

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications."

In St. Helens Core Strategy Examination 2011/2012 the inspector asked SHC an additional question number 25. The question was:

"Would an SRFI of the size envisaged in policy CAS 3.2 be a "nationally significant infrastructure project" as defined in the Planning Act 2008? If so, what implications are there for the policy CAS 3.2?"

The answer from SHC (examination document number EX009) was:

"The Council considers that an SRFI of the size envisaged in policy CAS 3.2 would constitute a "nationally significant project" as defined in the Planning Act 2008."

Under paragraph 8 of EX009, SHC states:

"The only impact on policy CAS 3.2 that the Council considers is the fact that the Council would not be the deciding authority for any application arising and would therefore provide a different role. Given this the term "planning permission will be granted...." in the current version of CAS 3.2 is perhaps inaccurate. This wording could be replaced by "the Council would support a development provided that" Which gets around the issue of the Council not being the deciding authority. An amendment of the wording along these lines could be proposed as a further minor post publication change."

But in the adopted and current Local Plan 31 October 2012 in Policy CAS 3.2, SHC failed to follow what they stated above. Policy CAS 3.2 SHC states the following:

"The Council will support the development of the site identified to the west"

and

"The Council will also support the development of land to the east"

By changing the word "would" into "will" as stated to the Inspector in EX009 in Policy CAS 3.2 SHC has reverted back to "...not be the deciding authority for any application..."

03 Nevertheless, SHC is also the deciding authority, based on their joint venture with Langtree Plc for Phase 1, Phase 2, Phase 3 and Phase SRFI, as well as, SHC as sole applicant for the PLR. Therefore, the Secretary of State needs to intervene. 03

In the St Helens Local Plan Submission Draft January 2019 in document ST.HELENS BOROUGH LOCAL PLAN 2020-2035 The Infrastructure Delivery Plan (IDP) is a supporting document (ST.HELENS BOROUGH LOCAL PLAN 2020-2035 INFRASTRUCTURE DELIVERY PLAN DECEMBER 2018) states in paragraph 3.37:

"Parkside Rail Access for Freight

3.37 The emerging Local Plan proposes to allocate land to the east of Parkside, Newton-le-Willows to facilitate rail enabled development. **The site is considered suitable in principle for development as a Strategic Rail Freight Interchange (SRFI) of regional and national significance.** The development of the site would allow for fast-moving consumer goods to be transported to Parkside and then distributed to the wider region. The realisation of this would play a key role in meeting the objectives of the emerging Local Plan and facilitate the long term rail strategy for the north, as confirmed in The Liverpool City Region Freight and Logistics Strategy."

(LPPO = Local Plan Preferred Option)

Note: **Bold blue text** emphasis by R. Ward.

Re-confirming what SHC stated to the inspector (examination document number EX009):

"The Council considers that an SRFI of the size envisaged in policy CAS 3.2 would constitute a "nationally significant project" as defined in the Planning Act 2008.

Conclusion

03 This confirms that St Helens Council and as a joint owner/developer of the Parkside site in Newton Park, knowingly have declared that the whole project is of national significance in their (SHC, not the Local People) infrastructure delivery plan, thus making the Parkside site a **National Significant Infrastructure Project (NSIP)** and have knowingly split the project in to smaller developments. This confirms by St Helens Council declaration in their LPPO, the whole project, as previously shown in the St Helens Council current adopted Local Plan 2012 Policy CAS 3.2, as being a nationally significant infrastructure project as stated in the NPPF paragraph 5: 03

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended)...."

This means all references to Parkside site as a SRFI project, must be removed from the St Helens Local Plan Submission Draft January 2019, due to SHC declaration as sole

03 developer of the Parkside Link Road, together with SHC being a joint owner/developer with Langtree plc of the developments: Phase 1, Phase 2, Phase 3 and Phase SRFI. Parkside as a "whole project" must be considered by the Major Infrastructure Unit of the Planning Inspectorate and would be the subject of a ministerial decision. 03

02 **c. Environmental aspects: project as a whole** 02

Local Plan 2012 Policy CAS 3.2 and the Proposal Phase 1, Phase 2, Phase 3, Phase SRFI and Parkside Link Road

St Helens Council (SHC) within 5 years of the current Local Plan to 2027 adopted 31 October 2012, decided to submit for public consultation their proposed update to the SHC Local Plan 2012 in December 2016.

Policy CAS 3.2 was approved on 31 October 2012. But one thing that SHC left out of the local plan, despite the Inspector's recommendation is "including battlefields", see the Inspectors Report 01 October 2012 (Ref: PINS/H4315/429/3) where paragraph 41 states:

*"It is of course very likely that an SRFI scheme at Parkside would be inappropriate development in the Green Belt (as defined by Section 9 of the NPPF), it is inevitable that it would transform the appearance of the mostly 'open' countryside site and that its presence would alter the character of the surrounding area and impact on the lives of local people to a significant degree. Health, air quality (bearing in mind that there is already an Air Quality Management Area in the vicinity), light and noise impacts, together with effects on biodiversity (including the nearby SSSI), farming, archaeology/heritage (**including battlefields**), landscape, agricultural land and a range of other issues would need to be carefully assessed in detail and the potential for, and likely impact of, mitigation measures considered. Even so, it is likely that not all local harm could be avoided, mitigated or compensated for.*

Note: **Bold blue text** emphasis by R. Ward.

Policy CAS 3.2 as shown published in the SHC Local Plan 2012:

02 **"Policy CAS 3.2**

Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location. 02

The Council believes a deliverable and viable SRFI can be developed on the western side of the M6 with an operational area of approximately 85 hectares, as shown indicatively on Figure 9.2.

02 The Council will support the development of the site identified to the west of the M6 as a SRFI, provided that each of the following criteria are met:

1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;
2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;
3. Direct access to the rail network is achieved and conforms with rail industry strategies and capacity utilisation;
4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;
5. Measures are incorporated which encourage travel to/from the site using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy CP 2. A travel plan will be essential;
6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;
7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;
8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;
9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;
10. Provision for the positive management of existing and new environmental assets;
11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St. Helens local authority area;

12. Training schemes will be put in place to increase the opportunity for the local population to obtain employment at the complex; and
13. All other material issues are satisfied.

02 It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. The Council will also support the development of land to the east of the M6 provided the above criteria are met, plus the following additional criteria:

14. That the area of land to the western side of the M6 is developed first; and
15. That the SRFI is proven to be not deliverable without the additional eastern land area.

Planning permission will not be granted for any other use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange.

Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

(For Figure 9.2 see Map 1)

04 **c. i. Green Belt size and what is actually the development size for Parkside west and Parkside east**

The removal of Parkside east and Parkside west does not comply with the current adopted Local Plan 2012-2027 Policy CAS 3.2 states:

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

This is a clear statement in the policy "Subject to a SRFI being fully developed on site", the word 'being' is very conclusive there MUST be an SRFI first on the site, before the Green Belt revision can be considered. This SHC approved with the inspector and consequently as did the Local People who from the previous NPPF 2012 Core Principles bullet point 1 states:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area..."

04 This the Local People approved till the year 2027 (the plan period) and see the rules are being changed before any development has even turned over a clod of soil, with the only

reason from Policy CAS 3.2 is that SHC are now the developer as well as SHC as a local plan maker are wanting to change the rules in SHC favour without the agreement with the Local People.

I refer here to the Court judgment [2012] EWHC 1889 (Admin), Case No: CO/12156/2011 where the Council development plan agreed to a series of conditions that was not followed in the subsequent application though the council passed the application, the judgment quashed the approval. I put this as an explanation what is going on with the whole Parkside East and West fiasco.

Who now in the revised NPPF have been given more of a say in Local Plan-making under the NPPF paragraph 15, has raised the Local People over and above the Council in the final say:

"a platform for Local People to shape their surroundings"

Without the Local People having to qualify their reasoning to accept or refuse the platform or local plan. The creators of NPPF does not explain or give reasoning behind the phrase.

Regarding the actual size of the Parkside development

CAS 3.2 states 85 Ha for Parkside west and 70 Ha for Parkside East in total 155Ha

The update in LPA10 for 7EA in paragraph 4.36.13 as being

"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."

"Justification for removing Site 7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. **Out of a total of 124.55ha** of land at Parkside East it is estimated that **64.55ha** will contribute to the Borough's needs for employment development with the remaining **60ha** being required to provide related rail and road infrastructure and landscaping. A further **5.58ha** of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site."

From the Green Belt does Parkside east = 124.55Ha i.e. 64.55Ha + 60 Ha = 124.55Ha

With on Parkside West having 5.58Ha as the rail spur line but CAS 3.2 states Parkside west is 85 Ha in total then minus 5.58Ha = 79.22Ha

This means the total size of 7EA + 8EA is 124.55 + 79.22 = 203.77Ha But CAS 3.2 total size is 155Ha Where has the additional 48.77Ha come from?

To me the Green Belt justification is wrong as it does not follow the Appendix 5 7EA and 8EA figures:

In Appendix 5 shows from the two map headers:

LPSPD Ref:	7EA - Parkside East, Newton-le-Willows	Ward:	Newton
Notional Capacity:	64.55ha	Designation:	Allocate

LPSPD Ref:	8EA - Parkside West, Newton-le-Willows	Ward:	Newton
Notional Capacity:	79.57ha	Designation:	Allocate

Making a total of 64.55 + 79.57 = 144.12Ha these two figures are confirmed in the Green Belt main chapter 1-5 as for the areas: **GBP_039 Parkside East as 64.55Ha** and for **GBP_041 Parkside West as 79.57Ha** as shown on the Figure 4.4 (see Map 2)

In the 2011/2012 hearings to the inspector's question 5 in EX003 was answered by SHC regarding the size:

"Question 5

"Policy CAS 3.2 – the now withdrawn planning application for the Parkside SRFI was for a 272ha site, but the policy envisages a maximum 155ha site. What is the reason for this difference?"

Response

1. In responding to this question it is first helpful to clarify that the policy includes analysis of a "dummy scheme" to explore the likely scale of such a development in the Core Strategy. It is important to stress that this "dummy scheme" bears no direct relation to the withdrawn application and has been produced independently. Obviously there are clear similarities between the two as there are certain "givens" about the potential layout of the site.

04 2. If comparisons are being made between the dummy scheme and the withdrawn planning application there is one key difference. The 155ha quoted for the "dummy scheme" is only the operational area of the Strategic Rail Freight Interchange whereas the 272ha for the withdrawn planning application is the boundary of that application and therefore includes the operational area together with other associated land uses such as landscape buffer zones and a country park."

04

If the total area is 272Ha (or 155Ha = 85Ha west and 70Ha East operational land) in 2011 to the inspector; how is it that only 144.12 Ha (64.55Ha east and 79.57Ha west) is removed from Green Belt What happened to the other 127.88 Ha when the CAS 3.2 and 7EA/8EA maps are identical.

This still leaves the Green Belt size quoted 144.12Ha for release short of the true figure 272Ha or 227Ha by 83 Ha. Green Belt release must be defined precisely and not, if the 144Ha is operational size. The Parkside west from the British Coal submission with Morrisons in 1994 gave the overall figure of approx 97Ha comprising of Agricultural fields (a) 12.2ha; (b) 10ha; (c) 18.2ha Area (i) Eastern Tipping 21ha and the core area (ii) 33Ha. Newton Park Farm was excluded from the calculations

From the Phase 1 Jan 2018 Spawforths main document page 33/34 paragraph 2.1 Phase 1 size is 47.90Ha and from page 102 paragraph 9.14 Phase 2 size is 43.16ha (this excludes Newton Park Farm). Operational size total 52.69Ha (including Rail safeguarding of 1.02+0.05ha) Landscaping buffers 25.11 +13.26 = 38.37Ha

This is very confusing because if the 272Ha and 155Ha are correct as shown in the Local Plan 2012 hearing sessions document EX003 then the submitted Green Belt document(s) are incorrect and legally not compliant.

Or are legally not compliant as the information with regards to size are wrong This causes knock on effects when considering other criteria when allocating the land of the SRFI in 7EA and 8EA etc etc etc. As &EA state 124.55Ha is 7EA but the Green Belt states that 7EA +8EA is 144.12 Ha indicating the west side is only 144.12 - 124.55Ha in size knowing it is in effect from the British Coal 1994 documents 97Ha for the west side

04

04 Green Belt release must be defined precisely and not the 144Ha is operational size. The Parkside west from the British Coal submission with Morrisons in 1994 gave the overall figure of approx 97Ha comprising of Agricultural fields (a) 12.2ha; (b) 10ha; (c) 18.2ha Area (i) Eastern Tipping 21ha and the core area (ii) 33Ha. Newton Park Farm was excluded from the calculations.

So this leaves the total including Newton Park Farm of 272Ha minus the total for Parkside west (minus Newton park Farm) 97Ha = 175 Ha for Parkside east (This includes the area for Newton Park Farm).

But Parkside east according to the Green Belt figure is 64.55Ha, so what happened to the rest?

Due to the SHC adjudicating the local plan for themselves in order as also being the developer of Parkside East and west, I put it in as it is to let the inspector sort it out.

Recommendation by Local People and PAG
Green Belt at 7EA and 8EA

The effect of the uncertainty of the sizes as shown above for sites 7EA Parkside east and 8EA Parkside West. These area are embedded in many other areas where the precise information is required to analyse how 7EA and 8EA are incorporated in to other polices. Due to the missing information, the analysis of these other policies make the Local People unable to accept and makes the St Helens Local Plan Submission Draft January 2019, not legally compliant.

But as it stands the Local People can not accept this as a platform to shape their surroundings (NPPF paragraph 15), and will in all event restrict any development on both Parkside East and Parkside west (NPPF paragraph 11b)i) that does not follow Local People's Policy LOCAL 10LP.

c. ii. Nationally Significant Infrastructure Project

The Proposed design proposed by SHC as joint owner/developer of Parkside east and Parkside west has been mirrored by SHC in the St Helens Local Plan Submission Draft January 2019, just in order to satisfy SHC needs as (developer) over and above the needs of the Local People, despite the NPPF policy: a platform for local people to share their surroundings. But the NPPF gives the Local People the final say not SHC. SHC in 2012 proposed Policy CAS 3.2 as a Nationally Significant Infrastructure Project to the inspector. The inspector agreed to the various points that must be satisfied to develop the Parkside west and Parkside east, to which SHC agreed by adopting the said policy. But what SHC as developer solely and jointly and as a council has proposed as the development that SHC want on Parkside east and Parkside west fails to follow policy CAS 3.2 as shown:

(The areas in 'highlight' are the points in the policy that SHC has not complied to. By not complying to does not make the policy not up-to-date, it is SHC are trying to change Policy CAS 3.2 to suit their needs and not the local people. The text in 'red' show points of contention and text with 'strikethrough' show option chosen)

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location.

24 The Council believes a deliverable and viable SRFI can be developed on the western side of the M6 with an operational area of approximately 85 hectares, as shown indicatively on Figure 9.2. 24

The Council will support the development of the site identified to the west of the M6 as a SRFI, provided that each of the following criteria are met:

1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;
2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;
3. Direct access to the rail network is achieved and conforms with rail industry strategies and capacity utilisation;
4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;
5. Measures are incorporated which encourage travel to/from the site using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy CP 2. A travel plan will be essential;
6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;
7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;
8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;
9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;
10. Provision for the positive management of existing and new environmental assets;
11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. ~~Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required~~

24 including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St Helens local authority area; 24

12. Training schemes will be put in place to increase the opportunity for the local population to obtain employment at the complex; and

13. All other material issues are satisfied.

It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. The Council will also support the development of land to the east of the M6 provided the above criteria are met, plus the following additional criteria:

14. That the area of land to the western side of the M6 is developed first; and

15. That the SRFI is proven to be not deliverable without the additional eastern land area.

Planning permission will not be granted for any other use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange.

Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision.

(For Figure 9.2 see Map 1)

Question:

Is Policy CAS 3.2 up-to-date to warrant the proposed scheme of Phase 1, Phase 2, Phase 3(SRFI) and the in-direct Parkside Link Road (PLR) to the motorway M6?

One thing from Policy CAS 3.2 is point 11 regarding Newton Park Farm. This point is the crux to the whole interpretation of the development of Parkside east and Parkside west. This point has two scenarios Retain in situ or remove? SHC have decided to Retain in situ so the remove becomes not applicable.

24 The proposed plan devised by SHC as clearly shown in LPSD7EA and LPSD8EA maps which confirms the Phase 1 masterplan(s) development plan all show the "Newton Park Farm Complex" has been retain with the SRFI rail spur line circumventing the complex. 24

BUT, in order to do so, the Phase 3 (SRFI) is brought in to be an integral part of the Phase 1 application as shown in the masterplan(s) and brings the Phase 1, Phase 2, Phase 3 SRFI) and PLR to be a major project all due to having to remove the Newton Park Farm Complex access (transport and utilities) via Newton Park Drive to the A49 Mill Road, to be altered via a new access junction, via the Phase 1, Phase 2 and PLR road network to the A49 Winwick Road. This declared change proves without a doubt that the Phase 3 (SRFI) to an integral part of the Phase I application as shown in the masterplan(s). This revelation in the masterplan can not be changed as the masterplan(s) are confirmed to be in the Environmental Statement February 2018 and the Environmental Statement January 2019.

Thus confirming Phase 1 is a part of the SRFI. This means the whole Project Phase 1, Phase 2, Phase 3 (SRFI) and PLR must be under the Major Infrastructure Unit of the Planning Inspectorate under the Planning Act 2008 and not a part of NPPF, as stated in the NPPF paragraph 5.

Conclusions

So all references to Parkside East and Parkside West, especially GBP_039 and GBP_041 (That is to say, the removal of Parkside east and Parkside west from Green Belt is a planning concern of the Major Infrastructure Unit of the Planning Inspectorate under the Planning Act 2008), must be removed from the St Helens Local Plan Submission Draft January 2019.

c. iii. The proof that Phase 1, Phase 2, Phase 3 (SRFI) and the Parkside Link Road (PLR) are one whole project

Phase 1 has incorporated Phase 2 and looking to have a decision made jointly as there is so much of Phase 2 in the so called phase 1 application. But the give away from the Phase 1 masterplan(s) that links all three phases together Phase 1 Phase 2 and Phase 3 (SRFI) is the Newton Park Farm Complex road removal for the SRFI rail spur and the new access junction on to the Phase 1, 2 and PLR area. By putting in the Newton Park Farm access alterations in order for the SRFI section to work in Phase 1, automatically links all together. Especially in Appendix 5 8EA states:

"The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map."

"future development of siding facilities" - facilities is more than just the rail this indicates future loading and unloading facilities that have been added as a probable extension on Parkside west, next to the new road area that shows the rail area widens out. This would enable the Phase 1 and Phase 2 to have a rail served area as well as A49 HGV containers and would reduce the on-site transport costs. The loaded/empty wagons could be shunted back and forth to Parkside east SRFI to assemble the trains lengths.

As well as the Phase 1 application masterplan(s) show that the Newton Park Drive has been removed to accommodate the Phase 3 (SRFI) rail spur line, making the Newton Park Farm Complex access for transportation and utilities effectively cut-off. In cutting-off this road access to Newton Park Farm, in doing so: The Phase 1 masterplan(s) has by default proven and shown that the Phase 1 application incorporates the Phase 3 (SRFI). The Phase 1 masterplan(s) goes even further to confirm the incorporation in the Phase 1 masterplan(s) by creating a new access junction for transportation and utilities to the Phase 1, Phase 2 and Parkside Link Road. This new junction means in order for the Phase 3 (SRFI) to exist, the centuries old access to Newton Park Farm via Newton Park Farm has to be removed for the Phase 3 (SRFI) to work and to facilitate the ability for the Phase 3 (SRFI) to come forward a new junction from Newton Park Farm becomes reliant

24 upon a newly created access just to satisfy the Phase 3 (SRFI) as detailed in the Phase 1 application. This confirms that Phase 1, Phase 2 Phase 3(SRFI) and the PLR are all part s of a much larger project as detailed in policy CAS 3.2. and not the proposed 7EA, 8EA, LPA10 and the other associated policies.

Policy LPA10 paragraph 4.36.13 states:

"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."

This means NPPF Introduction paragraph 5 states:

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications."

This confirms that Phase 3 (SRFI) is a 'nationally significant' under the Planning Act 2008", and as the Newton Park Farm Complex shown above confirms the SRFI is a part of the Phase 1 application and as the full environmental statement under the directive 2014/52/EU has not been assessed for the whole project.

Conclusion:

24 The applications that the developer SHC and the venture Group (SHC and Langtree plc) has put forward, the Phase 1 application and the PLR applications, MUST be withdrawn, then if they so desire place the whole project before the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision. 24

This means that Policy CAS 3.2 must be followed and not the St Helens Local Plan Submission Draft January 2019 policies.

So as it stands the Local People can not accept this as a platform to shape their surroundings (NPPF paragraph 15), and will in all event restrict any development on both Parkside east and Parkside west (NPPF paragraph 11b)i) that does not follow Local People's Policy LOCAL10LP.

c. iv. Employment Types - B8

Table 8 – Employment Capacities within key St Helens Local Plan Preferred Options allocated Employment Sites

LPPO site ref	LPSD site ref	Employment Site	Site Area	Jobs (FTE)	Employment Types
EA2	2EA	Florida Farm North, Haydock	35.17	1,487	B8
EA12	11EA	Gerards Park, St. Helens Town Centre	0.95	91	B1(c); B2
EA11	10EA	Land at Lea Green Farm West, Thatto Heath	3.84	321	B1, B2, B8
EA7	6EA	Land at Millfield Lane and Liverpool Road, Haydock	20.58	1,399	B2, B8
EA3	3EA	Land North of Penny Lane, Haydock	11.05	516	B8
EA4	2ES	Land North East of Junction 23 M6, Haydock	42.34	2,666	B2, B8
EA5	4EA	Land South of Penny Lane, Haydock	2.16	177	B2, B8
EA6	5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	462	B2, B8
EA1	1EA	Omega South Extension, Bold	31.2	1,240	B2, B8
EA10	9EA	Land to the West of Sandwash Close, Rainford	6.96	681	B2, B8
EA9	8EA	Parkside West (Non-SRFI)	79.57	2,351	B8
EA8	7EA	Parkside Rail Terminal		40	Rail uses
EA8	7EA	Parkside East (SRFI)	64.55	2,737	B8
		Total	306.12	14,167	

Source: St Helens Council, BE Group analysis, 2017

From document "Employment Land Needs Study– Addendum Report St Helens Council"
The concept that St Helens Council and the Local People who live in the borough that the only employment is B8 warehousing to the extent that there are approximately 14,000 jobs

05-09
LPA04
Site 7EA
SEA

LPA101
LPC09
LPC10

05-09

05-09

05-09 at 70m² per job, equates to approx 14,000 x 70 = 980,000m² of warehousing floor space. Where Phase 1 and Phase 2 accommodate approximately 244,000m².

But it is stated that between 7,700 and 9,800 jobs are available for Phase 1, Phase 2, Phase 3 and Phase SRFI from the SIF application documentation. But the above table shows 2351 + 40 + 2737 = 5128 jobs available.

But what is more of the concern of the Local People is:

The amount of B8 warehousing and SHC has stating their requirement for large warehousing:

"4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development,"

The associated requirement of commercial vehicles (for example: HGVs) that have to serve the function of the B8 warehousing as shown in the table 8 above. With the calculation of the expected size of B8 warehousing at an estimate size of 14,000 x 70 = 980,000m² envisaged. The expected pollution from the commercial vehicles expected to serve these large scale logistics developments will affect the health of the Local People, and against the Clean Air Strategy 2019 and current news on air pollution in the news article 11 March 2019, by Paul Cosford, Medical Director, Public Health England at:

<http://www.envirolink.org/2019/03/11/air-pollution-cars-should-be-banned-near-schools-says-public-health-chief/>

and

<https://www.bbc.co.uk/news/uk-47520848>

Air Pollutants means those that do not affect their (local people) surroundings and must include those that seriously comply with the recently published the government document 'Clean Air Strategy 2019': The pollutants with ambient air quality standards in the UK: Nitrogen dioxide (NO₂) / NO_x (vegetation); Particulate Matter (PM₁₀), Fine Particulate Matter (PM_{2.5}); Ozone (O₃); Sulphur dioxide (SO₂)/SO_x; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO₂); Nickel (Ni); Ammonia (NH₃); Non-methane volatile organic compounds (NMVOCs); Polycyclic aromatic hydrocarbons (PAH), Benzo[a]pyrene (B[a]P). The government will ensure industrial sector roadmaps for reducing air pollution are well aligned with those for decarbonisation. Where tensions exist, the government will ensure that a balanced approach is taken which supports clean growth as a whole.

05-09 Together with the associated air pollution eCO₂ produced just from the construction of 980,000m²

The eCO₂ of constructing 980,000m²: each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 980,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes.

05-09 If the concrete used was 1m in depth and the steel used was 0.5m in depth, the B8 construction eCO₂ value will be:

Concrete: 980,000m² x 1m x 2.38 tonnes x 1 tonne eCO₂ = 2,332,400 tonnes eCO₂

Steel: 980,000m² x 0.5m x 7.9 tonnes x 1 tonne eCO₂ = 3,871,000 tonnes eCO₂

Totalling **6,203,400 tonnes eCO₂** just to construct the B8 warehousing proposed by SHC to justify the 14,000 jobs. SHC need to seriously look again at the employment requirements as the Local People will reject this amount of B8 warehousing.

This eCO₂ figure does not include the thousands of HGV container movements per year to satisfy the 980,000m² of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO₂/tonne/kilometre for HGV. The resultant carbon emissions eCO₂ will never meet government climate change targets.

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings.

The B8 warehousing reasoning above applies to Parkside east and Parkside west.

05-09 The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

d. Listed buildings

Newton Park Farmhouse and Barn

The information discovered in the Phase 1 masterplan(s) shows that the designated Heritage Assets Listed Buildings, known as Newton Park Farmhouse Grade II Listed Building and Newton Park Farm Barn Grade II Listed Building, together with other non-designated dwellings located in what can be stated as the Newton Park farm Complex, are affected by the proposed Phase 3 SRFI Rail Spur line. So much so that the Phase 1 masterplan(s) shows the access road along Newton Park Drive has been removed to accommodate the Rail Spur line and that a new access road and utilities junction is reliant on the Phase 1 from drainage via Phase 2 and other utilities and the reliance on the Parkside Link Road as a new access, all due to the Phase 3 (SRFI).

With this additional information shown by the applicant SHC and Langtree Plc, it clearly shows that the project has been split in to smaller developments, The alteration of the Newton park Farm Complex as shown in the Phase 1 masterplan(s) proves the whole project consists of Phase 1 and must be considered as a whole, otherwise it fails to follow national policies as well as Directive 2011/92/EU, article 2 (1).

e. Transport

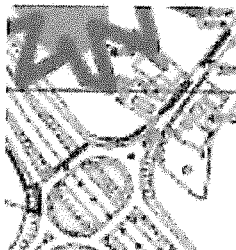
The map Figure 9.2 (see Map 1) shows the location of the intended motorway junction on the M6 as stated in Policy CAS 3.2 in point 2:

(2) "Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan". As shown:



Indicative Location of New or Revised Motorway Junction

But the SRFI that actually has been proposed by SHC as the Parkside Link Road (PLR) applicant is an indirect access to the M6, in direct conflict with their (SHC) current adopted Local Plan 2012 Policy CAS 3.2 point 2. The actual location of the access to the M6 is in one approach, via the in-direct route the local road A579 Winwick Lane access to the existing M6 Junction 22 at the location:



Another approach to the motorway network is via the in-direct route A49 Winwick Road, where two directions can be taken one to the north via the local road A49 through Newton High Street to the M6 Junction 23, and one to the south via the local road A49 through the town of Winwick to either: via the local road Winwick Link Road to the M6 Junction 22; or via the local road A49 to the M62 junction 9.

12 Also another approach to the motorway network is due to the in-direct PLR road crossing the motorway M6 bridge access to the local road A573 Parkside Road has yet again two directions that can very in-directly access the motorway network due to this existing local road, first, being the route along the A573 to Winwick and to Warrington to the south connects to the M6 junction 22 and M62 Junction 9 and second, the route along the A573 to Golborne and Lowton to the north to very in-direct route via the A580 East Lancs Road assesses the M6 Junction 23. 12

These in-direct routes the SHC PLR are not compliant with the Current Local Plan 2012 CAS 3.2 points 2, 4, 6, 7 and 8:

"2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;

4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;

6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;

7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;

8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;"

12 This in-direct route of the PLR can be shown easier see Map 3 showing the road transport routes that affect the local roads Not just in the Borough of St Helens, Merseyside; but in the borough of Warrington, Cheshire; and the Borough of Wigan, Greater Manchester. Which proves a cross boundary issue. 12

On 6 June 2018 Warrington Borough Council (WBC) Development Management Committee (DMC) meeting was held to decided on the WBC planning application number 2018/32247, this addressed the application P/2018/0048/OUP, as a neighbouring authority. The DMC resolved, voted and made the decision in public to object to the SHC and Langtree plc Phase 1 planning application P/2018/0048/OUP.

12 Nevertheless, SHC as applicant for the PLR and SHC and Langtree plc applicants for Phase 1, Phase 2, Phase 3 and Phase SRFI, needs the cooperation of WBC and of Wigan Council, because the councils are "neighbours". 12

Recommendation by Local People

Transport

CAS 3.2 specifically states "*Direct access to the site from the M6*" the SHC PLR clearly is an in-direct route utilising local roads to access the site from the M6.

SHC is stating the Local Plan 2012 is not up-to-date in December 2016: **NO**, the SHC PLR is not up-to-date. SHC have clearly not followed their own policy CAS 3.2

The impact that this in-direct access to the motorway M6 on the local road network by not following Policy CAS 3.2 seriously affects, the impacts of the transport, not just from the weight of numbers but from the pollutants from the air quality and from the noise on a 24/7/365 basis, the extra transport will impose upon the Local People making it impossible to shape their surroundings.

The Update local Plan states in document "Employment Land Needs Study– Addendum Report St Helens Council", Tables 9, 10 and 11 on pages 21 to 26, state:

"Parkside West (None SRFI)"

This means to the Local People that Parkside west is not linked to the SRFI, thus does not comply with the CAS 3.2 points 1 to 12 and does not comply with the east criteria statement of CAS 3.2 where: (text highlight and colour to emphasise the following reasoning)

"8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;"

and

"....a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI."

12 This clearly states that the Parkside west in point 8 primary use is to facilitate the movement of freight by rail, but the update states no SRFI movements will occur on Parkside west. Then to accommodate an enlarged SRFI on Parkside east means exactly what it states. For to accommodate an enlarged SRFI means to make or become larger, this indicates a SRFI already exists on Parkside west. 12

Any changes from CAS 3.2, due to the Transport access using in-direct access to the M6, the Local People have very strong reasons for restricting the proposed PLR and associated Phase 1, Phase 2, Phase 3, Phase SRFI, as the PLR is not a platform for the local people to shape their surroundings, therefore the Parkside Link Road is not sound and is not justified, therefore must be removed from the St Helens Local Plan Submission Draft January 2019.

f. Changes to the St Helens Local Plan Submission Draft January 2019

SHC have in the Local Plan 2012 approved Policy CAS 3.2 as a Nationally Significant Infrastructure Project, to which the Local People due to the planning rules at that time, have had to accept Policy CAS 3.2. Despite SHC and previous owners/developers, since 1993 when the colliery closed to date, all failed to complete their desires to enhance the need of employment and their claim that the site was of national significance to develop the former Parkside colliery site. Now SHC together with the joint venture group (SHC and Langtree plc) have recently submitted local level applications that fail to comply with Policy CAS 3.2 on several grounds, though the documentation submitted in the planning applications categorically show the applications are interlinked with each other as a much larger project that should be under an overall project a national level application for the whole indicated by figure 9 in Policy CAS 3.2 and by the previous owner Prologis.

The St Helens Local Plan Submission Draft January 2019 has several policies or areas that confirm the SHC intension not to have the Project taken as a whole but in smaller development. The main policy in the main document are:

(SHC Main document text is shown in black; Response Comments are in dark blue)

4.4 Policy LPA02: Spatial Strategy

10 6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough, the Liverpool City Region and beyond. Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.

10
LPA02
Site 7EAE
8EA

Comments on paragraph 4.4 paragraph 6

Paragraph 6 must be changed written as follows (strikethrough indicates change):

6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough, the Liverpool City Region and beyond. ~~Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.~~

LPA04 is purely employment figures and LPA10 (7EA) only refers to Parkside East as a SRFI. This means that Parkside west 8EA employment figure is 2351 jobs. As there is no policy for Parkside west to accommodate the figure of 2351 jobs.

Then the Local People change the Parkside west with the Local Peoples Policy LOCAL 10LP.

Justification

10 The LOCAL 10LP still accommodates the employment figure of 2351 jobs but the Warehousing B8 is altered to Office and Educational space, With the estimated and expected growth in population in the St Helens and neighbouring areas of Warrington and Wigan, the growth in jobs is not only a concern of the Local People but the government. The population increases in several ways, but not all are ready for the jobs market. That is to say, children under the age of normal employment, require to be educated to their natural abilities and goals. To not cater for the demand in the increase in population

10 without any respect to these educational needs is not very forward looking. This is where the Local People see their platform to shape their surroundings. Not just jobs but education: every parent wants the best for their children and will fight hard to make sure their children are not disadvantaged in any way. Gone are the workhouse days of the 19th century and early 20th century. Education, Education, Education is the key to the future. Parkside west is a prime location for an educational establishment. 10

Where the former colliery site having been restored totally back to agricultural land, that is proven in documentary evidence. What is known as the 'footprint' of the buildings, that is to say, the residual concrete standing area can accommodate buildings as the concrete has sealed any future use of return to agriculture in the near future. The rest of the former colliery land that was a part of the colliery workings, nature has taken over these areas but can not be used for agriculture yet: Due to the contamination of the ground from benzenes and other aldehydes associated with the coal volatile particulates. With respect to the spoil heaps these are best left untouched due to the inert material removed due to the mining process, where the 14 inches of restoration topsoil now cover, along with the intervening 26 years of natural plant growth has imposed. The mine shafts that are stated to have been backfilled with limestone must have a safe distance so as not to disturb the integrity of the shafts. The rest of what was called Parkside colliery continued to be in agricultural use from 1950's to 1993.

10 This means the Workings and Footprint of the former colliery (not the spoil heaps or shafts) are prime areas where an educational establishment of university standard can be built for the expected growth in population in the St Helens, Warrington and Wigan areas 2020 to 2035 and beyond. The owners of the former Parkside colliery will also profit from this type of development which will be similar to the warehousing scheme they are proposing with less upfront costs and building infrastructure: The Link Road across Parkside West will not be required saving millions of pounds. This does not mean the development of Parkside East can not still be developed. This just needs to be reappraised with the Local People's approval. Which can be discussed with the parties concerned. The remainder of the land which was farmed during the colliery days remain as agricultural land for use of the educational establishment and the public as a country park. Where the development stated above regards Parkside east the Rail Spur land can still be reserved. 10

Policy LOCAL 10LP verses Policy CAS 3.2; Policy PLA10 and LPSD 7EA and LPSD8EA

10 What this proposal justifies over the current Parkside West: Phase 1, Phase 2 and Link Road is that the traffic on the A49 Winwick Road through Newton High Street is not impacted upon to the A580/motorway M6 junction 23, the traffic on the A49 Newton Road through Winwick is not impacted upon to the motorways M6 junction 22 and M62 junction 9. The entrance to Parkside East can still be on the A579, along with Wigan Councils weight restriction on the A579 with penalties along the lines used in London congestion charge, whereby, the SRFI traffic is forced to use the Motorway M6. The A573 will not be connected will be assessed so as to prevent SRFI traffic using the site via this route. This the Local People see as a compromise between jobs as a platform to shape their surroundings. 10

Designated Heritage Assets

18 The Local People see Designated Heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The Designated Heritage Assets under threat from the Parkside West site current proposal known as Phase 1, Phase 2 and the Parkside Link Road (PLR) are as follows: 18

Grade II listed Buildings and monuments

St Oswald's Well

Woodhead Farm house

Woodhead Farm Barn

Newton Park Farm house

Newton Park Farm Barn

The above are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 especially with respect to their "setting", and the NPPF 2018, 16. Conserving and enhancing the historic environment. See paragraphs 184, 185, 193 and 194, due to paragraph 193 stating:

"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

This means any harm is not a decision factor as the NPPF states irrespective as paragraph 184 states:

"These assets are an irreplaceable resource, and should shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."

18 This means that substantial harm of a designated heritage asset can have harm as the registration process has ruled harm out or else how can future generations apply. So to class a designated heritage asset with a level of harm can not overrule future generations. The only level of harm a designated heritage asset due to the registration process is of the highest level. The only level one can give a heritage asset is to the significance, this is shown in paragraph 194. The listed buildings shown above have a significance of exceptional and therefore the Setting of the Listed building becomes the important factor as detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990. 18

Registered Battlefield

The Local People see that the National Planning Authority Historic England have registered the battlefield of Winwick Pass (Red Bank). This heritage asset clearly adds to the historic importance of both Winwick And Newton-le-Willows and having been recently registered on 31 January 2018. The registration advice report shows that the only objectors were St Helens Council not just as the council but as a joint developer of the former Parkside colliery. One important fact that St Helens Council and Langtree plc used in their objections to the registration planning application are the same reasoning used in the Phase 1 application and the same reasoning used in this Local Plan update; As the registration application was under a National Planning Authority then a local planning authority can not overrule the national decision, as can not a Local Plan review when the same evidence is used in all three. But the NPPF provides the solution for the Local People in paragraph 15 and paragraph 11b)i the local people can restrict the size of the development. This is a platform the Local People can shape their surroundings and accept.

The site of the battle of Winwick Pass as shown on the Historic England Registration map. Protected by the NPPF 2018, 16. Conserving and enhancing the historic environment:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as [Registered Battlefield] World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁶¹. These assets are an irreplaceable resource, and should shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations⁶².

⁶¹ Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.

⁶² The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, as well as to plan-making and decision-making.

185. Plans should shall set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should shall take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;***
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;***
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and***
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.***

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should shall be given to the asset's

18 conservation (and the more important the asset, the greater the weight ~~should~~ shall be). **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.** 18

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), ~~should~~ shall require clear and convincing justification. Substantial harm to or loss of:

- a) **grade II listed buildings**, or grade II registered parks or gardens, ~~should~~ **shall be exceptional**;
- b) **assets of the highest significance**, notably scheduled monuments, protected wreck sites, **registered battlefields**, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, ~~should~~ **shall be wholly exceptional**.⁶³.

Paragraph 193 states:

"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

This means any harm is not a decision factor as the NPPF states irrespective as these important sites are to be totally untouched and preserved, so that the Local People can shape their surroundings not just for this but for future generations to understand and enjoy as learn (education) about the history that surrounds them. Due to the NPPF paragraph 184 stating:

- i. *"These assets are an irreplaceable resource, and ~~should~~ shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations"*

18 To have in this paragraph "future generations" means this is beyond any plan-making or decision-taking period. So makes it clear that a designated Heritage Asset is irreplaceable so must be treated as such. The removal or destruction of a heritage asset does not shape the Local People's surroundings. 18

The remaining land on Parkside West

Though the years after the colliery closed in 1993, nature has taken over the agricultural land and various flora and fauna has re-populated the land and habitats.

The Local People will only approve Policy Local 10LP which replaces Policy CAS 3.2 Parts concerning Parkside west points 1 to 13 by:

Policy LOCAL 10LP

This policy is to ensure the right educational needs for the local people is achievable to in order that this and future generations can advance in order that they can have a healthier and better well-being life. In order to do so the Council and the Local People will and shall:

Only be concerned in this policy with the land as shown in plan 8EA is the area concerned in this policy which incorporates the land reserved as shown in plan 7EA

Promote Parkside West to be an educational development not a B8 development.

Establish a grant or sponsorship based system that benefits the Local People to enter the educational development to further their career prospects.

Ensure the educational development is only built on the former workings and footprint of the former colliery.

Ensure the spoil heaps are not excavated for further development(s), but to be retained as Forest using the Northern Forest scheme for funding.

Ensure the former agricultural fields closest to the A49 Winwick Road are retained as Farm Land or associated educational sports uses.

Preserve the Designated Heritage Assets as these assets are an irreplaceable resource, and shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Newton Park Farm access: Newton Park Drive is retained as the entrance for utilities and access to and from Newton Park Farm, with the relationship with 7EA. This could mean a road bridge, automated level crossing or similar once 7EA is in need of being developed.

Registered Battlefield: The area in shown in Historic England registration area for the battlefield of Winwick Pass. The part located in Newton Park to remain as a field where only agricultural use or a forest under the Northern Forest Scheme. Allowing access for the local people to enjoy and understand the history of the area not just for existing but future generations.

Utilise the advantage of Newton Railway station close to the site will allow students to travel to the educational development either on a daily basis or term-time basis.

Permit accommodation can be utilised by those locals whom desire to rent out lodgings to students.

Promote Newton High Street shops for relaxation and social events for the students.

Preserve the access only for the educational establishment from the existing A49 entrance with no further or future connection to the A573 Parkside Road.

4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development, due to its location close to the M6, M62 and A580 and to major north-south and trans-Pennine rail routes. There is also a unique opportunity to develop land at Parkside for rail-enabled and other employment development. The needs for employment development are set out in further detail in Policy LPA04.

11
LPA04
Site 7EA
8EA

Comments

The sentence "There is also a unique opportunity to develop land at Parkside for rail-enabled and other employment development." needs to be changed to

"There is also a unique opportunity to develop land as shown in 7EA at Parkside East for rail-enabled and other employment development."

Policy LPA 04 needs to be changed with regards to B8 employment, where it states B8 change to "*Educational type employment on 8EA Parkside west*".

4.6.12 The interconnected sites of Parkside West and East benefit from a location at the heart of the north-west motorway network and access to the national rail freight network, presenting an opportunity to provide an employment development that will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort. Policies LPA04, LPA04.1 and LPA10 set out details of the proposed development of these sites. The Council will also support steps to improve transport linkages between Parkside, the rest of the Borough and surrounding areas to facilitate sustainable access for the workforce.

Comments

References to 8EA as a B8 employment zone need to be removed: Paragraph 4.6.12, (where strikethrough shows text removed and text underlined added indicates text added) to read as:

~~The interconnected sites of Parkside West and East~~ benefits from a location at the heart of the north-west motorway network and access to the national rail freight network, presenting an opportunity to provide an employment development that will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort. Policies LPA04 (B8 changed to Educational workforce for Parkside West), LPA04.1 (with all references to 8EA removed) and LPA10 (with all references to 8EA removed) set out details of the proposed development of these sites. The Council with approval from the local people will also support steps to improve transport linkages between Parkside, the rest of the Borough and surrounding areas to facilitate sustainable access for the workforce.

4.10 Policy LPA04: A Strong and Sustainable Economy

Table 4.1: Allocations for Employment Development

Policies Map Site Reference Number ¹⁵	Site Name	Indicative Site Area (hectares)	Appropriate Use(s) ¹⁶
1EA	Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington)	31.22	B2, B8
2EA	Florida Farm North, Slag Lane, Haydock	36.67	B2, B8
3EA	Land North of Penny Lane, Haydock	11.05	B2, B8
4EA	Land South of Penny Lane, Haydock	2.16	B2, B8
5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	B2, B8
6EA	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	20.58	B2, B8
7EA	Parkside East, Newton-le-Willows	64.55 ¹⁷	See Policy LPA10
8EA	Parkside West, Newton-le-Willows	79.57 ¹⁸	B2, B8
9EA	Land to the West of Sandwash Close, Rainford	6.96	B2, B8
10EA	Land at Lea Green Farm West, Thatto Heath	3.84	B1, B2, B8
11EA	Gerards Park, College Street, St.Helens Town Centre	0.95	B1, B2, B8
TOTAL		265.3	

¹⁵ Sites 2EA and 6EA are subject to existing planning permissions for employment development.

¹⁶ The phrases B1, B2 and B8 in Policy LPA04 refer to use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended).

¹⁷ The Parkside East site has a gross area of approximately 124.55ha, of which at least 60 ha is reserved for development of a Strategic Rail Freight Interchange or other rail enabled use (see Policy LPA10). The indicative site area of 64.55 ha represents the remainder of the site which may be developed for a wider range of employment uses subject to compliance with Policy LPA10. A further 5.58ha of land is included (to the west of the M6) to facilitate the provision of rail access to the site from the north.

¹⁸ 79.57ha of land is allocated for employment use at the Parkside West site. This area excludes the 5.58ha of land which is required to facilitate rail access to site 7EA and a further 12.1 ha that is occupied by a spoil heap which is not considered developable.

Comments

Entry 8EA B8 changed to Educational workforce for Parkside West

4.12.6 The ELNS Addendum Report identified employment land OAN on the basis of historic trends, the need for a 5 year buffer to ensure choice and flexibility, and the potential for SuperPort¹⁹ and a future Strategic Rail Freight Interchange (SRFI) at the former Parkside Colliery to increase demand for employment land in the Borough, particularly in the large-scale logistics sector. It identifies an employment land OAN of up to 239ha from 2012²⁰ to 2037. It also splits this overall need indicatively into individual use types, based on sectoral forecasts from Cambridge Econometrics and Oxford Economics and the market drivers underpinning local employment land demand, as set out in Table 4.2.

Comments

The phrase “and a future Strategic Rail Freight Interchange (SRFI) at the former Parkside Colliery to increase demand for employment land in the Borough” needs to be changed to:

“and a future Strategic Rail Freight Interchange (SRFI) at Parkside east 7EA at the former Parkside Colliery to increase demand for employment land in the Borough”

This removes 8EA Parkside west as B8 employment to Educational workforce for Parkside West

Table 4.2: St.Helens Borough Estimated Employment Land Needs 2012-2037

Employment Type	Hectares
B1(a) Office	10-15
B1(b) Research and development	1-4
B1(c) Light Industry	15-20
B2 General industrial	55-70
B8 Storage and Distribution	110-155
Total employment needs	190-239

Comments

Re calculate B8 Storage and Distribution due to Parkside west as employment to Educational workforce for Parkside West

4.12.7 Based on the OAN identified in the ELNS Addendum Report up to 2037, the OAN requirement for 2012-2035 has been calculated as a minimum of 227.4ha as shown in Table 4.3. This figure has been calculated by projecting forward the historic 5.8ha per annum growth scenario for the 1997-2012 period (referred to in the ELNS Addendum Report) from the base date of 2012 to the end date of the Plan (2035), and then adding a 5 year buffer to the baseline OAN (to ensure adequate choice and flexibility) and the recommended allowance for SuperPort and Parkside SRFI of 65ha from the ELNS Addendum Report.

Table 4.3: Objectively Assessed Need for new employment land - 2012-2035

Local Plan Objectively Assessed Needs Requirement 2012-2035	Hectares
Baseline OAN 2012 to 2035 (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)	133.4
5 year Flexibility Buffer	29
Allowance for SuperPort and Parkside SRFI	65
Total	227.4

4.12.8 The residual requirement for employment land (i.e., the minimum supply from new sites that must be provided for in the Plan) has then been calculated by allowing for take-up of employment land since 2012 against the OAN (227.4ha) and the existing supply of developable employment land in the Borough as shown in Table 4.4. Once an allowance of 2.7ha for take up and 9.34ha for the existing developable employment land supply in the Borough has been applied the residual requirement is 215.4ha.

Table 4.4: Residual Employment Land Requirement - 2018-2035

Local Plan Employment Land Residual Requirement	Hectares
Local Plan OAN 2012-2035 including 5 year buffer and allowance for Parkside SRFI and SuperPort	227.4
Take-up between 1 Apr 2012 and 31 Mar 2018	2.7
Existing Supply of Developable Employment Land (31 Mar 2018)	9.3
Total Residual Requirement (2018 – 2035)	215.4

4.12.9 The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 2035. This approach is in line with the ELNS Addendum Report and is because the land take-up scenarios (from which the OAN is derived) are based on employment land gains only. It also cannot be assumed that losses of, for example, employment land that is not readily developable for employment uses and / or that has been vacant for a long time, need to be replaced.

The Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA)

4.12.10 The draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) - published for stakeholder consultation in October 2017 - considers the need for employment development across 7 local authorities in the Liverpool City Region and West Lancashire. Together these authority areas are identified as the Functional Economic Market Area (FEMA).

Comments

See 4.12.12

4.12.11 The draft SHELMA identifies that, across the FEMA as a whole, at least 397ha of land is required for large scale B8 development (capable of accommodating units of over 9,000m²) between 2012 and 2037. However, it does not apportion this need between local authority areas as it states that such apportionment should be guided by the distribution of suitable sites. The draft SHELMA also assesses the need for B1, B2 and for smaller scale B8 development (of less than 9,000m²). Unlike those for large scale B8 uses these needs are apportioned at a district level, and for St. Helens Borough are identified as totalling at least 61.4ha of land between 2012 and 2037.

Comments

See 4.12.12

4.12.12 Following the finalisation of the SHELMA, the Council will continue to work collaboratively with the Liverpool City Region and West Lancashire authorities in order to progress the matters addressed within it including the required distribution of land for large scale B8 warehousing. Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling 215.4ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough's needs for B1, B2 and small scale B8 uses and a substantial proportion of the subregional need for large scale B8 uses identified to date in the FEMA as a whole.

Comments

SHC has stated "required distribution of land for large scale B8 warehousing", this to the Local People means Warehousing of Height of 22m to 30m which comprises of floor to roof Pallet sized racking where forklift movements within for storing white goods and/or dry food products and/or clothing. This has to be questioned as the need with the current population satisfied with the current warehousing. So this additional B8 large scale warehousing can only satisfy the future population of the Northwest. Statistical forecasts show that the 20 year growth of the Northwest of 6.9 Million People from Carlisle to Chester Liverpool to Manchester will increase by 500,000 over the whole Northwest region over the 20 year forecast. With the number of Local Authorities in the Northwest region this breaks down to a population growth of about 20,000 people over the 20 year period. This is what SHC has as their growth in population, to which not all will be of an employable age. The figure from the Employment documentation of 14,000 jobs complies with the statistical forecasts.

So this means the B8 that SHC is proposing in the St Helens area is for the statistical forecast growth in the Northwest, in particular in St Helens (as all other local authorities will be facing the same growth forecast).

This means the SHC B8 warehousing shown the businesses that occupy these B8 warehouses, their products will be bought by the 20,000 statistical growth in the borough of St Helens. But the growth in St Helens will be working in these B8 warehouses. Therefore shows the B8 warehousing SHC stated has a flawed assumption and expectation. This also applies to the 7EA and 8EA and associated policies

This platform for the local people can not shape their surroundings therefore the B8 strategy proposed by SHC must be drastically rethought and a more realistic approach shown to the Local People. So the B8 warehousing is not sound or justified.

Employment Land Allocations

4.12.13 To strengthen the local economy, St.Helens Borough needs to build on those sectors where the Borough enjoys a competitive advantage. As identified above one such sector is logistics and distribution, where the Borough's location in relation to the M6 and M62 motorways and the rail network makes it particularly attractive for development. Market needs for the large scale distribution sector (for units of above 9,000m²) generally focus on sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in this Plan.

Overall comments Policy LPA04:

Remove, re calculate or change all references to B8 at Parkside west employment to Educational workforce for Parkside West.

Also see 4.12.12

4.13 Policy LPA04.1: Strategic Employment Sites

Policy LPA04.1: Strategic Employment Sites

1. The following sites allocated under Policy LPA04 shall constitute Strategic Employment Sites²¹:
 - 1EA: Omega South Western Extension, Land north of Finches Plantation, Bold;
 - 2EA: Land at Florida Farm North, Slag Lane, Haydock²²;
 - 6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock;
 - 7EA: Parkside East, Newton-le-Willows; and
 - 8EA: Parkside West, Newton-le-Willows.
2. Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least:
 - a) amount of development and proposed uses;
 - b) phasing of development across the whole site;
 - c) indicative layout and design details for the whole site, that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;
 - d) measures to provide good levels of accessibility to the whole site by public transport, pedestrian and cycling links;
 - e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;
 - f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way;
 - g) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;
 - h) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;

- i) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and
 - j) how development of the site as a whole would comply with other relevant policies of the Local Plan.
3. Detailed development proposals within a Strategic Employment Site must be accompanied by a comprehensive package of training schemes and / or other measures to enable local residents (including unemployed and disadvantaged people) to access and benefit fully from the employment opportunities provided at the Site.
4. Development within Strategic Employment Sites will be required to, subject to compliance with Policy LPA08, provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on-site or off-site and must be provided in time to meet the needs of the development. Where the specific development proposal would only cover part of the Strategic Employment Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in paragraph 2 of this Policy.
5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA,6EA,2EA and 8EA) and Policy LPA10 (in the case of site 7EA).

Comments

The Policy LPA04.1: Strategic Employment Sites to have all references to 8EA Parkside west removed

Also see 4.12.12

4.34 Policy LPA10: Parkside East

Policy LPA10: Parkside East

1. The Parkside East site (identified as Site 7EA in Policy LPA04) shall be considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes.
2. The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would:
 - a) bring significant inward investment, local employment and training benefits for the local community; and
 - b) (i) be rail served (i.e., requiring on-site access to a railway); or
(ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings and landscaping), on at least 60 hectares of the site, at any time in the future.
3. Proposals for development within site 7EA will be required to:
 - a) satisfy the masterplanning requirements set out in Policy LPA04.1
 - b) create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles;
 - c) mitigate any adverse impacts on the surrounding strategic and local road network;
 - d) comply with Policy LPC11 in relation to the protection of designated heritage assets;
 - e) achieve direct rail access to and from the Liverpool / Manchester ('Chat Moss') and the West Coast Main Lines (unless agreed otherwise by the Council);
 - f) be designed to minimise impacts on residential amenity;
 - g) establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy LPA07;
 - h) make provision for the positive management of existing and new environmental assets; and

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- i) put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to and employment at the site.
 - 4. That part of site 7EA which falls to the west of the M6 is safeguarded from all forms of development so that it may provide future siding facilities in connection with the development of an SRFI or other rail-enabled development within the part of the site which falls to the east of the M6 (see policies map).

4.36 Reasoned Justification

4.36.1 There is a long-standing history of developer interest in providing a Strategic Rail Freight Interchange (SRFI) on land within and close to the former Parkside Colliery. There have been a number of planning applications for such a use and the area was highlighted as a potential location for this use in the former Regional Spatial Strategy for the North West (2008).

Comments

Also see 4.12.12

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Since 1994 SHC has been advertising what seems like hundreds of reports saying "how Wonderful Parkside is as a Multi-modal Rail Freight Terminal and how this will provide jobs. But the result was the developers withdrew. In 1994-1998 British Coal/Morrisons doth withdrew due to not being able to formulate a transport strategy that did not impact the local area. In 2000 – 2002 Railtrack delayed in placing an application though produced a masterplan then the Labour Government's Secretary of State for Transport brought Railtrack into administration. In 2004 to 2009 Astral Developments submitted a scheme that was the first to use the east and West sides of the M6 with a dedicated new motorway M6 junction after numerous changes in their transport strategy for the area failed to finalise a solution and was taken-over by the United State company Prologis in 2009. In 2009 Prologis nearly filed for chapter 11 in the States, where with regards to the long-standing application first started by Astral Development they place the application on-hold due to economic reasons. Later Prologis merged with another United States Warehouse construction company and re-opened the Parkside application but approx 6-months later withdrew. Finally Prologis was a part of the SHC local Plan to formulate Policy CAS 3.2 but once Policy CAS 3.2 was adopted sold Parkside to SHC and Langtree plc in 2013. So the developer interest can be said to have been in doubt – one thing that can be said from all developers is: They all failed to solve the road transport problem access to the Parkside area and the direct access to the motorway network. The 2018/20219, SHC road transport solution is nearly identical or along the same lines to the British Coal/ Morrisons scheme in 1994.

Having reports saying Parkside is a suitable site all fail to address the local transport problem. So this paragraph an other related paragraphs do not show any weight towards showing Parkside on transport grounds is a sustainable development and shows due to

these transport failures not to be sound. To which the Local People agree as it fails to be a platform the local people can shape their surroundings.

National Policy Statement for National Networks (2015)

4.36.2 The National Policy Statement for National Networks (NPS) 2015 recognises that the railway network forms a vital part of the UK's transport infrastructure that must:

"... provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life".

4.36.3 The NPS strongly supports the development of an expanded network of SRFIs to help promote economic development (by responding to the changing needs of the logistics sector and addressing growth in movement of freight by rail) and addressing climate change. The NPS also stresses that SRFIs should be located near to business markets such as major urban centres or groups of centres and be linked to key supply chain routes. It suggests that SRFI capacity needs to be provided at a wide range of locations to provide the flexibility needed to match the changing demands of the market.

Comments

See 4.36.1

Transport for the North

4.36.4 The Transport for the North (TfN) Freight and Logistics Report (2016) concludes that 850ha of land should be developed for rail and / or water connected Multimodal Distribution Parks (MDPs) between 2016 and 2033. This is required to reduce the cost of freight transport, expand market share in the logistics sector and attract private inward investment to the North.

4.36.5 The Draft TfN Strategic Transport Plan (2018) identifies that the growth of the freight and logistics sector will be crucial to support the transformational economic growth ambitions of the North. It also identifies the need for improvements in the arrangements for interchanging goods movements between road and rail, and supports the development of sites with multi-modal access.

4.36.6 The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres). The report identifies four main principles for investing in and enhancing rail freight interchange infrastructure, including north-south and east-west connectivity and intermodal connectivity. These principles will be used to guide Strategic Development Corridor studies to be undertaken by TfN to produce a prioritised programme of investment.

Comments

See 4.36.1

Liverpool City Region Growth Plan and Strategic Economic Plan (2016)

4.36.7 The LCR Growth Plan and Strategic Economic Plan (2016) identifies logistics as one of six growth sectors. Due to its location with good access to the M6 and two major railway lines, the Parkside site has substantial scope to help grow the logistics sector by being developed as an SRFI. The LCR Freight and Logistics

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13 Strategy is being prepared to maximise the contribution made by the freight and logistics sector to the economic growth of the City Region. This is expected to present a suite of interventions to capitalise on this opportunity. The LCR Combined Authority is also continuing to explore options to progress the design of the required rail connections to the Parkside site. 13

Comments

In the previous reports the developer of Liverpool 2 deep water terminal stated that Parkside was not a part of their strategy and made a suggestion for Parkside to get containers from the South of England. Further the developer of the Liverpool 2 Deep Water terminal is on record of succouring the available Rail Route on the Chat Moss Railway Line for their needs between Liverpool and Manchester and other connections. Also See 4.36.1

Parkside Link Road scheme

12 4.36.8 The Parkside Link Road will comprise a 3.5km length of single / dual carriageway road that will provide access to the Parkside East and West sites (sites 7EA and 8EA) from M6 Junction 22 and the local road network, using the existing A573 Parkside Road bridge over the M6. The Council is in the process of securing funding to progress the delivery of the link road scheme. 12

Comments

See also 4.36.1

12 The Parkside Link Road (PLR) is an indirect access to the Motorway M6 which does not comply with Policy CAS 3.2 point 1, This also does not comply with the Previous Inquiry circa 1996 to 1998 where Warrington Borough Council recommended to the inspector for a direct link to the motorway M6, the inspector approved of a direct link but at the time due to the type of development proposed saw the cost of construction prohibitive. Subsequent developers Railtrack Plc, Astral Developments and Prologis all complied with designs that addressed the inspectors direct link to the M6 but all developers withdrew for differing reasons. The current proposal submitted by SHC as developer of the PLR fails to follow the inspector's recommendation and the agreed with the Local People in Policy CAS 3.2. The Transport section at 4.e. addresses the result of the in-direct access to the M6 via the local Road network further as the PLR uses the A573 M6 bridge to link Parkside west with Parkside east the A573 local road network at the bridge allows entry/exit via Hermitage Green where the road that from 642AD circumvents the place where King Oswald of Northumbria was slain by King Penda of Mercia at the Battle of Maserfeld on 05 August 642AD. Where the piety of King Oswald was sainted. The Well at this location is recorded by the Bede in 60 years later. This circumvention route of the A573 is a tight S-bend where on a regular basis even one HGV sometimes gets stuck due to the on-coming cars. This will become a point of concern if the PLR is allowed to use the A573/M6 Bridge while the access to Hermitage Green remains open to all traffic to use the A573/M6 Bridge. This SHC has not considered when planning the PLR as this area is in Warrington, SHC seems to have placed the problem of Warrington Borough Council and the Local People of Hermitage Green who will have to live with SHC flawed PLR planned route. The resulting congestion will result at the "A573 Hermitage Green S-bend with HGVs" as follows: 12



Schematic view of congestion grid-lock at the Hermitage Green "S" Bend on Golborne Road/Parkside Road if the Proposed Parkside Link Road goes ahead.

12 The Local People see the Parkside Link Road as a FLAWED solution due to being indirect over the two Inspector's decisions in 1996-98 (Unitary Development Plan) and in 2011-12 (Local Plan), as the resultant commercial traffic will impact the Local Roads with congestion, Air Pollution (Clean Air Strategy 2019), and continual noise on a 24/7/365 basis and is not a platform the Local People can approve to shape their surroundings. 12

Parkside Logistics and Rail Freight Interchange Study (AECOM and Cushman & Wakefield 2016)

14 4.36.9 The Parkside Logistics and Rail Freight Interchange Study 2016 investigated delivery options for road and rail-linked logistics development on land at Parkside East and West. It confirmed, having regard to the results of consultation with relevant industry stakeholders, that there is a clear demand for a new SRFI in the North West. It also identified that, due to its geographical location and specific characteristics Parkside is uniquely placed to satisfy this demand. In particular the opportunities for rail access from the site are considered to be second to none in the North West with access being easily achievable to both the West Coast Mainline and to the East-West ('Chat Moss') line between Liverpool and Manchester. This will allow train movements to / from the north, south, east and west to be catered for at the site. 14 LPA 10 Ste 78 A 2 85 A

4.36.10 The Study also identified that the development of an SRFI at Parkside would bring substantial benefits in terms of modal shift of freight movement (from road to rail) and therefore of reducing carbon emissions, when compared with the development of purely road based logistics uses of an equivalent scale.

4.36.11 Based on evidence available when it was completed, the Study indicates that the Parkside site could viably deliver a medium (8 trains per day) to large (12 trains per day) facility. The Study concludes that to deliver a viable SRFI at Parkside, land on both the west and east side of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

Comments

14 The eCO₂ of constructing the Phase 1, Phase 2, Phase 3 (SRFI) and PLR with each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 50,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes This does not include the HGV containers that on average weight (from full of cornflakes to full of potatoes) is 14tonnes per container at 68g eCO₂/tonne/kilometre for HGV, or the Freight train having between 38 containers to 50 containers per train with 38g eCO₂/tonne/kilometre The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO₂ neutral before any savings to meet Climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019". 14 The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the

14 Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings. 14

The Local People look at this very very seriously as the Particulates (PPMs) from HGV vehicles and their commitment to eCO₂, NO_x, SO_x, Methane and Ammonia among other climate change and clean air products not just for this generation and their children but for their future generations and their children. The Local People do not see or approve this platform for the Local People to shape their surroundings.

Other potential employment uses

4.36.12 The strategic location of the Parkside East site next to major north-south and east-west rail routes also makes it attractive to a range of other rail-enabled uses such as the manufacture and maintenance of rolling stock, and other industrial uses that require access to rail to serve their markets. The Parkside East site will be considered suitable in principle for these uses provided they bring significant inward investment and / or local employment and training opportunities, the benefits of which would outweigh any impact that the proposal would have on the scope to develop an SRFI at this location.

Comments

14 The eCO₂ of constructing the Phase 1, Phase 2, Phase 3 (SRFI) and PLR with each 1m³ of concrete used equates to 2.38 tonnes eCO₂, and 1m³ of steel equates to 7.9 Tonnes of eCO₂ the estimate for construction of eCO₂ of the size of warehousing envisaged of size 50,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes This does not include the HGV containers that on average weight (from full of cornflakes to full of potatoes) is 14tonnes per container at 68g eCO₂/tonne/kilometre for HGV, or the Freight train having between 38 containers to 50 containers per train with 38g eCO₂/tonne/kilometre The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO₂ neutral before any savings to meet Climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019". 14

The Local People look at this very very seriously as the Particulates (PPMs) from HGV vehicles and their commitment to eCO₂, NO_x, SO_x, Methane and Ammonia among other climate change and clean air products not just for this generation and their children but for their future generations and their children. The Local People do not see or approve this platform for the Local People to shape their surroundings.

24 4.36.13 The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008. 24

Comments

24 This proves as the Newton Park Farm Complex on Parkside West access via Newton Park Drive is shown to be required by the Phase SRFI, by having been removed in the Phase 1 masterplan(s) and a new transport access and utilities access from the Newton Park Farm Complex links and is dependant on the Phase 1, Phase 2 and the Parkside Link Road (PLR) in order. Then the action of doing this planning alteration means that the SRFI Rail Spur line being a part of the 60Ha threshold of a SRFI use as stated in paragraph 4.36.13 then Newton Park Farm alteration to accommodate the SRFI Rail Spur in order for the Planning Act 2008 to perform an environmental Statement under the Directive 2014/52/EU the phases: Phase 1 Phase 2 and the PLR are a part of the Nationally significant Infrastructure Project under the said Act. 24

Justification for removing Site 7EA from the Green Belt

15 4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016). 15

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

15 4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site. 15

Comments

(red text in 4.36.16 above to emphasise reasoning)

As there is no policy for 8EA then the policy for 8EA is Policy CAS 3.2 and as 8EA has no SRFI fully developed, does not comply with CAS 3.2. In fact, neither 7 EA or 8EA comply with CAS 3.2 then according to CAS 3.2 with respect to Green Belt the exceptional

circumstances The "subsequent revision" i.e. St Helens Local Plan Submission Draft January 2019, has been preceded by:

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

Also 8EA has not met as shown in CAS 3.2:

15 "1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;" i.e. the application(s) Phase 1, Phase 2 and the Parkside Link Road have not been approved so Policy CAS 3.2 is not justified, but if the plans had been approved using CAS 3.2, then Parkside west still can not be taken out of Green Belt due to "Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

What SHC is doing here is is akin to the judgment [2012] EWHC 1889 (Admin) Case No: CO/12156/2011 where the press transcripts of the hearing sessions:

<http://www.placenorthwest.co.uk/news/archive/11721-judicial-review-opens-into-amazon-widnes-shed.html>

<http://www.placenorthwest.co.uk/news/archive/11729-halton-defends-action-over-amazon-widnes-shed.html>

<http://www.placenorthwest.co.uk/news/archive/11763-amazon-widnes-hearing-closes.html>

<http://www.placenorthwest.co.uk/news/archive/12008-halton-loses-amazon-widnes-shed-judicial-review.html>

quoted:

"Kolinsky said the application by Prologis did not refer to the UDP condition of phasing brownfield sections of Ditton ahead of greenfield. He added that the Halton planning officer's report to the planning committee had 'air-brushed out' analysis of conditions set in the UDP.

15 His Hon Judge Gilbert QC, hearing the case, said: "I find it quite baffling that a professional developer of the size of Prologis did not address the most important planning policy [regarding the application]. It's sad."

Halton's planners said in witness statements there can be flexibility in the phasing of the development of the logistics park next to the Mersey.

The judge twice likened this idea of flexible phasing to Eric Morecambe playing Grieg's piano concerto - a reference to the episode of Morecambe & Wise in 1971 when Morecambe attempts to play Grieg for pianist and conductor Andre Previn. Previn complains he is playing all the wrong notes but Morecambe declares that he is in fact playing all the right notes but not necessarily in the right order."

SHC are trying just like in the above court case to change the conditions of the local plan: to remove from green belt the area before the land has been developed either partly or

15 fully (i.e. no special circumstances proven legally) when the policy categorically states that the SRFI is fully developed on site before any review of green belt boundaries. Where in fact no development has even occurred though 3 applications are under the legal planning system using Policy CAS 3.2, to which all three planning applications have failed to follow. So SHC can not even follow their own current adopted Local Plan Policy CAS 3.2 knowingly: (red text to emphasise reasoning) 15

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

The Local People will not sanction this section due to SHC not even following their own Policy. This means the Green Belt sections and figure 4.4 (see map 2) must be totally struck out of the St Helens Local Plan Submission Draft January 2019 as follows:

~~"Justification for removing Site 7EA from the Green Belt~~

15 ~~4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).~~ 15

~~4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.~~

~~4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site."~~

7.4 Policy LPC 06: Biodiversity and Geological Conservation

Policy LPC06: Biodiversity and Geological Conservation

European sites

1. Development that is likely to have a significant effect (either alone or in combination with other plans or projects) on one or more internationally important site(s), including any areas of supporting habitat that are functionally linked to the site(s), must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided, or where this is not possible, be mitigated to protect the integrity of the site(s). Development that would adversely affect the integrity of one or more internationally important site(s) will only be permitted where there are no alternative solutions or there are imperative reasons of overriding public interest, and where suitable compensatory provision has been made. Any mitigation or compensatory provision must be assessed in a project-related Habitats Regulations Assessment and be fully functional before any likely adverse effect arises.

Other protected sites, habitats and species

2. Development that would cause significant harm to a Site of Special Scientific Interest (SSSI), Local Wildlife Site, Local Nature Reserve, Local Geological Site, Priority Habitat(s), legally Protected Species and / or Priority Species, that would not be adequately mitigated or as a last resort compensated, will be refused.
3. Development that would be likely to cause any harm to ecological or geological interests will only be permitted in:
 - a) Sites of Special Scientific Interest where there are no alternatives and where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) ecological network; and
 - b) Local Sites (Local Wildlife Sites, Local Nature Reserves and Local Geological Sites) and Priority Habitats: where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site (or Priority Habitat) and its broader contribution to the LCR Ecological Network.

Mitigation, replacement or other compensatory provision

4. Where necessary to avoid harm, appropriate mitigation, replacement or other compensatory provision will be required. The location of such measures will be targeted, using the following sequential approach (with (a) being the preferred approach and (d) being the least preferred):
 - a) on the development site;

- b) locations within the immediate locality and /or supporting LCR Ecological Network;
- c) locations that fall within the LCR Nature Improvement Area and within the Borough; and lastly
- d) locations that fall within the LCR Nature Improvement Area but outside the Borough.

Evidence requirements

- 5. Development proposals that would affect a nationally or locally designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and / or compensation proposals, and of any proposed management measures.
- 6. Designated sites are shown on the Policies Map. Plan policies will also apply to any other sites that may be recognised during the Plan period as being of nature conservation importance, including land provided as compensation.

Internationally important sites

15 7.6.3 Paragraph 1 of Policy LPC06 sets out the requirements for developments that fall within St. Helens Borough but that may affect the internationally important nature sites in nearby districts. These sites include the sites of international nature importance listed in paragraph 7.6.1 above. Any development that may affect such a habitat (for example by affecting an area of supporting habitat, some of which cover parts of the Borough) must be accompanied by sufficient information to enable a Habitat Regulations Assessment to be undertaken. This process includes 'Appropriate Assessment' of any significant effects and specific monitoring and / or mitigation or compensation where required. Alternative solutions to be considered may include alternative locations for the proposed development, different scales or designs of development, alternative processes, or not going ahead with the development and should be considered at the earliest stage. Planning proposals should also consider potential impacts arising from, for example, other sources of pollution, increased human disturbance (including the impact of cumulative recreational pressure on the internationally important sites) or hydrological changes. 15

15 7.6.4 The Local Plan includes several site allocations for development that have been identified (in the Habitats Regulations Assessment of the Plan) as being most likely to provide functionally linked land connected to an internationally important site. These include: sites 6EA, 7EA and 8EA (allocated for employment development), site 8HA (allocated for housing) and sites 1HS, 4HS, 5HS, 7HS and 8HS (safeguarded for housing development). It is possible that other sites may also provide such habitat. Where it is possible that a site may provide supporting habitat, proposals for development will be required to contain sufficient evidence (such as a wintering birds survey), to enable their significance to the European 15

15 sites to be ascertained, and any necessary mitigation or compensation measures to be identified. 15

Comments

(highlighted text in 7.6.4 above to emphasise reasoning)

Remove 8EA and replace with LOCAL 10LP

7.13 Policy LPC09: Landscape Protection and Enhancement

Policy LPC09: Landscape Protection and Enhancement

- 16
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;
 - 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;
 - c) be informed by relevant guidance including the St.Helens Landscape Character Assessment and the Merseyside Historic Character Study; and
 - d) include assessments of the impact of the proposal on the landscape and appearance of the area, carried out in accordance with any relevant best practice guidelines.
 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.
- 16

7.15 Reasoned Justification

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 European Landscape Convention was ratified by the UK Government and came into force in 2007. The Convention acknowledges that the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas. The Convention's definition of landscape protection is "to conserve and maintain the significance or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and / or from human activity."

16 7.15.2 Natural England's National Character Areas (56) Lancashire Coal Measures, (32) Lancashire and Amounderness Plain and (60) Mersey Valley provide a high level overview of the landscape around the Borough and act as a starting point to the understanding of the area's landscape character and heritage.

7.15.3 The St.Helens Landscape Character Assessment (2006) provides a more detailed overview of the landscape character of the Borough and provides borough-wide guidance on landscape and visual sensitivity, woodland planting and landscape strategies. The Character Assessment (or any future replacement) should be used as a context for site-specific assessments of development proposals. 16

7.15.4 The Merseyside Historic Landscape Character Study provides further context for how development should reflect, safeguard and enhance landscape heritage and local distinctiveness.

Comments

(highlighted text in 7.15.4 above to emphasise reasoning)

The Landscape of Hermitage Green Valley will be affected by the Drainage from the Parkside west 8EA. Due to the flooding this will cause the landscape to be seriously affected the Heritage of the Area due to the landscape of the valley.

Policy LPC10
75A & 85A

7.16 Policy LPC10: Trees and Woodland

Policy LPC10: Trees and Woodland

1. The Council will, working where necessary with the Mersey Forest and other partner organisations, seek to increase the extent of tree cover across the Borough and to protect and enhance the multi-purpose value of trees, woodlands and hedgerows.
2. New development, as appropriate having regard to its scale and nature, will be required to include the planting of new trees, woodlands, hedgerows and / or financial contributions towards off-site provision. Arrangements should be made for any tree(s) or hedgerow(s) that are planted to be replaced in the event of failure or damage within a prescribed period.
3. Proposals for new development will only be permitted if they would conserve, enhance and / or manage existing trees, woodlands and hedgerows as appropriate, for example by being laid out to provide adequate spacing between existing trees and buildings and including long term management proposals.
4. Any development proposal that would affect a site containing tree(s) or woodland must be accompanied by a tree survey and an arboricultural constraints/implications report, produced to the current British Standard, to enable the effect of the development on the tree(s) to be properly assessed and appropriate tree protection measures to be identified. Any approved tree protection measures must then be maintained throughout the period of any demolition and / or construction works.
5. Development resulting in the loss or deterioration of any area of ancient woodland or of any ancient or veteran tree will be refused unless there are wholly exceptional circumstances in which the need for, and benefits of, the development would clearly outweigh any resultant loss and a suitable mitigation strategy exists.
6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period.

7. Proposals that would enhance the value and / or contribution of woodland in respect of: recreational or educational needs; health; the landscape or townscape; heritage; biodiversity; tourism; and / or economic regeneration will be supported.

7.18 Reasoned Justification

7.18.1 The Council supports the development of the Mersey Forest as part of the wider Northern Forest along the M62 corridor, as a key measure to ensure the Borough and the wider region is attractive and resilient to climate change.

7.18.2 Trees and woodlands are an integral component of Green Infrastructure forming part of the network of natural habitats and improving the visual appearance of the countryside and urban areas. They also provide opportunities for the positive use of the Green Infrastructure for recreation, education, health, biodiversity, regeneration and mitigation of adverse effects caused by climate change, air pollution and water run-off. Their value is recognised in the Regional Forestry Framework Woodland Strategy, St.Helens Landscape Character Assessment, North Merseyside Biodiversity Action Plan and Targets, Town in the Forest Initiative and Policy for Nature St.Helens.

7.18.3 The successful retention of healthy trees and planting of new trees as part of a new development can have numerous benefits for the community. In particular, trees can:

- enhance landscape character (in areas where trees are appropriate as guided by the St.Helens Landscape Character Assessment);
- be a vital component of Green Infrastructure;
- help to create a more positive image of an area and thereby encourage economic regeneration and inward investment;
- soften and screen buildings;
- enhance property prices;
- provide a vital role in respect of biodiversity and the urban ecosystem by helping to support a great variety of wildlife;
- save energy consumption through their moderation of the local climate;
- produce oxygen and help to lock up carbon emissions that contribute to global warming;
- help to stabilise ground;
- absorb water, control run-off and so help reduce flood risk;
- reduce noise by acting as a sound barrier;
- help to filter out pollution;
- provide shade;
- help alleviate the effects of extreme temperature and help to filter out harmful ultra violet radiation;
- help to improve mental wellbeing and reduce the stress of urban living; and
- form an important part of the heritage of an area.

7.18.4 The Council is a longstanding partner in the Mersey Forest, that was established

17 in 1991 with a vision to “get more from trees” to help make Merseyside and North Cheshire one of the best places in the country to live. Since then around 3,000ha of woodland or nine million trees have been planted. Woodland cover has doubled, from 4% to 8%, at a rate of three times the England average. The maturing woodland, including the former colliery sites now collectively known as Bold Forest Park, provides a recreation resource for much of the Borough and neighbouring authorities. The Mersey Forest Plan is a long term and strategic guide to the work of the Forest and its partners. In accordance with national planning policy it forms a material consideration in deciding planning applications.

7.18.5 National policy also requires local planning policies and decisions to contribute to and enhance the natural local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital – including the economic and other benefits of trees and woodland.

7.18.6 Woodlands have a wide range of benefits recognised in both the Mersey Forest Plan and the North West Regional Forestry Framework. Of particular significance in St.Helens is the contribution to urban regeneration. The Local Plan will be instrumental in delivering the St.Helens Woodland Strategy that was prepared in response to the City Growth Strategy objective of creating the Town in the Forest.

7.18.7 The North West Regional Forestry Framework is part of a wider national agenda on the protection, conservation and management of trees and woodlands across the UK. The Framework recognises the diverse, habitat rich and thriving 'green tourism' opportunities of trees and woodlands and sets out 'An Agenda for Growth' to help shape the woodland and forestry sector over the next 20 years.

7.18.8 Town in the Forest (2006) recognises the importance of St.Helens Borough undergoing an urban renaissance and utilising the urban fringe as a mechanism for urban renewal, through the development of linear forests in urban areas and connecting to community woodlands on the periphery.

7.18.9 All trees have a potential value to the character and amenity of the area. While particularly important trees will continue to be protected by Tree Preservation Orders, Policy LPC10 recognises that other trees affected by development should be identified, safeguarded, and where necessary, replaced.

7.18.10 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011) builds on the Natural Environment White paper and provides a comprehensive picture of how the Government will implement our international commitments. It aims to halt overall biodiversity loss and support healthy, wellfunctioning ecosystems and establish coherent ecological networks. In relation to forestry it aims to bring a greater proportion of existing woodlands into sustainable management and expand the area of woodland in England.

17 7.18.11 The Government's 25 Year Environment Plan (2018) has policies that include embedding an 'environmental net gain principle for development, including housing and infrastructure. As well as a focus on woodland to maximise its many benefits, including supporting the development of a new Northern Forest and larger scale woodland creation, it aims to create more green infrastructure and secure more tree planting in and around towns and cities. The value of trees in the landscape is also recognised in the St.Helens Landscape Character Assessment (2006).

7.18.12 All trees that are to be retained on site should be protected throughout the period

17 of development activity by protection measures. Proposals must also be supported by clear tree surveys, arboricultural implications / constraints plans, and tree protection plans. All work must comply with relevant British Standards that are extant at the time that the development is proposed and / or takes place.

7.18.13 The St.Helens Trees and Development SPD (2008) sets out further guidance to enable delivery of high quality developments that include new tree planting and the protection of existing trees as an integral part of their design. As woodlands are an important natural asset they are also subject to the controls set out in Policy LPC06. The St.Helens Nature Conservation SPD provides further guidance on the Council's approach, crucial parts of which are to ensure that appropriate mitigation or, as a last resort, compensation for any harm or loss to habitat(s) is made. 17

Comments

(highlighted text in 7.18.11 above to emphasise reasoning)

The 25 year Environment Plan (2018) and new Northern Forest and larger scale woodland creation. This must have included 8EA (now LOCAL 10LP) as an important area that contributes to the Northern Forest. To which the Local People will approve.

LPC11
79A-89A

7.19 Policy LPC11: Historic Environment

Policy LPC11: Historic Environment

1. The Council will promote the conservation and enhancement of the Borough's heritage assets and their settings in a manner that is appropriate to the significance of each asset. These include designated heritage assets such as Scheduled Monuments, Registered Battlefields, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and non-designated above ground assets and areas of archaeological interest.
2. All proposals for development that may affect a heritage asset or its setting should be accompanied by an Assessment of Significance that should form part of a Design and Access Statement and / or a Heritage Impact Assessment and clearly set out the significance of the heritage asset including any contribution made by its setting. The proposals should demonstrate how they respond to the significance of the asset. Merseyside Historic Environment Record (HER) should be consulted as a minimum.

Development affecting heritage assets

3. Development proposals that would lead to substantial harm to (or total loss of significance of) a designated heritage asset will be refused permission unless it can be demonstrated that:
 - a) the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or total loss; or
 - b) all the other exceptions set out in paragraph 195 of the National Planning Policy Framework (or any successor national policy that supersedes this paragraph) apply.
4. Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use.
5. Development involving harm to or loss of any non-designated heritage asset (such as any building identified on a Local List prepared by the Council) will be refused unless any public benefit from the development would outweigh such harm or loss.
6. Development and other works will be required to preserve or enhance the appearance, character and setting of all heritage assets (whether designated or not) by using good design and appropriate materials, detailing, scale, massing, siting, layout and landscaping.

- 18
7. Where the complete or partial loss of any heritage asset is justified, the asset's significance must be recorded to a standard agreed by the Council and made publicly available.

Areas of archaeological interest

- 18
8. Any development proposal that may affect one or more asset(s) of archaeological interest (whether designated or not) must include an appropriate desk-based assessment and where necessary a field evaluation, carried out by a suitably qualified person(s). Such evidence should identify any likely features of archaeological interest within or close to the site and how these would be affected by the proposal.
9. Development proposals affecting archaeological remains may be required (depending on the significance of the remains) to preserve the remains in situ or to secure the appropriate excavation and recording of the significance of the remains by a suitably qualified person.

Other implementation measures

10. The Council will:
- a) prepare, update and promote the implementation of Heritage Asset Appraisals and Management Plans and give appropriate weight to these in development control decisions;
 - b) work with partner organisations to interpret and educate the public about the heritage of the Borough;
 - c) take appropriate measures to improve public access to heritage assets; and
 - d) seek to secure the effective conservation and use of all heritage assets that are 'at Risk' within the Borough.

7.20 Policy LPC11:

Strategic Aims, Objectives and Key Delivery Mechanisms

Strategic Aims Met	SA 6
Strategic Objectives Met	SO 6.2
Is this a 'strategic' or 'local' policy?	Strategic
Key Delivery Mechanisms	<ul style="list-style-type: none"> • Development management process • Maintaining employment land supply • Facilitating housing delivery • Partnership working to secure conservation, recording and interpretation of heritage assets

7.21 Reasoned Justification

7.21.1 St.Helens Borough has a unique heritage, based upon its history connected with the railways, mining, glass and other industries. The Local Plan has a key role in improving the appearance and character of the built environment, and ensuring that it can be used in a way that adapts to changing social, economic and environmental requirements. Policy LPC11 sets out how the Council will seek to conserve the Borough's historic environment and promote awareness of its shared heritage.

7.21.2 National planning policy requires the Local Plan to set out a positive strategy for the conservation and enjoyment of the historic environment, and that planning applications should describe the significance of any heritage assets affected, including any contribution made by their setting. Development that would cause substantial harm to a designated heritage asset must be refused unless such harm would be necessary to achieve substantial public benefits or other very specific circumstances set out in national policy apply. Designated heritage assets in St.Helens Borough include those set out in paragraph 1 of Policy LPC11.

Listed Buildings

7.21.3 The Borough of St.Helens contains 148 Listed Buildings. Whilst Earlestown railway viaduct is the only Grade I structure, the Borough has 12 Grade II* structures including Scholes Hall and the Statue of Queen Victoria in Victoria Square. The Council has a statutory duty to ensure the preservation of buildings listed under Part 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest. Buildings and structures within the curtilage of listed buildings are also protected under the Act.

7.21.4 There are tight planning controls over development involving the alteration or loss of a listed building or land in its curtilage. Most new development affecting the exterior of a listed building or within the curtilage of a listed building requires planning consent. Works affecting the interior or exterior of a listed building, curtilage building or structure, normally require listed building consent. A comprehensive description and list of all listed buildings and other nationally designated heritage assets is set out on Historic England's website⁵⁴. ⁵⁴ <https://historicengland.org.uk>

Scheduled Monuments

7.21.5 A scheduled ancient monument is defined by the Ancient Monuments and Archaeological Areas Act 1979 as any structure, or site of a structure, above or

18 below ground that is considered by the Secretary of State to be of public interest by reason of its historic, architectural, traditional, artistic or archaeological importance. An application must be made to Historic England for any proposed works affecting a scheduled monument, in addition to any need for planning permission. All scheduled monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance, will be given the strictest protection. Development proposals that would result in substantial harm to or total loss of significance of any scheduled monument, or any associated feature contributing to their significance including their setting, will be refused except in wholly exceptional circumstances. Historic England's Heritage List for England identifies 12 Scheduled Monuments in the Borough, four of which are on their 'at risk' list.

Registered Battlefield – Battle of Winwick

7.21.6 The Battle of Winwick (also known as Battle of Red Bank) took place in 1648 and has been identified as being an important component of Oliver Cromwell's victory in Lancashire, which ended the Second English Civil War. The site of the battle has been designated as a registered battlefield by Historic England, recognising its significance as a turning point at this key moment in British history, and reflecting the military tactics of the time and comprising a likely final resting place for those that died during the battle. The battlefield is subject to the strong protection given to designated heritage assets set out in national policy and paragraph 3 of Policy LPC11.

Registered Parks and Gardens

7.21.7 Parks and gardens of national historic importance are designated as Registered Parks and Gardens and included in a register maintained by Historic England. There are currently two Registered Parks and Gardens in the Borough at Taylor Park (which was part of the former Eccleston Estate) and St. Helens Cemetery in Windle.

7.21.8 New development must promote the enjoyment, landscape character and interest of these areas by respecting their layout, design, character, appearance and setting. It should also avoid causing harm to key views from or towards these landscapes or prejudicing their future restoration.

Conservation Areas

7.21.9 The Planning (Listed Building and Conservation Areas) Act 1990 places statutory duties on Local Planning Authorities relating to the designation and ongoing review of Conservation Areas and adoption of policies to ensure their conservation and enhancement. There are currently eight Conservation Areas in St. Helens Borough. Proposals for development affecting a Conservation Area should preserve or enhance those elements that have been identified as making a

54 <https://historicengland.org.uk>

18 positive contribution to the character and special architectural or historic interest of the area. These elements may include buildings, boundary features, other structures, landscape features, open spaces and the setting. Where proposals would lead to harm to a Conservation Area, then the harm will be identified as being either substantial or less than substantial based on the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole. Development causing such harm will be subject to the tests set out in Policy LPC11 and national policy.

Non-designated buildings and other structures

18 7.21.10 The Borough contains a number of buildings and other structures that are not formally designated as heritage assets, but that nevertheless contribute to the character of the area. Policy LPC11 confirms that development that would cause harm to or loss of non-designated assets will be refused unless any public benefit from the development would outweigh such harm or loss. Development proposals that are likely to affect one or more non-designated assets will be required to include the evidence referred to in paragraph 2 of Policy LPC11. 18

Archaeological sites

7.21.11 Due to the long and complex history of the area, some sites (in addition to those affected by the formally designated Battlefield and Scheduled Monuments referred to earlier) are likely to contain remains of archaeological interest. Where a development would be likely to affect any site with potential to include archaeological interest (whether the site is formally designated or not), the Council will require the submission of an appropriate desk-based assessment and, where necessary, a field evaluation, demonstrating the level of such interest and how it would be affected. Planning conditions and / or agreements will be used as necessary to secure the appropriate preservation and / or recording of any remains, with the preferred solution depending upon the degree of significance of the asset.

Design of development affecting heritage assets

7.21.12 Particular attention must be paid to the design of any works affecting a heritage asset. For example on Listed Buildings and buildings in a Conservation Area, particular attention must be paid to the design and materials used in the walls, roof, doors and other detailing. The design of any windows must be carefully assessed, having regard to the importance of the building, the character and appearance of the area, the details of any opening mechanism, the appearance of 'joints' and the design of glazing bars and horns.

18 Historic environment records and the interpretation of heritage assets 18

7.21.13 The Merseyside Historic Environment Record⁵⁵ is the central heritage asset database for the Liverpool City Region and should be consulted by developers when designing their proposals. ⁵⁵ managed by Merseyside Environmental Advisory Service

7.21.14 St.Helens Council has a strong record of working with partner organisations to engage communities in their local heritage and further the understanding of the development of St.Helens as a town of the industrial revolution. Key partners in this context include Community Archaeology, the Museum of Liverpool, Merseyside Archaeological Society, Merseyside Industrial Heritage Society, Sankey Canal Restoration Society, St.Helens History Society and developers. It will continue to work with these bodies in this regard.

Comments

(highlighted text in 7.21.6 above to emphasise reasoning)

Designated Heritage Assets

The Local People see Designated Heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The Designated Heritage Assets under threat from the Parkside West site current proposal known as Phase 1, Phase 2 and the Parkside Link Road (PLR) in order to comply with Policy LOCAL 10LP are as follows:

Grade II listed Buildings and monuments

St Oswald's Well

Woodhead Farm house

Woodhead Farm Barn

Newton Park Farm house

Newton Park Farm Barn

The above are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 especially with respect to their "setting", and the NPPF 2018, 16. Conserving and enhancing the historic environment. See paragraphs 184, 185, 193 and 194, due to paragraph 193 stating:

"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

This means any harm is not a decision factor as the NPPF states irrespective as paragraph 184 states:

"These assets are an irreplaceable resource, and ~~should~~ shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."

This means that substantial harm of a designated heritage asset can have harm as the registration process has ruled harm out or else how can future generations apply. So to class a designated heritage asset with a level of harm can not overrule future generations. The only level of harm a designated heritage asset due to the registration process is of the highest level. The only level one can give a heritage asset is to the significance, this is shown in paragraph 194. The listed buildings shown above have a significance of exceptional and therefore the Setting of the Listed building becomes the important factor as detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990.

Registered Battlefield

The Local People see that the National Planning Authority Historic England have registered the battlefield of Winwick Pass (Red Bank). This heritage asset clearly adds to the historic importance of both Winwick And Newton-le-Willows and having been recently registered on 31 January 2018. The registration advice report shows that the only objectors were St Helens Council not just as the council but as a joint developer of the former Parkside colliery. One important fact that St Helens Council and Langtree plc used in their objections to the registration planning application are the same reasoning used in the Phase 1 application and the same reasoning used in this Local Plan update; As the registration application was under a National Planning Authority then a local planning authority can not overrule the national decision, as can not a Local Plan review when the same evidence is used in all three. But the NPPF provides the solution for the Local People in paragraph 15 and paragraph 11b)i the local people can restrict the size of the development. This is a platform the Local People can shape their surroundings and accept.

The site of the battle of Winwick Pass as shown on the Historic England Registration map. Protected by the NPPF 2018, 16. Conserving and enhancing the historic environment: (following text in bold to emphasise the importance and the strikethrough and underlined text denotes change of tense from should to shall)

18 184. **Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as [Registered Battlefield] World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁶¹. These assets are an irreplaceable resource, and should shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations⁶².**

⁶¹ Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.

⁶² The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, as well as to plan-making and decision-making.

185. Plans ~~should~~ shall set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy ~~should~~ shall take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight ~~should~~ shall be given to the asset's conservation (and the more important the asset, the greater the weight ~~should~~ shall be). **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), ~~should~~ shall require clear and convincing justification. Substantial harm to or loss of:

- a) **grade II listed buildings**, or grade II registered parks or gardens, ~~should~~ **shall be exceptional**;
- b) **assets of the highest significance**, notably scheduled monuments, protected wreck sites, **registered battlefields**, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, ~~should~~ **shall be wholly exceptional**⁶³.

Justification

Paragraph 193 states:

18 "This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

This means any harm is not a decision factor as the NPPF states irrespective as these important sites are to be totally untouched and preserved, so that the Local People can

18 shape their surroundings not just for this but for future generations to understand and enjoy as learn (education) about the history that surrounds them. Due to the NPPF paragraph 184 stating: (The strikethrough and underlined text denotes change of tense from should to shall)

b) *"These assets are an irreplaceable resource, and ~~should~~ shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations"* 18

To have in this paragraph "future generations" means this is beyond any plan-making or decision-taking period. So makes it clear that a designated Heritage Asset is irreplaceable so must be treated as such. The removal or destruction of a heritage asset does not shape the Local People's surroundings.

Conclusions

The policy LPC11 needs paragraph 3 to be removed and all of the comments above needs to be incorporated. This complies with Policy LOCAL 10LP

Also in Green Belt GB_041 the following statement will be struck out (removed) due to new information:

"Whilst part of parcel GBP_041 has recently been designated as a Historic Battlefield (Battle of Winwick (Red Bank)) this is not considered to be an over-riding constraint and Historic England has not raised any objections in principle to the phase one planning application referred to above."

7.22 Policy LPC12: Flood Risk and Water Management

Policy LPC12: Flood Risk and Water Management

Flood Risk

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
 - a) the St.Helens Strategic Flood Risk Assessment;
 - b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
 - c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
 - a) within flood zones 2 or 3; or
 - b) on a site of 1 hectare or larger within flood zone 1; or
 - c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
 - d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
 - a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
 - b) any applicable Exception Test required by national policy has been passed; and
 - c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):

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Policies LPC10,
LPC12,
LPC06,
LPC11

Sites
7EA
8EA

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- a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;
 - b) protect heritage assets (such as buried archaeology);
 - c) be fully described in the development proposal; and
 - d) be funded by the developer, including long-term maintenance.
5. Any proposal for major development⁵⁶ on a site that would abut, run alongside or straddle any watercourse⁵⁷ in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.
6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):
- a) an adequate soakaway or other form of infiltration system;
 - b) an attenuated discharge to watercourse;

⁵⁶ 'Major development' in this context has the same meaning as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, or any Order which amends or supersedes it. It includes, for example, proposals for 10 or more new dwellings

⁵⁷ The definition of "watercourse" in this policy is the same as that in the Land Drainage Act 1991 [section 72(1)] and includes "Main Rivers" identified by the Environment Agency and also "Ordinary Watercourses"

- 19-22
- c) an attenuated discharge to public surface water sewer;
 - d) an attenuated discharge to public combined sewer.
9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.
 10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.
 11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.
 12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.
 13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.
Protection of water and waste water assets
 14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.
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7.24 Reasoned Justification

Flood Risk

7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.

7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.

7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

Sankey Catchment Action Plan

7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.

7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, "safeguarding land from development that is required (...) for current and future flood management".

7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

Comments

19-22 Flooding from the proposed policy shown as site 8EA or policy CAS 3.2 on Parkside west the southern border is Hermitage Brook. The boundary between the borough of St Helens and the Borough of Warrington. The Hermitage Brook is the natural water drainage for the land in Newton Park the 8EA site. This brook is on a regular basis overflows its banks nearly every time it rains due to the water from Newton Park filtering naturally in to the ground the water that does not seep in to the ground flows over the land into Hermitage Brook. Three views of normal overnight rainfall and the resultant Hermitage Brook capacity:

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19-22 This is without the proposed use of surface water drainage from the 8EA development. The development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available to absorb the rainfall on Newton Park. The Roads and Roof areas will according to the Phase 1 proposed drainage scheme have drainage directed in to the Hermitage Brook to solve SHC 8EA surface water problem. SHC state there will be ponds, but the ponds to cater for the size of warehousing purported will not cope. This means the Hermitage Brook will burst its banks every time it rains just to cater for the warehouse roof and road drainage. The result will be the A49 banking will be permanently under water that will with time undermine the A49 foundations. At present the culvert under the A49 can just cope but not with the Warehousing. With the valley permanently under flood situation the flora and fauna will be affected as the roots will die due to being over watered. This SHC has not considered either in the application(s) or the St Helens Local Plan Submission Draft January 2019. The effect of flooding of Hermitage Brook is a Cross Border issue with Warrington Borough Council. This means additional wording to prevent Hermitage Brook from flooding needs to be seriously addressed as wildlife rely on the Flora and Fauna.

Also as the Hermitage Brook is the Key area as Identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the SHC side of the valley but the Warrington Borough Council side to which has not been addressed.

So not just this Policy LPC12 is flawed, the other affected policies are also flawed due to the associational link of the Hermitage Brook. These policies that are also flawed are: LPC06; LPC10; LPC11; and LPC12.

Therefore, not a platform for Local People to shape their surroundings.

Policy
LPD09
Sites 7&8A

Policy
LPD09
Sites 7&8A
SEA

SEA 8.25 Policy LPD09: Air Quality

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Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:
 - a) impede the achievement of any objective(s) or measure(s) set out in an Air Quality Management Area (AQMA) Action Plan; or
 - b) introduce a significant new source of any air pollutant, or new development whose users or occupiers would be particularly susceptible to air pollution, within an AQMA; or
 - 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
 - d) having regard to established local and national standards, lead to an unacceptable decline in air quality in any area.
2. Major development schemes should demonstrably promote a shift to the use of sustainable modes of transport to minimise the impact of vehicle emissions on air quality.
3. New development that would result in increased traffic flows on the M62 past Manchester Mosses Special Area of Conservation (SAC) of more than 1000 vehicles per day or 200 Heavy Goods Vehicles (HGVs) per day must be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on ecological interests within the SAC. Where such effects are identified they would need to be considered in accordance with Policy LPC06.

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8.27 Reasoned Justification

8.27.1 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor, for example, in the onset of heart disease and cancer and particularly affects vulnerable groups such as children and older people, and those with heart and lung conditions. Mortality rates in St. Helens Borough for cardiovascular and respiratory diseases are significantly higher than the national average.

8.27.2 There is a strong correlation with equalities issues, as many of the less affluent areas have poor air quality. Air quality can also affect biodiversity and thereby impact on legal obligations under the Conservation of Habitats and Species Regulations 2017.

8.27.3 Part IV of the Environment Act 1995 requires local authorities to regularly monitor levels of seven key pollutants against national standards set by the Air Quality (England) Regulations 2000 (as amended). St. Helens Council complies fully with these duties and works closely with other local authorities to protect air quality. The Council must designate an Air Quality Management Area (AQMA) where air

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pollution exceeds or is likely to exceed an air quality objective.

8.27.4 Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.Helens Borough as follows:

- M6 AQMA includes a strip of land either side of the M6 motorway;
- High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;
- Borough Road AQMA includes Borough Road, St.Helens between its junctions with Westfield Street and Prescott Road; and
- Linkway Reflection Court, located off Linkway West, St.Helens.

8.27.5 Further guidance and links to the AQMAs maps can be found on the Council's website at: <https://www.sthelens.gov.uk/business/environmentalhealth/environmental-protection/air-quality/>

8.27.6 Action to protect and improve air quality will be undertaken by requiring all planning applications to be accompanied by suitable mitigation measures where necessary. These may include for example requiring proposals that would generate additional traffic to include new Electric Vehicle Charging Points. All proposals for new development that could give rise to significant amounts of traffic must include information on any increase in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases.

8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. Any significant effects would need to be addressed in line with Policy LPC06.

Comments

The air quality has been covered in previous policies. But with respect to B8 warehousing and in particular 7EA and 8EA no measures have been shown in policy LPD09 to circumvent the impact of the Local Roads due to the indirect access to the motorway M6 network that will add to the already AQMA recorded levels. Currently and hence the future the Clean Air Strategy 2019 and current news on air pollution in the news article 11 March 2019, by Paul Cosford, Medical Director, Public Health England at:

<http://www.envirolink.org/2019/03/11/air-pollution-cars-should-be-banned-near-schools-says-public-health-chief/> and <https://www.bbc.co.uk/news/uk-47520848>


are important issues for the government has brought forward to address Air Quality. Whereas STC with all the B8 warehousing proposed is failing what the government and what the local people need – clean air. The SHC B8 warehouse program will impose commercial traffic pollution upon the local people and their children not just for now, for if the B8 (including 7EA and 8EA) warehousing are built SHC intend from what they have written to impose these pollution levels from 2035 and beyond. This the Local People do not accept – as the proposed St Helens Local Plan Submission Draft January 2019 is not a platform for local people to shape their surroundings.

Policy
LPD10Site
7EA & 8EA

Appendix 5: Site Profiles – Allocated Housing and Employment Sites

The document containing Appendix 5 refers to the two site used in the main St Helens Local Plan Submission Draft January 2019 document 7EA and 8EA as follows:

LPSD 7EA – Parkside East

LPSD Ref:	7EA - Parkside East, Newton-le-Willows	Ward:	Newton
Notional Capacity:	64.55ha	Designation:	Allocate
			
Requirements:			
<ul style="list-style-type: none"> • See Policy LPA10 			

Comments

This area as shown in LPSD 7EA – Parkside West definitively shows “sidings facilities” or a “Rail Spur Line” to be an integral part for the operation of 7EA coming forward, as a nationally significant SRFI. Without this Rail Spur Line the already announced design layout being an integral part of the SHC LPA application P/2018/0048/OUP, known as Phase 1 and the planning applications: SHC LPA P/2018/0249/FUL and WBC LPA 2018/32514, known as Parkside Link Road (PLR) which all used the Local Plan 2012 Policy CAS 3.2 behind the reasoning for the application(s). The details of Phase 1 and part

of the PLR together with the future Phase 2 are detailed in the Phase 1 submitted masterplan(s) including the Rail Spur Line. This Rail Spur Line is stated as a bullet point in LPSD 8EA:

"The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map."

Together with this Rail Spur Line located on the Parkside west (8EA) area, the Parkside east (7EA) area has been categorically stated in paragraph 4.36.13 as being

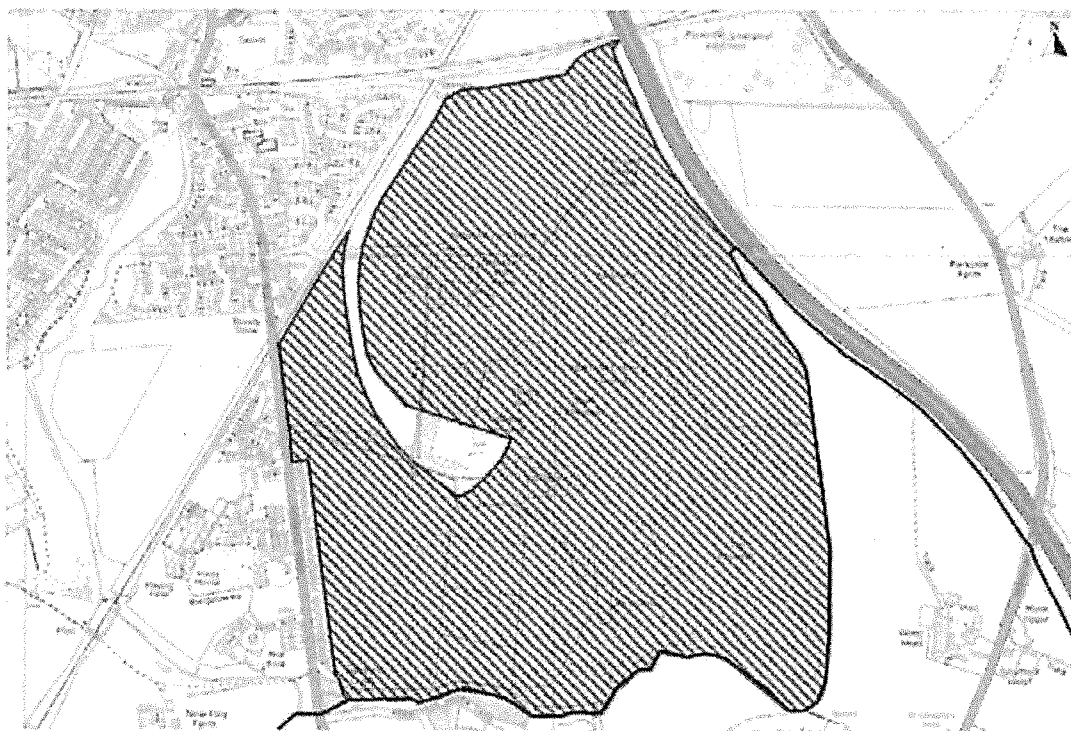
"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."

Conclusions

This proves as the Newton Park Farm Complex on Parkside West access via Newton Park Drive is shown to be required by the Phase SRFI, by having been removed in the Phase 1 masterplan(s) and a new transport access and utilities access from the Newton Park Farm Complex links and is dependant on the Phase 1, Phase 2 and the Parkside Link Road (PLR) in order. Then the action of doing this planning alteration means that the SRFI Rail Spur line being a part of the 60Ha threshold of a SRFI use as stated in paragraph 4.36.13 then Newton Park Farm alteration to accommodate the SRFI Rail Spur in order for the Planning Act 2008 to perform an environmental Statement under the Directive 2014/52/EU the phases: Phase 1 Phase 2 and the PLR are a part of the Nationally significant Infrastructure Project under the said Act.

LPSD 8EA – Parkside West

LPSD Ref:	8EA - Parkside West, Newton-le-Willows	Ward:	Newton
Notional Capacity:	79.57ha	Designation:	Allocate



Requirements:

- Access to an initial phase of development can be provided off the A49 (Winwick Road).
- Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).
- The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.
- Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the

25 surrounding area.

- Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.
 - The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.
- 25

Requirements:

- Access to an initial phase of development can be provided off the A49 (Winwick Road).
- Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).
- The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.
- Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area.
- Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.
- The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.

Comments

(highlighted text above to emphasise the following reasoning)

25 The final bullet point "the future development of siding facilities". This use of the word facilities is plural meaning more than one in relation to the sidings (or rail siding). The intention for the safeguarded land as shown on 8EA is so that tracks of rail can be laid in order for 450m to 750m length trains can leave the Chat Moss railway line quickly then reverse onto the Parkside east site (and the reverse) and that is the only requirement. This should have been expressed as "the future development of siding facility" (in the singular). But to have the phrase as part of LPSP 8EA as future development of siding facilities goes further than just the rail siding as it expresses additional facility to the rail siding. This gives in this policy the "room" for expansion of the Rail facilities that could be gantry loading and unloading of freight containers on the Parkside west side. This smaller sentence opens up the use of the A49 as a major route for all HGV freight to enter and use the Parkside west site, instead of using the Parkside east SRFI. So in effect the Rail siding or rail spur will become a rail freight terminal with in metres of where the local people live with not screening or protection from 24/7/365 working from rail gantry lights and noise from the loading unloading process. Then as each rail wagon is loaded or unloaded then shunted to the Parkside east side for adding to the appropriate train. This sentence needs to be

25

25 removed or changed to prevent other facilities only the track facility (singular). But the Local People do not see LPSP8EA as a feasible platform to shape their surroundings the Local People see Policy LOCAL 10LP as their preferred policy. 25

Justification for removing Site7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

24 4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site. 24

Table 5.1: Parcels/sub-parcels – overall score at Stage 3 for employment use

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (modules)
GBP_031a	Florida Farm North, Slag Lane, Haydock	Medium	Good	5	36.67ha
GBP_031b	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	Medium	Good	5	20.58ha
GBP_031c	Land to the west of Haydock Industrial Estate, Haydock	Medium	Good	5	7.75ha
GBP_032	Land to the east of Haydock Industrial Estate and to the west of M6 (north and south of Penny Lane), Haydock	Medium	Good	5	13.21ha
GBP_033	Land to the east of M6 Junction 23, Haydock	High	Good	3	55.90
GBP_036	Land south of A580 East Lancashire Road and south east of M6 Junction 23, Haydock	High	Limited	1	73.4ha
GBP_039	Parkside East, Newton-le-Willows	High+	Good	3	64.55ha
GBP_040	Land west of M6 and south of A572 Southworth Road, Newton-le-Willows	Low	Limited	4	4.3ha
GBP_041	Parkside West, Newton-le-Willows	Medium	Good	5	79.57ha
GBP_075d	Land north of M62 and south of Gorsey Lane, Bold	Medium	Limited	3	32.21ha

4.6 Known as 'Parkside East' and 'Parkside West', parcels GBP_039 (land east of M6 and north of A579 Winwick Lane) along with parcel GBP_041, form part of a wider site straddling the M6. This area is uniquely placed for the potential future development of rail enabled employment uses, having potential direct access to both the West Coast Mainline and the Chat Moss east-west rail lines and to the M6 close to its junction with the M62. There is a long standing history of developer interest in bringing parcels GBP_039 and GBP_041 - the former Parkside Colliery forward for development and the area was highlighted as a potential location for an inter-modal freight terminal in the now revoked North West Regional Spatial Strategy. Policy CAS3.2 of the St. Helens Core Strategy (adopted in 2012) identifies the site as a 'strategic location' for a SRFI. In 2016 the Parkside Logistics and Rail Freight Interchange Study identified Parkside as a site of national and regional significance in relation to relevant policy, market demand and need for the delivery of new and improved SRFIs. The Study found that the opportunities for rail access from the site are second to none in the North West. Consequently, whilst it is acknowledged that there would be a high impact on

24 the Green Belt if Parcel GBP_039 were to be developed, taking into consideration all the above factors, there are exceptional circumstances to justify carrying the parcel forward to the Stage 2 assessment. 24

The following will be struck out (removed) due to new information.

Whilst part of parcel GBP_041 has recently been designated as a Historic Battlefield (Battle of Winwick (Red Bank)) this is not considered to be an over-riding constraint and Historic England has not raised any objections in principle to the phase one planning application referred to above.

Comments

This has been shown to be a concern of the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision under the Planning Act 2008. So the parcels GBP_039 along with parcel GBP_041 must be removed from the St Helens Local Plan Submission Draft January 2019

5. Overall Conclusion for Objections

24 Based on the previous conclusions the overall conclusion is that the above applications for Parkside east and west associated policies referred to in the St Helens Local Plan Submission Draft January 2019 must be removed as they are not sound and not justified. According to the NPPF paragraph 5, the said applications must be considered by the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision under the Planning Act 2008. 24

6. Maps

Map 1

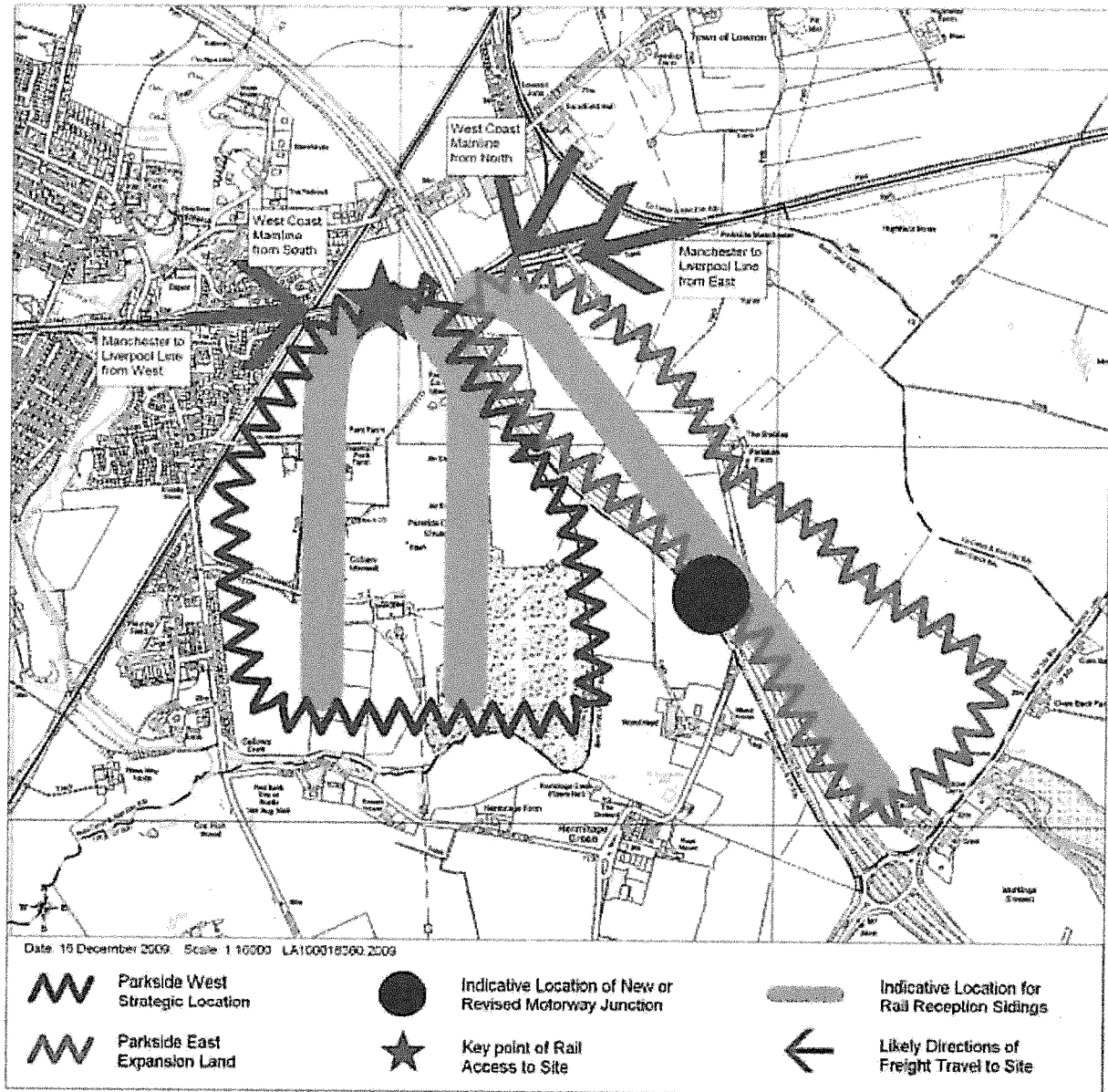
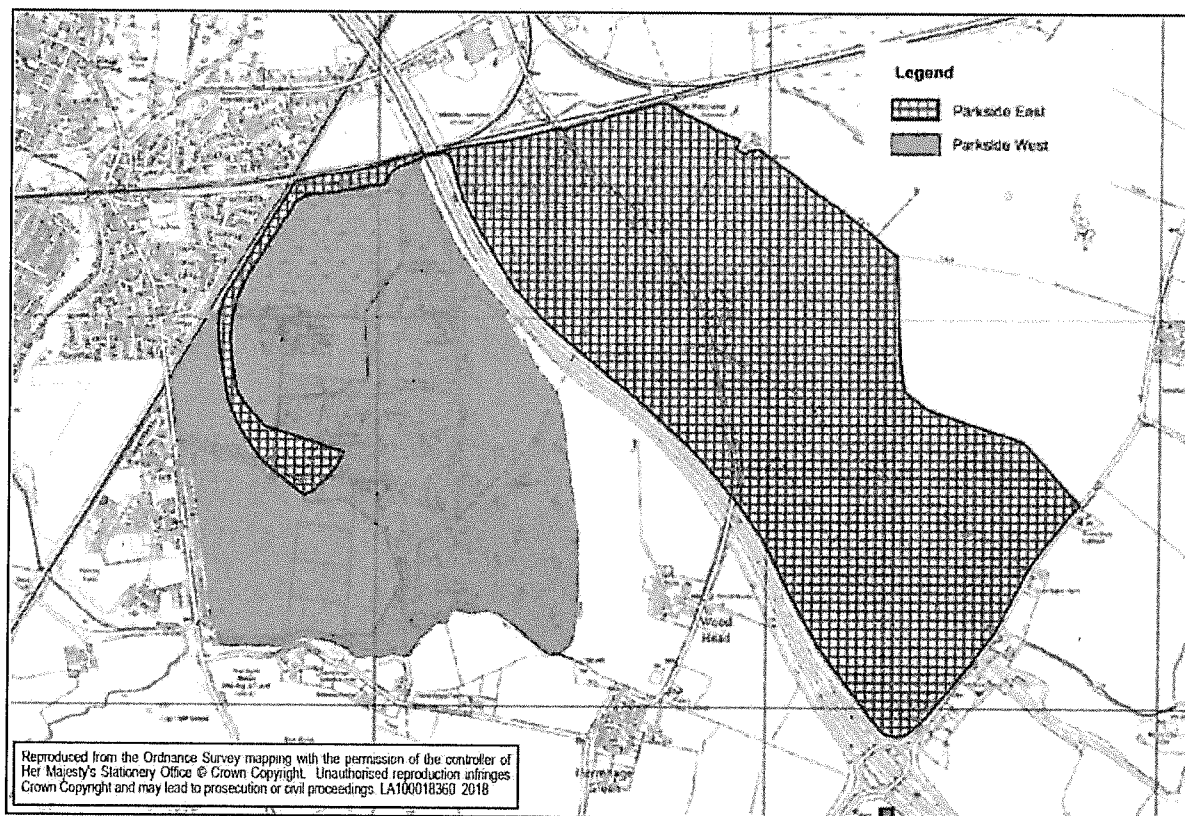


Figure 9.2 Strategic Rail Freight Interchange Site

Map 2

Figure 4.4: Parkside East and Parkside West



HGV Parkside Entry/Exit Options
(depending on the satellite navigation)

HGV traffic: Any Commercial Vehicle used for transporting goods or materials.

HGV traffic to/from Liverpool via M62a direction, will not use **D** to **C** to **A** to **V** due to extra driving distance. Instead will use **D** to **E** then either: via A49c to **A** to **V**, or at **A** via A573a to **C**, or at **A** via A49b to **X** to either Parkside East or West the shortest driving distance.

HGV traffic to/from Manchester via M62b direction will use **E** to **E** to **Y** to either Parkside East or West.

HGV traffic to/from Crewe, Birmingham via M6a direction will use to to either Parkside East or West.



HGV traffic to/from Preston, Wigan via M5b, will not use M6 junction 5 due to extra driving distance; instead will use A via A49e to 5 to 7 then either via A49d to 8; or via A572 to 5 to either Parkside East or West the shortest driving distance.

HGV traffic to/from Liverpool via A580b will not use M6 **A** to **C** due to extra driving distance: instead will use either via **A** to A49e via **E** and **F** then use A49d to **A** or use A572 to **E** or on A580b continue pass **A** to **A** via A573b to **E** to either Parkside East or West the shortest driving distance.

HGV traffic to/from Manchester via A580a will use **2** to **4** then either: via A572b to **5**; or at **4** via A579 to **5**; alternatively use the A580a to **1** then via A573b to **2** to either Parkside East or West the shortest driving distance.

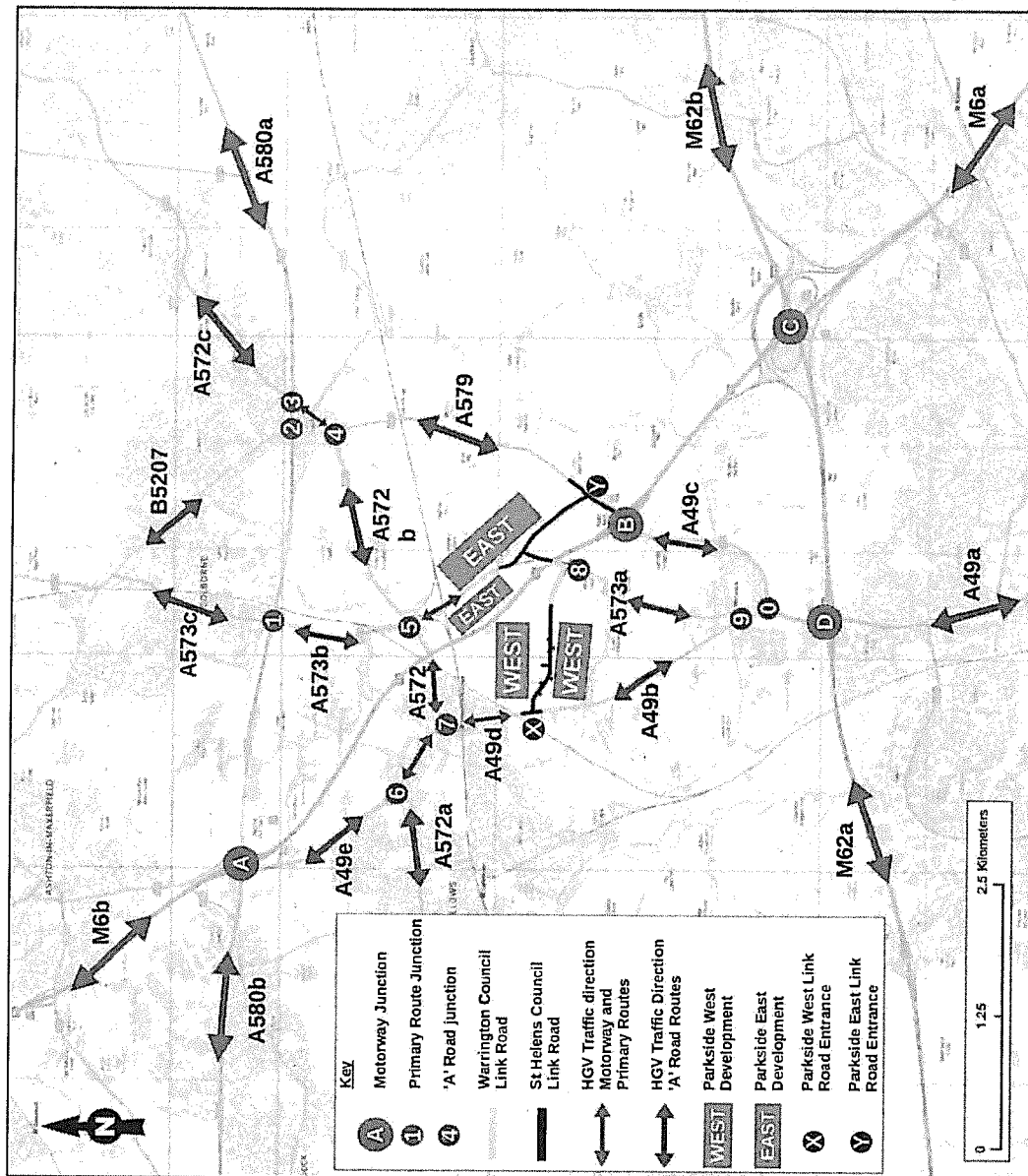
HGV traffic to/from St Helens via A572a to **5**, then to **7** then either via A49d to **8**, or via A572 to **3** to either Parkside East or West, the shortest driving distance.

HGV traffic to/from Leigh, Bolton via A572c to **E** to **A** then either: via A572b to **E**; or at **A** via A579 to **B**; alternatively use the A580a then via A573b to **E** to either Parkside East or West the shortest driving distance.

HGV traffic to/from Wigan via A573c to  then via A573b to  to either Parkside East or West the shortest driving distance.

HGV traffic to/from Wigan (alternate route) via B5207 to **2** to **1** then either: via A572b to **5**, or at **2** via A579 to **Y**; alternatively use the A580a **1** then via A573a to **5** to either Parkside East or West the shortest driving distance.

HGV traffic toll from Warrington A49a to **1** to **2** then either: via A49c to **3** to **4**; or at **5** via A573a to **6**; or at **7** via A49b to **8** to either Parkside East or West the shortest driving distance.





PAG Response to Local Plan Draft Submission - Biodiversity Report

[Redacted]

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:18

[Redacted]

3 Attachments



lpsd-representation-form R.Ward PAG Response inc Biodiversity.pdf



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report).pdf

Please find attached SHC response form and supporting Biodiversity document on behalf of Parkside Action Group (PAG).

Regards

Richard Ward (PAG Member)

(sent on behalf of Dave Tyas and Mark Lewis, Co-Chairs of PAG)

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.



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: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	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 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 LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041					

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report).pdf

Please continue on a separate sheet if necessary

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)
3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report).pdf

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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



St. Helens
Council

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

Ref: LPSD

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
-----------------------	------------------

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

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Biodiversity Report, March 2019

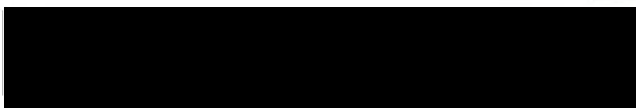
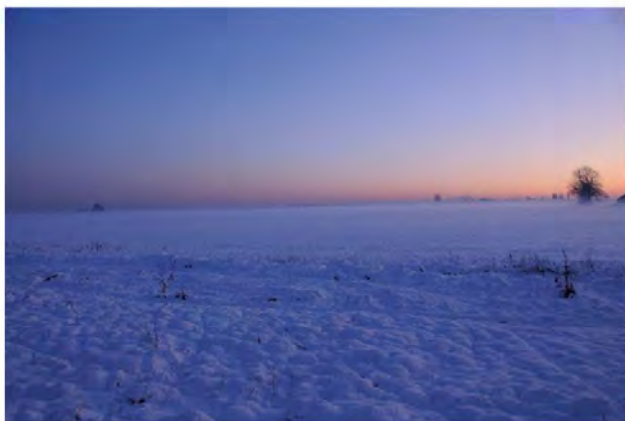


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4 Biodiversity Parkside West and East 4

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6 Recommendations..... 5

1. Purpose

1.1 This document provides a Biodiversity Response to the St Helens Local Plan Submission Draft January 2019.

2. Introduction

2.1 PAG was formed in 2006 to protect the land around the site of the former colliery from unsuitable development.

3. Parkside East and West Biodiversity Report



Barn Owl photographed by local enthusiasts.

Barn Owl, 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 Barn Owl 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 / West along with approximately 120 species of bird in addition to many mammals such as Roe Deer, Brown Hare, Foxes, Weasels, and Stoats.

Evidence of badgers is in the area: Where a dead badger was 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 is a regional website where rare bird sightings are posted every day by enthusiasts and county recorders. The website has sections on Barrow Lane, Highfield Moss and Winwick area around the site.

4. 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 is 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. Therefore, any nearby commercial development clearly has a requirement to be sensitive to that aspect.

Parkside East and West effectively cover most of the green belt between Newton-Le-Willows, Kenyon and Winwick an area between the three boroughs Warrington, Wigan and St Helens.



Endangered Brown Hare

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.

5. RECOGNITION WITHIN LOCAL PLAN SUBMISSION DRAFT JANUARY 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”.

6. 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 well being.

2 – The adjusted local plan should have formal provision for future Biodiversity Planning in areas like Parkside East and West where very large scale development is planned on sensitive countryside.



Local Roe Deer hind and fawn.

Roe Deer frequently seen and breed on Parkside East and West.

RO1810



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St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: CLAIR	First name:
Last Name: WARD	Last Name:
Organisation/company: RUTLAND HOUSE VETS	Organisation/company:
Address: 5 SPRINGMEADOW Rd LIVERPOOL	Address:
Postcode: L25 3PT	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

22.3.19

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.

RO1811

13 MAR 2019

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

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PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Alan Warren</u>	First name: _____
Last Name: _____	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>85a Carr Mill Ld</u> <u>Sillinge</u>	Address: _____
Postcode: <u>WNS7 7X</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12/3/19</u>
------------------	----------------------

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

☒ Yes (via email)

via post.

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Telephone: **01744 676190**

NEXT STEPS

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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)				ACOG Green Belt Review.					

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

Please tick as appropriate

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

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

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

Take this out of the local plan altogether. Leave it as it is - it should be in the greenbelt.

Please continue on a separate sheet if necessary

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

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



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

Yes, I wish to participate at the oral examination

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

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Please keep a copy for future reference.

6.

- No proper access to the Barrows farm site.
- Public Footpath at the entrance to Barrows farm should be kept in the greenbelt.
- Industrial units already mean more traffic.
- Access is on a bad bend.
- Football also on site, could be considered. overdeveloped as it is. - I wouldn't want more development.
- Can Mill Road is more like a country lane with only one footpath on one side, not suitable for development.
- Should be kept open land.
- ^{To be} kept part of the greenbelt as it's an original farm structure.
- Footprint on the farm hasn't changed.
- Nobody will benefit from this being made brownfield.
- 2 schools on the same road. - already traffic problems
- Danger for public services i.e. emergency services can struggle to have access as it is.
- There has been damage to vehicles from heavy goods vehicles on Can Mill Rd.
-

RO1812

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.

987
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>DONNA</u>	First name: _____
Last Name: <u>WATKIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 PADDOCK GROVE</u> <u>CLOCK FACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4QP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>11/3/2019</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input 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"/>
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<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>I support Bold + Clock Face ACTION GROUP.</i></p>

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

Yes, I wish to participate at the oral examination

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

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Please keep a copy for future reference.

RO1813



St. Helens
Council

251

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

Ref: LPSD

01 MAR 2019
(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>JAMES</u>	First name: _____
Last Name: <u>WATKINSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>38, SMOCK LANE</u> <u>GARSWOOD</u> <u>ASHTON IN MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: _____	_____
Mobile No: _____	Mobile No: _____
Email: _____	_____

Signature: _____	Date: <u>20.2.2019</u>
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Policy <i>LPA 05 SITE 1HA</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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Please tick as appropriate

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>Declining population since 1981. Green belt is to assist in urban regeneration, re use of derelict land and property. Release of green belt impacts detrimentally on countryside. No schools etc to service, increase in housing density. Roads access insufficient. The proposed area is undulating and subject to flooding. It is also on old mining works.</i></p>

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DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

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

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

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Please keep a copy for future reference.

RO1814

ELO013

① - LPA06, 8HS
② - LPA02



St Helens Local Plan 2020-2035 Draft

Linda Watson

to:

planningpolicy@sthelens.gov.uk

04/03/2019 10:01



1 Attachment



Review of greenbelt land.doc

Good Morning, please find attached my letter of representation in relation to the above, many thanks.

Sent from [Mail](#) for Windows 10

Re: Review of Greenbelt Land: Ecclesfield Road

Dear Sir/Madam

I am a resident [redacted] and I continue to be distressed about the proposed release of greenbelt land directly opposite [redacted] this is now described as safeguarded land, which will be used for future development. Some areas of greenbelt have now been taken out of the equation, why then is the piece of land from Houghtons Lane to Crantock Grove remained in the plan? this is one piece of land that alone has three public footpaths which are regularly used by ourselves and many, many members of the community.

On a personal note, which I know will not be acknowledged, but I wanted to include this anyway, we moved into our house [redacted] because of the amazing views and the fact that we would be able to live in the countryside (greenbelt area) [redacted] with an improved quality of life, which improved overnight on moving here, we have access to some wonderful walks which we use on a daily basis to exercise [redacted]. It is an absolute pleasure living here in this part of the town.

We see the local wildlife in their natural habitats where they are safe and treated with respect. We see many local people enjoying these wonderful walks on our doorstep and importantly they are maintaining a healthy lifestyle and mental health wellbeing, which is extremely important with the very busy lives we all lead. There are many people in this neighbourhood from all walks of life and at different stages in their lives, [redacted] some are working some are retired, all of whom, currently have the opportunity to get out into the greenbelt and enjoy a peaceful walk. I urge you to use these footpaths yourselves before making any decisions to see what could be potentially lost. There are a wide variety of different species of animals in this area; indeed, our understanding is there are water voles and other protected species- birds, owls, and bats living in this area which should be considered equally as important as the need to build houses, and their protection should be a primary factor for any decisions made.

The fact that the local council has decided to look at this land for development has had a dramatic impact on the people of Ecclestone; the community will be affected beyond belief, it will no longer be a village environment, our beautiful walks will be snatched away and replaced by a massive scale development taking many, many years to complete. Our quality of life will deteriorate overnight and it will be extremely stressful for the very long period of time for the building work required. The scale of this proposed development will greatly affect the health of the people living in Ecclestone because of the long term building works, the heavy machinery, the chaos on the roads during building and when the development is completed. This will undoubtedly cause road safety issues on a large scale, as those many people who can no longer access the foot paths will be attempting to cross the East Lancashire Road to enjoy a walk, this already very busy road will become busier than ever, this will be extremely dangerous and I find this very concerning.

I am sure that the people unaffected by this and who do not live in the area will have no issues with the concerns we raise as a community, as this will be, I do not doubt, be an extremely lucrative development for all involved. Sadly this will be at the cost of the lives of all the people currently living in Ecclestone. This greenbelt land can never be recovered if the planning department decides to release the land to developers - once it has gone it has gone forever. There must be other land suitable to build more

①

housing in the borough of St Helens where such development would make improvements rather than have a negative impact. The plans require the use of greenbelt land, which is also by the way, well farmed all year round by the local farmers, this is prime agricultural land. Local produce is in demand and now that we are getting closer to Brexit, I would have thought that farmers would be encouraged and indeed supported to continue farming and supplying local produce, sadly this does not appear to be the case in St Helens. This plan will ensure that more farmland is lost to greedy developers whilst we will have to rely on buying non-local produce, creating a larger carbon footprint than necessary.

On top of the above, and thinking ahead to this development being completed, how will Eccleston look with many more thousands of residents; where will their children be educated, where will the GPs surgeries, Dentists etc be, the pressure on our two local hospitals is already over capacity. There is already a great strain dealing with the current residents and most of [REDACTED] go outside of the area for our health care needs to be met? What will happen with the old country lanes that are at the heart of Eccleston and are part of the country charm.

Will the roads be sufficient to deal with many more thousands of cars on a daily basis? What are the plans for managing the increased traffic, What about the impact on the environment, does this not impact on sustainability? Where will all the wildlife go? They have lived in this habitat and been safe for generations, are their needs not important? Is anyone considering the wider issues and impact on the environment and the community in the long term?

[REDACTED] The forever home we thought we had bought [REDACTED] is now like a bad dream and we will want to sell our property if this land is released for development. And so, our dreams of living in a beautiful, scenic and healthy neighbourhood in St Helens will be history and we will all be left devastated if this goes ahead, thanks to the decisions made about this land by people who do not live here. We will then be forced to move out of St Helens as there will be nowhere left to live that will provide a healthy quality of life that we have become accustomed to [REDACTED] We are not the only people who are now having to consider moving away from St Helens, however I fear that sadly this will not be important to anyone else but ourselves.

I hope you read this letter in the sense in which it is written. We are pleading with you to make the right decision and keep Eccleston in the countryside for all of us to enjoy and cherish for future generations to come. I urge you to consider other land in the St Helens area and I am aware of land in the area (brownfield sites) that would not have such an impact on so many people, where neighbourhoods will change beyond all recognition and I do not know why on earth such a big development in any one area is even being considered in such a small town.

Obviously everyone understands that houses have to be built as the population is constantly growing but why do we have to use up beautiful parts of the valuable countryside where a good quality of life is being experienced by many people using the local footpaths which lead to some beautiful country walks. Eccleston has had, and is still undergoing, a major development at the Triplex site, Knowsley Road developments and Cunningham Grange only being completed in the last few years. Have we not done our fair share of development without completely changing the face of Eccleston?

My understanding of the key principles of the government with regards to protecting greenbelt land are –

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I do not feel these current proposals are justified and I do not feel the local council are listening to the people of Eccleston, Windle, and Rainford with regards to the release of greenbelt land. If the above principles were being applied then brownfield sites would be utilised and the borough would look like a better place instead of numerous unused eye sores being left to decay around the borough.

You will obviously be aware of many sites in St Helens that could be utilised and I am sure the sites chosen first will be those most lucrative for everyone involved. I just hope that the lives of the people living in St Helens will actually be considered before any decisions are finally made. We all live in hope, please do the right thing for the residents of Eccleston.

██████████ stated in the house of commons that local councils must listen to the voices of the local people living in the areas where greenbelt is being considered for release, I sincerely hope you take some notice of this statement.

Yours Sincerely
Linda Watson

████████████████████

RO1815



St Helens Local Plan 2020/2035 Draft

Dave Watson to: planningpolicy

10/03/2019 18:36

Dear Sir/Madam

I am a resident [redacted] and I continue to be distressed about the proposed release of greenbelt land [redacted]

[redacted] Some areas of greenbelt have now been taken out of the equation, why then is the piece of land from Houghtons Lane to Crantock Grove remained in the plan? this is one piece of land that alone has three public footpaths which are regularly used by ourselves and many, many members of the community.

On a personal note, which I know will not be acknowledged, but I wanted to include this anyway, [redacted] because of the amazing views and the fact that we would be able to live in the countryside (greenbelt area) of Eccleston, with an improved quality of life, which improved overnight on moving here, we have access to some wonderful walks which we use on a daily basis to exercise [redacted] It is an absolute pleasure living here in this part of the town.

We see the local wildlife in their natural habitats where they are safe and treated with respect. We see many local people enjoying these wonderful walks on our doorstep and importantly they are maintaining a healthy lifestyle and mental health wellbeing, which is extremely important with the very busy lives we all lead. There are many people in this neighbourhood from all walks of life and at different stages in their lives, [redacted] some are working some are retired, all of whom, currently have the opportunity to get out into the greenbelt and enjoy a peaceful walk. I urge you to use these footpaths yourselves before making any decisions to see what could be potentially lost. There are a wide variety of different species of animals in this area; indeed, our understanding is there are water voiles and other protected species- birds, owls, and bats living in this area which should be considered equally as important as the need to build houses, and their protection should be a primary factor for any decisions made.

The fact that the local council has decided to look at this land for development has had a dramatic impact on the people of Eccleston; the community will be affected beyond belief, it will no longer be a village environment, our beautiful walks will be snatched away and replaced by a massive scale development taking many, many years to complete. Our quality of life will deteriorate overnight and it will be extremely stressful for the very long period of time for the building work required. The scale of this proposed development will greatly affect the health of the people living in Eccleston because of the long term building works, the heavy machinery, the chaos on the roads during building and when the development is completed. This will undoubtedly cause road safety issues on a large scale, as those many people who can no longer access the foot paths will be attempting to cross the East Lancashire Road to enjoy a walk, this already very busy road will become busier than ever, this will be extremely dangerous and I find this very concerning.

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01

it has gone it has gone forever. There must be other land suitable to build more housing in the borough of St Helens where such development would make improvements rather than have a negative impact. The plans require the use of greenbelt land, which is also by the way, well farmed all year round by the local farmers, this is prime agricultural land. Local produce is in demand and now that we are getting closer to Brexit, I would have thought that farmers would be encouraged and indeed supported to continue farming and supplying local produce, sadly this does not appear to be the case in St Helens. This plan will ensure that more farmland is lost to greedy developers whilst we will have to rely on buying non-local produce, creating a larger carbon footprint than necessary.

On top of the above, and thinking ahead to this development being completed, how will Eccleston look with many more thousands of residents; where will their children be educated, where will the GPs surgeries, Dentists etc be, the pressure on our two local hospitals is already over capacity. There is already a great strain dealing with the current residents and most [REDACTED] have to go outside of the area for our health care needs to be met? What will happen with the old country lanes that are at the heart of Eccleston and are part of the country charm? 01

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Where will all the wildlife go? They have lived in this habitat and been safe for generations, are their needs not important? Is anyone considering the wider issues and impact on the environment and the community in the long term?

[REDACTED] The forever home we thought we had [REDACTED] is now like a bad dream and we will want to sell our property if this land is released for development. And so, our dreams of living in a beautiful, scenic and healthy neighbourhood in St Helens will be history and we will all be left devastated if this goes ahead, thanks to the decisions made about this land by people who do not live here. We will then be forced to move out of St Helens as there will be nowhere left to live that will provide a healthy quality of life that we have become accustomed to [REDACTED] We are not the only people who are now having to consider moving away from St Helens, however I fear that sadly this will not be important to anyone else but ourselves.

I hope you read this letter in the sense in which it is written. We are pleading with you to make the right decision and keep Eccleston in the countryside for all of us to enjoy and cherish for future generations to come. I urge you to consider other land in the St Helens area and I am aware of land in the area (brownfield sites) that would not have such an impact on so many people, where neighbourhoods will change beyond all recognition and I do not know why on earth such a big development in any one area is even being considered in such a small town.

Obviously everyone understands that houses have to be built as the population is constantly growing but why do we have to use up beautiful parts of the valuable countryside where a good quality of life is being experienced by many people using the local footpaths which lead to some beautiful country walks. Eccleston has had, and is still undergoing, a major development at the Triplex site, Knowsley Road developments and Cunningham Grange only being completed in the last few years. Have we not done our fair share of development without completely changing the face of Eccleston? 02

My understanding of the key principles of the government with regards to protecting greenbelt land are -

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I do not feel these current proposals are justified and I do not feel the local council are listening to the people of Eccleston, Windle, and Rainford with regards to the release of greenbelt land. If the above principles were being applied then brownfield sites would be utilised and the borough would look like a better place instead of numerous unused eye sores being left to decay around the borough. 02

You will obviously be aware of many sites in St Helens that could be utilised and I am sure the sites chosen first will be those most lucrative for everyone involved. I just hope that the lives of the people living in St Helens will actually be considered before any decisions are finally made. We all live in hope, please do the right thing for the residents of Eccleston

██████████ stated in the house of commons that local councils must listen to the voices of the local people living in the areas where greenbelt is being considered for release, I sincerely hope you take some notice of this statement.

Yours Sincerely
David Watson
██████████

RO1816



St. Helens
Council

666
**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>NORMAN</u>	First name:
Last Name: <u>MOORE</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
Address: <u>80 DEEPDALE DRIVE</u> <u>RAIN HILL PRESCOT</u> <u>MERSEYSIDE</u>	Address:
Postcode: <u>L35 4NW</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

27/02/2019

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 - 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)

146 Two Butt Lane, Rainhill, L35 8PT before 12noon on 13th March 2019 (please just push through letter box and do not ring doorbell)

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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DATA PROTECTION

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?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

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

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

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

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

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

1 Traffic problems on Walthamston Road
 getting out onto A57 FROM JONES ESTATE
 2 Very Difficult now without more traffic.
 3 Doctors Dentists will be worse
 4 schools will have less places
 5 MORE HEALTH PROBLEMS WITH EXHAUST
 CASES
 6 more brown sites should be used

6 (contd).

I have also discussed this issue with my wife, my daughter & son-in-law, and they all agree with my comments as set out on the previous pages. Their details are as follows: -

My wife's name - SUSAN REBECCA MOORE
(same address as mine).

My daughter's details are: -

MR. + MRS. S. WATTS
12 ELLON AVENUE
RAINHILL, PRESTON
L35 0NZ.

(Their children's ages are

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)

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.

RO1817



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)

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

This form has two parts;

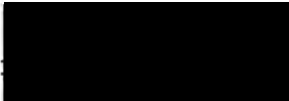
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ELIZABETH</u>	First name: _____
Last Name: <u>WEBB</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>18 GIRVAN CRESCENT</u> <u>GARSWOOD</u> <u>ASHTON IN</u>	Address: _____
Postcode: <u>WN4 0SS</u>	Postcode: _____
Tel No: 	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>20-02-2019</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.

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 05 SITE 1HA.		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input 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 <u>set out your comments</u>.</p> <p>THE LACK OF ANY IMPROVEMENT IN INFRASTRUCTURE WILL SERIOUSLY IMPACT ON THE QUALITY OF THE GARSWOOD AREA IN GENERAL. IT WILL INCREASE THE USE OF CARS AND POLLUTION. NO PROVISION FOR MORE SCHOOL PLACES. MAKE THE BUILDERS USE EVERY AVAILABLE BROWN-FIELD SITE BEFORE ANY GREEN BELT LAND IS CONSIDERED.</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.

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

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

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

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

Please keep a copy for future reference.

RO1818



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)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>WEBB</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>18 GIRVAN CRESCENT</u> <u>GARSWOOD</u> <u>ASHTON IN MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SS</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	_____

Signature: [REDACTED]	Date: <u>20.02.2019</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.

RETURN DETAILS

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

post to:

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

or by hand delivery to:

Ground Floor Reception
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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA05 SITE 1HA.									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<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>
<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 PROVE ITS POPULATION ESTIMATES IT HAS BEEN IN DECLINE SINCE 1981.</p> <p>THE RELEASE OF GREENBELT GOES AGAINST THE PURPOSE OF GREENBELT. BUILDING HOUSES WITHOUT INCREASING INFRASTRUCTURE, I.E. SCHOOLS BUS ROUTES IT WILL JUST ENCOURAGE THE USE OF CARS ADDING TO POLLUTION.</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 lead 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="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

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

--

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

Please keep a copy for future reference.

RO1819



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

Ref: LPSD

11 MAR 2019
(For official use only)

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

PART A – YOUR DETAILS

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

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

Signature:	Date: <u>07/03/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please 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

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPA 6	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"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

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

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

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

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

The council is proposing new homes in excess of that recommended by the government. We do not need this many new homes.

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

Please continue on a separate sheet if necessary

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.

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

RO1820

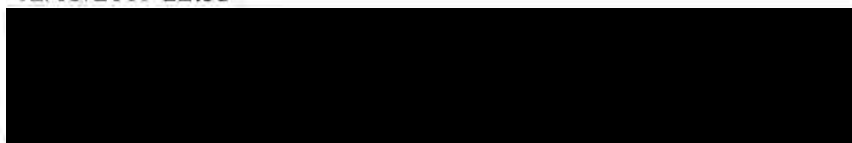
Sine 8HA

ELO143

①-LPA05



Revised St Helens Local Plan
Stephen Webster
to:
planningpolicy
12/03/2019 22:53



The Planning Inspector

I have the following comments on the Revised St Helens Local Plan Submission:

- The proposed site HA8 (Rookery Lane / Higher Lane in Rainford) 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 St Helens 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.
- There are no exceptional circumstances to justify the change to 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.

①

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.

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

I look forward to hearing from you.

Stephen Webster
32 Scarisbrick Road
Rainford
St Helens
WA11 8JN

RO1821

Site 8HA

ELO144



St Helens Local Plan
Gillian Webster
to:
planningpolicy
12/03/2019 23:03

①-LPA 05



I have the following comments on the Revised St Helens Local Plan Submission:

- The proposed site ^{8HA} HAS (Rookery Lane / Higher Lane in Rainford) 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 St Helens 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.
- There are no exceptional circumstances to justify the change to 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.

①

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.

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

Gillian Webster

32 Scarisbrick Road

Rainford

St. Helens

WA11 8JN

RO1822

ELO147

PHC 8HA

①-LPAOK



St Helens Local Plan
Eve Webster
to:
planningpolicy
12/03/2019 23:25



I have the following comments on the St Helens Local Plan:

You are proposing to build houses on Grade 1 Agricultural Land which is where my food comes from.

This is Green belt land which you can not build on unless you have a good reason. Do you have a good reason and have you asked Natural England?

The road are very busy already and this will make them much busier and dangerous for me to cross.

Will there be enough schools in Rainford for all the extra people?

Could you not build the extra houses on land that has already been used for something else before rather than on Green belt because we can never get it back in the future?

①

I think you need to change the plan and keep the Green Belt for me and future generations.

Eve Webster
47 Croxteth Drive
Rainford
St Helens
WA11 8JZ

RO1823

ELO148

Site 8HA

①-LP105



St Helens Local Plan
Eda Webster
to:
planningpolicy
12/03/2019 23:44



I have the following comments on the Revised St Helens Local Plan Submission:

The proposed site ^{8HA} HA8 in Rainford is Grade 1 Agricultural Land and is where food is grown and provides jobs for local people.

This is Green Belt land which, if houses are built, will be lost forever.

There are no exceptional circumstances to justify the change to Green belt boundaries.

Other reasonable alternatives have not been fully explored, including using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new roads and schools.

St Helens Council should amend the plan by retaining the Green Belt and by allocating more previously developed land.

Eda Webster
47 Croxteth Drive
Rainford
St Helens
WA11 8JZ

RO1824

Site 8HA

ELO278



Local Plan
 Anthony Webster
 to:
 planningpolicy@sthelens.gov.uk
 09/05/2019 11:07

① - LPAOK

② - PARQ 1-7-2

③ - S.A.

Anthony Webster

14 Rookery Drive

Rainford

St Helens

Mersyside

WA11 8BB

Rainford Specific points (8HA Rookery Lane)

- 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 not as high as set out in the Local Plan
- There are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target housing 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

Rainford Specific points (8HA 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 8HA is the least appropriate Green Belt site allocated for housing in Phase 1

③

- 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.

①

Sent from Mail for Windows 10

RO1825

① - LPA05

② - Green Belt Review 2018

Representor Details

Web Reference Number	WF0491
Type of Submission	Web submission
Full Name	Mr Paul Webster
Organisation	
Address	41 Makerfield Drive Newton le Willows Merseyside Wa129wa
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 2030-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The use of Brown land and inner town development areas has not been explored. The scoring system to justify the use of Greenbelt land is biased and planned to to achieve its aims of use. I believe the plan goes against Government guidelines.

There are no details of how affordable homes will be made available and is an exercise in how the local authority can benefit from selling Greenbelt to developers. The authority has failed to delivery past agreements as with the Labd fill site on Vista road. The agreed closure was extended as there was not enough waste in our land.

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

I would like details of the development of the land with details of how the Borough will safeguard road congestion, air pollution, provide affordable housing. How this is in line with Government policy. The area has already been developed as Land fill and further use of Greenbelt is excessive.

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

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

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

Response Date	1/18/2019 7:11:51 PM
---------------	----------------------

RO1826

Representor Details

Web Reference Number	WF0188
Type of Submission	Web submission
Full Name	Miss Diane Weeks
Organisation	
Address	34 Springfield Park Haydock St Helens Merseyside WA11 0XR
Agent Details	Diane Weeks

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

Yes (via e-mail)

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

Policy	LPA-05 SITE - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The plan is unjustified I disagree with the claim to rising population in St Helens.

There is land in Haydock that is brownfield and not in the plan, this land should be used before Greenbelt. One piece of land is in Bellorphen Way near Tesco.

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

Remove this land from the local plan and review any possible sites that are brownfield and are currently in a state to be sold to developers.

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 1:14:50 PM
---------------	----------------------

RO1827



St. Helens
Council

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

Ref: LPSPD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>PETER</i>	First name:
Last Name: <i>WELSH</i>	Last Name:
Organisation/company: <i>N/A</i>	Organisation/company:
Address: <i>20 ARABIS GARDENS NEW BOLD ST. HELENS</i>	Address:
Postcode: <i>WA9 4ZH</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

16/04/19

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.

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.

RO1828

PL0042

Sinc 8HA ①-LPA05
②-LPA02.

55 Rookery Lane
RAINFORD
WA11 8BL

726

9 March 2019

13 MAR 2019

01744 882558

Dear Sir/Madam

St Helens MBC Local Plan 2018/19 – 8HA – Land South of Higher Lane and East of Rookery Lane Rainford

I write as a resident of Rainford and one who would be particularly effected by the proposed building on the field adjacent to Higher Lane/ Rookery Lane. I wish to give my reasons why I think that the St Helens Local Plan, as it affects Rainford, is unsound.

Points against the Plan

1) The Plan states that up to 259 dwellings could be built on the land. Many families now have two cars (at least) and two wage earners, so there could be in excess of 400 cars exiting the "new estate" in a morning (Monday – Friday) on to "B" roads (Higher Lane/ Rookery Lane) which are already congested on school days taking pupils to the High School. Exiting from Rookery Lane onto Church Rd and then on to the bypass would create long 'tailbacks'. The result of this would be more traffic chaos in and around Rainford. The increase in traffic would impact seriously on the new road system at Windle. ①

2) There will be more children living in the new houses. Perhaps not in sufficient numbers to warrant a new primary school but there would need to be extensions to the existing ones. All three primary schools in Rainford do not have the space in their grounds for such extensions. Rainford High School is already a large school (pupil numbers) in a relatively new building and therefore an expansion of pupil numbers would not be feasible. ①

3) The additional number of houses would increase the population by potentially 750/800 necessitating more health facilities (doctor/dentist) – where would these be accommodated? ①

4) Amongst the aims of the Local Plan are that it wishes to promote industry and create jobs. The site in question is in constant use by a local farmer and the loss of such land for food production may well effect employment in the farming industry and may very well cost jobs. This would be contrary to the ①

13 MAR 2019

aims of the Plan and would therefore be counterproductive.

5) The Green Belt Land in question is, like the vast majority of Green Belt farming land in Rainford, Grade 1 agricultural land. The farmer grows vegetables for Supermarkets. We are constantly being told that post Brexit we will have to grow more of our "own" produce. Taking this land (or any farming land in Rainford) for building will mean that we will be growing less. Once removed you cannot 'regrow' Grade 1 agricultural land. This is yet another reason why this Plan is unsound. (1)

6) St Helens Council has a policy of "Brown field first" when it comes to building expansion. While it is acknowledged that there will be many dwellings built on "Brown Fields sites" there are still many such sites which are not being taken up. (2)

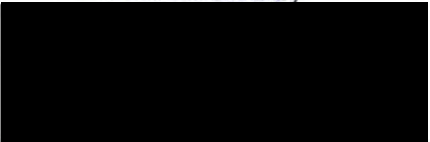
7) The "new dwellings" figure for St Helens seems to be unrealistic when looked at against population projections and estimates, there are already circa 900 empty homes in the Borough and more homes being built. The question that needs to be asked is why we need to build yet more when the population has remained fairly static over the past few years. I say that we do not; there is no reason or need to re designate any Green Belt Land within the Borough for development. (2)

8) Rainford is a thriving rural village with a large Farming Industry and community. To take away any of this would, I believe, damage the whole area. ✓

Points for the Plan

Give what I have said above I do not see any points in favour of the Plan. ✓

Yours faithfully


K H Wesley

Also sent by e-mail on 10.3.19 at 14.28.

RO1829



{In Archive} Proposed Developments in Garswood
James Weston
to:
planningpolicy
04/02/2019 16:21

SITES IHA & IHS

① - LPA05

② - LPA06

Dear Sir

We strongly object to the proposed building development in Garswood.

The roads are already overloaded and with cars and vans double parked on virtually every road, it is becoming hazardous to drive around the area.

Any more building and the added traffic would make the situation intolerable and dangerous.

James and Irene Weston
5 Elgin Avenue
Garswood

} ① & ②

RO1830



St. Helens Borough Local Plan 2020-2035 (Submission Draft) Representation Form - T. Wiswall
 paul.johnson
 to:
 planningpolicy
 11/03/2019 09:58



1 Attachment



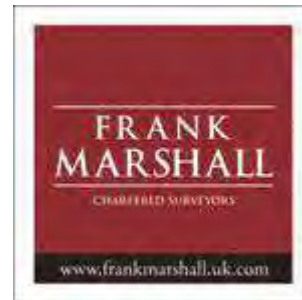
image001.jpg image002.jpg image003.jpg St. Helens Representation Form complete - T. Wiswall.pdf

We attach herewith a completed representation form and plan for your attention.

Paul Johnson FRICS FAAV
 Director,
 Frank Marshall & Co.,
 121 Billinge Road,
 Garswood,
 Ashton-in-Makerfield,
 Wigan. WN4 0XD



CHARTERED SURVEYORS
 AUCTIONEERS & ESTATE AGENTS



Frank Marshall & Co. is the trading name of Frank Marshall (Garswood) Ltd. Company Registration No. 6543828 Registered office: 6th Floor, Cardinal House, 20 St. Mary's Parsonage, Manchester, M3 2LG

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

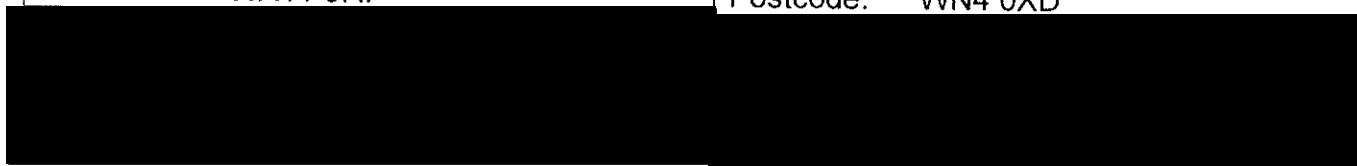
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title: Mr.
First Name: Thomas	First name: Paul
Last Name: Wiswall	Last Name: Johnson
Organisation/company:	Organisation/company: Frank Marshall & Co.
Address: Garswood Gates Farm, Liverpool Road, Haydock.	Address: 121 Billinge Road, Garswood, A-in-M, Wigan.
Postcode: WA11 9RP	Postcode: WN4 0XD



Signature: 	Date: <div>22nd February 2019</div>
--	-------------------------------------

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

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

RETURN DETAILS

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

post to:

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

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

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Telephone: 01744 676190

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LPA02				Page 11					
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?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input 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

In relation to the three parcels of land edged red on the attached plan amounting to about 8.2 hectares in the ownership of Mr. Wiswall, following the development of Florida Farm North and the effective removal of that site from the Green Belt, the land edged red no longer fulfils a Green Belt purpose when matched against the principles of preventing unrestricted spread of development, preventing neighbouring farms merging and safeguarding the countryside from development. In addition as outlined in table 2.1 of the Council's Green Belt Review (December 2018), the bund which now separates the Florida Farm development from the land

edged red is not as strong a boundary feature as Liverpool Road which is a more natural and definable boundary. The ribbon residential development along Liverpool Road already effectively impairs the purpose of the Green Belt to the South of Liverpool Road.

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.

Removal of land edged red on the plan from the Green Belt and its designation as a residential site in the 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.

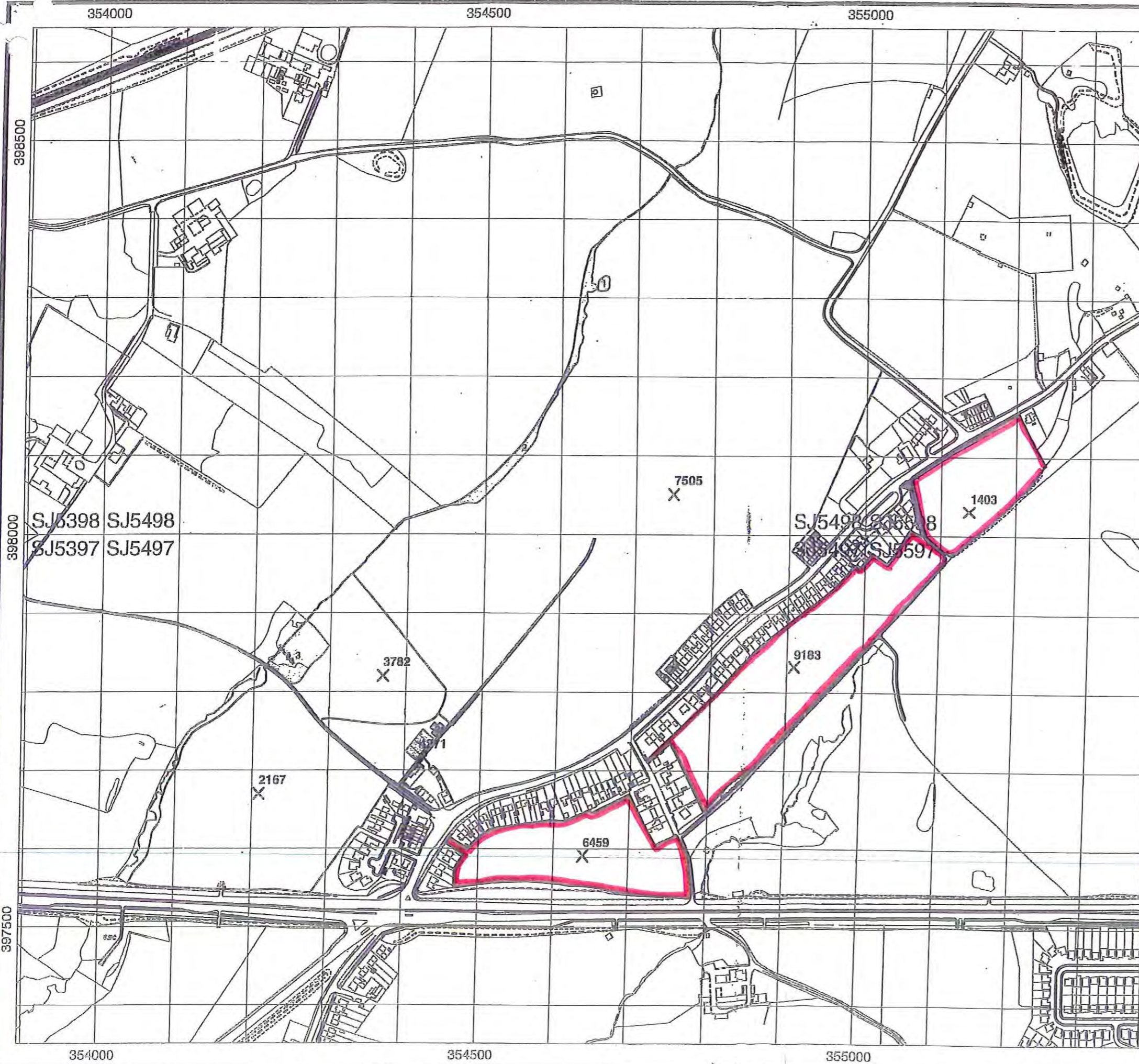
8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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





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

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

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




 rural payments agency
Rural Land Register (RLR) Map
 SBI - 106427384
 RLR/DRR009
 Map 1/1

- Legends**
-  Your RLR Parcel(s)
 -  SPS Permanent Ineligible Features
 -  Adjacent Parcel Boundary
 -  Unconfirmed Boundary

RLR Information

Sheet ID	Parcel ID	Total Area (ha)	SPS Recorded Eligible Area (ha)	English Region
SJ5497	2167	5.76	5.76	N
SJ5497	3782	2.62	2.29	N
SJ5497	4271	0.74	0.63	N
SJ5497	6459	2.53	2.53	N
SJ5497	9183	3.07	3.07	N
SJ5498	7505	27.61	27.23	N
SJ5598	1403	1.8	1.8	N



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RLR/DRR009 Date: 12/01/2010

RO1831



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>DEBORAH</u>	First name: _____
Last Name: <u>WHITE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 WESTEND RD</u>	Address: _____
<u>WIAMOCK, ST HELENS</u>	_____
<u>MARSEUSIDE</u>	_____
Postcode: <u>WA11</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
_____	mail: _____
Signature: _____ Date: <u>5.3.19</u>	

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED - ST HELENS POPULATION HAS BEEN IN DECLINE SINCE 1981. SO WHERE ARE ALL THE PEOPLE COMING FROM NEEDING EXTRA HOUSING?</p> <p>BY BUILDING ON GREENBELT LAND ANY WILDLIFE WHICH LIVES THERE CURRENTLY WILL BE DRASTICALLY REDUCED IF NOT WIPED OUT COMPLETELY.</p> <p>BUILDING EXTRA HOMES = EXTRA OCCUPANCY = EVEN MORE PRESSURE ON ALREADY STRUGGLING AMENITIES IE SCHOOLS, GP SURGERIES, TRANSPORT SERVICES. SO ELDERLY RESIDENTS WHO CANNOT DRIVE MAY BE LEFT EVEN MORE VULNERABLE + ISOLATED.</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.

PROVIDE EVIDENCE THAT THIS PROPOSAL IS NECESSARY OUTLINING THE BENEFITS THIS PROPOSAL WILL PROVIDE.
ENSURE THE CORRECT CALCULATIONS HAVE BEEN DONE TO SHOW THAT THIS PROPOSAL WILL NOT CAUSE MORE DAMAGE/HARM TO RESIDENTS / WILD LIFE AND ECONOMY OF THIS TOWN.
ENSURE IT WILL BE BENEFICIAL AND NOT DAMAGING TO OUR TOWN.
SUFFICIENT DRAINAGE. ALTERNATIVE HABITATS FOR ANY WILDLIFE WHICH HAS ALREADY BEEN REDUCED DRASTICALLY OVER THE LAST 12 MONTHS. AEREAH.

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 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:

I LIVE AT THE ^{YAWDOCK/BLACKBROOK} INTERSECTION OF CLIPSEY BROOK AND HAVE SUFFERED FLOODING EMOTIONALLY & FINANCIALLY AND HAVE CONCERNS ABOUT THIS DEVELOPMENT AND ITS REPERCUSSIONS -

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.

DEBORAH WHITE *LPA-05 SITE 2 HA* CONT.

✓ *LPA04
SITES 2EA
5EA
6EA ✓

*BY BUILDING EXTRA HOUSING ⁽⁵⁰⁰⁾ ON ALREADY STRUGGLING
FLOOD PLAINS WHICH WILL + DOES CAUSE DANGER TO BOTH
PROPERTY AND PEOPLE* WILL ONLY ACCELERATE NOT ONLY
*THE ~~QUANTITY~~ VOLUME OF WATER BUT ALSO THE SPEED
IN WHICH THE CURRENT DRAINAGE SYSTEM WILL FAIL.
RESULTING IN FLOODING ON A CURRENT LEVEL 3 FLOOD PLAN
AT THE BLACKBROOK / HAYDOCK INTERSECTION OF CLIPSEY
BROOK.

THIS SECTION IS ALREADY AT THE HIGHEST LEVEL OF A FLOOD
RISK SCALE + ALL EXTRA WATER ADDED TO LESS NATURAL
SOIL AWAY ADDED TO INADEQUATE DRAINAGE IS PROOF THAT
THIS DEVELOPMENT CAN ONLY CAUSE FURTHER STRESS / ANXIETY /
COST. ~~THE~~

THE PROPERTIES AT THE BLACKBROOK / HAYDOCK INTERSECTION ^{of CLIPSEY BROOK}
HAVE ALREADY FLOODED.

OCTOBER 2000 / SEPTEMBER 2012 / AFTER THE INSTALLATION
OF STANLEY BANK WAY WHERE RESIDENTS WERE INFORMED
EXTRA ^{STORM DRAINS} ~~FLOOD WATER~~ WERE PUT IN PLACE TO HELP
ALLEVIATE THE RISK / FREQUENCY OF FLOODING ACTUALLY
INCREASED THIS RISK FROM A 1:12 YEAR FLOOD TO A
1:3 YEAR FLOOD, AND FLOODED AGAIN IN 2015!!

HOUSE INSURANCE HAD INCREASED TO £187.00 PER MONTH +
I HAVE ALSO BEEN INFORMED IF FLOODED AGAIN MAY NOT
BE INSURABLE.

THE CURRENT UNCERTAINTY OF THE ECONOMIC CLIMATE WITH
REFERENCE TO FOREIGN IMPORTS. BY REDUCING THE GREENBELT
= REDUCING THE ABILITY FOR ANY GREENBELT LAND TO
BE FARMED FOR CROPS TO SUSTAIN OUR GROWTH. ✓

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.

UNTIL PROOF CAN BE GIVEN THAT PREVIOUS PLANNING PERMISSION FOR APPLICATION FOR SITE 2EA ~~11111~~ HAS BEEN SUCCESSFULL ~~11111~~

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	LPA04 SITES 26A SEA + 66A	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 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>NOT NOT JUSTIFIED - NO STRICT PROOF THE SCALE + TYPE OF DEVELOPMENT NEEDED IN THIS AREA WHICH IS SO CLOSE TO A RESIDENTIAL AREA WHICH WILL BRIGHT PROPERTY PRICES. REQUESTING GREENBELT LAND + WILDLIFE HABITAT. OVER ALL AREAS REQUESTED. LOOK AT CURRENT TRAFFIC CONGESTION BEFORE THE SITE HAS EVEN COMPLETED + INCORPORATE THE PREDICTED TRAFFIC THE FUNCTIONING SITE WILL ADD, AS ALREADY HIGH LEUGES CAUSING MAJOR CONGESTION. NOT TAKING THE HEALTH + WELLBEING OF LOCAL RESIDENTS INTO CONSIDERATION BE IE & FUMES / NOISE / SAFETY.</p>

Please continue on a separate sheet if necessary

RO1832



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;

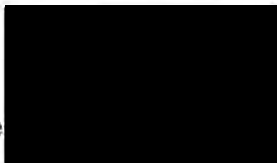
Part A - Personal Details

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>BARBARA</u>	First name: _____
Last Name: <u>WHITE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32 SELKIRK DRIVE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5PE</u>	Postcode: _____
	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 - 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 METHOD IS FLAWED
Effective?	<input checked="" type="checkbox"/> THE PLAN CAN'T BE DELIVERED
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</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 the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>As I have said above the plan has not been considered in proper a proper manner. as far as I can make out these things have not been taken into consideration. Roads & Traffic. Public Transport Schools & Shops also if we come out of Europe the land will be need to supply home grown food stuffs. the A580 is already over used by HGV's going to & from Liverpool & Manchester. this will increase with the growth of Docks in Liverpool and all the industrial expansion along the A580. more house in the area will also put pressure on the traffic flow. also Hospitals & ^{schools} in the area are over subscribed.</p>

Please continue on a separate sheet if necessary

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

The plan as it stands can not be used, it will upset the equilibrium of the ~~entire~~ present existing area.
I cannot think of anything to improve the plan except scrap it.

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.

RO1833

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.

1017
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>Maria</u>	First name: _____
Last Name: <u>White</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 Anemone Way</u> <u>New Bold</u>	Address: _____
Postcode: <u>WA9 4ZJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	mail: _____

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

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

RO1834



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Mr</u>	Title:
First Name: <u>George</u>	First name:
Last Name: <u>White</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>73 Gorsey Lane</u> <u>Clock face, ST Helens</u>	Address:
Postcode: <u>WA9 4XA</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

24.3.19.

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.

RO1835



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;

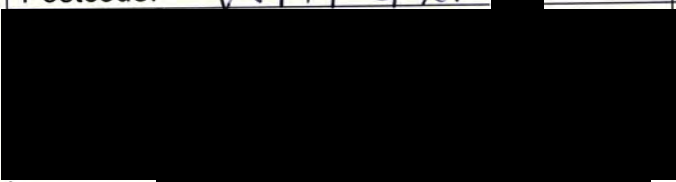
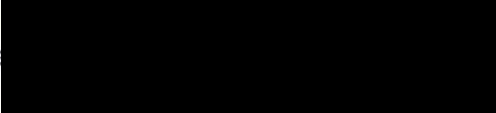
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

13 MAY 2019
1168

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: LEWIS	First name:
Last Name: WHITE	Last Name:
Organisation/company:	Organisation/company:
Address: 73 Gorse Lane Clock Face, ST Helens	Address:
Postcode: WA9 4XA	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: 24.3.19

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.

RO1836

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>MR</u>	Title: _____
First Name: <u>GEORGE</u>	First name: _____
Last Name: <u>WHITE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>19 AIRBOTS HALL</u> <u>AVE, CLOCKFACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4UX</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

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

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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.**

RO1837



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>MARIAN</u>	First name: _____
Last Name: <u>WHITE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>19, ARBOTS HALL</u> <u>AVE, CLOCKFACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4UX</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

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

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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setting out your representation/comment.**

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

RO1838

THE SHINING LIGHTS HERITAGE GROUP.

% MRS H WHITE.

03 APR 2019

19, ABBOTS HALL AVE.

CLOCKFACE WAY HUX.

926

The Shining Lights Heritage Group for the Dream site are horrified at the proposed local plan to build houses on Garton's Lane. This would be detrimental to the Dream site. It has taken ten years for the site to evolve as it is today. The local community and children have put a lot of hard work and effort planting trees and wild flowers etc. We feel the site would be enclosed and cut off from view. We have grave concerns about the water voles. One of its habitats is the stream that runs the whole way between the Dream site and Garton's Lane site from one end to the other. Proof that the water voles are there can be seen on the Dream web. The bats, hedgehogs, newts, deer, owls, butterflies, birds and wild orchids to name a few cannot be lost. Once we lose any of these we will never get them back. We need open spaces, we have a right to breathe clean air.

The Dream site is unique and the council should protect it not destroy it.

The whole idea of Dream was that it would be seen and people would want to visit the site. This would not be possible approaching from Jubilees Lane and Garton's Lane if it was obstructed from view by houses.

ALAN ROBY

MARIAN WHITE

SID SAUNDERS

GEORGE WHITE

RED

LINE

IS

STREAM

—

ENCLOSE

PHOTO

HEDGEHOG.

ON

SITE

NEAR

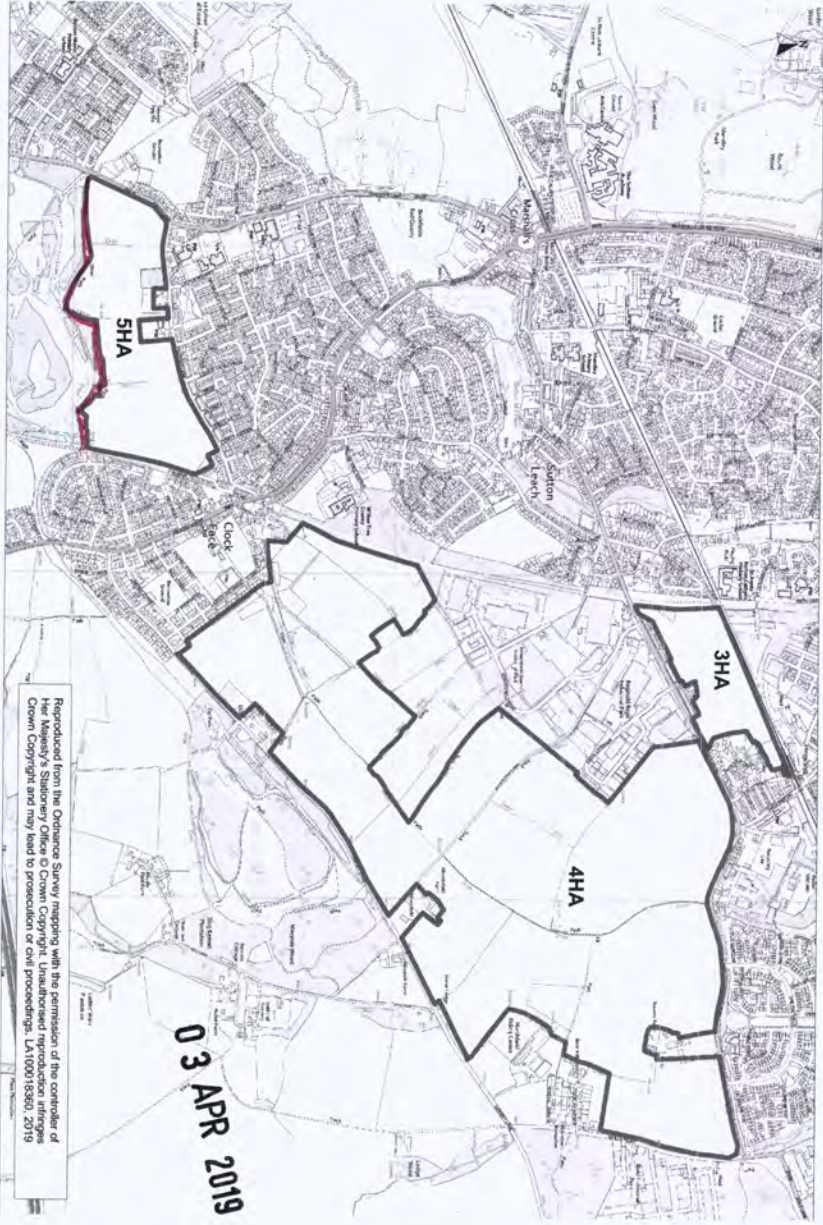
STREAM

—

GARTONS

LANE

SITE.



Reproduced from the Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. LA100018360, 2019

03 APR 2019



RO1839

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0176
Type of Submission	Web submission
Full Name	Mrs Susan White
Organisation	
Address	Orrits Nook Cottage Higher Lane Rainford St Helens Merseyside WA11 8NQ
Agent Details	

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

Yes (via e-mail)

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

Policy	All
Paragraph / diagram / table	All
Policies Map	All - but particularly LPSD 8HA Rainford
Sustainability Appraisal / Strategic Environmental Assessment	All
Habitats Regulation Assessment	All
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.

LP is not sound because:-

NO Grade 1 agricultural land should be released from the Greenbelt - this is just ridiculously short sighted, now more than ever - grade 1 agricultural land IS and IS GOING TO BE required more than ever for this country's future. There will never be any sufficient justification to release the perfect growing land. Just because a Borough has more area of Prime Growing land than others should not lead to that area being removed from the GB. Each area provides it's own contribution to meeting the needs of the people - Rainford's highest quality farming land provides the local/regional/national/international food, there is nothing more exceptional than that!!

No duty to co-operate:-

No formal notification of plan, even though my home's drive is within 200feet of area designated for removal from GB/development

This form makes it very difficult to comment -

I do not have the legal knowledge to say whether the LP is legally compliant or not, but I could not submit the form without ticking a box!

①

②

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

No Grade 1 agricultural land to be removed from the Green belt.

If there is any lesser Grade of GB land then this should be considered for release

Make the inclusion of everyone in consultation much easier i.e., just a blank comment box!!

3 properties share our private road - all border on the proposed area - all should receive formal notification of plans.

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 5:07:05 PM
---------------	----------------------

RO1840

Representor Details

Web Reference Number	WF0206
Type of Submission	Web submission
Full Name	Mr Glen White
Organisation	
Address	73 Gorsey Lane Clock Face St Helens WA9 4XA
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	x
Paragraph / diagram / table	
Policies Map	x
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.

Please note supporting information from Clock Face & Bold Action Group. Please note I am in total agreement with all its contents

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

Please note supporting information from Clock Face & Bold Action Group. Please note I am in total agreement with all its contents

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

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

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

Response Date	3/11/2019 8:50:43 PM
---------------	----------------------

RO1841

445



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

Ref: LPSD

12 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>KATHLEEN</u>	First name: _____
Last Name: <u>WHITESIDE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3, Avery Square</u> <u>Handocks</u>	Address: _____
Postcode: <u>WA11 0XB</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>4-3-2019</u>
------------------------------	-----------------------

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

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

☐ Yes (via email)

☐ No

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RETURN DETAILS

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

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Council should be put to strict proof for this type of development using greenbelt fails to encourage reworking of derelict and other urban land. Significant harm caused to greenbelt. Risk of flooding on Ainsley Brook increased. Higher volumes of traffic to already over capacitated highways.

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 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="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.

RO1842

Representor Details

Web Reference Number	WF0277
Type of Submission	Web submission
Full Name	Mrs Victoria Whiteside
Organisation	
Address	3 Wareham Close Haydock Wa11 0wh
Agent Details	

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

No

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

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

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

Is legally compliant?	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.

Do you live in Haydock and have the daily battle to try to get your child to school and to work on time? Obviously no! Is your child an asthma sufferer and does pollution make it worse! . The brook is full of Japanese knot weed by the way!! You are destroying a decent bit of the town that is falling apart

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

I haven't got a clue, but greed selfishness and clueless fine to mind

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 9:19:07 PM
---------------	---------------------

RO1843

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)

PART A - YOUR DETAILS

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

896

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MS</u>	Title: _____
First Name: <u>LINDA</u>	First name: _____
Last Name: <u>WHITFIELD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>28 HIGHFIELD STREET</u> <u>SUTTON ST. HELENS</u> <u>MERSEYSIDE</u>	
Postcode: <u>WA9 3PA</u>	Postcode: _____
Tel No: <u>07</u>	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	mail: _____

Signature: [REDACTED]	Date: <u>18-4-19</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 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:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

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

RO1844



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: MRS
First Name: GEORGE	First name: MARGARET
Last Name: WHITTINGHAM	Last Name: WHITTINGHAM
Organisation/company:	Organisation/company:
Address: 16 ARNOLD ST	Address: 16 ARNOLD ST
Postcode: WA9 4RT	Postcode: WA9 4RT

Signature: <div style="background-color: black; width: 300px; height: 40px; display: inline-block;"></div>	Date: 22/3/2019
--	-----------------

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

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

Yes ☐ (Via Email)

No ☐

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

RO1845



St. Helens
Council

164

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

Ref: LPSD

01 MAR 2019
(For official use only)

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www.sthelens.gov.uk/localplan

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>PATRICIA</u>	First name: _____
Last Name: <u>WHITTLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 FALKLAND DRIVE,</u>	Address: _____
<u>GARSWOOD,</u>	_____
<u>WILKIN</u>	_____
Postcode: <u>WN4 0SQ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20.2.2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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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.

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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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>LPAOS</i> <i>IHA</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 checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>Not justified - Council should be put to strict proof of its population estimates. St Helens has been in decline since 1981 - where are all the extra people coming from. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Access would be inadequate - Lack of schools, doctors.</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.

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

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

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

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

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

Please keep a copy for future reference.

165

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>PATRICIA</u>	First name: _____
Last Name: <u>WHITTLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 FALKLAND AVE</u>	Address: _____
<u>GALSWOOD</u>	_____
<u>WILKIN</u>	_____
Postcode: <u>WN4 0SQ</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>20.2.2019</u>
------------------------------	------------------------

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

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Telephone: **01744 676190**

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support 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 the need for this type of development, in this position and on this scale.</p> <p>The Council has already granted planning permission in the greenbelt. in respect of site 2EA. The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. Volumes of predicted traffic will add to the already over-capacity on the highways</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.

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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1846



St. Helens
Council

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

Ref: LPSD

01 MAR 2019
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Part B - Your Representation(s)

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

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Title: <u>MR</u>	Title: _____
First Name: <u>DEREK</u>	First name: _____
Last Name: <u>WHITTLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 FALKLAND DRIVE,</u> <u>GARSWOOD</u> <u>WIGAN.</u>	Address: _____
Postcode: <u>WN4 0SQ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>20-2-2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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WA10 1HP**

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setting out your representation/comment.**

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

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input 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"/>

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<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED, THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION. AND ON THIS SCALE THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.</p>

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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

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

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

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047

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

Ref: LPSD

01 MAR 2019
(For official use only)

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>DEREK</u>	First name: _____
Last Name: <u>WHITTLE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 FALKLAND DR,</u> <u>GARSWOOD,</u> <u>WIGAN.</u>	Address: _____
Postcode: <u>WN4 0SQ</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	_____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	mail: _____

Signature: <u>[REDACTED]</u>	Date: <u>20-2-2019</u>
------------------------------	------------------------

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

☒ Yes (via email)

☐ No

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WA10 1HP**

or by hand delivery to:

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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setting out your representation/comment.**

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

PART B - YOUR REPRESENTATION

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

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

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT 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 THE EXTRA PEOPLE COMING FROM.</p> <p>THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT,</p>

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DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

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

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

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

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

Please keep a copy for future reference.

RO1847



St. Helens
Council

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

Ref: LPSD

27 FEB 2019

(For official use only)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: CAROL	First name:
Last Name: WILCOCK	Last Name:
Organisation/company:	Organisation/company:
Address: 44, SMOCK LAWE, GARSWOOD	Address:
Postcode: WN4 0SW	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature:

[REDACTED]

Date:

20/2/19

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) wilcock 2 @ sky.com

No ☐

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

RETURN DETAILS

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

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

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

PART B – YOUR REPRESENTATION

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

Policy LPA05 14A	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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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 made to account for its population estimates. The population in St-Helens has been in ~~sharp~~ decline since 1981. The Council wants 486 houses built every year, but the latest figures from the Office for National Statistics show St-Helens only needs 383 houses a year. If these figures were used, the amount of building on protected land could be significantly reduced.

The Council's own register shows there is enough brown field land in the Borough for 5,818 houses. This would support the Council's housing supply – on its inflated figures – for nearly 12 years.

✓ One of the ~~main~~ purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of derelict & other urban land. Using Green Belt fails to encourage this and results in urban sprawl, which the Green Belt was created to prevent.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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PART B CONTINUATION SHEET

SECTION 6

* Housing in this area is not sustainable because of the lack of school places, doctors' surgeries, bus routes and other services. Increased housing will involve more use of cars because of lack of facilities.

Traffic is already a problem in Garswood with roads unable to cope with the current volume of traffic.

There is a train station but a lack of parking spaces results in a problem with cars parked on the roads surrounding the station.

* The proposed development will have an adverse effect on the character of the landscape, which in turn will have an adverse effect on the well-being of residents.

* There is no statement of common ground with neighbouring authorities.

* The primary purpose of the plan is to remove land from the Green Belt for economic needs based on predictions which are questionable. Indeed the Council's own predictions on housing needs are now for fewer houses than they estimated in their original plan two years ago

*The Department of Communities and Local Government has stated that, "Local Authorities may only alter Green Belt boundaries in exceptional circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional..

RO1848

Representor Details

Web Reference Number	WF0215
Type of Submission	Web submission
Full Name	Miss Jane Wilcock
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
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	LPA04 - sites 2EA, 5EA & 6EA
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.

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. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exceptional circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/11/2019 7:04:41 PM
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RO1849

ELO119

SITE 8HA

①-LPHOK

②-PA 1-7.2

③-S.A.



Local plan
Georgina Wilding
to:
planningpolicy
12/03/2019 17:49

I have some points to make about the St. Helens local 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

Rainford Specific points (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

Regards
Georgina Wilding

111 Bushey Lane,
Rainford,
St helens,
WA11 7TE

RO1850



Planning Policy.
gloria wilding
to:
Planningpolicy
25/04/2019 11:33

ELQ272

3HS

①LPACB

① I am against the proposed changes to the Green Belt Land of the Eccleston Park Golf Course, for the reasons given on the leaflet delivered by the Focus team.
Building on the land will affect Schools, Doctor, s, Highways and Key services, which are already heavily used. We need more of these services. not more people in the area using them.
There are very few amenities on Portico Lane, so the increased population would struggle to cope.
There would also be more irritability among road users, causing more work for the already overstretched police.
I think more thought needs to be given to the plans and more consideration to residents living in the locality.

MRS GLORIA WILDING,

RO1851

Representor Details

Web Reference Number	WF0224
Type of Submission	Web submission
Full Name	Mrs Sharon Wilkie
Organisation	
Address	4 Litchborough Grove Prescot L35 7NE
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

We have a declining population in the area, so who are we expecting to purchase all these houses or the ones that they leave to move to a new one?

Brownfield sites in the area can 5808 houses, so why do we need to build an extra 1437 on extra greenbelt land?

Local road infrastructure is currently unable to support current demand, I live off Portico Lane and it can be a nightmare to even get out of my road, and we struggle to even get to the local Tesco's due to volume of traffic. How will these new properties especially on the golf course impact on the road infrastructure. Even getting through Rainhill to the motorway can take at times, up to 40 minutes! There is no facility within this current road structure to enlarge them, therefore how will this affect the current road delays, especially at peak times.

There is only 1 A road A57 Warrington Road and it is gridlocked now at peak times, you then have traffic diverting down the local roads to bypass the lights and stationary traffic. It can be a nightmare and a dangerous situation, the proposed new builds will make this situation worse and impact on the current estates and minor B and C roads such as Kendal Drive Estate, Royal Oak estate, Stoney Lane, Blundells Lane, Mill Lane, Holt Lane, Longton Lane and View Road.

It has already been confirmed by council figures that the Warrington Road/Rainhill Road and Portico Lane/Prescot Road junctions are at full capacity. Major works would need to be done to improve them for increased traffic. The area is already gridlocked with current temporary lights for the

various new builds already taking place and there is already a lot of congestion just to get through the lights.

The increased traffic already affects pedestrian walking areas, I don't take my dog on walks down this area anymore due to the volume of traffic, noise and air pollution in these areas.

The section of 3HS is a natural green area that buffers Whiston, Portico, Eccleston Park, Nutgrove, Thatto Heath and Rainhill. It is what makes this area special, by removing this from greenbelt and placing into Safe Guarding and possibly building on it would create a continuous urban development area and push out wildlife and raise air pollution issues.

The area is already unsustainable due to lack of school places (neighbours have struggled to place their children in local schools), there are no DR or Dentist places in the walkable area, thus forcing people into their cars. People moving into the area are already struggling to access these crucial facilities, how will more development cope if there are no places as there does not seem to be any further DRs or Dentists opening for the increased population, never mind schools junior or senior! 3HS is a confirmed zone two and three flood area, we already have a high water table in our area off Portico Lane and have had flooding issues in our gardens. There have been reported issues with the new build site on Scotchbarn Lane, how will new development affect this area and the ability of the land to drain along the existing brook which is already overflowing and flooding areas as mentioned above.

Sport England, a statutory government consultant has objected at local plan stage 1 to EPGC status being changed from the Eccleston Golf Club. The objection has not as yet been answered and an objection from a statutory consultee must be resolved or upheld. St Helens Council has yet to provide evidence that there is an oversubscription of golf clubs within this area.

The area of 3HS supports many species of flora and fauna, this includes more than 13 species that are protected, we cannot afford to lose this wildlife and have already seen an increase decline in previous species in the 20 years I have lived in the area.

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

I want to see the council remove the proposed development and safeguarding of this greenbelt land and abiding with the National Planning Policy Framework (2019).

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

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

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

Response Date	3/11/2019 1:58:50 PM
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RO1852



St. Helens
Council

695

**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>Ms</i>	Title:
First Name: <i>KIRSTY</i>	First name:
Last Name: <i>WILKINSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>7 LANGLEY GROVE, DURHAM</i>	Address:
Postcode: <i>DL14 6UJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on 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:

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

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

Please tick as appropriate

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

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

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

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

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

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

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

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

RO1853



Local Plan Representation

J WILLIAMS

to:

planningpolicy@sthelens.gov.uk

09/03/2019 10:33

Hide Details

**St. Helens Borough Local Plan 2020-2035: Submission Draft
Town and Country Planning (Local Planning) (England) Regulations 2012**

I write to make representation on the above plan, specifically in relation to the proposals to build 259 houses in Rainford.

My name is John Williams and I live at 18 Old Lane Rainford WA11 8JE

I am not responding on the online representations form as I think it is a totally inappropriate and misleading way for any ordinary resident to adequately express their views as to why or why not they support or disagree with the proposals. To ask people whether they think you are legally compliant or unsound is disingenuous.

With that out of the way, I state quite clearly that I support the proposals to build 259 houses in Rainford. The population of Rainford, according to Census figures, is decreasing, from 8344 in 2001 to 7779 in 2011. Rainford has a decreasing and increasingly elderly population and I believe that for the village to continue to thrive, function and flourish, additional families are necessary. The village has a good number of excellently organised community organisations, including sports teams, senior and junior, all in need of new members (with the possible exception of the popular junior football) and a host of well-run groups and societies for all ages, all of which have plenty of scope for new members. All the churches, would I am sure, welcome new parishioners. We have three Primary schools all rated Good by Ofsted (of which I believe there are current, and with the falling birth rate, projected spaces) and a High School also rated Good. 01

I also don't see a great problem in the proposed location. As long as the additional traffic issues are addressed it is a logical extension of housing within the village footprint and does not create a separate enclave detached from the village centre and community activities. At the same time either the Parish or Borough Council urgently need to sort out Car Parking in the village centre. Perhaps making use of the vacant land behind the Golden Lion and the Church would be a good idea – without affecting the cricket club. .

I do have one main area of concern – **Health and GP Services.**

I understand and agree with the concerns of people in Rainford about the increasing demand for GP appointments and am not convinced by the information in the Infrastructure Delivery Plan as follows: *Rainford 8HA - Land South of Higher Lane and East of Rookery Lane, Rainford There are two practices in Rainford. There are 259 new dwellings expected between 2020 – 2035, none of which currently have planning permission There is expected to be sufficient capacity in existing surgeries to cater for increased demand subject to the ability to recruit.* 02

Both surgeries in Rainford are excellent. They are however, both currently and significantly overstretched. I checked on the patient website today (9 March) and the first available appointment at the Rainford Health Centre is 21 March. This will definitely need addressing as 259 houses will clearly generate more patients.

I believe that we need to think about the needs of our village, not just the environment and fields. Issues such as greenbelt and traffic are important but in my view do not override the need to ensure that, for the future, Rainford needs to remain a strong and vibrant community – and a great place to live,

John Williams

9 March 2019

RO1854

E10254



Planning Policy

Sue Williams

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:50

Sinc 8HA

- All LPA05

[REDACTED]

From Mr & Mrs A Williams, 7 Henderson Drive, Rainford. WA118PH. [REDACTED]

I would like you to take into account the following re building on green belt in Rainford. — Sinc 8HA

- 1) There should be no building on green belt until all brownfield sites have been utilised. We need these fields for growing food.
 - 2) We have not got the necessary infra structure to accommodate the numbers of houses planned.
 - 3) The waiting list for a Dr appointment is unacceptable now, it would be far worse with so many more people.
 - 4) There is no NHS dentist in Rainford
 - 5) Before any more houses are built, new schools would be an absolute necessity. Children from outside Rainford may not be able to be accommodated in schools here.
 - 6) After the amount of rain we have had over the last few days, there is already flooding on the fields and on Higher Lane. Where will this rain go if fields are concreted over.
 - 7) There are very few jobs in Rainford. The bus and train services are wholly inadequate for commuting, so there will be far more traffic from Rainford along the by pass to either, St Helens, (where there are no jobs) the East Lancs Road, which is already a nightmare, or the M58.
 - 8) There are supposed to be "lungs" between towns to prevent urban sprawl.
 - 9) Is St Helens taking seriously The Year of Environment 2019?
- "Have you taken part in the #GreenspaceChallenge yet? Visit one of our parks or open spaces, keep your eyes peeled for any wildlife that you may find living there and submit any sightings you may come across"
- LPA05

I would like to be informed of any decisions you make affecting Rainford please.

Mrs S Williams. Mr A Williams

RO1855

13 SIGNATURES INCLUDING LP0026
EB MIN CONTACT

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)

3HS ①-LPA06

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>ANGELA</u>	First name: _____
Last Name: <u>Williams</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>5 OWEN RD</u> <u>RAINHILL</u>	Address: _____
Postcode: <u>L35 0PJ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>7.3.2019</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.

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

RETURN DETAILS

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

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy	LP A06	Paragraph/ diagram table	3HS	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

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"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p style="text-align: center; font-size: 2em;">Refer to letter</p>
--

We are strongly opposed to the removal of area 3HS from the Green belt along with its proposed 'safeguarded for housing' status in the new Local Plan. Even if such development only happened several years from now, it would have a serious impact on many aspects of our life in this community. ✓

Rainhill has already got a serious traffic congestion problem which makes accessing main roads and motorways, or just travelling locally, very difficult for us during large portions of the day. Every day side roads are congested with parked cars of local workers or commuters. The local roads are narrow, as is the one A road (Warrington Road, with its protected Skew Bridge) which often has long traffic queues at every junction. This currently makes journeys much longer than they should be and is a nightmare for emergency vehicles, of which there are many, given the proximity of Whiston Hospital. Any increase in traffic would only aggravate the situation and all housing developments bring more cars into an area. The length of time you have to allow to leave or pass through Rainhill is excessive. It is a disincentive to anyone moving into the area who would have to commute. We do not see how Rainhill, Portico, Eccleston Park and Thatto Heath could take the strain of more traffic. (1)

The idea that area 3HS is ideal because of the vicinity of several railway stations, thus helping commuters to forsake their cars, is misguided. Parking facilities at those stations are either non-existent or already full to capacity early in the day. (1)

Local services are stretched to their limits. Few places are available in local schools, with requests for admissions from recent large housing developments, where schools were promised but have not materialised, adding to the demand. The local hospital, doctors and dentists surgeries are all already under pressure, both from excessive numbers of patients and shortage of parking spaces. (1)

The whole point of having a green belt is to protect communities from spreading into each other and give them some green space which has a good effect on health and well-being. Removal from the green belt means the permanent loss of an amenity with such benefits. (1)

Areas in neighbouring authorities are also planned for massive development, for example Halsnead Garden Village. These will add to all the problems we already have and add to the difficulties development of 3HS would bring, yet there doesn't seem to have been any discussion about them by our council. 3HS cannot be viewed in isolation. (1)

For these reasons and in the interests of anyone living here in the coming years we send in this representaion. ✓

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 FOR HOUSING.

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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.

We have discussed this and agree fully with the ideas expressed in this representation.

Name Wendy Hanky

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 7-3-2019

Name Robert William S

Address [REDACTED]

I give explicit

ed in this response.

Signature [REDACTED]

Date 7/3/19

Name Robert Gordon

Address [REDACTED]

I give explicit

ed in this response.

Signature [REDACTED]

Date 07/03/19

Name Cheryl Gordon

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 7/3/19

We have discussed this and agree fully with the ideas expressed in this representation.

Name .. H. M. EASTWOOD

Address ..
.....
.....

I give explicit permission for my details to be included in this response.

Signature ..

Date ... 7.3.19

Name .. B. EASTWOOD

Address ..
.....
.....

I give explicit permission for my details to be included in this response.

Signature ..

Date ... 7.2.19

Name .. D. McAULIFFE

Address ..
.....
.....

I give explicit permission for my details to be included in this response.

Signature

Date ... 7.03.19

Name .. W. McAULIFFE

Address ..
.....
.....

I give explicit permission for my details to be included in this response.

Signature ...

Date ... 07.03.19

We have discussed this and agree fully with the ideas expressed in this representation.

Name MARION NICHOLSON

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 6/3/19

Name SEÁN HANRAHAN

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 7/3/19

Name MRS BARBARA MARSH

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 7/3/19

Name MR A W MARSH

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 7/3/19

RO1856

Sinc SHS

LP0042



COMMENTS ON LOCAL PLAN

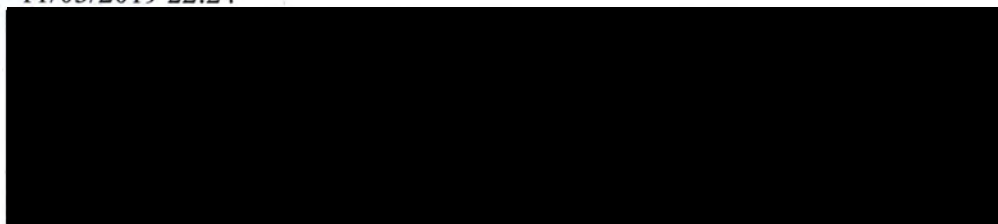
Sarah Reeves

to:

planningpolicy@sthelens.gov.uk

11/03/2019 22:24

①-LPA06



1 Attachment



LOCALPLAN.pdf

Please find attached document.

Please confirm receipt.

Andrew Williams FRICS FCIQB C.Build E FCABE Dip HI / NDEA MFPWS
on behalf of Andrew R Williams & Associates Ltd
Chartered Surveyors / Commercial Energy Assessors



**Andrew R Williams
& Associates Ltd.**

Chartered Surveyors

Home Inspectors

Commercial Energy Assessors

Party Wall Surveyors

For our terms and conditions see our website <http://www.andrewrwilliams.co.uk>





St. Helens
Council

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

Ref: LPSP

(For official use only)

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

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Geraldine	First name:
Last Name: WILLIAMS	Last Name:
Organisation/company:	Organisation/company:
Address: 8 ANSDELL VILLAS ROAD RAINHILL, PRESCOT, MERSEYSIDE	Address:
Postcode: L35 4PN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 11 March 2019
-----------------------	---------------------

This response is also made on behalf of the following individuals:-

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

We have worked together on this response and are in agreement with its content.

Andrew R Williams

Beryl A Leahair

Jinnat Westcott

Jane C Morrow

Gerard J Edwards

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

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

Yes x ☐ (Via Email)

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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?	Yes	<input type="checkbox"/>
Sound?		No x
Complies with the Duty to Cooperate	Yes	<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"/> yes
Effective?	<input checked="" type="checkbox"/> yes
Consistent with National Policy?	<input checked="" type="checkbox"/> yes

6. Please give details of why 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 policy states that land should only be removed in exceptional circumstances; the council have failed to demonstrate that such circumstances exist. Thus the plan is not compliant.

The Green Belt is designed to prevent urban sprawl and the joining up of disparate areas. The council have failed to acknowledge the vastly differing characters of the village-type locations within St Helens, and the fact that the loss of this area to housing would merge the areas of Rainhill, Eccleston Park, Nutgrove and Thatto Heath.

The proposed level of required housing is excessive and not borne out by demographic data. Such housing needs that may exist could be largely met by brownfield and infill development in addition to the significant number of houses that have been built since the plan was drafted. The plan is therefore unsound

Further housing development in the vicinity of Rainhill is not sustainable for the following reasons:-

the road network is already at capacity (evidenced by delays and traffic jams at all times of the day) and there is little or no scope for road widening;
there will already be additional pressure on roads resulting from large scale housing developments in surrounding areas whose residents will use Rainhill as a through-route;
increased traffic would adversely affect health (by increasing pollution) and pedestrian safety;
schools, doctors, dentists and police are already under pressure and cannot sustain significant increases in the local population.

The area of land in question constitutes an amenity and recreation space within an otherwise built-up area and supports considerable flora and fauna.

We understand that Sport England has previously objected to the change of use from golf club, but there is no indication that this has been addressed.

Please continue on a separate sheet if necessary

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

This parcel of land (known as Eccleston Park Golf Course) should remain within the Green Belt.

It should not be included in the local plan as a site to be removed and/or given "Safeguarded" status.

Please continue on a separate sheet if necessary

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

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

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.

RO1857

138

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

Ref: LPSD

01 MAR 2019
(For official use only)

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PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SOUCE</u>	First name: _____
Last Name: <u>WILLIAMS</u>	Last Name: _____
Organisation/company: <u>Retired</u>	Organisation/company: _____
Address: <u>110 HAMILTON RD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0UE</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>20/02/19</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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant 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>Where are all the people coming from as St Helens population is in decline. Why use greenbelt when there is brown fields that can be used. Why use greenbelt and destroy wild life and using available land. There is already a lack of school places for the young children in the area. Waiting time to see a doctor is three weeks. Lack of public transport. inadequate roads to the sites and the developer should be responsible for any cost for road works delete this land from the proposed removal from greenbelt</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.

All my objections are written on the
previous pages

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 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>SARAH</u>	First name: _____
Last Name: <u>HILLIAMS</u>	Last Name: _____
Organisation/company: <u>retired</u>	Organisation/company: _____
Address: <u>110 HAMMINGTON RD</u> <u>GARRS WOOD</u>	Address: _____
Postcode: <u>W14 0NE</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>20/02/19</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	LP	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	A06.	Site IHS		Site IHS	PARSWOOD				
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Where are all the people coming from as St Helens population is in decline, why use greenbelt when there is brown fields that can be used. Why use greenbelt and destroy wildlife and using available land. There is already a lack of school places for the young children in the area, waiting time for the doctors is three weeks. Lack of public transport, inadequate roads to the sites and the developer should be responsible for any cost for road works delete this land from the proposed removal from greenbelt

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.

All my objections are written on the previous pages

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.

RO1858



St. Helens
Council

675
**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: PAUL	First name:
Last Name: WILLIAMS	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 16 ST DAVIDS CLOSE RAINHILL MERSEYSIDE	Address:
Postcode: L35 4NY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/19

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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DATA PROTECTION

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

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

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

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

Please tick as appropriate

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

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

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

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

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

THE ROAD SYSTEM IN THE AREA AROUND 3HS CANNOT SUSTAIN THE POTENTIAL INCREASE IN TRAFFIC/VEHICLES WHICH IS LIKELY TO OCCUR. THE ROADS ARE NARROW AND RESTRICTED 'B' AND TRAFFIC CONGESTION IS ALREADY A COMMON OCCURANCE. LOCAL AUTHORITY INFO SUGGESTS THERE IS SUFFICIENT AVAILABLE BROWN-FIELD SITES TO MEET NEW HOUSE REQUIREMENTS. INCREASED TRAFFIC WILL INCREASE AIR POLLUTION AND ALSO CAUSE MORE DANGER TO PEDESTRIANS WITH MORE VEHICLES ON ALREADY BUSY ROADS. I DO NOT WISH TO LIVE IN AN AREA OF URBAN SPRAWL. DEVELOPING ON 3HS WILL REMOVE THE SPLIT BETWEEN AREAS AND RESULT IN LOSS OF COMMUNITY

Please continue on a separate sheet if necessary

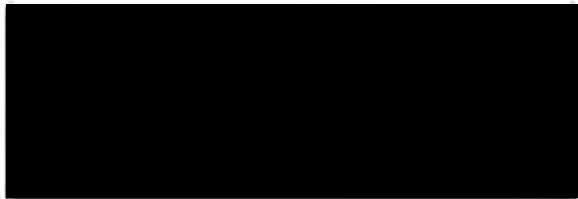
CONTINUED

SECTION 6 CONTINUED

THE REMOVAL OF 3HS FROM GREEN BELT WILL BE A SIGNIFICANT ISSUE TO LOCAL WILDLIFE AND PLANTS. THERE ARE A NUMBER OF PROTECTED SPECIES WITH 3HS WHICH HAVE BEEN IDENTIFIED.

THERE IS ONLY ONE 'A' ROAD WHICH PASSES THROUGH THE RAINHILL AREA AND THE TRAFFIC AND CONGESTION AT TIMES CAUSES DELAYS FOR LOCAL RESIDENTS. THE IMPACT OF DEVELOPING 3HS ALONG WITH PROPOSALS AT HALSNEAD VILLAGE (KNOWSLEY VILLAGE) AND OTHERS IN THE AREA WILL CAUSE ADDITIONAL PRESSURE ON THE ALREADY CONGESTED A57. THERE ARE A LOT OF SMALLER SIDE ROADS WHICH WILL BECOME SHORT CUTS FOR VEHICLES TO AVOID THE A57 AND THE CONGESTED 'B' ROADS AND THESE SMALLER ROADS ARE TRADITIONALLY QUIETER RESIDENTIAL STREETS NOT USED TO HIGH TRAFFIC VOLUMES.

ADDITIONAL HOUSING AT 3HS IS NOT SUSTAINABLE DUE TO THE LACK OF LOCAL FACILITIES SUCH AS DOCTOR, DENTIST, HOSPITAL ETC WHICH ARE AT CAPACITY ALREADY AND ALSO PLACES AT LOCAL SCHOOLS ARE ALREADY OVERSUBSCRIBED.



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)

	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.

RO1859



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.

12/19
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>BETH</u>	First name: _____
Last Name: <u>WILLIAMS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>4 EDGEWORTH CLOSE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 3QH</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>19/4/19</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 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.**

RO1860



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.

1219
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>JANE</u>	First name:
Last Name: <u>WILLIAMS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>31 The Pastures ST Helens</u>	Address:
Postcode: <u>WA9 4ZN</u>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>23-4-2019</u>
-----------------------	------------------------

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

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

Yes ☐ (Via Email)

No ☐

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

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

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DATA PROTECTION

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

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

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

RO1861



St.Helens
Council

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

Ref: LPSPD

(For official use only)

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

Please ensure the form is returned to us **by no later than 5pm on 1 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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>SUE</u>	First name: _____
Last Name: <u>WILLIAMS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>7 EDGEWORTH</u>	Address: _____
<u>CLS SUTTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA9 3QU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>19/4/19</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 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
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or by email to:

planningpolicy@sthelens.gov.uk

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

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

Telephone: **01744 676190**

NEXT STEPS

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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.**

RO1862

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>JILLIAN</u>	First name: _____
Last Name: <u>WILLIAMS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>4, EDGEWORTH CLOSE</u> <u>ST. HELENS.</u>	Address: _____
Postcode: <u>WA9 3QH</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>19-04-19</u>
------------------	-----------------------

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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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.**

RO1863

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.

13 MAY 2019
1546

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: CARL

Last Name: WILLIAMS

Organisation/company: _____

Address: 31 THE PADDERS

ST HELENS

Postcode: WA9 4TA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25 / 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 - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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Telephone: **01744 676190**

NEXT STEPS

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

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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.**

RO1864

Representor Details

Web Reference Number	WF0002
Type of Submission	Web submission
Full Name	Mr Francis Williams
Organisation	St Helens Green Party
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT
Agent Details	

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

No

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

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

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

Is legally compliant?	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.

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

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

5/13/2019 4:10:28 PM

RO1865

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Justified

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

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

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

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

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

Yes, I wish to participate at the oral examination

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

Response Date	3/13/2019 8:06:21 AM
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RO1866

Representor Details

Web Reference Number	WF0415
Type of Submission	Web submission
Full Name	Mr William Glynn Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from greenbelt

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

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

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

Response Date	2/28/2019 2:28:33 PM
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RO1867

Representor Details

Web Reference Number	WF0416
Type of Submission	Web submission
Full Name	Mrs Jessie Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 2:21:38 PM
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Representor Details

Web Reference Number	WF0423
Type of Submission	Web submission
Full Name	Mrs Jessie Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

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

No

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

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

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

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

Delete this land from the proposed removal from greenbelt

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

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

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

Response Date	2/28/2019 12:34:33 PM
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Representor Details

Web Reference Number	WF0432
Type of Submission	Web submission
Full Name	Mrs Jessie Williams
Organisation	NA
Address	166 Victoria Rd Garswood wn4 0uh
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows.

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from greenbelt

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

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

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

Response Date	2/28/2019 10:35:23 AM
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RO1868

Representor Details

Web Reference Number	WF0422
Type of Submission	Web submission
Full Name	Mr Glynn Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

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

No

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

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

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 12:37:43 PM
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Representor Details

Web Reference Number	WF0431
Type of Submission	Web submission
Full Name	Mr Glynn Williams
Organisation	NA
Address	166 Victoria Rd Garswood WN4 0UH
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from greenbelt

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

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

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

Response Date	2/28/2019 10:41:39 AM
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RO1869

Representor Details

Web Reference Number	WF0430
Type of Submission	Web submission
Full Name	Mrs Catrina Williams
Organisation	
Address	13 Windlebrook Crescent Windle St Helens Merseyside WA10 6DY
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

St Helens Council has used the ONS(2014) forecast that 486 houses will be needed. Later, and more accurate, statistics (ONS(2016) predicts 383 houses per year will be required to meet housing needs in St Helens. The Council are aware of the reduction in housing need but still choose the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

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

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

Develop brownfield sites, there is 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.

Green belt areas should be left for future communities to enjoy and loss of valuable agricultural land would have a devastating effect in years to come.

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

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

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

Response Date	2/28/2019 10:59:38 AM
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RO1870

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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

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

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

- * 3HS lies on the St Helens Borough and Knowsley Borough border. Knowsley Borough Council currently have a development of 200 houses under construction on Scotbarn Lane, Whiston/Prescot. A development of 400+ houses under construction on Manchester Road, Prescot. Also a planned development of 1600 houses, less than 3 miles from 3HS.
- * Sport England consult the British Government and have objected to 3HS (Eccleston Park Golf Club) from losing its status.
- * In a time where we are losing wildlife with many species becoming close extinction, we need the land of 3HS to remain.

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

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

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

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

Response Date	3/13/2019 12:35:37 PM
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RO1871

① - LPA05 ② - GEN ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0396
Type of Submission	Web submission
Full Name	Mr Peter Williams
Organisation	
Address	26 Prestbury Drive Eccleston St Helens WA10 5RA
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The plan is not positively prepared as:

1. St Helens Council has used the ONS(2014) statistics and not the more recent and more accurate, statistics ONS(2016) which are available. The later statistics suggest that there is a reduction in housing needs. The Council must be aware of the reduced needs but still choose to use the older figures, resulting in unnecessarily high housing targets. Changing the plan to use the latest figures would reduce the requirement for building on Green Belt.

2. There has been inadequate regional & cross border collaboration with adjacent authorities, in particular with regard to on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road. These developments all dependent on road freight. When combined with the additional local traffic directly from a large residential development, as proposed by The Plan, this already busy & hazardous trunk road would undoubtedly have an undesirable impact along with an increased risk of accidents.

3. The Plan is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the

①

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needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed.

The plan is not justified as:

The Plan neglects to consider reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If only 7% of this land was considered for remediation there would be no need to consider use of green belt land.

The plan is not effective as:

The local plan does not offer evidence that effective joint working on regional or cross boundary strategic matters have been dealt with. Also, no plan can be effective if it is incomplete - The Plan does not address the lack of infrastructure and the poor education on offer in St Helens and concentrates, instead, on house building and low skilled employment. Allocating Green Belt for housing without addressing the additional infrastructure needs will only make the situation worse. In addition, the type of houses built will, in all likelihood, not meet the housing needs of in St Helens.

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety.

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

1. The plan should be based on the more recent and more accurate, statistics ONS(2016) which are available.
2. The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with Central Government and the developers who will make extensive financial gains.
3. All infrastructure needs should be addressed comprehensively by the plan.

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

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

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

Response Date	3/1/2019 6:15:39 PM
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RO1872

①-LPA05 ②-GEN ③-IDP ④-Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0400
Type of Submission	Web submission
Full Name	Mrs Alison Williams
Organisation	
Address	26 Prestbury Drive WA10 5RA
Agent Details	

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

Yes (via e-mail)

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

Policy	LpA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The plan is not positively prepared as:

1. it fails to meet the area's objectively assessed needs as the council has used ONS figures from 2014 when more current forecasts have been published (ONS, 2016) ①

2. it has not been informed by agreements with other authorities as there has been inadequate regional & cross border collaboration eg the recent & on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road, all dependent on road freight, then proposing the addition of local traffic directly from a large residential development to this already busy & hazardous trunk road which would surely increase risk of accidents in terms of both likelihood & impact. ②

3. it is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed. ③

The plan is not justified as:

The Plan is not an appropriate strategy, as it neglects reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If ④

only 7% of this land was considered for remediation there would be no need to consider use of green belt land. ①

The plan is not effective as:

The local plan doesn't appear to provide evidence of effective joint working on regional or cross boundary strategic matters that have been dealt with rather than deferred or any statement of common ground. Furthermore, no plan can be effective if it is incomplete. The infrastructure delivery plan fails to provide an adequate explanation of the impact on Health & Social Care, Education or other community statutory services, let alone making provision for managing these requirements. ④
③

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety. ①

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

The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with the developers who are set to make extensive financial gains.

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

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

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

Response Date	2/28/2019 8:50:37 PM
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RO1873

①-LPAOS ②-GEN

Representor Details

Web Reference Number	WF0464
Type of Submission	Web submission
Full Name	mr ron williams
Organisation	
Address	80 ecclesfield rd eccleston st.helens wa10 5nd
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

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

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

i believe the plan does not satisfy;

- the requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increase car dependency remote from transport hubs
- sustainable housing, targets proposed are based on aspirational employment growth predictions
- effective land use by concentrating on Green space development over town centre development with higher densities
- food security by ignoring Agricultural Land Quality

②

①

②

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 5:55:10 PM
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RO1874

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>MR</u>	Title: _____
First Name: <u>STAN</u>	First name: _____
Last Name: <u>WILLIAMSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>RETIRED</u> <u>6 AMANDA RD</u> <u>RAINHILL</u> <u>L35 8PP</u>	Address: _____
Postcode: <u>L35 8PP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>21.3.19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO1875



St. Helens
Council

① - LPA06 ② - Statement of Common Ground 13 MAR 2019
③ - LPA05 ④ - Statement of Common Ground
St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS.</u>	Title:
First Name: <u>Soozie</u>	First name:
Last Name: <u>Willis</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>555 CARSWOOD RD</u>	Address:
Postcode: <u>WN4 0XH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.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 <div style="text-align: center;">LP A06</div>	Paragraph / diagram / table		Policies Map <div style="text-align: center;">115</div>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)							

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LP A05	Paragraph / diagram / table		Policies Map	11A	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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?

RO1876



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).

1174

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: SHARON	First name:
Last Name: WILLIS	Last Name:
Organisation/company: —	Organisation/company:
Address: 57 Crestwell St Helens	Address:
Postcode: WA10 2PN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

26/3/19

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.

RO1877

21 FEB 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>MR</u>	Title: _____
First Name: <u>PHILIP</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 HOLLINS CLOSE</u>	Address: _____
<u>GOARSWOOD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0RR</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>20 Feb 2019</u>
-----------------------	--------------------------

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☒ Yes (via ~~email~~ post)

☐ No

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Town Hall
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St Helens
WA10 1HP**

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

Policy LPA 04 Sites	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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsey Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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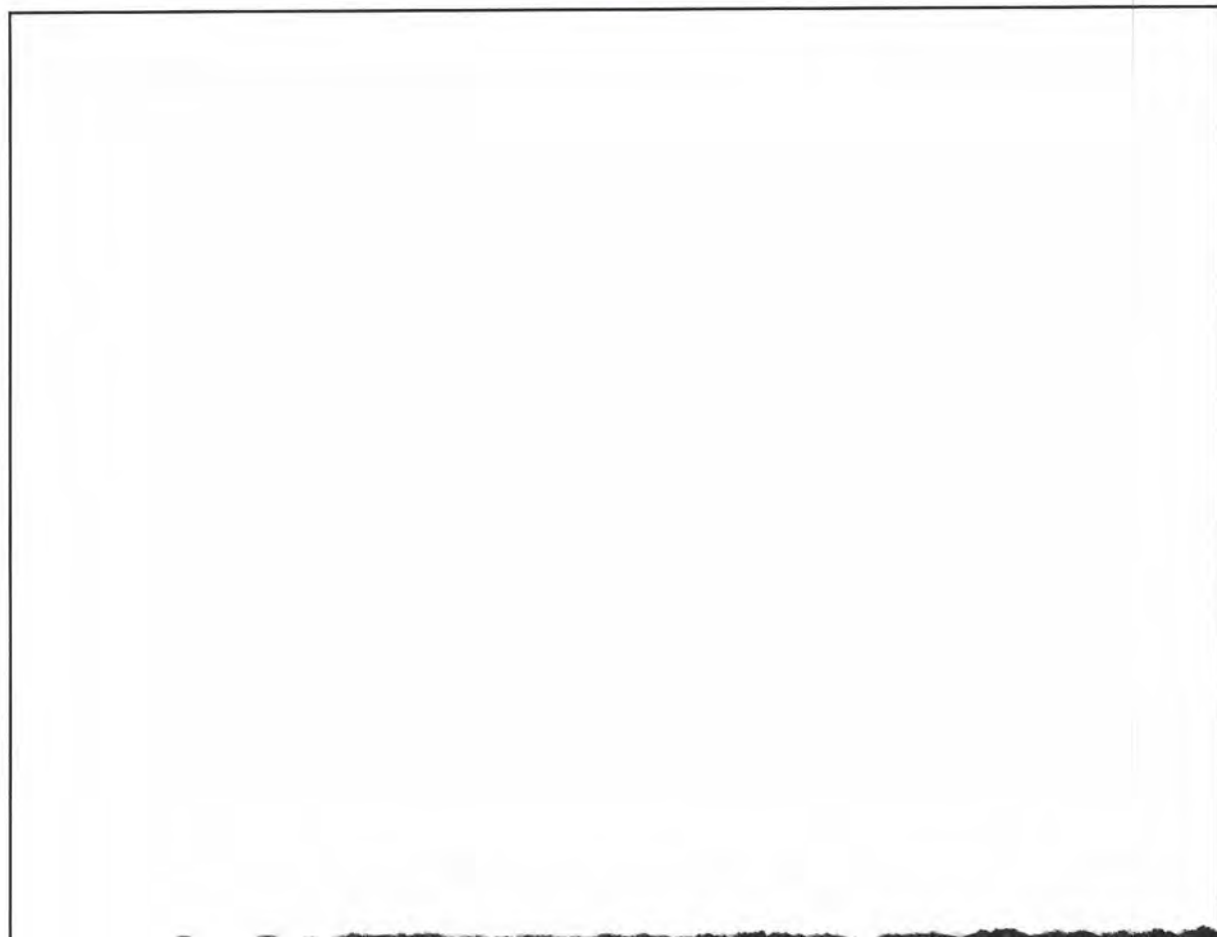
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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6 cont

There is no statement of common ground with neighbouring authorities



21 FEB 2019



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Ref: LPSD

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Last Name: <u>WILSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 HOLLINS CLOSE</u> <u>GARSWOOD</u> <u>WIGAN</u>	Address:
Postcode: <u>WN4 ORR</u>	Postcode:
Tel No: [REDACTED]	Tel No:
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Email:	Email:

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant 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>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.</p> <p>One of the purposes of the Greenbelt is to assist urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.</p> <p>Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, dental practices, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>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.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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RO1878



St. Helens
Council

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Title: <u>MR</u>	Title: _____
First Name: <u>ADAM</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 NEWBRIDGE CLOSE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ASHTON - IN - MAKERFIELD</u>	_____
Postcode: <u>WN4 0RU</u>	Postcode: _____
Tel No: _____	_____
Mobile No: _____	_____
Email: _____	_____

Signature: _____	Date: <u>04/03/19</u>
------------------	-----------------------

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☒ Yes (via email)

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3. To which part of the Local Plan does this representation relate?									
Policy LPA05 SITE 1HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats 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

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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St. Helens
Council

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Organisation/company: <u>/</u>	Organisation/company:
Address: <u>1 NEWBRIDGE CLOSE</u>	Address:
<u>GARSWOOD</u>
<u>ASHTON-IN-MAKERFIELD</u>
Postcode: <u>W14 0RU</u>	Postcode:
Tel No: [REDACTED]
Mobile No: [REDACTED]
Email: [REDACTED]

Signature: [REDACTED]	Date: <u>04/03/19</u>
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Policy LPA06 SITE 1HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>ADAM</u>	First name:
Last Name: <u>WILSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>1 NEWBRIDGE CLOSE</u>	Address:
<u>GARSWOOD</u>
<u>ASHTON - IN - MAKERFIELD</u>
Postcode: <u>WN4 0RU</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>07/03/19</u>
-----------------------	-----------------------

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

☐ Yes (via email)

☐ No

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

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No 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 not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>1. NO JUSTIFICATION FOR DEVELOPMENT. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF A SPECIAL NEED FOR THIS TYPE OF DEVELOPMENT IN THIS LOCATION AND ON THIS SCALE - STILL EMPTY UNITS ON HAYDOCK INDUSTRIAL ESTATE - NOT REQUIRED!</p> <p>2. PLANNING POLICY dictates dictates THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL AND ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD /PERILIT/ URBAN LAND. RELEASING GREEN BELT GOES AGAINST PLANNING POLICY AND THE COUNCIL'S OWN CURRENT CORE POLICY CQ11 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION IN GREENBELT IN RESPECT OF 2EA (FLORIDA FARM NORTH), ONE UNIT SPECULATIVE AND AS YET UNOCCUPIED -SEE ABOVE COMMENTS - THERE IS NO REQUIREMENT OR JUSTIFICATION -</p> <p>4. RISK OF FLOODING TO CLIPSLEY BROOK WHICH IS STILL TO BE SUBJECTED TO THE ADDITIONAL DISCHARGE FROM FFN, SITUATION STILL UNPROVEN -</p> <p>5. HIGH VOLUMES OF TRAFFIC WILL ADD TO THE ALREADY OVER-CAPACITY HIGHWAYS IN THE VICINITY - MILLFIELD LANE & LIVERPOOL ROAD /ASHTON CROSS WILL BECOME NIGH ON UNUSABLE AT AT PEAK HOURS .</p> <p>6. NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING LOCAL AUTHORITIES .</p>

Please continue on a separate sheet if necessary

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

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

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St. Helens
Council

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<u>GALEWOOD</u>
<u>KESTON - IN - MAKERFIELD</u>
Postcode: <u>WN4 0RU</u>	Postcode:
Tel No: [REDACTED]
Mobile No: [REDACTED]
Email: [REDACTED]

Signature: [REDACTED]	Date: <u>07/03/19</u>
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3. To which part of the Local Plan does this representation relate?									
Policy LPA-05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input 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 set out your comments.
<p>1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATES DATA. CENSUS DATA PROVES POPULATION HAS BEEN IN DECLINE SINCE 1981. EVEN ON DATA PROVIDED THE ESTIMATED 'INCREASE' STILL PUTS THE POPULATION DOWN ON THE LEVEL OF 1990 - WHERE ARE ALL THE PEOPLE COMING FROM?</p> <p>2. PLANNING POLICY DICTATES THAT GREEN BELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT URBAN LAND. RELEASING GREENBELT GOES AGAINST PLANNING POLICY AND THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "SAFEGUARDING & ENHANCING THE QUALITY OF LIFE IN ST HELENS."</p> <p>3. HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF LACK OF INFRASTRUCTURE - SCHOOL PLACES, DOCTORS, DENTISTS, BUS ROUTES, SHOPS, OTHER SERVICES. USE OF CARS IS BEING ENCOURAGED AND NEGATIVELY IMPACTING ON POLLUTION AND AIR QUALITY LEVELS.</p> <p>4. ACCESS TO THE SITE IS INADEQUATE/POTENTIAL SAFETY ISSUE - A LEFT-IN/LEFT-OUT ONTO THE ELR ISN'T SAFE & THE PROPOSAL FOR A JUNCTION AT LIVERPOOL ROAD/VICARAGE ROAD WOULD PUT ADDITIONAL TRAFFIC ON AN ALREADY OVER-STRETCHED HIGHWAYS SYSTEM. ALSO POTENTIAL PROBLEMS OF RAT-RUNNING.</p> <p>5. EXISTING FLOOD PROBLEMS AT THIS SITE & ANY REMEDIES TO PREVENT THIS WOULD PUT EVEN GREATER AMOUNTS OF WATER INTO THE CLIPSLEY BROOK WHICH IS AS YET STILL SUBJECT TO ADDITIONAL DISCHARGE FROM THE FLORIDA FARM NORTH SITE.</p> <p>6. NO STATEMENT OF COMMON GROUND.</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.

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

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Council

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Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 NEWBRIDGE CLOSE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ASHTONS-IN-MAKERFIELD</u>	_____
Postcode: <u>W44 0RU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>09/03/19</u>
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3. To which part of the Local Plan does this representation relate?									
Policy LPA06 2ES		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1. NOT JUSTIFIED - THE COUNCIL SHOULD BE OUT TO STRICT PROOF OF THE SPECIAL NEED FOR THIS TYPE OF DEVELOPMENT AND ON THIS SCALE - AS ALLOCATED AS SAFEGUARDED UNTIL 2035 AND GIVEN THE EXPECTED LIFESPAN OF THIS TYPE OF DEVELOPMENT, THE SITE SHOULD REMAIN IN THE GREENBELT SO THAT THE DISTINCT QUESTION OF NEED CAN BE RE-EVALUATED AT THE END OF THE LOCAL PLAN PERIOD.</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL AND ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT/URBAN LAND. RELEASING GREENBELT GOES AGAINST THIS POLICY (PLANNING POLICY) AND THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION IN GREENBELT IN RESPECT OF 2EA-FFN, ONE UNIT SPECULATIVE AND AS YET UNOCCUPIED - SEE ABOVE COMMENTS. APPLICATIONS HAVE BEEN MADE FOR SIMILAR DEVELOPMENTS AT SEA WEST OF HAYDOCK LANE AND BEA PARKSIDE WEST, NEWTON-LE-WILLOWS.</p> <p>4. HIGH VOLUMES OF TRAFFIC ADDING TO THE ALREADY OVER-CAPACITY JUNCTION 23 OF THE M6 (HAYDOCK ISLAND)</p> <p>5. NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES</p>	

Please continue on a separate sheet if necessary

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

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RO1879



St.Helens
Council

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1. Your Details

(we will correspond via your agent)

Title: MR Title: _____
 First Name: WILLIAM First name: _____
 Last Name: WILSON Last Name: _____
 Organisation/company: _____ Organisation/company: _____
 Address: 6 Marlborough Ave Address: _____
ECCELESTON _____
 Postcode: WA10 5PQ Postcode: _____
 Tel No: _____ Tel No: _____
 Mobile No: _____
 Email: _____

2. Your Agent's Details (if applicable)

Signature: _____

Date: 5/3/2019

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

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

Please tick as appropriate

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

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<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>Present conditions within this area are unable to be maintained, IF further development is approved it would not be viable. Road proposals being implemented now conflict with Proposal of this plan.</p>

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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

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.

RO1880

594

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>MRS</u>	Title: _____
First Name: <u>MARION</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 MELROSE AVENUE</u>	Address: _____
Postcode: <u>WA10SPQ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>4/3/2019</u>
------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

**Now please complete PART B of this form,
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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input 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>Pressure on local services will be unable to cope. Health.</p> <p>Road Structure is unsuitable for extra housing causing more traffic onto a road where it can't cope with present traffic.</p> <p>Schools traffic in now that pupils have to go earlier and arrive home later.</p>

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

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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RO1881

7172

13 MAR 2019

Ref: LPSD

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This form has two parts;

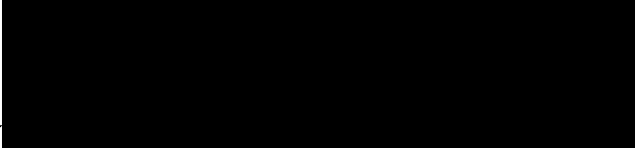
Part A - Personal Details

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PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>BRIAN</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>95 WINDSOR ROAD</u>	Address: _____
<u>ASHTON-IN-MARKFIELD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 9ET</u>	Postcode: _____
	Tel No: _____
Mobile No: <u> </u>	Mobile No: _____
Email: <u> </u>	Email: _____

Signature: 	Date: <u>12-3-19</u>
--	----------------------

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

☐ Yes (via email)

☐ No

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>1. NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE SPECIAL NEED FOR THIS TYPE OF DEVELOPMENT AND ON THIS SCALE - AS ALLOCATED AS SAFEGUARDED UNTIL 2035 AND GIVEN THE EXPECTED LIFESPAN OF THIS TYPE OF WAREHOUSE DEVELOPMENT, THE SITE SHOULD REMAIN IN THE GREENBELT SO THAT THE DISTINCT QUESTION OF NEED CAN BE RE-EVALUATED AT THE END OF THE LOCAL PLAN PERIOD.</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL AND ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT/URBAN LAND. RELEASING GREENBELT GOES AGAINST PLANNING POLICY AND THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION IN GREENBELT IN RESPECT OF 2EA (FLOIDA FARM NORTH) - ONE UNIT SPECULATIVE AND AS YET UNOCCUPIED - SEE ABOVE COMMENTS. APPLICATIONS HAVE ALSO BEEN MADE FOR SIMILAR DEVELOPMENTS AT 5EA - WEST OF HAYDOCK LANE AND 3EA - PARKSIDE WEST, NENTON - ie- WILLOWS.</p> <p>4. HIGH VOLUMES OF TRAFFIC ADDING TO THE ALREADY OVER-CAPACITY JUNCTION 23 OF THE M6 (HAYDOCK ISLAND)</p> <p>5. NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.</p>

Please continue on a separate sheet if necessary

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT

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

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

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

Yes, I wish to participate at the oral examination

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

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13 MAR 2019

Ref: LPSD

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First Name: <u>BRIAN</u>	First name: _____
Last Name: <u>WILSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>95 WINDSOR ROAD</u> <u>ASHTON-IN-MAKERFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 9ET</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: <u>—</u>	Mobile No: _____
Email: <u>—</u>	Email: _____

Signature: _____	Date: <u>12.3.19</u>
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☐ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy LPA 04 2EA SEA GEA		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.	
<ol style="list-style-type: none"> 1. NO JUSTIFICATION FOR DEVELOPMENT. COUNCIL NEEDS TO QUALIFY STRICT PROOF FOR A SPECIAL NEED FOR THIS TYPE OF DEVELOPMENT IN THIS LOCATION AND ON THIS SCALE - STILL EMPTY UNITS ON HAYDOCK INDUSTRIAL ESTATE - NOT REQUIRED! 2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL AND ASSIST URBAN REGENERATION BY RECYCLING BROWNFIELD/DERELICT/URBAN LAND. RELEASING GREENBELT GOES AGAINST THIS POLICY AND THE COUNCIL'S OWN CURRENT CORE POLICY CQL1 "SAFEGUARDING & ENHANCING THE QUALITY OF LIFE IN ST. HELENS" 3. COUNCIL HAS ALREADY GRANTED PLANNING PERMISSIONS IN GREENBELT IN RESPECT OF 2EA (FLORIDA FARM NORTH), ONE UNIT SPECULATIVE AND AS YET UNOCCUPIED - SEE ABOVE COMMENTS - THERE IS NO REQUIREMENT OR JUSTIFICATION 4. RISK OF FLOODING TO CLIPSLEY BROOK, WHICH IS STILL TO BE SUBJECTED TO THE ADDITIONAL DISCHARGE FROM FLORIDA FARM NORTH DEVELOPMENT, SITUATION STILL UNPROVEN 5. HIGH VOLUMES OF TRAFFIC WILL ADD TO THE ALREADY OVER-CAPACITY HIGHWAYS IN THE VICINITY - MILLFIELD LANE & LIVERPOOL ROAD / ASHTON CROSS WILL BECOME HIGH ON UNUSABLE AT PEAK HOURS 6. NO STATEMENT OF COMMON GROUND. 	

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

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Yes, I wish to participate at the oral examination

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

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RO1882

①-LPA05

②- Statement of Common Ground

PF0771

13 MAR 2019

St Helens
Council

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

Ref: LPSD

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Title: <u>MRS</u>	Title:
First Name: <u>CAROLE</u>	First name:
Last Name: <u>WILSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>53 HILLBECK CRESCENT</u>	Address:
<u>GARSWOOD</u>
<u>ASHTON - IN - MAKERFIELD</u>
Postcode: <u>WN4 0RP</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>12/3/19</u>
--	----------------------

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3. To which part of the Local Plan does this representation relate?									
Policy LPA05 1HA		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATES DATA. PREVIOUS CENSUS DATA SHOWS THE POPULATION HAS BEEN IN DECLINE SINCE 1981. EVEN ON THE PROPOSED LOCAL PLAN DATA PROVIDED, THE ESTIMATED 'INCREASE' STILL PUTS THE POPULATION DOWN ON LEVELS 20 YEARS AGO - WHERE ARE ALL THE PEOPLE COMING FROM?</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION BY RECYCLING URBAN/DERELICT/BROWNFIELD LAND. RELEASING GREENBELT GOES AGAINST THIS POLICY & THE COUNCIL'S OWN CURRENT CORE POLICY (CLL1) "SAFEGUARDING & ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. HOUSING IN THIS AREA ISN'T SUSTAINABLE DUE TO THE LACK OF INFRASTRUCTURE. USE OF CARS IS BEING ENCOURAGED THEREBY NEGATIVELY AFFECTING POLLUTION LEVELS AND AIR QUALITY.</p> <p>4. ACCESS ON BILLINGE ROAD / LENTLAND GREEN ROAD / GAKSWOOD ROAD IS / WOULD BE INADEQUATE - ANY NECESSARY HIGHWAYS WORKS, SHOULD ANY SCHEME BE APPROVED, MUST BE FUNDED BY THE DEVELOPER - NOT THE COUNCIL TAX PAYER.</p> <p>5. NO STATEMENT OF COMMON GROUND WITH WIGAN MBC.</p>	

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL OF THE GREEN BELT .

Please continue on a separate sheet if necessary

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



No, 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 - LPA06

② - Statement of Common Ground

13 MAR 2019

PF0712

St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: CAROLE

Last Name: WILSON

Organisation/company: _____

Address: 53 HILLBECK CRESCENT

GARSWOOD

KINTON-IN-MARKFIELD

Postcode: WN4 0RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12/3/19

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPAD6 1HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1. COUNCIL NEEDS TO QUALIFY STRICT PROOF OF POPULATION ESTIMATED DATA. PREVIOUS CENSUS DATA SHOWS POPULATION HAS BEEN IN DECLINE SINCE 1981. EVEN ON THE PROPOSED LOCAL PLAN DATA PROVIDED, THE ESTIMATED 'INCREASE' STILL PUTS THE POPULATION DOWN ON LEVELS 20 YEARS AGO - WHERE ARE ALL THE PEOPLE COMING FROM?</p> <p>2. PLANNING POLICY DICTATES THAT GREENBELT IS REQUIRED TO STOP URBAN SPRAWL & ASSIST URBAN REGENERATION BY RECYCLING URBAN/DERELICT/BROWNFIELD LAND. RELEASING GREENBELT GOES AGAINST PLANNING POLICY & COUNCIL'S OWN CURRENT CORE POLICY CQ1 "SAFEGUARDING AND ENHANCING THE QUALITY OF LIFE IN ST. HELENS."</p> <p>3. HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF INFRASTRUCTURE - SCHOOL PLACES, DOCTORS, DENTISTS, BUS ROUTES SHOPS, OTHER SERVICES. USE OF CARS IS BEING ENCOURAGED THEREBY NEGATIVELY AFFECTING POLLUTION LEVELS /AIR QUALITY LEVELS.</p> <p>4. ACCESS ON BILLINGE ROAD /LEYLAND GREEN ROAD/GATESWOOD ROAD WOULD BE INADEQUATE - ANY NECESSARY HIGHWAYS WORKS SHOULD ANY SCHEME BE APPROVED MUST BE FUNDED BY THE DEVELOPER - NOT THE COUNCIL TAX PAYER.</p> <p>5. NO STATEMENT OF COMMON GROUND WITH WIGAN MBC.</p>	

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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.

RO1883



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.

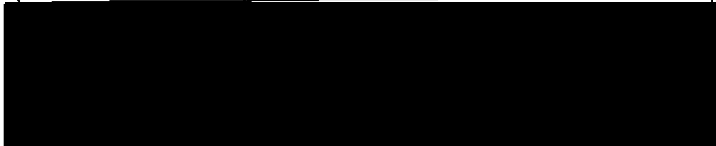
This form has two parts;

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: <i>MISS</i>	Title:
First Name: <i>JULIE</i>	First name:
Last Name: <i>NILSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>76 Crawford Street-</i>	Address:
Postcode: <i>WA9 4XH</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>12/5/19</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 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.

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.

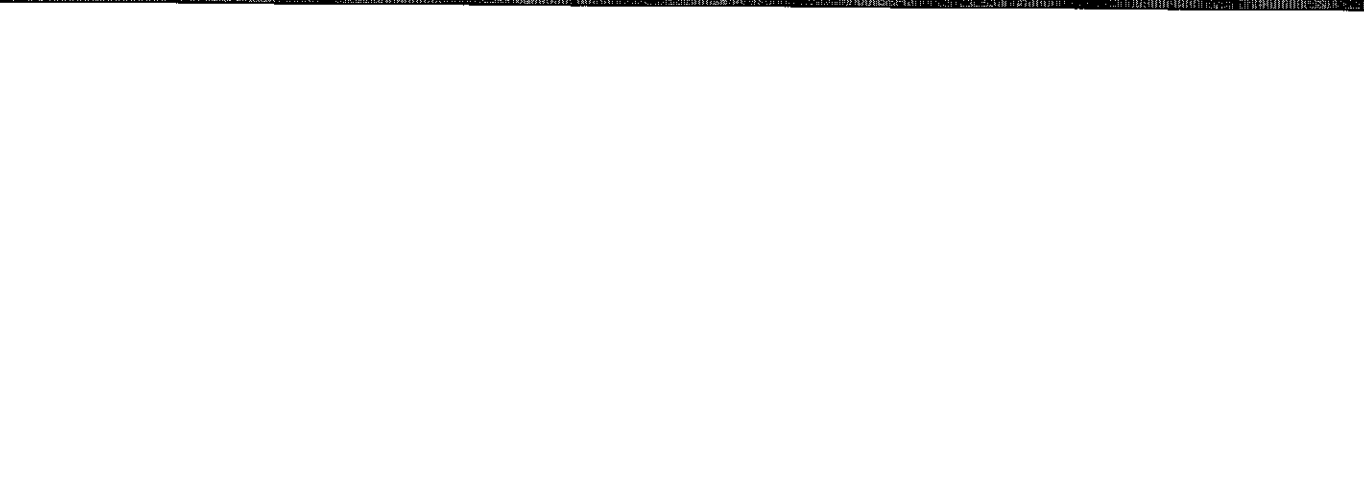
Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering, wind turbine factories. Then if they come and need employees, the Council would be able to justify the need for housing in the area.

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.

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



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.

RO1884

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0470
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN4 0RR
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	LPA04 Sites 2EA,5EA,6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development in this position & on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

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

The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsey Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity and add to air pollution.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/20/2019 3:58:11 PM
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① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0471
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN40RR
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981.

One of the purposes of the Greenbelt is to assist urban regeneration by encouraging the recycling of derelict land and other urban land. Using Greenbelt fails to encourage this.

Housing in this area isn't sustainable because of the lack of school places, doctor's and dentist's surgeries, bus routes and other services. The use of cars on already overcrowded roads is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/20/2019 3:48:21 PM
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RO1885



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A – Personal Details

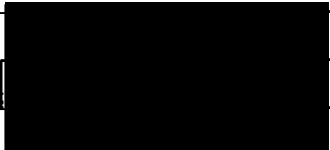
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>GILLIAN</u>	First name:
Last Name: <u>WINDGOM</u>	Last Name:
Organisation/company: <u>TUNSTALL FARM</u>	Organisation/company:
Address:	Address:
Postcode: <u>WA9 4QJ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>13/5/19</u>
--	----------------------

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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Telephone: 01744 676190

NEXT STEPS

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

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

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

RO1886



St. Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1407
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: ABBIE	First name:
Last Name: WINDGREN	Last Name:
Organisation/company:	Organisation/company:
Address: TONSTANS FARM	Address:
Postcode: WA9 4QJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	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.

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

RO1887



St. Helens
Council

188

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)

Title: MR

First Name: KENNETH

Last Name: WINGLE

Organisation/company: _____

Address: 103, SLAG LANE

HAYDOCK

Postcode: WA11 0UY

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25-3-19

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

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3. To which part of the Local Plan does this representation relate?									
Policy LP05		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 set out your comments.</p>

HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES & OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF THE LACK OF FACILITIES. THE ACCESS TO THE SITE IS INADEQUATE, A 14T/16T OUT FROM THE EAST LANSHIRE ROAD ISN'T SAFE & THE PROPOSED JUNCTION ON LIVERPOOL RD & VICARAGE RD WOULD PUT ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRETCHED HIGHWAY SYSTEM. THERE ARE EXISTING FLOODING PROBLEMS AT THIS SITE AND REMEDIES TO PREVENT THIS WOULD PLACE EVEN GREATER AMOUNTS OF WATER INTO CLIPSLEY BROOK. SLAG LANE CANNOT COPE WITH THE INFLOW OF HEAVY TRAFFIC & NOISE.

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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

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

--

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

Please keep a copy for future reference.

RO1888



Local Plan Representation Form

neil.winstanley@tiscali.co.uk to: planningpolicy

13/03/2019 12:37

1 attachment



NW Representaion Form.pdf

Attached is my form



St.Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Neil	First name:
Last Name: Winstanley	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Windle Grove Windle St Helens Postcode: WA10 6HL	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

11/3/19

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

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Yes ☒ (Via Email)

No ☐

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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

Please tick as appropriate

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

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

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, the land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town there are numerous examples of developments where remediation has been required, why should the council give up our heritage of the green belt to give quick profits to housing developers and leave large plots of brownfield sites fallow. The plan should focus on developing those brownfield sites with the housing developers part of the package includes the land remediation as have other councils in the area. It can be done if there is a willingness to do so. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

Recognising that St Helens Council has used the ONS (2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS (2016)) are available. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens, the Council are using the older forecast of 486. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

There is a complete lack of infrastructure in the area as the local road networks, health service, schools, policing, public transport, barely supports the current Windle and Eccleston neighbourhoods, a massive expansion of housing into otherwise farming land. The Infrastructure Delivery Plan does not address these requirements and only points to current work at Windle Island and Bleakhill School, but these are to meet the current needs not those of a massive new development. The Plan is not effective.

The location of the site does not meet those for sustainable development as it would require everybody to use cars or taxi's as the public transport options are already minimal and what facilities that exist are actually being moved further from the proposed site (New Millfield Healthcare facilities).

The very large risk from flooding has been blatantly overlooked, the designation of the flood zones within the area apply to an undeveloped site and are too small for the run off that would be created from developing the site. In addition, flood defences installed at various locations along Windle Brook into the centre of St Helens installed after numerous flooding problems in the past would be overwhelmed by the runoff from the new housing developments that is currently being absorbed into the fields

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

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

Please continue on a separate sheet if necessary

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

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

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RO1889



LDP Representation Form

[REDACTED] to: planningpolicy

13/03/2019 16:30



1 attachment



CW Representaion Form.pdf

Sent from my iPad



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Christine	First name:
Last Name: Winstanley	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Windle Grove Windle St Helens Postcode: WA10 6HL	Address:
Tel No: [REDACTED]	Postcode:
Mobile No:	Tel No:
Email: [REDACTED]	Mobile No:
	Email:

Signature: [REDACTED]

Date:

11/3/19

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

Please tick as appropriate

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RO1890

13 MAR 2019

Ref: LPSD



St. Helens
Council

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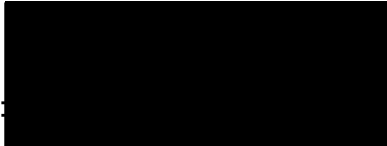
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Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>George</u>	First name: _____
Last Name: <u>WINSTANLEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>21, PAINCLANDS DRIVE</u> <u>ASPALL WIMBORNE</u> <u>GTR. MANCHESTER</u>	Address: _____
Postcode: <u>WN2 1 2N</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>8/3/19</u>
--	---------------------

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☒ No

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

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

Please tick as appropriate

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

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

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Delete plan for proposed
removal of green belt
LAND

Please continue on a separate sheet if necessary

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

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--

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PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Urban Sprawl - Plan fails to protect -
Food 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 plan from proposed
removal of green belt
(LNN)

Please continue on a separate sheet if necessary

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

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

Please keep a copy for future reference.

RO1891



Local Planning Consultation HA (Rookery Lane)
 pippa wisedale
 to:

12/03/2019 19:20



Mrs June P Wisedale
 89 Heyes Avenue
 Rainford
 WA118AP

8178HA

ELO124

① - LP105

② - PAR 1.7.2

The site has been selected when it is the least appropriate Green Belt site allocated for housing in Phase 1

Why select land that is near an industrial site, so would be at risk from industrial activity such as pollution, explosions, I also not that other sites have been excluded due to being near similar industrial sites.(SHL22 2016 ref 16M & 142)

The site is grade 1 agricultural land and is actively used, so therefore provides jobs which the plan says is intended to promote employment so this is counterproductive.

Should you not have consulted with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

With regards to the rest of the plan there seems reason why you have not used a standard method to calculate housing need.

The economic analysis is flawed and based on over optimistic assumptions, meaning that the level of land needed is therefore not as high as set out in the local plan. Which means there are no exceptional circumstances to change Green Belt boundaries.

You have failed to fully explore reasonable alternatives such as using previously developed land, which in return would have less impact on the environment and lead to less need for new infrastructure.

You have failed to co-operate with other councils and have not published any statement(s) of common ground.

I wish all my points to be considered before these plans go ahead. Because for all these reasons & unless the plan is significantly modified it should fail both the legal tests it has to pass the tests of soundness.

JP Wisedale
 12/03/2019

①

②

RO1892



St. Helens
Council

① - LPAOS ② - Statement of Common Ground
13 MAR 2019
③ - LPAOS ④ - Statement of Common Ground

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

Ref: LPSD

(For official use only)

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: LOUISE	First name:
Last Name: WISWELL	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

02/03/2019

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

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

Yes ☒ (Via Email)

No ☐

RETURN DETAILS

post to:

or by hand delivery to:

or by e-mail to:

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

FURTHER INFORMATION

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

1968

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

Thank you for taking the time to complete and return this response form.
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Please use a separate copy of Part B for each separate comment/representation.

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LP AD5				IHA			
Other documents (please name document and relevant part/section)							

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Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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3

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

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

HH:

2009.9

Please continue on a separate sheet if necessary

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RO1893

12 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title:	Title:
First Name: <u>FRANCIS</u>	First name:
Last Name: <u>WILKINSON</u>	Last Name:
Organisation/company: <u>1</u>	Organisation/company:
Address: <u>55. SMOCK LANE</u> <u>CARSWOOD. WIGAN</u>	Address:
Postcode: <u>WN4 0SN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>11.3.2019</u>
------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) By Post

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Telephone: **01744 676190**

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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

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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<p>See separate sheet attached.</p>

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Delete this land from the proposed
removed from the Green Belt

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

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this to be necessary:

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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

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3. To which part of the Local Plan does this representation relate?							
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
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Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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See separate sheet attached] ②

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Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1894

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2018
(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

01 MAR 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>Stephen</u>	First name: _____
Last Name: <u>Withington</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12, Sunny Side Road</u> <u>Ashton-in-Makerfield</u> <u>Wigan</u>	Address: _____
Postcode: <u>WN4 0LB</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: _____	Date: <u>23rd 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

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy <i>LPA06 Norm to Site Billage Road</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p><i>Not justified - The council should be put to strict proof of its population estimates. The population of St. Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging recycling of derelict and urban land. Using greenbelt fails to encourage this. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.</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
 of up most importance to maintain this land as greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>Stephen</u>	First name: _____
Last Name: <u>Withington</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 Sunnyside Road</u> <u>Ashtam-Market, Wigan.</u>	Address: _____
Postcode: <u>WN4 0LB</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>23rd FEB 2019</u>
--	----------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA05 Site 1HA</i>	<i>South Borough Leas Smoor Lane</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support 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 proof (strict proof) of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist with urban regeneration by encouraging the recycling of derelict land. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable as there are no schools + doctors etc. Access to the site on these roads is inadequate. 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 of the green belt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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RO1895



St Helens
Council

① - LPA06 PFOO 72
② - Statement of Common Ground 84

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

01 MAR 2019

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Olive

Last Name: Withington

Organisation/company: _____

Address: 12 Sunnyside Road

Ashton-in-Makerfield

Wigan

Postcode: WN4 0LB

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd 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

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LPA06 Site IHS	North or Billing Road	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified - The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging recycling of derelict and urban land. Using greenbelt fails to encourage this. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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Delete this land from the proposed removal from the greenbelt.

It is of prime importance to maintain this land as greenfields and greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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07 MAR 2019
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Part B - Your Representation(s)

PART A - YOUR DETAILS

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>O.</u>	First name:
Last Name: <u>Warrington</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>12 Sunnyside Road</u> <u>Ashurst - Macclesfield, Wigan.</u>	Address:
Postcode: <u>WN4 0LB</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>23rd FEB 2019</u>
--	----------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA05 Site ZHA</i>	<i>Sound Building Red West Smack Lane</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input 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"/>
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Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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RO1896



St. Helens
Council

279

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Representation (i.e. Comment) Form**

Ref: LPSD

04 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: TERENCE	First name:
Last Name: WITTER	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

25.02.19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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3. To which part of the Local Plan does this representation relate?

Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table		Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input 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

My objection is simple really, I think the Council wants to take the school (St. Augustine's) out of the green belt and then close the school and merge it with another school. The land can then be sold to a developer to build houses and with houses come increased cars/traffic. There are already cars coming off a new estate in Boardmans lane, and coming down Park Road. The traffic has also been increased by the Lidl supermarket and all this traffic merges onto Blackbook Road and causes delays. Anything that caused an increase to this volume of traffic would be a nightmare.

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.

As stated in (6).

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

<div style="text-align: center; height: 200px;">/</div>

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.

RO1897



St Helens
Council

① LPA06
② Statement of Common Ground

13 MAR 2019

PF 0756

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: SCOTT

Last Name: WOLSTENHOLME

Organisation/company: _____

Address: 432 Garswood Rd
Garswood

Postcode: WN4 0XJ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 07/03/2019

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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**Local Plan
St.Helens Council
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St Helens
WA10 1HP**

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setting out your representation/comment.**

**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA 06 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified. No statement of common ground between neighbouring authorities. St Helens has been in population decline since 1981. There is no prog of these population estimates by council to show why the St Helens population is suddenly increasing.

One purpose of green belt is to assist urban regeneration by encouraging the recycling of disused and other urban land. Using greenbelt fields to encourage this

living in the area is not sustainable due to lack of school places, doctors surgeries, bus routes and other services. Sadly, this will encourage the use of cars and further clog the road network and increase pollution.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please delete this book from the proposed removal
of GREENBERT

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This image shows a blank page from a document. There are very faint, illegible markings along the top edge, which appear to be bleed-through or extremely faded text from the reverse side. The rest of the page is completely white and contains no other content.

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.

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>SCOTT</u>	First name:
Last Name: <u>WILSON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>45 (MRS WILSON) RD</u> <u>GLASGOW</u>	Address:
Postcode: <u>WV4 0XJ</u>	Postcode:
<div style="background-color: black; width: 100%; height: 50px;"></div>	Tel No:
	Mobile No:
	Email:
Signature: <div style="background-color: black; width: 100%; height: 50px;"></div>	Date: <u>07/03/2019</u>

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA 15 11/18	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified Council should be put to proof of population estimates.
Population is declining since 1981.
Wigan, St Helens, Ormskirk all predict rises - how can this be?
No statement of common ground with neighbouring authorities.
Release of greenbelt will cause significant harm to the purposes of the Greenbelt.
Housing in this area is not sustainable due to lack of school spaces, doctors/dentists, bus routes and other services. Use of car will be encouraged due to lack of services.
Access to site on Killinghall or Greenhead Rd would be inadequate.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED
REMOVAL OF GREEN BELT.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral
examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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Please keep a copy for future reference.

RO1898

13 MAR 2019

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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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: Helen

Last Name: Walskenholme

Organisation/company: _____

Address: 432 Sanswood Rd

Postcode: WN4 0XJ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Signature: _____

Date: 11/3/19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
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☒ Yes (via email)

☐ No

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06 IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Howing in this area isn't sustainable because of lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the
proposed removal from Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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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</u>	First name: _____
Last Name: <u>Walsworth</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>430 Garswood Road</u>	Address: _____
Postcode: <u>W4 8 NT</u>	Postcode: _____
[Redacted Signature Area]	

Signature: [Redacted Signature]	Date: <u>11/3/19</u>
---------------------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA CS LHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all these extra people coming from?</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the
proposed removal from the
Greenbelt

Please continue on a separate sheet if necessary

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☒ No, I do not wish to participate
at the oral examination

☐ Yes, I wish to participate at the oral
examination

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RO1899



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

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Title: <u>MRS</u>	Title:
First Name: <u>RHIAN</u>	First name:
Last Name: <u>WOOD</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
Address: <u>36 WATLING WAY</u> <u>WHISTON, MERSEYSIDE</u>	Address:
Postcode: <u>L35 7NG</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>6th March 2019</u>
--	-----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - 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

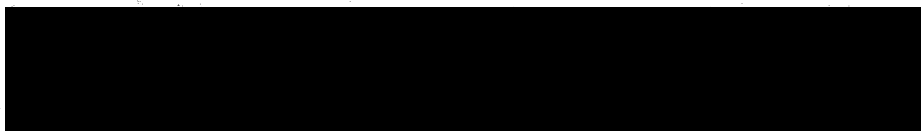
Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

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

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached form over leaf.

6. Please give details of why 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.

- It is our belief that since 1981 there has been a decline in the population so it is unclear where the additional people are coming from to justify an increase in housing.
- We believe that since the mid-1980's there has been a decline in industries in the area of 3HS (EPGC), hence employment outside the St.Helens area must provide the income-based salaries to purchase property in the surrounding area.
- It is our belief that the St.Helens brownfield register suggests an availability for 5808 houses yet Table 4.6 shows a requirement for 7245 houses, this equates to an additional 1437 houses and 57 hectares of extra land needed not the 288 hectares in Table 4.5.
- The road infrastructure around 3HS is made up of two B roads ie Rainhill Road and Portico Lane and one C road that being Two Butt Lane. Currently these roads are not able to support the current level of traffic at various times throughout the day. Rainhill has only one A road ie A57 Warrington Road which serves the Rainhill area and the additional developments in Scotchbarn Lane. We believe that due to the increase in traffic these developments will produce, there will be a detrimental impact on the smaller estates and minor B and C roads such as Holt Lane and Longton Lane which at times are already very congested.
- It is our belief that both Portico Lane/Prescot Road junction and Warrington Road/Rainhill Road ie Skew Bridge junction are confirmed with council figures at capacity. We believe that major works at the Skew Bridge junction would have to be undertaken to facilitate the increased traffic. There is very little scope if any at the Skew Bridge.
- The increased traffic will surely have an effect on pedestrian safety and air pollution. We believe that Thatto Heath is rated as the second highest affected area in the Borough of St. Helens
- We believe that releasing and hence building on this green belt will cause significant harm to the purpose of a green belt. At the present time 3HS is a natural green buffer that separates Portico, Eccleston Park and Rainhill. If this was placed in Safe Guarding and then in time subsequently developed, it would create a continuous area of urban dwelling.
- We are aware that 3HS is a confirmed zone two and three flood zone with a very high water -table. Developing on this area would endanger the flood zone and dramatically affect the ability of the land around it to drain and hence place properties along the existing brook in danger of flooding.
- We are aware that the area of land 3HS supports many species of flora and fauna, 13 of which, are protected species.

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)

No, I do not wish to participate at the oral examination		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

(21)

I give explicit permission for my
name to be used in this response

Rhian Wood

David Wood

Iewan Wood

Natalie Wood

JANET THOMPSON

13 MAR 2019

ALAN THOMPSON

WOLC LEE.

We have worked together on this response.

RO1900

(304)

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)

Title: MISS

First Name: ALICE

Last Name: WOODS

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:

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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Other documents (please name document and relevant part/section)				EPGC - ZHS.					

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 type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Rainhill is already Full.</p> <ol style="list-style-type: none"> 3 housing estates on former Rainhill hospital site already. Another 1000 homes on already over-reached services eg GPs, dentists, hospitals, schools - not acceptable. Traffic congestion on Rainhill Road, Nutgrove road. Another potential 2000 cars will not help 'clean air act'! Leisure areas being annihilated by potential urban sprawl.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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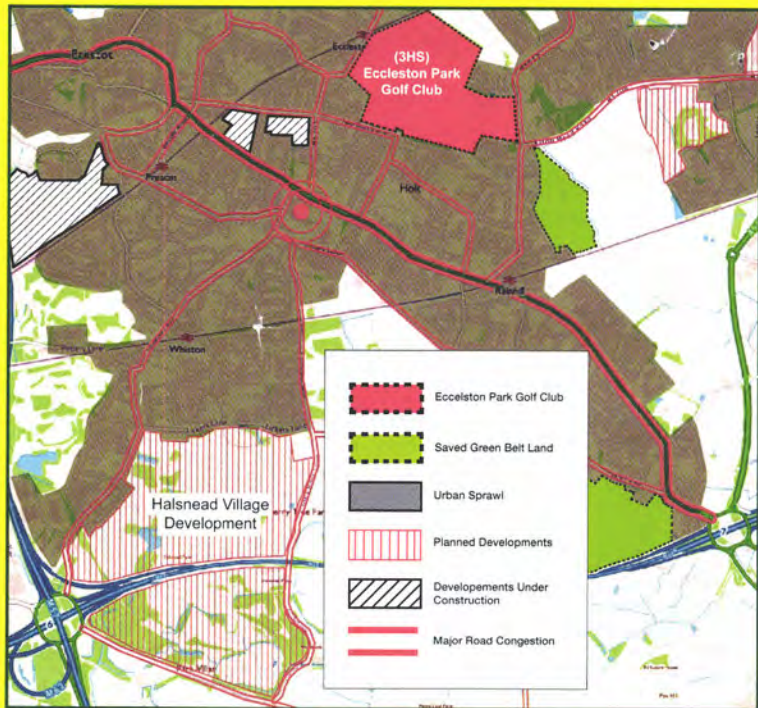
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y aged over 13 years (with parents permission), regardless of the

[planning-policy/local-plan/comment-form/](#)

partner campaign group to provide reports that will carry much more
ntation”) will be as relevant and as strong as possible.

to complete the forms once the specialists have completed their work.
f the time we have.

ISOGB, Twitter @RainhillISOGB, Website - www.rainhillsogb.co.uk
(etails).

**IN BY ST HELENS COUNCIL AT THE PLANNING
CE IT'S GONE, IT'S GONE FOREVER.**

**sure you fill it in before 5pm - 13th March 2019.
encourage as many people as possible to take part.**

**ifferent species of Birds, Mammals and Flora across
leston Park Golf Club.**

Different species of Birds.

