

ST HELENS BOROUGH LOCAL PLAN 2020-2035 EXAMINATION

INSPECTORS' PRELIMINARY MATTERS AND ISSUES ON SITE ALLOCATIONS AND SAFEGUARDED LAND

Introduction

1. The purpose of this note is to comment, and ask some questions of the Council, on some of the site allocations, safeguarded sites and the supporting evidence base. These comments and questions should be read alongside our previous notes to the Council dated December 2020 (INSP003) and January 2021 (INSP004). These views and questions arise from our initial reading of the St Helens Borough Local Plan (Plan or LP), the summary of representations on the Submission Draft of the LP in the Consultation Statement SD004, and some of the other key Submission Documents.
2. The answers will help us to draw up Matters, Issues and Questions (MIQs) for the examination hearings. We may have further questions during the preparation period which are not covered in this note. Our questions and comments are without prejudice to consideration of the soundness of the Plan's policies during the remainder of the Examination, including at the hearings. Some of the answers to the points that we raise may be contained within the evidence base. *If that is the case, please could our attention be drawn to where we can find the information?*
3. Not all matters raised go to soundness but may assist with the clarity of the LP. Where a point could potentially be addressed by a Main Modification (MM) or Additional Modification (AM) to the LP, we will make this clear by including **MM** or **AM** in the text.
4. All references to paragraphs and policies relate to the Submission Draft version of the LP of January 2019 (SD001).

Matter 4 – Housing and Employment Allocations and Safeguarded Land

5. 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).

5EA - Land to the west of Haydock Industrial Estate

6. 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. 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? As site 2EA appears to be complete can access still be achieved via this site and if so by what means? Should the need to also consider access requirements be taken into account when developing sites 6EA?

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

7. 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. Should Appendix 5 specify the means of access to the site? Should the need to also consider access requirements be taken into account when developing site 5EA?
8. 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. How will the policies in the Local Plan mitigate these factors?
9. 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. 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?

7EA and 8EA - Parkside East and West

10. 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. Could suitable road and rail access for the development be achieved from site 8EA alone?
11. 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?

12. 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?
13. Reference has also been made to the Public Inquiry being held into the planning application relating to the Parkside site and associated link road. Can the Council provide an update on progress with the Inquiry?
14. 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. 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?
15. We note that more detailed work on Parkside is due to be published in March 2021. Have Network Rail been involved in this study? Will this detailed work consider the availability of space on the rail network to accommodate a SRFI at Parkside?
16. 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. Have the impacts of these projects on the feasibility of Parkside been considered if the required number of paths are not achievable?
17. If there are less than 12 paths available in each direction then would a large scale SRFI be deliverable on the site? What level of certainty is there that the required number of paths will be available in the future?
18. 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. Was the option of a medium to large facility at Parkside (in line with option 2 or 3 of the 2016 study) considered? 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)?

19. When discussing market demand, the study identifies comfortable market demand for 3 trains per day building up to 8 trains over 5-10 years. What level of certainty is there that there would be sufficient market demand for a facility running 12 trains per day in each direction?
20. The study refers to access to the M6 being achieved via a new access road underneath the M6 for both option 2 and 3. 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)?
21. 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. Which is correct and would this affect the SA's assessment of the site?

4HA – Bold Forest Garden Suburb

22. 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. Is the scale of site 4HA compatible with the AAP when taken as a whole?
23. The AAP emphasises the need for any development to meet high design standards and positively contribute to the Forest Park. How will this be achieved?
24. 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. Will these be maintained and integrated with the development of the site and if so how?
25. There are also a number of recreation hubs close to the site. How will the allocation help to deliver these in line with the policies in the AAP?
26. What would be the infrastructure requirements (such as the highway network) to ensure delivery of the site?
27. 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. 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?
28. 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. How will the development of site 4HA assist with that implementation?

29. 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. 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?

5HA – Land south of Gartons Lane, Bold

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

6HA – Land at Cowley Street

32. The 2017 SHLAA (HOU002) refers to this site as a partly vacant employment site. Would the development of this site for housing have any impact on the existing business operating on part of the site? Has the loss of employment land been considered and if so how would it impact on the area's supply of employment land?
33. 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. Is it clear as to the extent of existing woodland that should be retained as part of the development? How will it be incorporated into the site, taking account of any buffer zone that may be needed?

1ES – Land north of M62 (Omega North)

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

2ES – Land to east of M6

35. 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. Does this reason amount to exceptional circumstances for the purposes of national Green Belt policy?
36. 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. When is this work due to be completed? We understand that this work may have implications for site 2ES as land from this parcel may be required for those improvements. What effect would this have on the sites ability to potentially contribute to the long term employment needs of the area? Would development of this site constrain future plans to improve the motorway network? 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?

3HS – Former Eccleston Park Golf Club

37. 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. 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?

8HS – Land south of A580, Windle

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

Response

39. We would like a response by the Council to the above comments and questions by **12 March 2021**. We are not inviting comments from other parties at this stage. We want to clarify the Council's position first. This will help us to refine MIQs for the remainder of the examination and the hearings. All parties with relevant representations will have the opportunity to respond in advance of the hearings should they wish.
40. As referred to earlier, if the Council consider that the point or question could be dealt with by a **MM** or **AM**, then please confirm. As the examination develops, Schedules of MMs and AMs should be produced. The former should be in place in draft form in advance of the hearings, preferably published at the same time as any statements when it will become an examination document and inform discussion at the hearings. It will be refined during and after the hearings.
41. With regard to the above, we acknowledge that the Council wish us to recommend any MMs that are necessary to resolve issues of legal compliance or 'unsoundness'. If you require clarification of any of the above points please contact us via the Programme Officer.

Mark Dakeyne and Victoria Lucas

INSPECTORS

February 2021