

CPRE Comments

Session 5 – 09.30 Wednesday 9 June 2021

Matter 4 Allocations, Safeguarded Land and Green Belt Boundaries Rainford, Billinge, Garswood and Haydock

This matter considers the proposed allocations and safeguarded land in Rainford (9EA, 8HA), Garswood (1HA, 1HS) and Haydock (2EA, 3EA, 4EA, 5EA, 6EA, 2HA, 2ES).

Issue 1: Land to west of Sandwash Close, Rainford (9EA) and land south of Higher Lane, Rainford (8HA)

1. Do the Green Belt assessments support the allocation of Site 8HA 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 defends Green Belt release in the absence of exceptional circumstances.

2. 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. Exceptional circumstance do not exist.

3. Is the configuration and scale of allocation 8HA justified taking into account development needs and the Green Belt assessments?

The Site 8HA is shown as the entirety and CPRE recommends, if allocation is justified, that more areas for open greenspace for local recreation and health being benefits, and for improvement in biodiversity should be shown, if justification results in the site being allocated.

More policy text to ensure in the event the site is developed that more green infrastructure, buffers, open space, trees and hedgerows to support recreation and biodiversity result on the ground. Any new development at this scale of 259 houses should have a master planned approach and have pedestrian and cycle linkages to integrate it into the surrounding areas. Sustainable travel modes should be encouraged. Creating quality places that yield a high residential amenity is important at such rural/urban fringe locations.

4. Would the adverse impacts of developing Site 8HA (Green Belt impacts, highway safety, proximity to industrial development) outweigh the benefits?

Yes. The loss of Green Belt causes a negative planning balance.

5. Is Site 9EA justified taking into account vacant land/units nearby on Rainford Industrial Estate?

No

6. Can a safe and suitable access be achieved to Sites 9EA and 8HA?

CPRE is concerned about the additional traffic arising from 9EA and 8HA

7. Are the requirements for Sites 9EA and 8HA within Appendix 5 (Site Profile) positively prepared and effective?

No. Please refer to issues raised in Matter 2 Issue 2 and Issue 3.

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

If brought forward NPPF Section 11 should be considered, but also the rural character of the receiving environments to ensure landscape character at these rural fringe sites are enhanced.

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

CPRE wishes the sites to remain undeveloped in the Green Belt, but recommends if the sites are included in the local plan that adequate infrastructure should be identified for the developers to contribute in the event the site are developed.

10. Are there any barriers to Site 8HA coming forward as anticipated by the housing trajectory?

CPRE is unaware of barriers to delivery, apart from the level of local opposition, Green Belt and other harms arising.

Issue 2: Land to south of Billinge Road, Garswood (1HA) and land to south of Leyland Green Road, Garswood (1HS)

11. Do the Green Belt assessments support the allocation of Site 1HA and the safeguarding of Site 1HS and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

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.

12. 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.

13. Is the configuration and scale of allocation 1HA justified taking into account development needs and the Green Belt assessments?

The Site 1HA is shown as the entirety and CPRE recommends that more areas for open greenspace for local recreation and health being benefits, and for improvement in biodiversity should be shown, if justification results in the site being allocated.

More policy text to ensure in the event the site is developed that more green infrastructure, buffers, open space, trees and hedgerows to support recreation and biodiversity result on the ground. Any new development at this scale of 216 houses should have a master planned approach and have pedestrian and cycle linkages to integrate it into the surrounding areas. Sustainable travel modes should be encouraged. Creating quality places that yield a high residential amenity is important at such rural/urban fringe locations.

14. Would the adverse impacts of developing Site 1HA (Green Belt impacts, highway safety) outweigh the benefits?

The level of local traffic is already high on the local road network, particularly at Garswood Road and Billinge Road. Local people are concerned at the impacts arising from additional housing in the area, particularly on rural roads.

The adverse impacts of developing a brownfield site are usually less than developing an unbuilt greenfield site.

15. Are the requirements for Sites 1HA and 1HS within Appendices 5 and 7 (Site Profiles) positively prepared and effective?

Please refer to CPRE comments on Matter 2 issue 2. Housing requirement is too high based on a flawed approach.

As previously mentioned, traffic problems are anticipated if the Sites 1HA and 1HS are retained for future development. The junction at Garswood Road and Billinge Road is identified as difficult to negotiate. Highway safety issues may need to be resolved.

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

NPPF Section 11 seeks higher densities to maximise the effective use of land for development and thereby taking pressure of land in the countryside for development in the future.

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

Wider infrastructure needs beyond highway should be fully considered such as community facilities and services. Local people feel costs of developments should be borne by the developer. It is therefore important the local plan makes clear what the developer contributions will be, so that in future there are no gaps in infrastructure funding. It is understood that the tax payer has had to fund infrastructure that should have been covered by the developer, such as at Florida Farm. In this case, Liverpool City Region Combined Authority publicly funded £2.5 million junction improvements that were required as a result of the increased traffic associated with this private sector development.

18. Are there any barriers to Site 1HA coming forward as anticipated by the housing trajectory?

There is local opposition to the development of this site in the future due to Green Belt and other harms arising.

Issue 3: Florida Farm North (2EA), land north of Penny Lane (3EA), land south of Penny Lane (4EA), land to west of Haydock Industrial Estate (5EA), land west of Millfield Lane, Haydock (6EA), land at Florida Farm, Haydock (2HA), and land north-east of Junction 23 (M6), Haydock (2ES)

19. Does the Plan reflect the current status of Florida Farm North (2EA) and land north of Penny Lane (3EA) (completed sites)?

The status of the sites need to be updated, please refer to comment below.

Florida Farm North (2EA) is now partially complete with two large warehouses that are now operational. A triangle of land remains in a vacant and neglected condition. This was subject of a screening opinion from the Council in July 2019 but there is no update on the Council's website.

Land north of Penny Lane (3EA) is understood locally that there is outline permission for two warehouses, but this is only partially complete with one warehouse built.

Land to west of Haydock Industrial Estate (5EA) was the subject of a planning application to construct four industrial units totalling 27,402 sqm, which was refused by the Planning Committee against the officer recommendation. The grounds for refusal were that the proposed development represents inappropriate development in the Green Belt and the harm to Green Belt and other harms are insurmountable. Very Special Circumstances were not demonstrable. The proposals are contrary to the saved Policies GB1 and GB2 in the St Helens adopted Development Plan, and also the policies of the National Planning Policy Framework.

As previously stated, CPRE is concerned that the Council is focusing future employment development in the narrow sector of logistics warehousing, which is considered low value and locking St Helens into poor socio-economic performance in the future. A more diverse economy including agriculture and rural businesses would help strengthen the economic base. Arguably, the Council has acted prematurely by allowing large scale B8 warehouses in advance of the local plan being found sound and being adopted, but this is due to the NPPF policies. Wherever responsibility lies, the reality is that the Florida Farm development continues to be controversial due to the anti-social behaviour of HGV drivers discarding bottles of urine in the neighbourhood and causing noise and other disruption 24/7. The residential amenity is permanently harmed and to date enforcement by the Council of planning conditions has not resolved problems. The local community is frustrated that their vociferous opposition (more than 2,000 people opposed) was ignored and continues to be ignored. This problematic planning approach naturally raises concerns over other employment land allocations.

The large amount of valuable Green Belt already lost to development, and in total 2EA, 5EA and 6EA amount to some 64 hectares. CPRE considers that this level of loss forever leaves future generations hampered. It is inconsistent with sustainable development goals.

20. Do the Green Belt assessments support the allocation of Sites 4EA, 5EA and 6EA and Site 2HA and the safeguarding of Site 2ES and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

In CPRE view generally the Green Belt assessments have underplayed the contribution of many sites that are proposed for allocation and safeguarding in the Local Plan.

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

Please refer to CPRE comments in Matter 2 Issue 2 and Issue 3. CPRE believes the housing requirement and employment requirement are too high based on flawed data and assumptions. This undermines the case for exceptional circumstances.

What is more, the logistics focus is not proven to remedy the socio-economic deprivation, and there is local concern that the value of logistics is low in terms of jobs (security, quality and skills) and GVA.



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).

22. *Should Site 2ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?*

CPRE believes this site is important for future food security and rural economy and should not be allocated at all. Safeguarding is preferable than allocation as it means the site is retained for use in the future. The value of the soils should be understood.

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

The configuration and scale of the allocations are over-bearing to the surrounding area, particularly residential properties located on Liverpool Road, Slag Lane, Great Delph, Springfield Park, Slag Lane, Avery Road, Avondale Road, Vicarage Drive and further afield are dominated by the Kellogg's and Amazon development (2EA). The scale harms Green Belt purpose

It is considered by councillors that site 2EA is an extension to the Haydock Industrial Estate, which lies to the east of the development. Residents and objectors disagree. This Industrial Estate was designated as employment land many years ago, when the Green Belt was designated. The only high buildings are at the far eastern end of the estate. Those properties adjacent to 2EA are single and two story units, which are dwarfed by the huge new developments.

All land within the sites shown are for development. CPRE recommends that more areas for open greenspace for local recreation and health being benefits, and for improvement in biodiversity should be shown, if justification results in the site being allocated.

More policy text to ensure in the event the site is developed that more green infrastructure, buffers, open space, trees and hedgerows to support recreation and biodiversity result on the ground. Any new development at this scale of housing should benefit from a master planned approach and have pedestrian and cycle linkages to integrate it into the surrounding areas. Sustainable travel modes should be encouraged. Creating quality places that yield a high residential amenity is important at such rural/urban fringe locations.

24. Would the adverse impacts of developing Sites 4EA, 5EA and 6EA and Site 2HA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

Residential

CPRE is aware that the residential development to the south of the East Lancashire Road A580, including Springfield Park, Great Delph, Ashbury Drive and the side roads off Ashbury Drive resulted from the successful reuse of previously developed land/brownfield sites associated with the RAF Signals station and forming part of colliery spoil tips. They remind us of the potential locked in the many many brownfield sites that lie in an underused and vacant condition.

Land at Florida Farm South (2HA) comprises farmland on the south side of the A580, directly opposite the development at Florida Farm North, currently used as pasture land and growing of arable crops such as hay, supplying nearby Haydock Park Racecourse.

Development of this Green Belt land will erode the gap between the townships of Haydock and St Helens considerably. The loss of Green Belt at this location, coupled with the loss on the north side of the East Lancashire Road will have a cumulative negative effect on the gateway to St Helens. The harm is substantial and significant.

The landscape impact has been adverse with rural views to the north, towards Liverpool Road, (A58) lost as a consequence of the development effects of Florida Farm North. This area of Green Belt inclines gently up towards the A58, Liverpool Road, known as the Arch Lane slope, Arch Lane being a little to the north of the A58.

Highway Safety

CPRE is aware of highway safety issues. Access to the A580 as proposed is viewed as dangerous. The junction immediately to the east of the proposed junction (Haydock Lane) was previously altered to provide the access to Florida Farm North. It now consists of 4 way traffic signal. There

are also pedestrian controlled crossing facilities. Traffic is delayed compared to before during the morning and evening peak periods. The traffic flows off in the direction of Liverpool at a much faster speed than before. The distance between the Haydock Lane signals and the proposed junction is so short that rapidly accelerating vehicles will be confronted by much slower vehicles attempting to join the A580.

The proposed primary access from Vicarage Road will throw a great many extra vehicles onto either Stanley Bank Way (A58) or West End Road (formerly the A599). All vehicles travelling east from this proposed development will have to exit via the Vicarage Road junction and travel through Haydock (A599) or use the A58 to access the A580 and turn right to travel east.

There is also the added problem of vehicles using the development as a rat run to bypass the traffic signals at the A58/A580 junction.

Flood risk

During intense rainfall there is localised flooding at its lower eastern boundary backing onto Avery Road and Springfield Park. This is the lowest point of the field. Over time this has progressively worsened with what was originally a seasonal pond becoming a long term lake.

The area that is prone to flooding is some way from the Clipsley Brook, which is used as the outfall from Florida Farm North. Since that development was built there have fortunately been no incidents of flooding further downstream at the junction of Stanley Bank Way, West End Road and Blackbrook Road, adjacent to the Ship Inn. However, we understand that it has perilously close to flooding on a couple of occasions.

Agricultural Land

As stated earlier, the land is mainly given over to grass cultivation but it could be converted to provide for the growing of food crops, more of which could be required following the UK's exit from the European Union.

Air Quality

The A580 suffered from very high levels of pollution prior to the construction of Florida Farm North and the consequent increase in HGV traffic on a 24 hour basis can only have added to that level of pollution. The addition of more than 500 dwellings so close to Florida Farm North will again add more to the pollution level.

During the campaign against the granting of planning permission for Florida Farm North and subsequently, we have heard of events having negligible or minor effect but there must come a time when all these negligible and minors begin to add up to something significant.

The adverse impacts to residential amenity and Green Belt harm from B8 employment development are discussed above. CPRE is also concerned over the adverse impacts to the landscape and to local biodiversity due to the development effects arising from the scale of the developments proposed.

Employment

Land at 5EA lies to the north east of 2EA (Florida Farm North) but the two parcels don't have a co-terminus boundary. As stated above, this land was the subject of a planning application in July 2019 which was refused. The applicant did not appeal against that refusal.

There is a short section of access road to Haydock Lane which has been in existence for very many years. Hoardings on site have been advertising this plot for development for many years also. So much so that they deteriorated and were removed and replaced shortly before the hearing in July.

There is a planning enforcement issue concerning an advertising hoarding in situ.

CPRE is concerned that the proposed sites will increase air pollution due to more HGV activity with harmful health impacts.

Land at 6EA – this plot of some 20.5 hectares together with 5EA, would involve the complete loss of land in the Green Belt separating the highways of Slag Lane, Liverpool Road, Millfield Lane, Haydock Lane and A580 (east Lancashire Road). The development effect would be to close the gap between Ashton in Makerfield and Haydock.

The local community is concerned about the loss of residential amenity, from noise light and air pollution remain high with this proposal.

Development of 5EA and 6EA would lead to landscape harm. The landscape and visual impacts need to be fully considered.

There should be a coherent plan of how the sites are to be serviced if they are allocated/ safeguarded. Access to 6EA from Millfield Lane is considered problematic as the lane is already heavily used, particularly by HGV's. Traffic congestion will be worse if the developments are progressed in the view of local people. There are already problems with the queuing traffic due to the traffic signals at the A58/Millfield Lane/Tithebarn Road junction.

CPRE is concerned about flood risk, agricultural land and air quality remain the same as the comments above on 2HA at Florida Farm South.

25. Are the requirements for Sites 4EA, 5EA, 6EA, 2HA and 2ES within Policies LPA04.1 and LPA05.1 and Appendices 5 and 7 (Site Profiles) positively prepared and effective?

No. As mentioned elsewhere CPRE is concerned at the dominance of a narrow employment base. There is no evidence to show logistics is a high GVA or provider of secure, skilled and high paid employment. The local plan should diversify the economy of St Helens to ensure it is sustainable and able to withstand economic shocks in the future.

Covid and Brexit have caused economic uncertainty. We should proceed with a precautionary approach and protect and enhance our farmland and green spaces for the benefit of all in the future.

Site 2HA should be more certain about the scale of developer contribution arising to provide for needed new community facilities, such as highways and schools.

26. How should the requirements for Sites 5EA and 6EA be modified to provide clarity on access arrangements?

The site profiles for 5EA and 6EA should be better linked together to provide a coherent policy towards access to the sites from the existing highways network.

In respect of 5EA, the refused planning application referred to above recommended that permission be granted with an access off Haydock Lane, the existing stub end. The requirement for this site is that it can be accessed safely through neighbouring allocated sites 2EA and 6EA.

27. 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?

More site area should be dedicated to green space to promote biodiversity and public health and well-being benefits.

28. Will infrastructure to support the allocations, including improvements to Junction 23 (M6), be delivered at the right time and in the right place?

The timing of infrastructure is uncertain. Road investment needs to be redirected into more sustainable travel modes. Building more roads simply induces more traffic.

29. Are there any barriers to Site 2HA coming forward as anticipated by the housing trajectory?

CPRE is not aware of barriers, other than the fact the public want Green Belt retained for health and well-being and biodiversity benefits among others.

Issue 4: Other Green Belt boundaries

30. Are the Green Belt boundaries elsewhere in Rainford, Garswood, Billinge and Haydock justified?

CPRE believes that the Green Belt loss in Garswood, Billinge and Haydock is totally unjustified and contrary to the Government and Council's stated aim of a brownfield land first policy. The cost to the public in terms of Green Belt harm and other adverse consequences should be balanced with claimed benefits of those with an interest to understand what is reasonable. A precautionary approach is recommended, particularly as the impacts of Brexit and Covid are not yet fully understood.