

**Statement in relation to generic policies (matter 9) within the St Helens Local Plan, on behalf of the Bold and Clock Face Action Group.**

**Open Space**

Under Policy LPC05, St Helens Council state, 'it will seek to ensure that the Boroughs network of open spaces is protected, managed, enhanced and where appropriate expanded.' However, this seems to be in direct conflict with the proposals for the development sites within the area covered by the Bold Forest Park Area Action Plan. The plans restrict and remove access to high quality open spaces that have been identified as significant value to the Forest Park and its success and earmarked for the expansion of routes and facilities. If the expansion of the area 1EA, discussed previously, if the development is allowed to go ahead, some of this has already been lost. Further loss would decimate the plans for the Forest Park.

St Helens Council have failed to address this. They have relied solely on the Greenbelt Review 2018, seemingly ignoring all other assessments and recommendations conducted and determined as part of the Area Action Plan. The Group believe St Helens Council have failed to exercise relevant and independent judgement in this approach.

**Greenways**

Policy LPC07 Section 2 states, 'Development proposals that would affect a Greenway will be refused if they would:

- a) Prejudice the continuity of public access to the greenway;
- b) Harm the integrity of the greenway in terms of off-road linkages, character or amenity.

The Policy makes no reference to the Bold Forest Park Area Action Plan. Site 4HA and 5HA are criss-crossed by a number of Public Rights of Way. 4HA incorporates Bold Loop, a Mersey Forest Trail, Bridleways and proposed Bridleways. Development of these areas would harm the integrity of the greenway, in some cases preventing the expansion altogether.

**Green Infrastructure and Ecological Network**

All assets as listed under Policy LPA09, can be found within the Bold Forest Park. An independent Ecological Network Development Report was completed as part of the Area Action Plan. It resulted in the statement, 'Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.' Neither LPC08:

Ecological Network or LPA09: Green Infrastructure make any reference to the Bold Forest Park Area Action Plan. Policy LPA09 states, 'Developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites.' It does not make clear how this will be achieved on development sites such as 4HA, which may take decades to complete and may involve a number of developers. It is essential that the Area Action Plan is considered to ensure cohesion of the green infrastructure within the Forest Park. Failure to adopt the recommendations in the Ecological Network Development report, has the potential to result in the loss, isolation or fragmentation of important and priority sites. It is important to demonstrate a net biodiversity gain with a long-term management plan.