

3rd June 2019

Mr Alan Kilroe
Case Officer
St. Helens Council
Contact Centre,
Wesley House,
Corporation Street,
St Helens,
WA10 1HF

By email: alan.kilroe@sthelens.gov.uk

Dear Mr Alan Kilroe

RE: Planning application: 2018/0249/FUL Formation of a new link road between A49 (Winwick Road) and M6 Junction 22 including the re-alignment of Parkside Road and other associated works. Land Between A49 Winwick Road To A573 Parkside Road, Including A Portion Of The Former Parkside Colliery Site And Then Land From A573 Parkside Road To A579 Winwick Lane Connecting To M6 Junction 22.

1. I am writing on behalf of both CPRE Lancashire and CPRE Cheshire to **strongly object** to the abovementioned development.
2. We believe a beautiful, thriving countryside is important for everyone, no matter where they live. Millions of town and city dwellers recharge their batteries with a walk or a bike ride in the local Green Belt, spend weekends and holidays in our National Parks, or enjoy fresh local produce. People who live in rural areas keep our countryside beautiful and productive.
3. The countryside is unique, essential, precious and finite - and it's in danger. Every year, a little more is lost forever to urban sprawl, new roads, housing and other developments. Rural shops and services are closing, and increasingly intensive farming is changing the character of the countryside. Climate change, too, will have serious impacts on the rural environment.

4. We believe the proposal is unjustified, and that it will prevent the strategic rail freight opportunity from being realised in the future. In summary it is not in accordance with the Development Plan and it will lead to more harm than benefit in the short and long term.
5. The St Helens Metropolitan Borough Council (SHMBC) Development Plan is comprised of the Core Strategy (adopted 2012), and Saved Policies of the Unitary Development Plan (1998). It contains strategic policies up to 2027, and provides an overall plan of where development should be located and how the needs of the Borough are met.
6. Policy CSS1 identifies the spatial strategy for the plan period including directing an element of development towards previously developed land 'principally based on the former Parkside Colliery...' (CSS1, VIII). However this access road will in fact open up land in the Green Belt for development, rather than brownfield as it claims.
7. Policy CAS 3.1 Newton-le-Willows and Earlestown Strategy supports maintaining the effectiveness of the Freight Route Network including the M6 junction 23 and developing initiatives to improve access to employment opportunities, including those at Parkside. This road will reduce the prospect of the Strategic Rail Freight from being realised.
8. Policy CAS 3.2 Development of a SRFI at the Former Parkside Colliery in the Core Strategy is specific to the former Parkside Colliery and adjacent land. This policy is specifically related to the Proposed Scheme. The Council support in principle the delivery of a SRFI in this location.
9. Policy CAS 3.2 states that "...Subject to a SRFI being fully developed on site.... the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision...". This proposal isn't subject to the delivery of the SRFI.
10. CPRE acknowledges that Paragraph 9.52 of the Core Strategy states that the development of a SRFI at Parkside is 'not only concerned with transport, but will make a substantial contribution to economic development, regeneration and employment creation, delivering additional GVA to the regional economy and reclaiming brownfield/contaminated land'. But, the reality of B8-uses providing anywhere near the 7,750 new jobs suggested is fanciful to the extreme. The harm to Green Belt purpose is not outweighed in the planning balance as the applicant suggests.

11. CPRE disagrees that very special circumstances are demonstrated to permit this inappropriate development in the Green Belt.
12. Policy CE 1 (A Strong and Sustainable Economy) supports the reuse, reconfiguration or redevelopment of vacant, derelict or older employment land and premises for commercial purposes. The policy also makes specific reference to the SRFI at Parkside, in line with Policy CAS 3.2, to meet a regional and sub-regional need.
13. The Unitary Development Plan 1998 (Saved Policies) identifies that the land proposed for the Scheme is designated as Green Belt and for Landscape Renewal.
14. Policy S1 Green Belt states that the Green Belt will be maintained in order to check unrestricted sprawl, prevent neighbouring towns from merging and safeguarding the countryside from encroachment. Yet the road proposal is inappropriate development, causing St Helens and Warrington to merge, and it erodes the essential characteristics of the Green Belt, and development that impacts on openness and permanence.
15. Policy GB1 duplicates national policy, and establishes a general presumption against inappropriate development which is, by definition, harmful to the Green Belt. The policy goes on to state that applications seeking planning permission will therefore have to demonstrate that very special circumstances exist to justify the inappropriate development. Again, CPRE asserts there are not VSC.
16. Policy ENV20 Landscape Renewal states new development is not normally permitted in a designated Landscape Renewal area if it would lead to further deterioration of the landscape. The local community is united in its opposition to this proposal. They are accepting of a country park use with limited mixed (job and housing) development to meet specific local need.
17. Local people objected in large quantities to the Submission Version Local Plan progressed by the Council for 2018 - 2033. St Helens Green Belt Group on behalf of local residents commissioned an expert planner, economist and demographic to provide independent evidence to challenge the ambitious growth rates on which the high volume of development quantum was based.
18. With expert evidence of a flawed evidence base it is likely the Local Plan Examiner will call for a reduction in job and housing numbers to better reflect reality and continuing economic uncertainty.

19. In addition, the draft Green Belt Review has yet to go through Examination. The Local Plan must comply with the Green Belt policy set out in the revised National Planning Policy Framework 2019. This is true for Sites EA8 (Parkside East), EA9 (Parkside West) and draft policy LPA10 (Development of Strategic Rail Freight Interchange) refer to the overall strategic site and identify its designation for providing employment in the Borough.
20. In any case, only limited weight can be attributed to draft policy LPA04.1 that states sites EA8 (Parkside East) and EA9 (Parkside West) have been allocated as Strategic Employment Development Sites. The same is true for draft policy LPA10 (Development of Strategic Rail Freight Interchange states 'land to the east and west of the M6 including part of the site of the former Parkside Colliery is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. Full weight could be attributed if the policy had been through examination and was adopted.
21. If the Council really does support the delivery of a SFRI in this location as it has been identified as a site of national significance and regional importance in the Transport for the Northern Freight and Logistics Report, 2016' this proposal should be withdrawn.
22. CPRE Lancashire believes that the key issues when determining the application are:
 - Harm to Green Belt purposes, including the substantial and significant cumulative impact of large B8 shed developments in ribbons along the M6 motorway, for this reason if minded to approve the decision would need to be referred to the Secretary of State for a decision on whether it is necessary to call-in for his own determination;
 - Landscape impacts. The land to the east of the M6 Motorway is particularly rural and isolated as there is no public transport. The intrusion of a road carriage way will harm the rural setting. There are barely any unspoilt views left in the vicinity. The landscape character will be permanently degraded.
 - An unsustainable increase in road based freight, leading to further air quality issues - air pollution is already evidence to be in exceedance of safe limits, plus an existing Public Right of Way will be harmed;
 - Environmental harms, including noise and light pollution - the loss of tranquillity from the area and the loss of wildlife habitat and flora and fauna contained within;
 - Loss of land currently used for agriculture and jobs directly and indirectly associated with it. Indirect jobs include those across the North West of England within the food and drink sector. For food security reasons we ought to retain our high grade farmland for future food and farm produce.

23. The Government sets out its policy for Green Belt in National Planning Policy Section 13. Protecting Green Belt land. In Paragraph 133. The NPPF states, 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF Paragraph 134. Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
24. NPPF Paragraph 136. Goes on to say 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.'
25. CPRE Lancashire doesn't believe 'Exceptional Circumstances' exist or that in the case of this application that Very Special Circumstances exist.
26. CPRE Lancashire did respond to the various Local Plan consultations where we repeatedly challenged the economic assumptions that are used to evidence the City Region wide Strategic Housing and Employment Land Assessment (SHELMA) produced by GLHearn, and that of the BE Group. There are flaws in the calculation of objectively assessed need for employment. In reality, less jobs are needed.
27. There is a considerable brownfield land resource in St Helens. Releasing further farmland in Green Belt will not support brownfield reuse, in fact allowing more greenfields form development will diminish the prospect of brownfield sites opportunity being realised for future development.
28. To be clear CPRE does not object to the regeneration of that part of the site (approximately 30%), which was recorded Details of: National Land Use Database: Former Parkside Colliery, Winwick Road, Newton-le-Willows for employment use (NLUD reference 431500005). But we think an alternative scheme can be devised to deliver a reduced scale scheme for needed jobs and housing without necessitating this new link road. Local people are keen for a country park to be promoted.

29. CPRE considers that current transport infrastructure for roads must be improved rather than expanded. We supports smart choices for travel, such as travel plans, car clubs and remote meeting, and that road freight should be discouraged and better alternatives for the moving of goods to be found. Unabated road building has to stop.
30. There is evidence from the Department for Transport, that increasing road capacity increases road use, therefore it does not providing long-term benefit. In fact it leads to an increase in Greenhouse Gas (GHS) emissions and is therefore unsustainable. The CPRE report [The End of the Road?](#)(click hyperlink) challenges the road building consensus.
31. CPRE believes that long term considerations should be applied to transport infrastructure planning to provide for a sustainable future. Transport has a critical impact on employment levels in rural areas. ‘Transport poverty’ has a significant social impact. Employment is changing, and micro businesses can be supported by digital infrastructure. Sustainable tourism can help boost transport provision and CPRE supports low carbon options for travel.
32. CPRE supports investment and improvement in bus, coach and light rail services and increased investment in these and active travel services and routes.
33. Local people are opposed to the link road proposal being promoted in the Green Belt by St Helens Council. Local people ought to be listened to.
34. In summary, the application should be refused, and it should be referred to the Secretary of State for a call-in determination.

With my thanks for your consideration of this letter.

Yours sincerely,

Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager

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