



ST HELENS
BOROUGH COUNCIL

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

**ST HELENS BOROUGH COUNCIL'S
RESPONSE TO THE INSPECTORS' INITIAL
QUESTIONS AND COMMENTS ON SITE
ALLOCATIONS AND SAFEGUARDED LAND**

March 2021

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Matter 4 – Housing and Employment Allocations and Safeguarded Land

It is noted, following a familiarisation visit, that some of the allocated sites have been developed or are under construction (2EA, 3EA, 10EA, 3HA and 10HA). Given the stage that these sites (and others?) have reached there is no longer a need to allocate the sites in the LP (MM). Moreover, their status as completed development or sites under construction should be reflected in Tables 4.4 and 4.6 (see INSP003 paragraphs 65 and 74).

Noted. Site 10HA (Moss Nook Urban Village) currently has outline consent, and a Reserve Matters application for Phase 1 of the development has been submitted and is currently under consideration.

To address this, sites 2EA, 3EA, 10EA and 3HA can be removed (as a Main Modification) from:

- Appendix 5,
- Table 4.1 associated with Policy LPA04,
- the reference to site 2EA in policy LPA04.1, and
- Table 4.5 associated with Policy LPA05

The same can be done for site 10HA if it is considered that this is still appropriate in view of the planning status of the site as provided above. However, it is the Council's view that it may still be wise to keep this site as an allocation.

It is important however that if the allocation status of the sites is removed, the Green Belt boundary on the Policies Map is amended for those sites that are still formally designated as within the Green Belt, for example, sites 2EA and 3EA.

Tables 4.4 & 4.6 will be amended in April to reflect the updated status of these sites once a year end position (31st March 2021) has been reached, in accordance with paragraphs 65 and 74 of INSP003.

5EA – Land to the west of Haydock Industrial Estate

The 2018 Green Belt Review refers to access for this site being achieved off Haydock Lane or the adjacent employment sites 2EA and/ or 6EA.

Question 1. Should Appendix 5 refer to the potential need for access to be provided via 2EA and 6EA so that this can be taken into account when developing the sites?

Yes, this would be sensible. A main modification could be made to the Site 5EA site profile in Appendix 5 to strengthen the third bullet point in the 'Requirements' section to refer to the potential need for access to be provided via 2EA and 6EA. This would ensure it is taken account of when neighbouring site 6EA is developed (2EA is already complete).

Question 2. As site 2EA appears to be complete can access still be achieved via this site and if so by what means?

Yes, a potential access from this site through to site 6EA (and therefore on to 5EA) is still practically possible. This takes the form of a potential access point in the northeast corner of the site. The site is accessed off the A580 via Moore Park Way, and if this is followed over the roundabout, this provides a route up the eastern edge of the site. This road stops as it approaches the site boundary with proposed site 6EA. However, in principal, this could be used to provide a continued passage into 6EA (and 5EA beyond), and so it therefore remains an access option.

Question 3. Should the need to also consider access requirements be taken into account when developing sites 6EA?

Yes, this would be beneficial to ensure options for access into site 5EA are protected. A main modification could be made to the Appendix 5 site profile for 6EA to ensure potential future access into 5EA is taken into account in the design and layout of site 6EA. This could build on the third bullet point of the 6EA site profile (which should refer to sites 2EA and 5EA, rather than 4EA and 6EA, as set out in Annex B of the Local Plan Schedule of Changes (SD003)).

It is worth noting that a planning application for employment use was considered on this site in 2019, and this proposed an access from a priority junction off Haydock Lane via an existing access that serves an adjacent unit. That particular access arrangement was considered to be acceptable at that time. So this represents a further access option for site 5EA.

6EA – Land to the west of Millfield Lane, Haydock

The 2018 Green Belt Review (SD020) ('GBR') refers to a number of access options for access to the site. These include via site 2EA and 5EA or directly off Millfield Lane.

Question 4. Should Appendix 5 specify the means of access to the site?

It is also possible that access could be provided by Liverpool Road to the north / northeast of the site. The 6EA site profile in Appendix 5 could be updated via a main modification to acknowledge this. It is considered appropriate at this time to retain this flexibility of approach with regards the potential access options, so that this can be considered in further detail when a planning application is submitted, and to make sure that no potentially suitable alternatives are discounted at this time. It will help retain flexibility at this stage in terms of the design and layout of the site.

Question 5. Should the need to also consider access requirements be taken into account when developing site 5EA?

This may be beneficial so that a consistent approach is taken between the site profiles for these neighbouring sites, and to ensure flexibility in access options is protected at this stage.

In terms of Green Belt considerations, the GBR does acknowledge the role of this parcel of land in preventing ribbon development along Liverpool Road and in broadly contributing to the physical and visual separation of Haydock and Ashton-in-Makerfield.

Question 6. How will the policies in the Local Plan mitigate these factors?

Policy LPA04.1 requires that any planning application for site 6EA, because it is identified as a Strategic Employment Site, must be supported by a comprehensive masterplan, setting out details including:

“c) indicative layout and design of 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 ...

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 ...”

Policy LPA03 sets out development principles, and section 5 of the policy is particularly relevant because it requires new development to contribute to a high quality built and natural environment.

Policy LPD01 will also be used to ensure the quality of new development, including the need for new development to maintain or enhance the character and appearance of the local environment (in bullet point 1a).

These policies, along with a raft of environmentally focussed policies in the Plan, most notably, LPC06 through to LPC10 will help to ensure that through the development management process, the Council will be able to mitigate concerns around ribbon development along Liverpool Road and the physical and visual separation of Haydock and Ashton-in-Makerfield. They can be used to shape the development of site 6EA in such a way as to design it to maximise the opportunities to address the identified concerns, including through the use of layout, boundary treatments, landscaping areas etc.

If further clarity is considered to be required, it could be possible to emphasise the need for development of this site to mitigate these specific concerns through an additional bullet point in the site 6EA profile in Appendix 5, as a main modification.

The 2019 Sustainability Appraisal (SD005) ('SA') considered that the site has medium to high landscape sensitivity. Views from Liverpool Road across the site are relatively open. The SA also acknowledges that development of this site would alter the character of the area and affect the visual amenity of residents living opposite the site.

Question 7. Whilst areas of significant landscape may remain between the settlements of Garswood and Ashton-in-Makerfield, how would policies in the Local Plan mitigate any landscape impacts in the immediate vicinity of the site?

Policy LPC09 refers to Landscape Protection and Enhancement. It outlines that where a development would lead to the landscape and visual character of the area, mitigation measures will be sought to reduce the scale of such harm. The St Helens Landscape Character Assessment (2006) (NAT001) provides a more detailed overview of the landscape character of the Borough. This should be used as context for site-specific assessments of development proposals, taking into account any more recent changes in the vicinity (ie. the development of site 2EA in the case of an assessment of this site).

With specific reference to mitigating landscape impacts in the immediate vicinity of the site, page 108 of the Landscape Character Assessment provides a Landscape analysis and highlights opportunities to sensitively design and locate development which is sympathetic to the former estate landscape. This can be used to shape the development in landscape terms through the Development Management process.

7EA and 8EA – Parkside East and West

The relevant policies in the St Helen's Core Strategy state that land at Parkside East can only come forward for development if Parkside West is developed first and if Parkside West is insufficient to fully accommodate the SRFI.

Question 8. Could suitable road and rail access for the development be achieved from site 8EA alone?

Whilst it is technically feasible to develop a rail freight facility on Parkside West, site 8EA, the AECOM study, table 8.35 (EMP005) outlines the pros and cons of doing so.

In relation to rail access, 8EA can accommodate trains from all directions through the use of a side reception siding loop on the west (7EA). However, reception sidings in the terminal are required to accommodate trains from the west / south, but the approach track is of insufficient length to accommodate a reception siding prior to the terminal without blocking the west siding loop. So, rail access on the west side is not as suitable as the rail access on Parkside East, site 7EA. This is confirmed by the assessment in Table 8.35 of the AECOM Study.

In respect of the road access for site 8EA, the A49 can be used to access the site for an initial phase, but to be developed to its fullest extent and to maximise the locational opportunities of this site, a connection from the A49 through Parkside East and Parkside West should be provided through to the M6 Junction 22. The AECOM Study suggested this connection could be made by way of a box tunnel structure under the M6. However, since the AECOM study was prepared, the Council has secured funding for the Parkside Link Road, which will provide the necessary east-west connection, to enable access to M6 Junction 22.

It should also be noted at this point that the extent of development on Parkside West identified in the AECOM study that is developable without the east-west connection (and instead would be reliant solely on the A49) is limited to a rail facility that could handle up to three trains per day only. A Strategic Rail Freight Interchange must be able to handle at least four trains per day, by definition¹. In view of that, it is not possible for a suitable road access to be achieved on Parkside West if it is to deliver a SRFI, without the connection through to the east of the M6, which takes the form of the Parkside Link Road.

The Parkside Background Paper (SD024) outlines the key findings of the AECOM 2016 Study (EMP005) and the rationale for the approach in the LPSD. The AECOM study found that the Parkside site could support a large scale development (12 trains a day) through the use of Parkside East. The Study recommends consideration should be given to the modification of Core Strategy Policy CAS 3.2 accordingly, to provide a more flexible policy position to support a viable and deliverable SRFI scheme to come forward. The Study shows that a SRFI on the east of the M6 appears to be the most likely form of SRFI to come forward. The approach in the

¹ National Policy Statement on National Networks para 4.89

LPSD reflects the evidence, and optimises the locational advantages that Parkside offers to deliver a SRFI of regional and national significance.

Question 9. Is the Parkside Link Road essential for the development of both or one of the sites? Should a reference to the Road be included in Policy LPA10?

The Parkside Link Road is essential for the development of Parkside West in full, or the development of both Parkside East and West together, as proposed in the Plan.

In relation to Parkside West, the AECOM Study (2016) (EMP005) indicates that up to 750,000ft² (ie. a small terminal that could handle up to three trains per day, option 1) could be developed without a connection through to the east of the M6 to connect into the M6 J22. The Study considers that the A49 may be able to cope with the traffic generated by the site at this scale, provided some minor junction improvements are undertaken. If the floorspace is expanded, the site access via the A49 only (previously main entrance to the Colliery) would not be feasible. (EMP005, section 8.2.4

However, for the medium and larger scale development options (2,3 and 4) set out in the Study, these would need to be supported by a connection through to the east of the M6 to provide access to M6 Junction 22. For this reason, the site 8EA (Parkside West) profile in Appendix 5 of the Plan requires, 'later phases of development should be served by a new link road from the east (linking to junction 22 of the M6). This can be provided by the Parkside Link Road.

As identified in the introduction to question 11, there has been a recent planning inquiry into the Parkside West Phase 1 proposal, which is primarily for a road based logistics scheme (in accordance with the proposed LPSD 8EA allocation). This is considered able to be delivered without the need for an east-west connection linking into the M6 J22, in accordance with the Appendix 5 site 8EA profile in the LPSD. However, further phases of the development would need to be supported by the Parkside Link Road.

The planned delivery of the Parkside Link Road has the potential to support the timely development of Parkside East. However, the Parkside East site alone is not considered to require the full east-west Parkside Link Road connection to create a suitable access for the development, as it is able to link into Junction 22 without crossing over the M6 to the west side. For this reason, policy LPA010 does not include specific reference to the Parkside Link Road. Instead, in section 3b) it requires that 'proposals for development within site 7EA will be required to ... create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles'.

For the above reasons, it is not considered that a reference to the Parkside Link Road is necessary in LPA010 in relation to the delivery of Parkside East. However, if it is felt a reference to the Road as part of Policy LPA010 would be useful to provide re-assurance and confidence in the deliverability of Parkside West, a reference could be included on this basis.

Question 10. Would 8EA be sufficient to accommodate a SRFI? If an SRFI were to be located on Parkside West what implications would there be for the Local Plan?

Site 8EA can accommodate an SRFI, but not without the need to have the necessary road, and potentially rail (depending on scale) infrastructure on the site identified as Parkside East (7EA).

Paragraphs 8.2 – 8.5 in the AECOM study (EMP005) outline the options. Option 1 does not utilise Parkside East in any respect and only allows for up to 3 trains per day. The National Policy Statement for National Networks (NPSNN) references the Planning Act 2008 and that SRFI sites qualifying as NSIPs must be capable of handling 4 goods trains per day as a minimum (paragraph 4.89). Furthermore, the AECOM Study suggests that Option 1 would not provide an economically viable facility, and is therefore ruled out.

Although 8EA could utilise the existing road network for the first phase, future phases would require additional infrastructure that require utilisation of site 7EA. Likewise, in terms of the rail infrastructure, to handle 10 or more trains per day through Parkside West, rail infrastructure on the Parkside East would be required. This option is the most sustainable to make an efficient SRFI as outlined above.

It is therefore not considered that 8EA alone is sufficient to deliver a SRFI. The evidence clearly indicates that the SRFI is better located on Parkside East.

With regards to the impacts on the Local Plan if an SRFI were to be located on Parkside West, this may result in a reduced amount of land to be released from the Green Belt (ie. Parkside East). If this were the case, it would have a knock on effect in terms of less employment land being delivered across the Borough as a whole. This could also have an impact on the wider LCR employment provision, if St Helens is contributing less employment land, and may trigger the need to review the balance between jobs and homes within the Local Plan.

It would also potentially mean that the Local Plan is not maximising the opportunity to deliver a SRFI facility of regional and national significance, and therefore could mean the Plan isn't well aligned with the NPPF, particularly chapter 6, and specifically paragraphs 80-82. The land at Parkside, including the emerging proposals for the SRFI at Parkside East, has been promoted and recently identified

as part of the Liverpool City Region Freeport, which was announced by the Government on 3 March 2021 as one of England's eight Freeports.

Reference has also been made to the Public Inquiry being held into the planning application relating to the Parkside site and associated link road.

Question 11. Can the Council provide an update on progress with the Inquiry?

The two inquiries for Parkside Phase 1 (PINS reference APP/H4315/V/20/3253194) and Parkside Link Road (PINS references APP/H4315/V/20/3253230 and APP/M0655/V/20/3253232) were heard consecutively in January 2021. They are now closed, and the Council is currently waiting to hear the outcome.

The 2016 Parkside study (EMP005) considers a range of options in terms of the scale of development. The largest option which includes the development of both 7EA and 8EA would require 12 paths a day in each direction. This appears to be the option (number 4) that has been allocated in the Local Plan. The 2016 study indicates that the economic viability of option 4 assumes the availability of 12 paths per day in each direction being available.

Question 12. In terms of feasibility and deliverability, is the scale of development at Parkside linked to the capacity of the rail network and the number of paths likely to be available in both directions to service the SRFI?

As highlighted in the AECOM Study (2016), the experience of existing SRFIs indicates that it can take several years for a site to achieve a mature level of rail freight traffic. Therefore, the site will handle at least 4 paths a day initially and increase as the development builds out in line with capacity.

In the recent decision on a similar SRFI DCO application further south on the West Coast Main Line at Northampton Gateway, the Secretary of State agreed with the Examining Authority which noted the following:

“5.2.52 Having carefully considered the evidence provided the ExA concludes that:

- although no absolute certainty can be provided, it is in the balance of probabilities feasible that the Proposed Development could be connected to the rail network and be capable of being served by four trains per day, in accordance with the NPSNN; and*
- the ability for rail freight traffic to grow and for the SRFI to be served by an aspirational 16 trains per day is more uncertain. This is because of likely*

constraints and competition on the network and the unknowns as to how the network could accommodate growth several years hence. That said, this has to be seen against the background of the Government's belief as set out in paragraph 2.53 of the NPSNN that it is important to facilitate the development of the intermodal rail freight industry as part of its vision for transport in a low carbon sustainable system that is the engine for economic growth. It also should be seen against the commitment to facilitate rail growth over the coming years. This uncertainty must therefore feed into the balance when weighing the suggested overall benefits of the Proposed Development as a project aimed at promoting transmodal freight movement."

In a similar vein, the Examining Authority on the West Midlands Interchange SRFI at Cannock noted:

"5.5.9 The Applicant's note on the Viability of Rail Services, at Appendix 3 to REP6-012, outlines that the creation of new clusters of SRFIs has led to a new market for rail freight with intermodal services increasingly likely to drop off a part train load at one SRFI when on route to another facility. Together with port related services, this intermodal traffic now forms the single largest component of the rail freight market. Given the evolving nature of those markets, the growth to 10 trains per day would not be wholly dependent on new services being established or on the allocation of new paths for all of those trains.

5.5.10. Stop WMI [REP2-159] and other objectors argue that any increase in the use of the WCML for freight services is dependent upon HS2 to release capacity and that the current uncertainty about the HS2 proposals casts doubt on the prospect of securing the necessary rail paths. However, neither the Timetabling Study nor the Applicant's assessment of potential capacity is founded on that assumption as confirmed at page 91 of the Applicant's Response to Other Parties' D2 submissions [REP3-007]. As noted above, NR has confirmed its own assessment of capacity within the existing timetable.

5.5.11. For these reasons, I consider that there would be a good prospect of sufficient paths being available to provide for the 4 trains per day operation of the Initial Rail Terminal as proposed and that there are no good reasons to doubt the potential, over the longer term, to achieve the 10 trains per day capacity of the Extended Rail Terminal. The capacity of the network should not, therefore, be seen as a constraint on the site's development as a SRFI."

Against this background, there is significant confidence that a SRFI at Parkside could be supported on the network, but there are longer-term factors such as the impact of HS2 on the network. This is being addressed through the network capacity study currently underway, in which one of the scenarios being considered is the impact of HS2. This will be completed at the end of March. The preliminary findings from the study would align with the conclusions achieved for the Northampton Gateway SRFI.

Transport for the North's (TfN) 'Northern Freight and Logistics Strategy Report', September 2016 (as referred to in EMP005, section 2.4.1) focuses on the "increased use of rail freight through improved availability of train paths and development of rail freight interchanges to help achieve the goals of the strategy". It acknowledges the lack of capacity on the existing rail network in the North as a threat to growth in rail freight traffic in the region, with additional capacity therefore needed, and should be provided incrementally starting now to encourage the market to invest.

The impetus in the TfN strategy, combined with Government policy and the importance it places on rail freight and the expansion of the SRFI network, justifies confidence that the scale of the Parkside proposal in the LPSD aligns with the likely number of paths that will be available in both directions to service the SRFI as it develops out over a number of years.

We note that more detailed work on Parkside is due to be published in March 2021.

Question 13. Have Network Rail been involved in this study?

Yes, Network Rail are aware of this Study, and have been invited to become involved as an identified key stakeholder. Indeed, Network Rail submitted comments to the Local Plan Submission Draft consultation, and in relation to Parkside East, noted that feasibility work would be required to understand the availability of space on the rail network to accommodate the SRFI. This Study addresses this matter to provide a comprehensive understanding of capacity on the network.

Network Rail provided some initial input into the study scope, including agreement on the baseline timetable and the alternative scenarios to be tested as part of the Study. Network Rail have had a copy of the initial findings sent through for comment, and will also have a copy of the final report shared. Their input has been welcomed and valued throughout.

Question 14. Will this detailed work consider the availability of space on the rail network to accommodate a SRFI at Parkside?

Yes, the scope of this study is focussed on determining the potential capacity on the rail network to serve the Parkside site. It is expected that traffic will operate northwards, southwards and eastwards from the site, with minimal or no traffic operating westwards towards Liverpool (although direct access is available is required). On that basis, the Study is identifying capacity on the network to the following three locations:

- Winsford South Junction (for Crewe and southern destinations)

- Ribble Junction (for Preston and northern destinations)
- Ordsall Lane Junction (for Manchester and eastern destinations)

The study will identify paths in both directions between Parkside and the above locations, and will consider the capacity for a series of incremental scenarios:

- Baseline – train services operating as of December 2019 (prior to Covid-19 amendments)
- Baseline + - as per 'Baseline', and incorporating any known changes to May 2022
- HS2 – as per 'Baseline +' and including latest service assumptions for HS2 from 2035.
- NPR – as per 'HS2', and including the latest service assumptions for Northern Powerhouse Rail from 2036

This work will consider the 24 hour period (00:00 – 23:59), instead of a standard one or three hour period, which has been used previously (for example, in EMP010 – Network Rail study).

The study will also provide indicative analysis on the potential rail paths being available to key rail freight destinations, beyond the three nodes listed above.

Furthermore, a high level identification of opportunities and / or interventions on the rail network that could release additional freight paths to serve Parkside will be provided, this being of specific interest to the Liverpool City Region Combined Authority (LCRCA) for the wider development of its rail freight strategy and associated investment.

The evidence base indicates that there are factors that may decrease the number of paths that might be available for Parkside including new HS2 services and predicted growth in passenger and freight services. Additionally, major developments such as the Port of Liverpool and Port Salford may affect the number of paths that may be available to service Parkside. For example, we note some 2018 work undertaken by Network Rail (Parkside Strategic Rail Freight Interchange Report Capability & Capacity Analysis) considered the impacts of HS2 and indicates that around 8 paths departing and 4 paths arriving would be available.

Question 15. Have the impacts of these projects on the feasibility of Parkside been considered if the required number of paths are not achievable?

Yes, as set out in the response to Q14 above, the study is taking into consideration the potential impacts of HS2 as one of the scenarios to be tested for capacity.

Regarding the effects of the Port of Liverpool and Port Salford projects on the network capacity, these were considered in the AECOM study (EMP005). Whilst it was considered that these could potentially have an impact on network path availability, depending on a number of factors (scale, origin / destination points etc), Section 9 of the report, 'conclusions and recommendations', found that it was likely, in view of the evidence, that 8 trains could feasibly be serviced by Parkside in the medium term.

The evidence gathered to date and contents on the Parkside background paper (SD024) set out the importance of delivering Strategic Rail Freight Interchanges, and not just regionally, but the national importance associated with them, particularly reflecting the Government Policy as set out in the National Policy Statement for National Networks (NPSNN). Parkside is a unique opportunity given its access in all directions by road and rail. The AECOM study considers there to be market demand for both Parkside and Port Salford in the push to shift freight from road to rail. Given this importance, it is expected that potential infrastructure improvements, or other measures to deliver improved path availability, to support an expanded SRFI network, as promoted by the Government, can be delivered over the coming years.

The SRFI will be developed out over a period of time, and to deliver a SRFI in the short term, the site must be able to handle at least four trains per day. As the site develops, it is expected that the number of trains servicing the site per day will increase. This approach allows time for potential path capacity improvements to be made should this be needed, for example, through infrastructure improvements, timetabling changes etc, as well as allowing occupiers and surrounding businesses to incorporate rail services into their distribution arrangements (Tesco and Eddie Stobart were early occupiers at DIRFT in the mid-1990s but only started operating trainload services from 2006, and are now the largest generator of rail services through the SRFI).

Question 16. If there are less than 12 paths available in each direction then would a large scale SRFI be deliverable on the site?

The site will need to demonstrate the ability to handle four trains per days initially, in accordance with the definition of a SRFI in the Planning Act 2008, section 26. The site will be built out over a period of years, over which the number of trains being handled per day is expected to increase accordingly. Amongst the existing SRFI in operation, every one of the sites has generated rail freight traffic, and whilst some have only recently commenced operation, on average each site handles 7 trains per day with a maximum of 12 trains per day achieved at DIRFT after 23 years of operation.

It is therefore not necessary for 12 train paths per day in each direction to be available straight away. The evidence gathered to date, and the stated Government

support for an expanded network of SRFIs, provides confidence that 12 paths per day in both directions to support a large scale SRFI at Parkside will be achievable in due course. Indeed, Network Rail's strategy for rail freight enhancements is related to the development of SRFI, as referenced in the NPSNN (paragraphs 2.48-2.50)

Question 17. What level of certainty is there that the required number of paths will be available in the future?

The Parkside SRFI Capacity Study is currently underway and will provide a robust assessment of network path capacity under a number of different scenarios into the future. This should provide confidence in the likely number of paths available. It will also provide a high level identification of the opportunities and / or interventions on the rail network that could release further capacity as necessary, which should provide a reasonable indication of potential ways in which additional capacity may be found in future years.

In addition to this, there is a lot of support regionally, and nationally for moving freight from road to rail through the delivery of SRFI facilities, of which Parkside is an identified key opportunity. Given this, it is reasonable to expect that into the future, work will be undertaken to release further capacity on the rail network to support such ambitions. This aligns with the approach taken by the Secretary of State in the determination of all SRFI Development Consent Orders to date at DIRFT phase III, East Midlands Gateway, Northampton Gateway (described earlier in Q12) and West Midlands Interchange.

The 2016 study notes that only a medium sized facility (8 trains a day) or larger (10 trains a day) would be economically viable. An illustrative diagram in the study shows that only a small parcel of land on site 7EA would be required to deliver both options.

Question 18. Was the option of a medium to large facility at Parkside (in line with option 2 or 3 of the 2016 study) considered?

Paragraph 4.36.11 of the Reasoned Justification for Policy LPA10 highlights that based on the evidence available, the AECOM Study (EMP005) found 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 of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

Option 4 in the study best achieves this recommendation and is the option with the best viability results. Options 2 (8 trains per day) and 3 (10 trains per day) only utilise land to the east of the M6 for road infrastructure (Option 2) and road and rail

infrastructure (Option 3). Section 8 of the 2016 AECOM study (EMP005) provides further clarity in this regard.

In addition, Option 4 has the earliest year of economic payback (2044) in comparison to Option 2 (2046) and Option 3 (2057).

Option 4 is considered to make optimal use of the unique circumstances provided by the site's road, and particularly, rail access to meet market demand and maximise the opportunity to shift more freight from road to rail. The SRFI presents a huge opportunity for the Borough, LCR and wider national infrastructure requirements as outlined in the NSPNN and therefore it should be considered to its fullest capability.

In summary, Options 2 and 3 were considered, but were found to be less favourable than Option 4. In considering these options, the AECOM Study recommended consideration should be given to the modification of Core Strategy Policy CAS 3.2 to provide a more flexible policy position to support a viable and deliverable SRFI scheme to come forward. The Study shows that a SRFI on the east of the M6 appears to be the most likely form of SRFI to come forward. The Parkside Background Paper (SD024) outlines the key findings of the AECOM 2016 Study (EMP005) and the rationale for the approach in the LPSD.

Question 19. Alongside the economic benefits were other factors considered when selecting the preferred Parkside option, including minimising harm to the Green Belt (Given that the GBR found that the site makes a strong contribution to the purposes of the Green Belt)?

Policy LPA10 and the Reasoned Justification, along with the Parkside Background Paper, and the AECOM study provides the range of factors considered when selecting the preferred Parkside Option. The site does present clear economic benefits but also delivers social and environmental benefits that help to make it fully sustainable. The SA also provides an overview of the factors considered in relation to this site.

Whilst job creation can widely be regarded as an economic benefit, given that the site is in close proximity to areas of deprivation, the creation of jobs on this site can be considered a major social benefit also. This is particularly so in view of Policy LPA10, part 3i), which seeks to provide training schemes through this development to enhance the opportunity for local people to find employment at the site. The Green Belt Review identified that development of this site would help to reduce poverty and social exclusion.

From an environmental perspective, there is a significant push, both regionally and nationally, to shift freight from road to rail, and in doing so to expand the network of SRFIs. This is not just to support economic benefits, but has benefits environmentally, in terms of reducing road freight emissions by primarily removing

long haul freight journeys from the road. Transporting freight by rail has greater environmental benefits overall than by road. The preferred option in the LPSD to deliver the SRFI on Parkside East is shown to maximise this benefit, and therefore support both regional and national policy in this respect.

Additionally, the preferred option in the LPSD for delivering Parkside includes the delivery of the Parkside Link Road, for which funding is secured. In this respect, whilst the SRFI would generate additional HGV trips within close proximity to the site, and the associated air quality issues this could bring, the preferred option and delivery of the PLR can mitigate this, by ensuring these trips are directed away from the areas of denser population along the A49 corridor (ie. Newton-le-Willows and Winwick), and instead directly to the M6 J22 through Parkside East. In contrast, a smaller facility on Parkside West would be more reliant on the A49. In this respect, this is another factor in support of locating the SRFI on Parkside East.

Whilst the Council recognises the contribution the site makes to the Green Belt, it also concludes that with careful masterplanning, the negative effects could be mitigated. These factors, along with the economic benefits to be generated by the proposal, provide a compelling justification for selecting the preferred Parkside option.

When discussing market demand, the study identifies comfortable market demand for 3 trains per day building up to 8 trains over 5-10 years.

Question 20. What level of certainty is there that there would be sufficient market demand for a facility running 12 trains per day in each direction?

The Planning Act 2008 states that SRFIs qualifying as NSIPs must be capable of handling 4 goods trains per day as a minimum. So whilst there is no expectation that the site will start off handling 12 trains per day, there is confidence that the demand is there for this over the longer term as the facility is developed out, as confirmed by the evidence from one of the earliest SRFI developments at DIRFT (see responses to questions 12 and 16 above) and the view of the Secretary of State on other SRFI DCO applications.

This is supported by section 3.5 of the AECOM Study (EMP005) which highlights the market view of the Parkside site in respect of distribution use more generally. It is considered that there is an identified constrained future supply as several of the key distribution locations such as Omega and Trafford Park are beginning to reach critical mass and there is now a recognised shortage of large scale employment sites in single ownership within the North West with the ability to be delivered within the medium to long term (post 3-5 years). Added to this, there is considered to be a limited supply of strategic sites in the pipeline, and as Parkside East is in the control

of one developer, capable of delivering large footprint premises, and in an edge of motorway location, it is considered to have a key advantage in delivering a site to meet the demand.

Section 3.6 of the Study goes on to demonstrate the key considerations in relation to the market for rail linked property at Parkside, and provides a clear steer on the drivers for rail linked demand, and how Parkside sites within that. This provides a good indicator of the likely market attractiveness, and consequent demand for a SRFI at Parkside, not least including considerations such as:

- the overall growth of rail distribution, and Parkside's advantages in relation to that with its rail connectivity in four directions, and
- the fact that Parkside is located in an established distribution location, with the advantages of co-location of other warehouses in the area (Omega, Haydock etc) to enable the scale of supply and demand allowing the development of internodal train services to be offered to a range of locations.

The Study also recognises increasing interest from users and buyers of warehousing and distribution services to integrate rail freight into their transport operations on the basis of cost and environmental savings. Some procurement contracts specify rail freight options.

Furthermore, section 3.7 of the AECOM study summarises stakeholder views on the market attractiveness of the site, which is overwhelmingly positive, showing clear market demand for the site. This is particularly relevant as the stakeholders involved included freight operators, logistics companies, the Chief Exec of the Rail Freight Forum etc, who know the sector well, so are well placed to advise.

Perhaps even more telling, in terms of demonstrating the market demand for this facility, the site is now being promoted by iSec. iSec has a long track record for delivering major strategic logistics based developments. Furthermore, iSec are in advanced discussions with a rail freight operator in relation to this site. This is clear indicator of the market confidence in this site in terms of its ability to deliver a SRFI that can handle 12 trains per day. A summary of this position is set out in the Parkside Background Paper (SD024), paragraphs 6.3-6.5. This Background Paper also includes, in Appendix 2, a Delivery Statement for the site prepared by CBRE, on behalf of iSec.

iSec's plans for Parkside East, as set out in Appendix 2 of the Background Paper, are to deliver a SRFI with a major manufacturing and logistics 'SuperHub', and are based on "a thorough understanding of commercial and deliverability considerations, and are following a similar approach to the development being promoted by iSec at the Thames Enterprise Park ("TEP") next to London Gateway Port". It is therefore clear that the site is being promoted by a group that understands the sector well, and has confidence that Parkside can successfully deliver on the allocation proposed in the Local Plan.

Furthermore, designs for the SRFI are being worked up by iSec (and their specialist SRFI consultant advisors) along with the proposed operator, and this shows private sector confidence that the facility will certainly see demand for 12 trains per day, if not more (paragraph 3.7).

Parkside is also included in the Liverpool City Region's bid for freeport status. The announcement in the budget that the bid has been successful, also serves to add to the potential demand for the Parkside facility.

The Parkside Background Paper concludes in paragraph 9.1 that there is robust evidence for the allocation of Parkside East for a SRFI.

The AECOM Study (page 49) refers to TfN's Freight and Logistics Strategy that demand for GB Freight Train kilometres in the North is set to double between 2014 (10.8 million km) and the 2033 central case forecast of 19.2 million km. Additional intermodal train handling capacity is required to support this. Parkside is well placed to assist in meeting this need. Indeed, the industry consultation undertaken as part of the AECOM Study considered that Parkside was 'best placed' to satisfy the identified need (section 9.2).

Taking these points together, it is reasonable to conclude that there is a high degree of certainty that there will be sufficient market demand for a SRFI in this location running 12 trains per day in each direction.

The study refers to access to the M6 being achieved via a new access road underneath the M6 for both option 2 and 3.

Question 21. Would a dedicated motorway junction be required for the new site access referred to or would it be linked to an existing junction (if so which one)?

The site access linking into the M6 is planned to be delivered through the Parkside Link Road, for which funding has been secured. This will link into the existing Junction 22 on the M6.

The 2020 Parkside background paper states that site 7EA comprises Grade 2 and Grade 3a agricultural land. However, the SA refers to the site as being Grade 3.

Question 22. Which is correct and would this affect the SA's assessment of the site?

When using the 'Post 1988 Agricultural Land Classification (England)' layer on the <https://magic.defra.gov.uk/MagicMap.aspx> website, it can be seen that site 7EA does not have full, comprehensive ALC classification coverage. The available data

indicates the presence of some grade 2, 3a and 3b on the site at the southern end, with the rest of the site left uncategorised.

The SA's classification of the site aligns with the alternative 'Agricultural Land Classification – Provisional (England)' dataset on the Magic website (as above), where the land around the site is predominantly categorised as grade 3 (which is not sub-divided between 3a and 3b in this dataset). This data is provided at a much broader scale than the other ALC dataset.

On this basis, whilst it would be wrong to suggest the SA conclusion is incorrect, a more precautionary approach to this issue would assume the Parkside Background Paper assessment is more accurate. In doing so, this is not considered to materially affect the SA's assessment of the Plan. This is because the SA considered that employment development in this location would lead to an irreversible loss of active agricultural land, and this would be a substantial loss. For this reason, it concluded a negative effect. Whilst this effect was not considered significant on the basis of the site being Grade 3, it was still recorded as a negative effect.

The reference to ALC in Appendix H of the Green Belt Review (2018) (SD020) should also be noted here. It states that "*the vast majority of Green Belt land within the Borough is identified as "best and most versatile", consequently, if the Council took the decision to discount all the land within the "best and most versatile", it would not be able to meet its housing and employment needs for the proposed plan period and beyond.*" It is therefore fair and reasonable to conclude that had the SA identified the presence of grade 2 and 3a on the site, this would not have changed the outcome with regard to the allocation of the site.

4HA – Bold Forest Garden Suburb

Policies in the Bold Forest Park AAP acknowledge that land within the Bold Forest may be required to meet the future housing and employment needs of the area.

Question 23. Is the scale of site 4HA compatible with the AAP when taken as a whole?

The Council considers that the scale of site 4HA is compatible with the Bold Forest AAP as the site allocation is part of the wider Bold Forest Park which totals 1,808ha and includes land both to the North and South of the M62. The site allocation totals 132.86ha, which equates to 7.3% of the entire Bold Forest Park area. The Council considers this to be acceptable.

The site is located near to existing residential areas and is bounded to the south by a B-road (Gorse Lane). Therefore, development is well placed to support the delivery of the wider St Helens Borough housing and employment needs whilst also supporting the development of the Bold Forest Park.

The delivery of an appropriate level of development within the Bold Forest Park area, which is primarily focussed around this site, is key to enabling the ambitions for the Bold Forest Park AAP to be delivered, and realising the transformation of this area from a former industrial mining landscape to a Forest Park that benefits the community. Accordingly, the Appendix 5 site profile emphasises the importance that the development of this site must align with the vision, aims, objectives and policies of the AAP.

There is a wider recognition, supported by the findings included with the SA report (SD005) that as part of the local plan spatial strategy, significant positive effects are predicted for the Bold area over the long-term as development will help to continue landscape reclamation and environmental improvements within the Bold Forest Park.

The AAP emphasises the need for any development to meet high design standards and positively contribute to the Forest Park.

Question 24. How will this be achieved?

The BFPAAP is a statutory document and forms part of the development plan framework for the Borough of St Helens. Policies included within the AAP will remain extant following the adoption of the new Local Plan, and due regard for all policies must be given when considering any future development proposals.

Within the BFPAAP, policy BFP SN1 (Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park) states that “Development must:

- a) Contribute positively to the development of Bold Forest Park;
- b) Not result in the loss of critical infrastructure elements of the Forest Park or prevent their implementation; and
- c) Housing or employment development should include measures to enhance connectivity.”

This establishes an over-arching principle that ensures high-quality development is achieved, which contributes positively to the Forest Park, and this carries full weight in the Development Management process. The opportunities for achieving this will be varied, and depend on site circumstances, but to ensure compliance with the policy, such opportunities will need to be realised through the design of developments. Within the reasoned justification of policy BFP SN1 it is acknowledged that “some development is positive as it contributes directly to the

development of the components of the Bold Forest Park set out in this Plan [BFPAA], such as the Recreation Hubs”.

In regard to the LPSD, there are various policies that are interconnected and will work alongside the AAP to ensure that developments are built to high design standards and contribute positively to achieving the Bold Forest Park vision.

Criterion 5 of Policy LPA03 Development Principles states that new developments will be required to contribute to a high quality built and natural environment, taking account of the distinct character of local areas within the Borough of St Helens as well as protecting and enhancing the natural, built and historic environment.

As site 4HA is a strategic housing allocation, policy LPA05.1 states that “a comprehensive master plan covering the whole site” will be required to support any planning application. Master planning of the site will facilitate a cohesive approach to ensure sustainable development through the delivery of high-quality homes alongside improving the wider environmental and social qualities of the area. For example, the provision of open space within residential areas will support and encourage a positive approach towards improving biodiversity, air quality and the health and well-being of existing and new residents.

In addition, policy LPA05.1 states that developer contributions (in compliance with policy LPA08) will be sought for the necessary infrastructure required to support site delivery.

In addition, there are many environmental policies (listed below) that will support the development of residential dwellings that positively contribute to the Forest Park as well as achieve high-quality design standards.

Environmental Policies that support the delivery of high-design standards and contribute positively to the Bold Forest Park.
LPA09 Green Infrastructure
LPC05 Open Space
LPC06 Biodiversity and Geological Conservation
LPC07 Greenways
LPC08 Ecological Network
LPC09 Landscape Protection and Enhancement
LPC10 Trees and Woodlands
LPC12 Flood Risk and Water Management

LPC13 Renewable and Low Carbon Energy Development
LPD03 Open Space and Residential Developments

Lastly, Appendix 5 lists site requirements specific to site 4HA that will also support the achievement of high levels of design and ensure that development positively contributes to the Bold Forest Park. Further requirements can be added to site 4HA profile included within appendix 5 if considered necessary.

On the basis of the above, it is considered that taking the AAP and the LPSD policies together, there is a very strong policy framework to secure high design standards and ensure that new development will positively contribute to the Forest Park. The requirement to masterplan the site, as per LP05.1 will provide the opportunity to do so comprehensively.

The AAP policies also seek to avoid the loss of critical infrastructure which is defined as including footpaths and bridleways. The policies map shows a number of key walking routes and proposed bridleways that cross the site.

Question 25. Will these be maintained and integrated with the development of the site and if so how?

As stated above, as site 4HA is a strategic housing site, a master plan for the entire site area is required to be produced. As part of the master plan exercise, policy LPA05.1 Criterion 2f, indicates that a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage in a holistic and integrated way is to be produced. In relation to this question, the greenway element of Green Infrastructure is particularly relevant.

Green infrastructure is a vital component of site 4HA and will be considered thoroughly to ensure that a 'garden suburb' vision is achieved. It is envisaged that the current green infrastructure will be enhanced during the development of site 4HA. In addition, the development of new green infrastructure will be encouraged; for example, the creation of a new greenway routes as indicated in policy LPC07, figure 7.2, which is of particular relevance to site 4HA as one of the potential new routes goes through the site in a north-south direction.

As part of the masterplanning exercise, there must also be details around the permeability of the site by walking, cycling and public transport. Therefore, how the existing walking and bridleway routes are treated, along with the potential delivery of

new routes within the site will be considered and determined through the masterplanning work.

The Appendix 5 profile for this site also emphasises the need for the development to provide a choice of foot, bridleway and cycle routes through the site for enhanced accessibility between different points, so this will be a key matter in considering the design of the site.

There are also a number of recreation hubs close to the site.

Question 26. How will the allocation help to deliver these in line with the policies in the AAP?

The BFPAAP policy BFP INF1 outlines the locations for the proposed development of five recreation hubs. Notably, two proposed recreation hubs are located adjacent to site 4HA at Clock Face Country Park and Colliers Moss Common. Development of site 4HA will provide access to developer contributions, which could potentially be directed to enable off-site improvements of these specific recreation hubs, in accordance with LPA08. Such improvements would have to take account of policies BFP INF3 Clock Face Country Park Recreation Hub/Cycling Centre and BFP INF4 Colliers Moss Common Recreation Hub Development Opportunity Site as they identify specific requirements for each proposed recreation hub. The BFPAAP acknowledges that “some development is positive as it contributes directly to the development of the components of the Bold Forest Park set out in this Plan, such as the Recreation Hubs” (Policy BFP SN1).

Question 27. What would be the infrastructure requirements (such as the highway network) to ensure delivery of the site?

Outlined below and contained within the Bold Forest Garden Suburb Position Statement (SD027) is the latest infrastructure requirements to ensure site delivery.

Transport

St Helens Borough Council commissioned consultants WSP to undertake an initial transport review (TRA005) to understand the likely impact of the Bold Forest Garden Suburb on the wider highways network and to consider transport initiatives that could support development of the site.

Initial findings show that some junctions will experience increased capacity as a result of development, therefore a series of local junction models will need to be created to establish a future ratio flow to capacity. However, there is an opportunity to create new through routes which will serve both the development and the wider highway network, that should mitigate the impact of development traffic and help to

alleviate current congestion issues. In addition, review findings suggest that there is a potential to achieve a greater modal shift towards use of sustainable transport modes.

It is anticipated that as part of the master planning for this site, this transport study will be developed further and outcomes will be included with a future site-specific SPD for site 4HA.

Education

The Council's School's Support Services Team is currently in the process of assessing schools in close proximity to site 4HA to determine which schools would be capable of extension and where a new school could be required.

In relation to primary school provision, the Council's School's Support Services Team have indicated that presently there is existing capacity at some of the nearby primary schools, but moving forward they are aware that this could be reduced due to other proposed Local Plan allocations in the Bold areas (sites 5HA, 9HA and 10HA). The School's Support Team have indicated that there could be options for expansion at some of the primary schools nearby to the BFGS.

In relation to secondary school provision, nearby secondary schools St Cuthbert's Catholic High School and The Sutton Academy, have been oversubscribed in recent years.

Health and Well-being Services

St Helens CCG advised that there is a deficiency of healthcare practitioners to the south of the Borough, particularly in Bold. Therefore, there could be a need for a new general practice surgery to be constructed within the BFGS to accommodate the increased demand for healthcare in Bold (and from surrounding areas). The CCG have indicated that this new practice could be in the form of relocating and expanding an active practice onto the site.

Retail

The proposed BFGS is not within walking distance of a local or district centre. However, due to its size it is considered that the BFGS could possibly support a small local centre containing community and retail facilities. The BFGS may also provide an opportunity to help sustain the existing small row of shops north of the BFGS that were built as part of the 'New Bold' estate, which currently struggle to maintain occupancy. Again, this will be looked at in more detail through the comprehensive master planning process and in the subsequent SPD.

The Council acknowledges that further assessment work in relation to infrastructure for education and transport is required and the outcomes of such will be contained within a future site-specific Supplementary Planning Document (SPD).

The GBR notes that parcels of land within the site are in different ownership and that an allowance should be made for slower implementation in terms of its contribution to housing land supply.

Question 28. Has this been taken account of? What level of growth will take place during the Plan period and are the land ownership issue likely to act as a constraint on those assumptions?

Given the size of site 4HA, a lead in time of seven years on adoption of the Plan has been applied to allow for a thorough master planning process and the production of a site-specific Supplementary Planning Document (SPD). In addition, the council has taken a cautious approach to apply an assumed build out rate of 60 units per annum to support site delivery. This will result in delivery of 360 units on the site during the proposed plan period (ie. up to 2035). This is reflected in the latest housing trajectory included in SHBC004 (St Helens Council's response to INSP003 Matter 5 - Housing Land Supply), will be updated in advance of the public hearings to reflect the latest housing land supply position as of 31.03.2021.

The council does not consider land ownership to be a constraint that could affect the delivery of site 4HA, beyond the cautious delivery rate of 60 dwellings per annum referred to above, when considering the scale of the site. The Local Plan preparation process has been informed by a number of Call for Sites (CfS) exercises which has resulted in a number of landowners/agents coming forward to promote development interests on land that is part of site 4HA. Landowners also came forward at the LPSD consultation stage providing concept masterplans for their specific pieces of land and for site 4HA as a whole. Some of these responses have indicated the ability to build out at higher rates than assumed by the Council.

In the Council's response to the Inspector's Preliminary Matters and Issues, reference is made to mitigating the removal of land from the Green Belt through the implementation on the Bold Forest AAP.

Question 29. How will the development of site 4HA assist with that implementation?

Following on from the Council's response to PQ47 in SHBC001, it is envisaged that the master planning process required for site 4HA (in accordance with policy LPA05.1) will enable compensatory measures to be developed in order to meet the following objectives of the BFAAP:

“3: Create an easily understood and accessible network of linked open spaces within Bold Forest Park and with surrounding areas;

4: Promote the provision and positive use of green space for the benefit of the local community and visitors; and

5: Enhance the natural environment through targeted delivery of green infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park area; [and]

6: Create quality outdoor space with opportunities for physical activities and positive use of green space to improve mental health and wellbeing of the local community and visitors”.

As part of the master planning exercise, policy LPA05.1 Criterion 2f, indicates that a Green Infrastructure Plan will be produced. Green infrastructure is a vital component of site 4HA and will be considered thoroughly to ensure that a ‘garden suburb’ vision is achieved.

As per the site profile in Appendix 5, additional tree planting within site 4HA will be part of the need to provide a well landscaped setting, which will meet policy requirements included within policy BFP ENV1: Enhancing Landscape Character, which indicates that increasing tree coverage by 30% is desirable within the BFP area. Tree planting will also support measures to improve biodiversity, improve air quality and reduce flood risk.

In addition, site 4HA will provide a network of pedestrian, cycle and equestrian routes thus supporting policy BFP INF6: Creating an Accessible Forest Park. It is important to recognise that sustainable transport routes provided within site 4HA will also increase the connectivity of the whole area encompassed within the Bold Forest Park including New Bold, Clock Face and Sutton Manor.

It is also worth noting that Figure 7.2 and the reasoned justification to Policy LPC07 have identified the potential to provide a new greenway within site 4HA. This will further improve accessibility and recreation within the Bold Forest Park.

The development of site 4HA will attract developer contributions that could be used to invest in improvements to the Bold Forest Park, in accordance with LPA08, to provide the stated implementation, including the two recreation hubs on the site boundary. Such improved facilities will provide good compensatory measures.

The GBR assessed the site as a number of smaller land parcels. In terms of the contribution that those parcels make to the purposes of the Green Belt, the northern part of the site was given a medium score overall whereas the southern / southwestern part (closest to Clock Face) was given a low score.

Question 30. Will the development of the site take into account these differences, such as the more open nature of the northern part of the site, through the use of measures such as enhanced design features or landscape enhancements?

LPA03 criterion 5b states that landscape character and the distinctive setting of specific areas must be considered to ensure that new development contributes to a high quality built and natural environment. This is further supported by policies LPD01, Ensuring Quality Development and LPD02, Design and Layout of New Housing. As set out in the policies and reasoned justification, a positive approach will be facilitated to optimising development opportunities which also protects and enhances the surrounding environment, whether this be of rural or urban character.

Therefore the varied landscape characteristics will be taken account of during the master planning and development management processes.

5HA – Land south of Gartons Lane, Bold

Question 31. Have any cumulative highway impacts of developing site 5HA alongside 4HA been considered? Is so what are they and what mitigation measures (if any) will be required?

The highways impacts of developing 5HA were assessed through the St Helens Local Plan Transport Impact Assessment, January 2019 (TRA003). The impacts of the full site 4HA were assessed through Bold Forest Garden Suburb Transport Review (TRA005). Only Phase 1 (197 dwellings) of the Bold Forest Garden Suburb was assessed for its impacts through the Transport Impact Assessment (TRA003). It is therefore not the case that the full extents of sites 4HA and 5HA were cumulatively assessed for their highway impacts through the TIA, albeit the highway impacts have been assessed for each site.

Notwithstanding this, Policy LPA05.1 will require both of these sites (as identified ‘strategic housing sites’), through part 2 of the policy, to ensure that a planning application is supported by a comprehensive masterplan covering the whole of the site, setting out a number of details. Sub criterion 2f) of the policy requires the masterplan to provide details of how the site as a whole would comply with relevant policies in the Plan. These will include Policy LPA07 – Transport and Travel, which states that new development will only be permitted if it would “3a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network.”

It is also worth clarifying that policies LPA05.1 and LPA07 will require these sites to provide good accessibility by public transport, cycling and walking, which will also help mitigate their impacts on the highway network.

The Housing Need and Supply Background Paper (SD025) shows that these sites are expected to come forward at differing timescales, with 5HA expected to start delivering homes in 2024/25, 5 years before 4HA in 2029/30. This is expected due to the differing scales of the two sites, and the likely longer lead in times required for a site on the scale of 4HA. Consequently, the detailed design, consideration of highways impacts, and identification of necessary highways mitigation for 4HA can be undertaken taking into account the delivery of 5HA in due course.

Appendix 5 for both of these sites states that financial contributions for off site highways works may be required, and that this will be subject to further assessment at the masterplanning stage.

Whilst the details of off site highways works are not set out in the Plan, reference to the fact that works are likely is clearly stated. The policy framework provided will ensure that these sites will be delivered with appropriate highways mitigation in place.

The Bold Forest Park AAP policies map shows a recreation hub immediately to the south of the site which has a key walking route and proposed bridleway passing through it close to the boundary with the site.

Question 32. How will the development of site 5HA enhance these facilities in line with the policies in the AAP? Are there opportunities to integrate them with the development?

The land directly to the south of site 5HA is referred to as the Sutton Manor Recreation Hub in the Bold Forest Park AAP (LOC004). Within this document, Policy BFP INF2 – Sutton Manor Recreation Hub identifies this location as being the principal Forest Park Visitor Hub. The Policy sets out to support proposals that would deliver a number of infrastructure pieces that would transform the site into a visitor hub, including an 'access road into Sutton Manor off Jubits Lane'.

The site 5HA profile in Appendix 5 of the LPSD states that the developer would be expected to fund the provision of a suitable access road to the car park in the adjacent Bold Forest Park (ie. the planned Sutton Manor Recreation Hub), as well as utility service connections. Therefore, there is a very clear link between the development of site 5HA and enhancements of the recreation hub through the provision of an access road from Jubits Lane through to the car park of the visitor hub, plus utility connections to support further development of the hub. Such an enhancement as a result of site 5HA will support the onward investment and development of the remainder of the recreation hub site.

Given the planned paths around the Sutton Manor hub site, the delivery of a high quality development at site 5HA could provide a high quality setting to the hub and contribute to an enhanced hub user experience. In terms of integration between site 5HA and the hub to the south, the ability to provide direct walking, cycling connections between the sites would provide improved integration, potentially all the way through to Gartons Lane to the north of 5EA, depending on the design and layout of site 5HA. To reflect this, Appendix 5 picks up on this point in bullet point 3.

The AAP identifies a Strategic Linking Route between the Brickfields and Sutton Manor recreation hubs (page 30). The development of site 5HA could assist in the delivery of this and is a further enhancement to the Bold Forest Park that the development of 5HA could deliver.

In accordance with Policy LPA05.1, a detailed masterplan for site 5HA will be required as it is an identified 'strategic housing site'. This will ensure that the opportunities for the development of this site to maximise enhancements of the Bold Forest Park are fully taken account of in the design and layout considerations through the Development Management process.

6HA – Land at Cowley Street

The 2017 SHLAA (HOU002) refers to this site as a partly vacant employment site.

Question 33. Would the development of this site for housing have any impact on the existing business operating on part of the site?

The updated SHLAA proforma for this site (reference 111) in SHBC004 indicates that site 6HA is a vacant former employment site, resultantly no impact will be evident in terms of employment uses within the boundaries of the proposed site allocation. Notwithstanding this, Pilkingtons continue to operate a large coating plant adjacent to North Road, but this is not part of proposed site allocation 6HA.

There is a live planning application on this site (P/2020/0083/OUEIA). There are not considered to be any impacts on this business use, as it will have a separate access, and mitigation measures can be included regarding visual impact and noise etc.

This application is due to be determined shortly, so the Council will likely be able to provide an update on this site at the time of the MIQs, or sooner if necessary.

Question 34. Has the loss of employment land been considered and if so how would it impact on the area's supply of employment land?

The Cowley Hill allocation site is comprised of Previously Developed Land, with many of the former buildings on site either vacant or now demolished. It was formerly used by NSG Pilkington for the manufacture of glass. The site is now surplus to requirements. Following the reduction and then closure of operations within the allocation site boundary, no other employment uses have moved onto the site. Instead, it has been promoted for up to 1,100 dwellings and some mixed use floorspace for commercial and employment uses, with a planning application currently pending.

Whilst paragraph 4.1 of the Employment Land Need and Supply Background Paper (SD022) acknowledges that this represents a large loss of employment land in the Borough, the fact that no other commercial occupiers have moved onto the site indicates to some extent that the site is no longer attractive to the market for employment uses.

It is not considered that the loss of this site requires a review of the supply of employment land in the Plan.

The SA refers to a LWS on the site that would need to be retained with a buffer. There is also woodland along the Northern boundary of the site.

Question 35. Is it clear as to the extent of existing woodland that should be retained as part of the development?

See response to Q33 above regarding the live planning application on this site that is due to be determined shortly. An update can be provided soon.

Question 36. How will it be incorporated into the site, taking account of any buffer zone that may be needed?

See response to Q35.

1ES – Land north of M62 (Omega North)

The GBR identifies highway and access constraints that affect this site. Access would need to be achieved on land outside of the site to the east that is in separate ownership. It also refers to the need for potential cumulative impacts of developing this site along with other development in the area would need to be

addressed in conjunction with Highways England and Warrington BC (Junction 8 of the M62 is said to be at capacity).

Question 37. Given these constraints, is this site deliverable in the long term even beyond the Plan period?

This site has been promoted by DB Symmetry, who made detailed representations in respect of the site at the Local Plan Submission Draft consultation stage (March 2019). The representation addresses the site access issue, and suggests that DB Symmetry are in advanced discussions with the Omega site management company and they understand that there are no constraints in respect of access. It would be expected that any outstanding issues in this respect could be addressed to ensure the site is deliverable in the longer term beyond the Plan period.

With respect to M62 Junction 8, capacity of this junction is a matter in need of further detailed consideration between the relevant Highways Authorities and Highways England, in terms of potential improvements to support longer term growth in this broad area. So whilst the site is not considered appropriate for allocation at this time, it is still expected that the site could come forward over the longer term, beyond the Plan period. Highways England have not objected to the safeguarded status of this site in the Local Plan.

2ES – Land to the east of M6

The GBR acknowledges that development of this site would have a high impact on the Green Belt. This site was given a high score in terms of the contribution it makes to the purposes of the Green Belt. The main reason being the contribution the parcel of land makes to the strategic gap between settlements (Haydock and Golborne and also Haydock and Ashton-in-Makerfield). It was also acknowledged to play an important role in checking the outward expansion of the large built-up areas of Haydock and Ashton-in-Makerfield. The GBR acknowledges that development of this parcel of land would have a high impact on the GB. However, the site was taken forward for consideration at Stage 2B of the GBR due to its potential to help meet the long-term needs for logistics development within the Borough.

Question 38. Does this reason amount to exceptional circumstances for the purposes of national Green Belt policy?

Yes, the exceptional circumstances are set out in the site's stage 1B assessment in the GBR (SD020, page 258), regarding the strategic aim of the Plan to provide sufficient land to meet employment land needs in full, and this needs to be considered in the context of the policies in the National Planning Policy Framework.

NPPF (paragraphs 81 and 82) states planning policies should set out a clear economic vision and strategy to positively encourage sustainable economic growth, and identify sites to match anticipated needs, and specifically refers to policies addressing the specific locational requirements of sectors, and in doing so, refers to “storage and distribution operations at a variety of scales and in suitably accessible locations”.

Whilst the Council considers that the site allocations identified in the Plan can fulfil this requirement over the identified Plan period, the NPPF goes on to state in the Green Belt section (chapter 13), in paragraph 136 that “strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

Consequently, NPPF paragraph 139, criterion c) states plans should “where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”.

As set out in the introduction of the GBR, paragraphs 1.19-1.20, it is not currently the case that neighbouring authorities can help meet the needs of St Helens, and this is likely to remain the case in the future. As there is insufficient land outside the Green Belt in St Helens, this means Green Belt release within St Helens Borough is necessary.

In determining whether to take this site forward to stage 2 assessment (GBR, p258), regard was had to the market evidence of need and the site requirements stemming from this, ie. “large sites capable of accommodating large scale employment opportunities, in close proximity to the strategic road network of the M6 and M62.

Therefore to ensure that the Green Belt boundaries set through this Plan can endure well beyond the end of this plan period, as required by the NPPF, and given the nature and location of the site in view of the likely future needs as set out, exceptional circumstances were considered to exist to take this site on for further stage 2 assessment, and the resultant proposed safeguarding status, taking account of the acknowledged impacts on the purposes of the Green Belt in this location.

We note that a study is being undertaken by the Council to look at potential improvements that might be needed to Junction 23 of the M6.

Question 39. When is this work due to be completed?

Work on this Study has now finished, and can be found in the examination library under document TRA007, with a supplementary report to this at TRA008. This is a technical study, and does not have any formal support from the Council, or the other commissioning partners. It does not provide an agreed definitive solution to the

technical issues identified at J23 of the M6, and consequently has not been used in relation to any bids for funding. Further work will need to be undertaken by the Council and its partners in relation to J23.

The Council is intending to submit a position statement in relation to J23 to provide a comprehensive explanation of the J23 situation to inform the Examination.

We understand that this work may have implications for site 2ES as land from this parcel may be required for those improvements.

Question 40. What effect would this have on the sites ability to potentially contribute to the long term employment needs of the area?

It is not considered that future improvements to J23 will have a significant impact on the ability of this site to contribute to the long term employment needs of the area. Indeed, the recent planning application and subsequent inquiry for this site (PINS reference APP/H4315/W/20/3256871) demonstrated that the necessary highways mitigation in this location generated by this site could be provided along with the proposed employment land, and wasn't considered to put at risk any future, bigger improvement schemes to increase the capacity of J23.

In any event, if this site is to be safeguarded as proposed in the LPSD, future improvements to increase capacity at J23 will need to take this into account.

Question 41. Would development of this site constrain future plans to improve the motorway network?

As above, development of this site in the longer term would not constrain the ability to improve the motorway network, specifically, a capacity improvement scheme at Junction 23. Further, the current proposal on this site (recently subject of the inquiry referenced above) incorporates the re-routing of the A49 to the north of the Junction through the site, which is likely beneficial to the longer term improvements needed.

In addition, Highways England are aware of the scheme, and attended the recent Inquiry (referenced above), and did not raise any objection in respect of the potential for the scheme to constrain future motorway network improvements.

Finally, as above, if the site is safeguarded as proposed in the LPSD, a future improvement scheme at J23 will need to be designed taking account of this.

Question 42. How would this consideration be likely to affect the extent of development that is likely to be able to take place on the site,

particularly alongside the need for a substantial buffer to mitigate effects of development on the landscape including from the Racecourse?

The site's relationship to the Racecourse has been considered through the planning application (P/2017/0254/OUP), and subsequent inquiry (reference provided above). As above, the site can be (and has been for the purposes of the planning application) designed to re-route the A49 from the north away from Junction 23 and through the site, and has not been considered a concern regarding any further improvements at J23.

Whilst there are acknowledged landscape concerns in relation to this site, it is considered that a mitigation solution can be provided to enable the site to contribute to the long term employment needs beyond the plan period.

3HS – Former Eccleston Park Golf Club

A reason cited for not allocating the site in the GBR is that the site is a golf course and therefore a sports facility of value to the local community. We also understand that Sports England objected to its allocation at the Preferred Option stage on the basis that insufficient evidence has been provided on sporting need.

Question 43. Did the Council consider undertaking a study so as to better understand any impact from the loss of the Golf Course, particularly if the facility closed in 2018?

As part of the evidence base preparation for the local plan, St Helens Borough Council commissioned an Open Space, Sport and Recreation Study (OSSRA) which was published at Preferred Options (LPPO) in 2016. As part of this study, a specific report title 'St Helens Indoor and Built Sports Facilities Needs Assessment - Golf Course Addendum' (OPE002) assessed the provision of golf courses within St Helens. This report identified that there is a good provision of golf-courses facilities within St Helens Borough and that most of the golf clubs assessed have capacity to accept new members. This means that as the population grows over the coming years, it is not necessarily the case that new courses will be needed, but instead, any further demand can be accommodated by the existing facilities.

Notwithstanding the piece of work referred to above, it is understood that further work would be required to satisfy the requirements of Sport England should the site have been allocated.

Following the LPPO consultation, St Helens Borough Council undertook a comprehensive Green Belt Review (SD020 and SD021) which as part of stage 2A

and 2B assessed potential site constraints and deliverability issues. For site 3HS, it is evident that there are site constraints that would reduce the overall net developable area. Therefore, further work in relation to understanding the impacts of the loss of the golf course was not undertaken.

Reflecting on these constraints and a reduced housing need for the Borough since the LPPO, the Council revised its conclusion and currently proposes to safeguard site 3HS for future development to enable further assessment work to be undertaken, rather than allocate it in this Plan.

In addition, it should be acknowledged that Sport England (RO1788) did not submit any objections in relation to the safeguarding of site 3HS in the LPSD.

8HS – Land south of A580, Windle

The GBR identifies a number of reasons why the decision was taken to safeguard this site rather than allocate it. Notably that it would form a sizeable extension of the built up area into the countryside beyond a well-defined urban edge and the loss of high quality agricultural land. Significant highway improvements would also be required as access would need to be via a narrow country lane that would require a substantial upgrade.

Question 44. Given these considerations is the safeguarding of this site for 1000 units beyond the Plan period justified?

Whilst the GBR identified a number of constraints in relation to this site as referred to, the majority of these constraints can be addressed through further work to address identified issues, including, for example, the potential need to prepare a mitigation strategy in relation to the site's potential role as functionally linked land. The safeguarded status of this land (rather than allocation) provides time for this issue to be addressed to support development here over the longer term. Many of the other issues identified can be dealt with through a detailed masterplanning process and careful phasing of the site.

The masterplanning of the site would provide the opportunity to provide a new, well defined edge in this location. Whilst it is accepted that the potential development of this site in the longer term would result in the loss of high quality agricultural land, it is important to acknowledge what the GBR states about best and most versatile land in Appendix H:

“The vast majority of Green Belt land within the Borough is identified as “best and most versatile”, consequently, if the Council took the decision to discount all the land within the “best and most versatile”, it would not be able to meet its housing and employment needs for the proposed plan period and beyond.”

It is therefore the case, that best and most versatile land will likely be needed beyond this Plan period, and therefore cannot be a basis on which to not safeguard land for future development.

With regard to the highways issues, the site will need to deliver infrastructure improvements in terms of upgrading Houghton's Lane, in accordance with the site profile in Appendix 5. This is a benefit as the GBR identifies this road currently as 'a narrow country lane'.

To conclude, whilst it is acknowledged that there are some identified issues in relation to this site, it is not considered that these are prohibitive to development in the longer term, in accordance with the proposed safeguarded status. Additionally, the site has the potential to provide infrastructure improvements locally, in the form of an upgraded Houghton's Lane, which would be a benefit. The safeguarded status of this site is therefore considered justified, and there is confidence that the identified issues can be addressed and that the site could meet longer term needs, beyond the current Plan period.