

Statement in relation to allocations in Bold (matter 4, session 4), on behalf of the Bold and Clock Face Action Group.

The Bold Forest Park Area Action Plan was adopted by St Helens Council in July 2017.

The submission draft St Helens Local Plan 2020-2035 proposes significant developments at 4HA, 5HA, 1ES and 1EA, which are all contained within the Bold Forest Park Boundary. The development planned within the Forest Park, constitutes over 55% of the planned housing development in the Local Plan. Together with the land originally planned for employment development, there would be an overall reduction of 12% of the Greenbelt Land within the Forest Park Area. However, it's important to note, since this draft Local Plan was submitted, the area of 1EA has been the subject of a planning application on behalf of TJ Morris for warehousing. This more than doubled the area of 1EA. The plans were approved by St Helens Council, but are currently subject to a planning inspectorate review. If approved, this will see the loss of Greenbelt land within the Forest Park Area, increase significantly.

The environmental quality of the area is of fundamental importance to the success of the Area Action Plan. The erosion of the Greenbelt Land to such an extent, within an area where the environment is paramount will have significant negative impact on the success of the Area Action Plan. This is also demonstrated in the statement submitted by Mr Conley regarding the Dream Artwork installed at the Dream site, within the Forest Park. The location of the project was of national importance. It was chosen due to the openness and attractiveness of the area.

Both sites 4HA and 5HA are classed as strategic housing sites in the Local Plan and both also form part of the Forest Park and are covered by the Area Action Plan. Policy LPA05.1, fails to have any regard to the Bold Forest Park Area Action Plan. As an adopted statutory document, with legitimate expectations from the local community and St Helens Councils own view that, 'AAPs give a geographic or spatial dimension and focus for the implementation of policies for that area', LPA05.1 should have specific reference to the Area Action Plan.

The Greenbelt Review 2018, used to allocate land, is fundamentally flawed. To summarise the key concerns. Boundary features that have been defined as 'Less Strong' within the Greenbelt Review, have then been described as 'Strong' boundary features in relation to the allocations within Bold, 4HA specifically. The settlement of Burtonwood has been excluded altogether in relation to the strategic gap between settlements. Constraints on the land, specifically in relation to the land use as public open space have not been considered. This is even more important when the Area Action Plans for the area of 4HA and the expansion of the bridleway network are considered. The Area Action Plan has in fact not been listed as a data source against any constraint type. As discussed previously, Area Action Plans, should

be central to Local Plan Framework. For this to be completely ignored is a fundamental error and renders the Greenbelt Review invalid in relation to Bold. If all the inaccuracies were corrected and the Area Action Plan considered, the Group argue, and we believe have demonstrated in our representation the areas within Bold should have been discounted for consideration at each stage.

The Area Action Plan and supporting documents, clearly identify areas for some development, but also areas where no development should take place. The area of 4HA is entirely covered by an area identified for no development. St Helens Council have failed to take an independent and balanced judgement in land allocation and have ignored independent assessments completed in this area. The Bold Forest Park Area Action Plan has not been considered and resolutely ignored.

The development of the land at 4HA would result in the closure of the largest equestrian business within the Forest Park Area Action Plan and negatively impact on a second. It will also halt the proposals for the development of the bridleway network, earmarked for this area. The equestrian sector has been identified as a key focus in the Area Action Plan and is fundamental to its success. A further statement on the economic benefits on the equestrian sector to the local economy have been submitted separately by this group. This is in direct conflict with Policy BFP1: A Sustainable Forest Park, which states it will promote current employment sites. Promote rural diversification which contributes to the Forest Park vision, aims and objectives and safeguard and expand the range of leisure and visitor facilities within the Forest Park.

The environmental quality is key to the success of the Bold Forest Park Area Action Plan. A high-quality environment is a key ingredient of a successful outdoor leisure attraction. This was recognised in the Area Action Plan with Objective 5 stating the plan will, '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. Policy BFP ENV2, states St Helens Council will, 'within a woodland and farming framework enhance biodiversity in Bold Forest Park. As previously mentioned, the environmental aspect and its relation to the Area Action Plan seem to have been ignored and not even considered in the Greenbelt Review 2018. Policy LPC06: Biodiversity and Geological Conservation, makes no specific reference to the Area Action Plan. The area of 4HA covers a patchwork of habitats, many of which are priority habitats, as listed in the Area Action Plan and should be a material consideration and accounted for within the Local Plan.

Development at 4HA will have a significant negative impact within the Forest Park, resulting in net loss biodiversity. Development would compromise and result in negative changes to priority habitats and loss of priority species. The mix of land use was not considered in the Greenbelt Review 2018, as stand-alone habitats or in relation to the Forest Park. This makes the results of the review flawed and unreliable and therefore cannot be used to justify the

removal from the Greenbelt, especially as many aspects of this review are in direct conflict with independent assessments completed as part of the Area Action Plan.