

CPRE Comments

Session 6 – 09.30 Thursday 10 June 2021

Matter 4 - Allocations, Safeguarded Land and Green Belt Boundaries

Parkside and Newton-le-Willows/Earlestown

This matter considers the proposed allocations and safeguarded land at Parkside (7EA, 8EA) and Newton-le-Willows/Earlestown (7HA, 2HS, 4HS, 5HS)

Issue 1: Parkside East (7EA) and Parkside West (8EA), Newton-leWillows

1. Do the Green Belt assessments support the allocation of Sites 7EA and 8EA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

CPRE is strongly opposed to the release of site 7EA for development, as it serves important Green Belt functions, keeping Newton-Le-Willows, Hermitage Green, Winwick and areas in Lowton separate, preventing urban sprawl and countryside encroachment and above all supporting the regeneration of brownfield land elsewhere in the area. These are key aims of Green Belt.

We think farmland should be retained for the benefit of all in the future. The land is an important agricultural asset with high grade soil, considered Best and Most Versatile. The NPPF paragraph 170 b) sets out that local authorities should afford it protection when bringing forward local plans and when taking decisions. People need to be able to feed themselves in the future. Farmland with fertile soil ought not be easily sacrificed.

CPRE is supportive of the reuse of brownfield land and the part of the site that was formerly the Parkside Colliery. Importantly only a small proportion of the site is previously developed, large swathes of the western part of the allocation is in agricultural use and was never physically impacted by the previous coal mine use.

We acknowledge this western part of the site has been allocated for use as a strategic rail freight interchange (SRFI) for a long time, and it was formally allocated in the North West Regional Spatial Strategy (NWRSS) as a strategic site for rail freight. CPRE wants to see an increase in the modal share of rail freight, to reduce the amount of HGV trucks on the strategic and local road network with associated problems of greenhouse gas emissions, air, noise and light pollution.

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

Local Plan Policy CAS 3.2 Parkside East and West included sound text, only allowing Green Belt release for an SRFI of wider public benefit than a narrow 'general road-based B8' use, which be located elsewhere.

As previous stated elsewhere CPRE considers that the employment land need analysis is flawed and over-inflated. The text is not specific to rail freight and the land is simply allocated as 'general, could be anywhere employment land'. No explanation for exceptional circumstances is provided.

Given the Government ambition for a Green Recovery, in line with ambitions of the Liverpool City Region Combined Authority, the levelling up agenda for the North ought to support a strategic rail role for the Parkside site, enabling sustainable development at the heart of decisions with the public good that flows. Allowing road based B8 development on Parkside West depreciates the future inter-modal road to rail opportunity. It would throw all previous policy ambition to harness public good and inherent climate change benefits away, including trust in the planning system to yield socially responsible outcomes. This is not sound planning.

3. Is the configuration and scale of the allocations and safeguarded land justified taking into account development needs and the Green Belt assessments?

a. Is the allocation of a SRFI of the scale proposed in the Plan justified?

A SRFI should be proposed but only using site 8EA to the west. Land to the east 7EA should be kept for agricultural uses. Parkside West has been proven to be able to easily accommodate a SRFI with minimum infrastructure costs. The development of Parkside East involves more complex engineering options and cost.

b. Would a facility of a smaller scale (for example handling up to 8 to 10 trains daily) achieve similar benefits whilst minimising potential impacts (for example a reduced amount of Green Belt land needing to be released as these smaller options would only utilise land to the east of the M6 for road and rail infrastructure)?

A smaller allocation should be promoted in advance of any expansion to the east. The Parkside Action Group has commented on the engineering options that have been considered, from previous rounds of public consultations that have occurred over the past two decades.

c. Could the Plan's aim of seeking to maximise the opportunities of delivering an SRFI of regional and national significance still be achieved?

Yes. However, the first phase should be based on land to the west of the M6. However, the site to the west has become naturalised and only the area that has hardstanding should come forward for development and the green areas, and unbuilt parts should remain unbuilt to promote biodiversity.

4. Would the adverse impacts of developing Sites 7EA and 8EA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

CPRE thinks a negative planning balance arises from the development of both parcels. Only development of 8EA is positive due to the regeneration benefits. The justification to develop land to the east can only arise in the long-term future (after the life of the local plan) if the previously developed land is used in advance.

There are considerable adverse impacts relating to the nightglow from large logistics warehousing in rural areas.

Highfield Moss has protected species and the site to the East and also West contribute by being in the zone of influence of Highfield Moss SSSI. Biodiversity should be a key issue for the local plan policies and allocations.

5. Are the requirements for Sites 7EA and 8EA within Policies LPA04, LPA04.1 and LPA010 (Site 7EA) and Appendix 5 (Site Profiles) positively prepared and effective?

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 CO² reduction. Decarbonising the economy should be a real and measurable ambition of the St Helens Local Plan.

This would support carbon neutral aims set out by the Government and the more ambitious carbon zero of the Liverpool City Region Mayor. The Policy for 8EA must therefore focus on the intended (as set out in NW RSS) road to rail modal shift to reduce greenhouse gas emissions and other adverse impacts of HGVs transporting freight. Improvement in St Helen's Air Quality Management Areas to ensure clean air and improved health is important.

6. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Table 4.1 justified and effective?

As set out above, CPRE thinks a negative planning balance arises from the development of both parcels. Only development of 8EA is positive due to the regeneration benefits.

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

The proposed Parkside Link Road was the focus of an application by St Helens Council, it was opposed locally, and by CPRE, and it is the subject of a decision by the Secretary of State following a call-in Inquiry.

The current proposed road alignment would potentially constrain the site layout for the SRFI.

8. Would there be delivery implication for sites 7EA and 8EA if a suitable connection to J22 (whether via the proposed Link road or an alternative link) is not delivered during the Plan period?

There are alternative route options to link with the M6 from the site to the west to unlock the SRFI.

9. In terms of feasibility and deliverability, will the future capacity of the rail network be capable of facilitating the delivery of an SRFI at Parkside?

CPRE understands that the capacity of the rail network is capable of supporting a SRFI. New research has been ongoing in 2021 and the updated capacity report should inform the examination.

10. What level of certainty is there that there will be sufficient capacity and is that sufficient to demonstrate that the proposed facility will be deliverable during the Plan period?

CPRE understands that the Government and Transport for the North have expressed commitment to improve the rail connectivity of northern towns and cities to be comparable with southern areas of

the country, such as London and ports of Dover, Portsmouth and Southampton. In line with Liverpool's Freeport status there should be a genuine attempt to lock in sustainable modal shift to rail freight and an increase in the capacity of the rail network to support the levelling-up agenda.

11. Are there any barriers to Sites 7EA and 8EA coming forward as anticipated?

CPRE is not aware of any barriers for 8EA. CPRE is aware of local opposition and adverse impacts outweighing benefit on 7EA coming forward.

Issue 2: Newton-le-Willows/Earlestown (7HA, 2HS, 4HS, 5HS)

Site 7HA is allocated for housing with an indicative site capacity of around 180 dwellings. The Plan proposes safeguarding Sites 2HS, 4HS and 5HS.

12. Do the Green Belt assessments support the allocation of Site 7HA and the safeguarding of Sites 2HS, 4HS and 5HS and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

CPRE considers that the value of the site parcels to Green Belt purpose is underplayed in the Green Belt assessment.

CPRE is opposed to development of unbuilt land in the Green Belt of St Helens due to the large number of suitable sites identified on the Brownfield Register. We are supportive of the reuse of previously developed land in existing settlements.

In line with Section 11 of the NPPF the Council should direct future housing delivery to previously used land. There is harm to biodiversity and other natural capital functions by concreting over greenspace. We should do everything possible to make brownfield preference a reality.

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

No. as mentioned in Matter 2 Issue 2 CPRE thinks the approach to the housing requirement is flawed and is therefore much too high. This erodes the robustness of the case for exceptional circumstance.

14. Should Sites 2HS, 4HS and 5HS be allocated rather than safeguarded so that they can contribute to meeting needs in the Plan period?

CPRE believes the sites should not be the focus of development at all, as there are suitable Brownfield sites available across St Helens. There is likely to be further previously developed sites coming forward as windfall.

However, if the justification is robustly evidenced, CPRE does encourage safeguarding in advance of allocation to delay the loss of greenspace.

15. Is the configuration and scale of allocation 7HA and safeguarded site 4HS justified taking into account development needs, the Green Belt assessments and, in the case of 4HS, the effects on the setting of the Vulcan Village Conservation Area and recreational facilities?

7HA configuration appears to be the entirety of the plot west of Winwick Road. Attention should be given to the inclusion of green infrastructure, buffers, open space, trees and hedgerows to support recreation and biodiversity. Any new development at this scale of 180 houses should have a masterplanned approach and have pedestrian and cycle linkages to integrate it into the surrounding areas. Sustainable travel modes should be encouraged.

16. Would the adverse impacts of developing Site 7HA (Green Belt impacts, highway safety, loss of playing field) outweigh the benefits?

Yes, CPRE considers that there are adverse impacts to the loss of 7HA. Although we accept there is benefit from delivering needed housing, we a) think too many houses are being planned, and b) prefer to see brownfield land reused as a preference. Brownfield sites are often located centrally with good rail and bus services, and access via walking or cycling to employment, schools and health facilities.

17. Are the requirements for Sites 7HA and 2HS, 4HS and 5HS within Appendices 5 and 7 (Site Profiles) positively prepared and effective?

No comment.

18. In particular in relation to Site 7HA, will the Plan ensure that any playing fields lost will be replaced by the equivalent or better provision?

No comment.

19. Are the indicative site areas, net developable areas, minimum densities and indicative site capacities within Tables 4.5 and 4.8 justified and effective?

No comment.

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

The additional houses will increase traffic on a local road system that already has air quality exceedance as evidenced by the Air Quality Management Areas. See mapping.

21. Are there any barriers to Site 7HA coming forward as anticipated by the housing trajectory?

No comment.

Issue 3: Other Green Belt boundaries

22. Are the Green Belt boundaries elsewhere in Parkside and Newton-le-Willows/Earlestown justified?

The area suffers deprivation and inequality when considering health indices. Respiratory illnesses are common and is linked to the area's poor air quality arising from HGV traffic. The green lung

benefit of Parkside and Newton-le-Willow/Earlestown should be factored into planning policy decisions.