# Request for call-in - application P/2017/0048/OUP

[**Outline application for up to 92,900 m2 of employment floorspace (B8 with ancillary B1(a)) and associated servicing and infrastructure including car parking; vehicle and pedestrian circulation space; alteration of existing access roads; noise mitigation; earthworks to create development platforms and bunds; landscaping including buffers; works to existing spoil heap; creation of drainage; substations and ecological works**](http://publicaccess.sthelens.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=P2T79VPE01O00)

# 1 Summary

**Croft** **Parish Council[[1]](#footnote-1)** requests that the Secretary of State uses the power under section 77[[2]](#footnote-2) of the Town and Country Planning Act 1990 to direct the local planning authority refer application P/2017/0048/OUP to St Helens MBC for logistics sheds on land currently designated as **Green Belt** to him for decision so that it can be considered in the context of related planning applications (Haydock Point and Link Road) and proposals for other proposed logistics development in St Helens, Wigan and Warrington that will overwhelm the sub-region.

Individually application 2017/0048 and collectively with other proposed developments are of regional significance and meet the criteria set by Government for call-in as they[[3]](#footnote-3):

* Will have a significant long-term impact on economic growth across a wider area than a single local authority;
* could have significant effects beyond their immediate locality;
* give rise to substantial cross-boundary controversy; and
* raise significant architectural and urban design issues.

We appreciate that it is the Secretary of State's policy to be very selective about calling in applications and, in general, this will only be where issues of more than local importance arise and those issues should not be decided by the local planning authority. We think these issues apply in this case, and that strong support of St Helens Council means that as a planning authority means they cannot take an objective view of the development.

# 2 Introduction

Application P/2017/0048/OUP is for piecemeal (Phase 1) development of the former Parkside Colliery and surrounding Green Belt and greenfield land in advance of the St Helens Local Plan. This will prejudice proper consideration of the wider area including Haydock Point, the Parkside Link Road (PLR) and other important Green Belt sites. Approval of phase I will prejudice any potential to provide rail access as part of a future Strategic Rail Freight Interchange (SRFI). A wide range of other regional logistics development are proposed including along the M56 and the whole of the M60 Manchester orbital motorway. The whole Parkside and wider area must be considered together in a way that is not possible if the local authority determine this application in isolation.

‘Parkside colliery’ is the original colliery footprint but also includes spoil heaps and ancillary infrastructure much of which is now green and biodiverse. The ‘Parkside area’ includes additional land between the M6, the A49, the Chat Moss line and Warrington which was never affected by colliery activity and has remained agricultural. The local authority also consider land to the East of the M6, as ‘Parkside’ although this is wrongly intended to suggest that it is either previously used or otherwise suitable for development.

The whole of the M62/M60 corridor is developing as an unplanned regional distribution hub. To our knowledge there is:

* Omega J8 M62: Several existing distribution sheds, several under construction with two more starts planned for 2019. The west bound J8 exit is now 5 lanes.
* Birchwood J11 M62, large industrial estate, again with many large distribution warehouses. Scoping for a motorway service station at junction underway.
* Haydock Point (application P/2018/0254/OUP) and Florida Farm Junction 23 with A580 - large warehouses close to the junction - massive congestion even after the A580 junction with M6 was recently improved.
* Winwick Road J9 M62, B&Q warehouse and J9 Retail Park operational.
* Lymm and Appleton J20 - proposals for Green Belt warehouses.
* M56/M6 (J9) - currently 145,000 sq ft of logistics space; proposals for 600,000 sq ft Green Belt warehouses due to be re-submitted (Stobart).
* GMSF – various other plans for several distribution warehouses around the M60
* Airport City – large concentration of distribution warehouses built and planned

Wewant St Helens and surrounding communities to grow and thrive as places with a good quality of life and quality jobs. But the current application and related proposals in the region would deliver a low and uncertain number and density of poor-quality jobs on a large Green Belt site. Including job displacement only 100 mainly low-paid and low skilled new full-time equivalent permanent jobs will be created. It would create significant traffic that would cause congestion on the strategic road network, and during the increasingly frequent times of disruption would cause country lanes and communities to the north of Warrington such as Croft, Culcheth and Glazebury to be overwhelmed by traffic and HGVs with associated danger, noise, pollution and severance.

Air quality is a national issue where the UK is in contravention of European obligations and the Government has lost several times in court to both by the European Commission and local campaign groups. Development of logistics on this scale raises regional air quality implications.

We have offered to discuss traffic issues and their potential resolution but neither the applicant nor the local planning or highway authority has taken up this offer.

We have provided a detailed objection to P/2017/0048/OUP to St Helens MBC and summarise the main points in this document.

# 2 Summary of reasons to justify a call-in

## 2.1 Amount of development has significant long-term impact on economic growth

The very large amount of warehouse/logistics development either built, subject to current planning applications or proposed within emerging Spatial Frameworks or Local Plans dominates provision for industrial land in the region. This will preclude provision of higher skilled and paid jobs.

For instance, the Greater Manchester Strategic Framework (GMSF) Draft policy Policy GM-P1: F Maximising the potential of the key growth locations, identifies under point (viii) a ‘M6 logistics hub in Wigan, extending into Warrington, St Helens and West Lancashire, providing a major cluster of warehousing and distribution activity along the M6 corridor with easy access to the Port of Liverpool via the M58’. GMSF also identifies large scale logistics sites round the M60 to the south (airport), north and east of Greater Manchester including 25% over-supply to ‘provide choice’. It does not distinguish between B2 and B8, but Policy GM P1 makes it obvious that most of this allocation will be for logistics. While GMSF is at an early preparation stage, it has a significant effect on the wider area.

is simply a fact that most logistics jobs are low paid and low skilled and that the applicants’ estimate of jobs and employment density is optimistic. An **optimistic expectation is that around 100 new jobs** would be created by Parkside Phase 1. No alternatives have been considered that would lead to higher skilled, better paid jobs and that might justify a Green Belt release. The applicant does not take account of displacement of jobs from other locations. Much of the growth in logistics is fuelled by cheap imported goods which continue to displace domestic production.

The over-emphasis on logistics by local authorities competing for the same jobs will have a significant long-term impact on economic growth as other, potentially higher skilled and paid jobs more desirable for long term sustainable employment are squeezed out.

## 2.2 Green Belt: significant effects beyond the immediate locality

The development detailed in the introduction cumulatively represents many millions of square feet of warehouse development. Much of this is proposed on currently designated Green Belt.

The application site is currently Green Belt. The applicant has supplied no ‘Very Special Circumstances’ justification for use of Green Belt for their proposal. The St Helens Local Plan 2020-2035 is at an early stage of preparation and St. Helens Borough have only published the Submission Draft under Regulation 19 on 17 January 2019 (comments to 13 March 2019).

Both Government guidance and case law suggests that the potential allocation in this plan (which is at least two year from adoption) and **the desire of the local planning authority to remove the land from Green Belt must be given very little weight in the decision-making process**. Given the large amount of available distribution warehouses and proposals elsewhere, the scheme cannot possibly meet the very high bar of ‘very special circumstances’ that are needed to justify a development in the Green Belt. Approval at this stage in advance of the Local Plan would carry a high risk of a successful judicial review.

All the local authorities in the area including St Helens, Warrington, Wigan and the other 9 authorities within Greater Manchester are all proposing taking land out of the Green Belt for logistics. Cumulatively this will have a massive effect on the integrity and purposes of the Green Belt that will have significant effects beyond the immediate locality.

These local authorities are abusing Green Belt review in a desperate chase for the few logistics jobs on offer. Sheds by the edge of a motorway are not ‘urban regeneration’, this sort of development meets none of the Green Belt tests and distribution parks do not constitute VSC.

## 2.3 Amount of development has regional transport and air quality implications

Parkside is just one of several large, entirely road-served distribution parks proposed in the area which would continue current dependence on roads for freight transport and on diesel goods vehicles which create noise and pollution including particulates and NOx.

As well as the developments listed in the introduction it has been [reported in 'Place' 27/2/19](https://www.placenorthwest.co.uk/news) (second story) that the North West now has 1.5m sq ft of speculative warehouses under construction, the largest pipeline in the UK behind the East Midlands. With an average plot size of 214,000 sq ft and totalling around 1.5m sq ft, these include:

* M6 Major, Haydock: 523,500 sq ft
* Crewe Commercial Park: 237,000 sq ft
* Grand Central, Trafford Park: 185,000 sq ft
* Unit 4, Mountpark Omega, Warrington: 184,000 sq ft
* Unit 1 Pioneer Court, Blackburn: 135,000 sq ft
* Haydock Green: 125,000 sq ft
* Liberty Park, Widnes: 107,000 sq ft

The key cumulative effects are that:

* Road-based development proposed in the wider area is far greater than that examined in the TA or EIA. Overall, these developments need to be assessed together to see if the impact is acceptable. A single TA, or the efforts of Highways England (which has a focus solely on keeping the SRN moving) cannot consider overall transport demands and modes other than road. This is particularly true for communities not directly on the SRN, which will pay a price in a lower quality of life as traffic increases through their areas.
* A comparable application has been submitted for road-based distribution at Haydock Point (P/2018/0254/OUP). We think that Parkside phase 1 cannot be considered in isolation.
* The isolated TA provided with the scheme doesn’t fully include both local or regional proposed potential developments or background traffic growth. The traffic growth factors provided in the updated Transport Assessment are lower than previously. Traffic Growth Factors do not include the stated growth ambitions of either Merseyside, Warrington/North Cheshire or Greater Manchester – all these are based on substantial additional development on Green Belt and greenfield sites near Motorway junctions, and substantial population growth. Both these mean that the TA seriously underestimates the effect of the scheme on congestion and local communities.
* It doesn’t assess any effects on the communities of Croft, Culcheth and Glazebury north of Warrington. None of these important local communities are even mentioned in the TA
* Nor does it consider the potential effects on minor roads and communities when there is disruption on the major road network.

Air pollution has been identified as the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. It is one of the biggest public health challenges, shortening lifespans and damaging quality of life for many people. The young, older people and those with existing health conditions are most likely to be affected by exposure to air pollution and it has been estimated that the health and social care costs of air pollution in England could reach £5.3 billion by 2035, primarily due to small particulates (PM2.5), unless action is taken. In Greater Manchester alone, the draft Strategic Framework estimates that exposure to small particulates at current levels will cause around 1,200 deaths per annum.

The air quality implications of the development has regional implications, and this should be examined by the Secretary of State once the application is called-in

## 2.4 Cross-boundary controversy

Proposals to develop the former Parkside Colliery have been as contentious as they have been frequent, and they have given rise to substantial cross-boundary controversy. The site is very close to the boundary with Warrington, but St Helens have always pursued a very local agenda and this has caused significant discontent across the boundary. There is a vocal and well-informed action group opposing the proposals, and widespread press coverage.

While part of the site has previously been developed, the colliery was established through a special license and the whole site has always remained Green Belt. It was always the intention to restore the site – the preferred use was agriculture, although other uses could potentially be compatible with Green Belt designation. The previous and current proposals have always generated controversy with local decision makers always having a vested interest in the decision.

In summary, the cross-boundary aspects of the application remain contentious.

## 2.5 Winwick Battlefield effects raise significant architectural/urban design issues

The application covers part of the registered battlefield of the Battle of Winwick, an important engagement in the English Civil War (1642-1651). The battle location, combatants and events are well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War. The battlefield and its relationship to the application site is shown in the appendix. Local Historian Richard Ward produced this [web article](https://www.youtube.com/watch?v=pYSmrRifoqE&t=90s) for ‘Our Local Voice’ showing step by step how the battle was won.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Historic England[[4]](#footnote-4) consider in their email of 14 Jan 2019 that ‘*the level of harm to the registered battlefield remains high’*. National Planning Policy Framework suggests that ‘*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation*’ (NPPF para 193) and that ‘*Where a proposed development will lead to substantial harm to … a designated heritage asset, local planning authorities should refuse consent …*’ (NPPF para 195)

By placing very large sheds almost at random, and without any reference to the battlefield, the action and features, the proposal will cause significant raise significant architectural/urban design harm to a designated heritage asset. Any use of the site should respect the battlefield and its setting.

End of document. Appendix follows

# Extract from Environmental Statement – Battle of Winwick



1. Any third party may request the Secretary of State to intervene and call in an application for determination. [↑](#footnote-ref-1)
2. The power can be used any time up to the grant of planning permission by a local planning authority, usually when the local planning authority has resolved to approve an application, but before a decision is issued. [↑](#footnote-ref-2)
3. Criteria from written ministerial statement 26 October 2012. [↑](#footnote-ref-3)
4. They also raise the effect on the setting of Grade II listed Newton Park Farmhouse, not considered here. [↑](#footnote-ref-4)