

Session 4 – 09.30 Tuesday 8 June 2021

**Matter 4 Allocations, Safeguarded Land and Green Belt Boundaries Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area**

**Issue 1: Omega South Western Extension (1EA) and Omega North Western Extension (1ES)**

*1. Do the Green Belt assessments support the allocation and safeguarded land and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

No.

**Omega South Western Extension (1EA)**

For site 1EA, the Green Belt Review 2018 scores GBP\_076c (Omega South Western Extension) Stage 1B as medium, and Stage 2 B as medium with an overall score of 4, it is 31.22 hectares in scale. Site 1EA /GBP\_076c should have been scored high at Stage 1B. CPRE disagree as development at Site 1EA is likely to lead to unrestricted sprawl to the west and south. For Green Belt purpose b) this parcel /sub-parcel is on the urban edge within a 'Strategic Gap' i.e. an essential gap that needs to be kept open and kept clear of new development to ensure that adjacent settlements do not merge. The parcel is located between St Helens, areas of Bold and Clock Face to the north and west, and Warrington's Omega warehousing to the east and the Lingley Green residential area to the south east. The land does provide the purpose of preventing neighbourhood towns from merging into one another to a high level. If developed it would have the adverse consequence of merging the two areas in different local authority areas. In a spatial sense the distance of separation between the houses on A569 Clock Face Road and the existing Omega buildings would be reduced and the different parishes of St Helens and Warrington would coalesce. In a visual sense it will feel to people in the area that the built-up form is continuous when travelling along the M62 and on the local public rights of way.

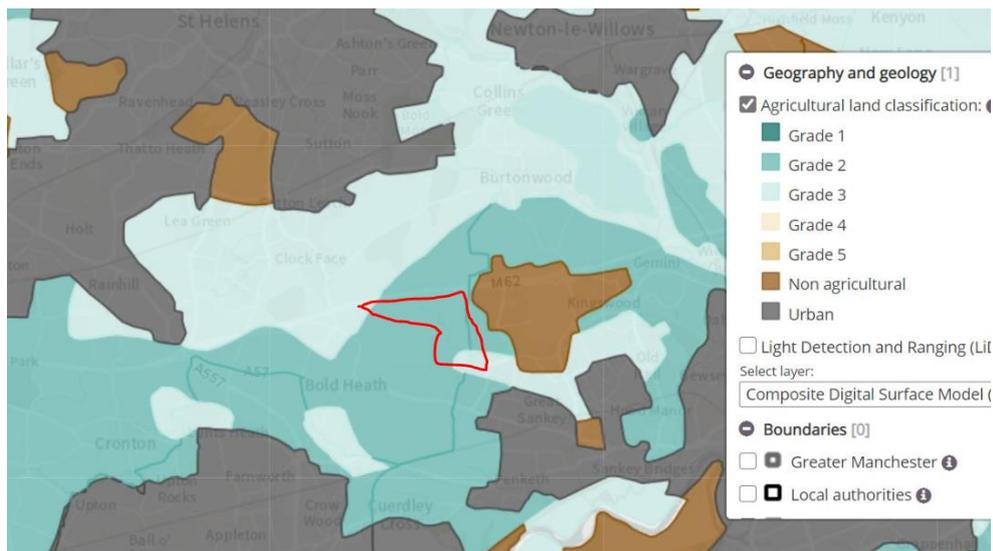
In terms of Green Belt purpose c) *to assist in safeguarding the countryside from encroachment* – it is believe that the land does provide this purpose and the proposals would have an adverse impact on encroaching into the rural part of the Bold area. The applicant for the Omega West development agrees with this finding at the Call-in Inquiry. It cannot be assessed as 'medium'.

In terms of Green Belt purpose d) *to preserve the setting and special character of historic towns* – CPRE accepts that this Green Belt function is not served by the site Site 1EA.

In terms of Green Belt purpose e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land* – CPRE believes that Site 1EA does provide this purpose and the allocations of it would have an adverse impact on St Helens regeneration ambitions.

At the Stage 2B the soil quality should have been considered and the Grade 2 of Best and Most Versatile land considered. This is identified on the Greater Manchester GMODIN Map.

### Extract: Indicative OMEGA West site boundary on the GMODIN map



There are biodiversity issues arising from the nearby woodland to the west.

Overall, the site should have scored lower and been ranked lower.

### Omega North Western Extension (1ES)

Proposed safeguarded land for employment 1ES covers 29.98 hectares Omega North Western Extension, Bold

As above, GB purpose 1 could be considered high due to the pressures release would have to the north and west.

Green Belt purpose 2 would be eroded in the same way as Site 1EA, plugging an important strategic gap between distinct areas of St Helens and Warrington.

Green Belt purpose 3 would also be harmed as the rural characteristics are urbanised. This is contrary to the Bold Forest Park Area Action Plan 2017.

Green Belt purpose 4 is not applicable and Green Belt purpose 5 is not supported if allowed for development.

Overall, the site should have scored lower and been ranked lower.

### Both sites

Since its designation in 1983, The Merseyside Green Belt has been robustly defended by St Helens Council, and the Government has set out in National Planning Policy Framework, 2019 (NPPF) Section 13 that it attaches great importance to Green Belt.

In CPRE's response to Matter 2, Issue 3 CPRE set out why it considers the employment land requirement to be incorrectly inflated, due to reliance on the SHELMA evidence base, which itself relies on high growth assumptions and has not been checked against the environmental constraints

of St Helens. CPRE is opposed to the loss of Green Belt where the exceptional circumstances are not justified.

CPRE wishes the local plan to respond to St Helens Council declaring a climate emergency in July 2019. In October 2020 St Helens Council published a Local Plan 2020-2035 Climate Change Background Paper with the two purposes: firstly, it is to set out the background of and approach taken towards climate change within the SHBLP; and secondly to provide an update on the Council's current and future projects which support mitigation and adaptation to climate change. CPRE wishes the examination to fully consider the impacts of policies and site allocations.

*2. In relation to these exceptional circumstances, is Site 1EA justified to meet Warrington's needs, having particular regard to the stage that Warrington's LP has reached?*

CPRE supports joined up spatial planning however it is concerned that Warrington and St Helens Councils have agreed that the 31.22ha of land at parcel GBP\_076c (Omega South Western Extension) would contribute to Warrington's and not St Helens' employment needs. This is because more greenfield land could be the focus of development, given that the Warrington Local Plan is at an earlier stage and indeed stalled due to Covid.

There have been a number of large scale B8 developments sought on a speculative basis. CPRE remains opposed to the loss of Green Belt due to the important purpose and value for local health and well-being.

As mentioned in comments for the Week 1 Matters, locally the value of logistics warehousing has been challenged due to it being perceived to being low. The terms and conditions of employment involved in logistics is understood to be low, with a low skills base and low wages.



Photo above shows, in the St Helen's local media there was coverage of action by the Unite Union campaigning to stop exploitation and for improved conditions for employees at the new Florida Farm site occupied by Amazon (date 20 May 2021).

The impacts on land in the planning pipeline in St Helens and Warrington needs to be fully understood in advance of allocating more. Covid and Brexit has caused considerable uncertainty. Safeguarding is a more cautious approach to full allocation.

*3. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

No. The quantum of suitable brownfield land recorded on the St Helens Brownfield Register is substantial and this land should be effectively reused in advance of Green Belt land, in accordance with NPPF Section 11.

*4. Are the configuration and scale of the allocation and safeguarded land justified taking into account development needs and the Green Belt assessments?*

Logistics operations do require large formats and good highway and motorway access. However, the large format sheds are disproportionately served by automation, increasingly so, so the benefits in terms of jobs is limited and the previous Omega development already displaced local wildlife and there is concern that further expansion will harm local ecology.

*5. Would the adverse impacts of developing Site 1EA (Green Belt impacts, traffic, air quality) outweigh the benefits?*

Overall, yes the adverse impacts will outweigh the benefits. As stated above and in Matters 2 and 3, the value of logistics to the local community in terms of jobs is considered low, and the GVA for St Helens is questionable. Locally people are sceptical about focusing too much on logistics as already more than 25% of jobs are in transport, warehousing, retail sectors and such heavy dependence may lead to vulnerability to economic shocks. We encourage more diversity in the business base.

*6. Is Site 1EA deliverable, taking into account any offsite transport infrastructure required?*

No comment.

*7. Should Site 1ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?*

CPRE is of the opinions both sites should be deleted. If no other option, then safeguarding is preferable than allocation, to preserve land for the benefit of future generations.

*8. Are the indicative site areas and appropriate uses for Sites 1EA and 1ES within Tables 4.1 and 4.7 justified and effective?*

Some land should be retained for green corridors and promotion of health and well being benefits and biodiversity.

*9. Are the requirements for Site 1EA within Policy LPA04.1 (Sections 2, 3, 4 and 5) and Appendix 5 (Site Profile) and for Site 1ES within Appendix 7 (Site Profile) positively prepared and effective?*

The Bold Forest Park Area Action Plan 2017 should be respected when the local plan is progressed. It is considered that there are issues with the community consultation and engagement of local plan policies and allocation, as set out in the Statement of Community Involvement 2013.

*10. Are there any barriers to Site 1EA coming forward in the Plan period?*

There is local opposition and Green Belt and other harms.

**Issue 2: Bold Forest Garden Suburb (4HA), Land south of Gartons Lane (5HA) and Former Penlake Industrial Estate (3HA)**

*11. Does the Plan reflect the current status of Penlake Industrial Estate (3HA) as a commitment?*

No.

*12. Do the Green Belt assessments support the allocations 4HA and 5HA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

In Matter 2 CPRE sets out why we think the Council has identified a housing requirement that is inflated and unnecessarily high. CPRE disputes the exceptional circumstances. CPRE tenaciously defends Green Belt release in the absence of exceptional circumstances.

*13. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

As stated above, exceptional circumstances are disputed.

*14. Are the configuration and scale of the allocations justified taking into account development needs, the Green Belt assessments and land ownerships?*

The allocation takes in a significant area. In our view the Green Belt in this location performs important functions of keeping land permanently open, and is good for the local community's health and well-being.

*15. Is the allocation of Site 4HA broadly consistent with the Bold Forest Park Area Action Plan?*

If the Government's new standard method still dictates a high housing requirement and not enough brownfield land is considered suitable, then as a last resort then this and other sites in the Green Belt should be considered. But, it is important community wishes are incorporated into the local plan, and Bold and Clock Face parish councils and the Bold Face Action Group should be listened to and the expressed vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (BFPAAP) relied upon to progress the policy wording. It seems to CPRE that the Bold Forest Park Area Action Plan will not be able to progress certain aims and objectives that relate to keeping land open and extension of the bridleway network for the advancing of the equestrian businesses that induce investment into the area from outside areas.

*16. Would the adverse impacts of developing Sites 4HA and 5HA (including Green Belt impacts, traffic, air quality, flood risk, loss of agricultural land, biodiversity) outweigh the benefits?*

CPRE believes there is a negative balance arising from such a large amount of Green Belt loss. The adverse consequences arise from Green Belt harm which is substantial and significant and from other major adverse impacts.

*17. Are the requirements for Sites 4HA and 5HA within Policy LPA05.1 (Section 2) and Appendix 5 (Site Profiles) positively prepared and effective, particularly in relation to ensuring Green Infrastructure and sustainable modes of travel are delivered alongside the development?*

Much more could be said about addressing climate emergency issues, natural capital and biodiversity, flood resilience, protecting best and most versatile land and how to enable more sustainable modes of transport. CPRE supports the 20-minute walkable neighbourhood concept.

*18. Are the net developable areas, minimum densities and indicative site capacities within Table 4.5 justified and effective?*

NPPF Section 11 requires the effective use of land. 30 dwellings per hectare is a low density and it could be that higher densities could be tolerated to make effective use of the site. The site would benefit from a proper masterplanned approach.

*19. Should the Bold Forest Garden Suburb (4HA) have a bespoke policy in view of its scale?*

If this allocation is taken forward it must have a bespoke policy to ensure it is effectively masterplanned. Adequate Green Infrastructure and green links must be provided. Biodiversity must be protected and enhanced. The development should promote sustainable modes, including walking, cycling and horse riding.

Design of good quality places is a key issue to protect and enhance local character. Residential amenity of existing people should be considered, and layouts should ensure no harm to noise and other disturbance, such as night light pollution.

*20. Will infrastructure to support the allocations be delivered at the right time and in the right place?*

Adequate developer contributions must be secured for needed community infrastructure including schools and highway improvements.

*21. Are there any barriers to Sites 4HA and 5HA coming forward as anticipated by the housing trajectory, for example land assembly/multiple ownerships?*

To investigate the extent to which brownfield is a viable option for development, CPRE commissioned construction analysts Glenigan to compare the speed of residential development on brownfield sites with development on greenfield, once these sites have been granted planning permission. Brownfield is faster. <https://www.cpre.org.uk/resources/brownfield-comes-first-2/>

The Letwin Inquiry considered reasons why developers landbank sites, and pursue permissions on greenfield sites instead. CPRE recommends the Letwin Inquiry recommendations inform the local plan to ensure a timely delivery of development.

**Issue 3: Eccleston (3HS), Sutton Manor (6HS), and Thatto Heath (10EA, 9HA, 7HS)**

*22. Does the Plan reflect the current status of Former Linkway Distribution Park (9HA) (with planning permission) and Lea Green Farm (10EA) (completed)?*

No. See comments in answer to Qu.26.

*23. What is the up-to-date position on the application for development at Eccleston Golf Course?*

The local community, and CPRE are opposed to the proposals to develop Ecclestone Golf Course, which is protected by Green Belt designation.

*24. Do the Green Belt assessments support the safeguarded land (3HS, 6HS, 7HS) and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

In Matter 2 CPRE sets out why we think the Council has identified a housing requirement that is inflated and unnecessarily high. CPRE disputes the exceptional circumstances. CPRE tenaciously defends Green Belt release in the absence of exceptional circumstances.

*25. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

No

*26. Is the configuration and scale of the safeguarded land justified taking into account long-term development needs and the Green Belt assessments?*

The site is too large in scale and there are issues relating to the loss of a golf course with an objection from Sport England. There are flooding issues and highway constraints. The site provides residential amenity and is highly valued locally, which will be harmed if developed. There is biodiversity, landscape and tranquillity value to be protected.

*27. Should any of the safeguarded sites be allocated rather than safeguarded so that they can contribute to meeting needs in the Plan period?*

CPRE wishes to see the site deleted entirely. If retained CPRE recommends keeping it as safeguarded to ensure a supply of land for future generations.

*28. Are the requirements for the sites within Appendix 7 (Site Profiles) necessary, positively prepared and effective?*

No. More detail would be required if the site is retained, but CPRE thinks this sites should remain unbuilt in the future and should benefit from Green Belt designation due to the public benefits.

*29. Are the net developable areas, minimum densities and indicative site capacities within Table 4.8 justified and effective?*

Appropriate densities should be applied to comply with NPPF Section 11. A masterplan approach is essential for a site allocation of such a large scale.

**Issue 4: Gerards Park, College Street (11EA), Land east of City Road, Cowley Hill (6HA), Moss Nook Urban Village (10HA) and land south of A580, Windle (8HS)**

30. *What is the up-to-date position on the allocations 11EA, 6HA and 10HA?*

No comment.

31. *Should the status of any of 11EA, 6HA and 10HA be changed from allocations to commitments?*

CPRE supports the reuse of brownfield land in urban places.

32. *Does the Green Belt assessment support the safeguarded land (8HS) and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

In Matter 2 CPRE sets out why we think the Council has identified a housing requirement that is inflated and unnecessarily high. CPRE disputes the exceptional circumstances. CPRE tenaciously defends Green Belt release in the absence of exceptional circumstances.

33. *If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

No comment.

34. *Is the configuration and scale of the safeguarded land justified taking into account long-term development needs and the Green Belt assessments?*

No comment.

35. *Should 8HS be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?*

CPRE recommends the progression of 8HS is fully assessed for importance to nature and the development is designed accordingly with adequate mitigations to achieve biodiversity net gain. Open space for public health and well being should be included, and walkways and cycle lanes should enable more people to rely on sustainable modes in the future. S

36. *Are the requirements for the Site 8HS within Appendix 7 (Site Profiles) necessary, positively prepared and effective?*

The local plan policy should ensure adequate developer contributions.

37. *Is the configuration of Site 10HA justified taking into account the extant planning permission?*

Adequate greenspace should be incorporated in this allocation.

38. *Are the requirements for Sites 6HA and 10HA within Policy LPA05.1 (Section 2) and Appendix 5 (Site Profiles) positively prepared and effective?*

The local plan policy should ensure adequate developer contributions.

39. *In particular in relation to Site 10HA, will the Plan ensure that any playing fields lost will be replaced by the equivalent or better provision?*

Adequate greenspace should be incorporated in this allocation for formal and informal recreation.

*40. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?*

No comment.

*41. Does the Plan contain sufficient safeguards so that the development of Site 6HA would not prejudice adjoining employment uses?*

No comment.

*42. Will infrastructure to support the allocations be delivered at the right time and in the right place?*

No comment.

*43. Are there any barriers to Sites 6HA and 10HA coming forward as anticipated by the housing trajectory?*

No comment.

#### **Issue 5: Other Green Belt boundaries**

*44. Are the Green Belt boundaries elsewhere in Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area justified?*

In terms of responding to the climate emergency, and the Council's declared climate emergency of July 2019, the policy for Parkside is not positively prepared and effective.

CPRE is concerned that local plans take a long time to prepare and be independently examined, and since the submission local plan was lodged for examination, the situation is agreed to be more urgent.

The policies, and allocations including those for economic development and housing need to be refined to be more effective at realising high level strategies and targets for CO<sup>2</sup> reduction. Decarbonising the economy should be a real and measurable ambition of the St Helens Local Plan.

The Bold Forest Park Area Action Plan 2017 should be respected when the local plan is progressed.