

## St Helens Local Plan – submission draft

# Culcheth and Glazebury Parish Council and Croft Parish Council

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## 1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the [Submission Draft](#) for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- [Employment Land Needs Assessment – Addendum Report January 2019](#); and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision *‘By 2035, St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. A range of high-quality new employment development will have taken place...’*.

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide *‘balanced regeneration’* or *‘sustainable growth’* or provide *‘high quality new employment’*. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a world leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51<sup>st</sup> to the 36<sup>th</sup> most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

## 2 Summary

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by existing and new road building. It:

- Is wasteful of land, including good quality agricultural land
- Would destroy the integrity of the Green Belt
- Bring a low density of poorly paid and low skilled jobs
- Would entrench car dependency both in St Helens and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality
- Increase climate change gas emissions and reduce air quality
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

Parkside West and Parkside East, rather than offering a '*transformational employment opportunity*' will mainly attract low-skilled and poorly paid jobs, eat up large tracts of Green Belt and are unlikely to bring many of the claimed benefits. The same is true for the other planned Green Belt logistics developments within St Helens such as Florida Farm.

For employment, the Growth Scenarios used are over-optimistic and are based on significant and unrealistic assumptions about in-migration to the Liverpool City Region. Estimation of land required has used a poor methodology, leading to a gross overestimate of land needed. The focus on logistics creates poor quality employment – low employment density, low skilled jobs and low wages. It also ensures a 'Race to the bottom' with other local authorities chasing the same logistics jobs.

We oppose the following proposed allocations as Strategic Employment Sites under Policy LPA04.1 for reasons outlined in the rest of this document:

- 2EA: Land at Florida Farm North, Slag Lane, Haydock22;
- 6EA: Land west of Millfield Lane, south of Liverpool Road and N of Clipsley Brook, Haydock;
- 7EA: Parkside East, Newton-le-Willows; and
- 8EA: Parkside West, Newton-le-Willows.

We think the employment strategy should be recast to focus on education and training, leading to higher quality employment and manufacturing. This is a more difficult path to follow than drawing a red line around large sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if St Helens is to be prosperous and have a future good quality of life.

## 3 Employment land and logistics

### 3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
- Amount of employment land needed per year calculated illogically
- Five-year buffer included – this is not required by any planning guidance

- Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the [Employment Land Needs Assessment – Addendum Report January 2019](#) (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

### 3.1.1 Baseline calculations

Confusingly the submission draft details employment land need from **2012-2035** rather than the plan period 2020-35. It suggests 5.8 ha/y is needed, making 133.4ha, plus a five year 'flexibility buffer' (29ha) and an 'allowance for Liverpool SuperPort<sup>1</sup> and Parkside (65ha) making 227.4ha.

Netting off 'Take-up between 1 Apr 2012 and 31 Mar 2018' and 9.3ha existing land supply, the submission draft suggests that **215.4 hectares** of land for employment development should be allocated between April 2018 and March 2035. As relatively little employment land was used from 2012 to 2018, the effect of using 2012 as a baseline is to inflate the theoretical amount of land needed. This is nonsensical, as 2012-8 is in the past – there is no need to provide land for a period that has already happened

Using ELNA methodology but applying it to the actual plan period (2020-35) and assuming 15 years@5.8 ha/y = 87ha, plus buffer (29ha) and allowance for SuperPort and Parkside (65ha) gives 181ha. Adding 5.8ha for 2019 but netting off 9.3ha existing land supply suggests **177ha is required – roughly 50 ha less than claimed by St Helens, even if ELNA methodology is accepted.**

### 3.1.2 Amount of employment land needed per year

The ELNA methodology is far from objective. It is predicated on the assumption (ELNA 2.11) that '*employment land take-up in St. Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites.*' This is not supported by evidence. The only evidence provided is that take-up in some other areas such as Liverpool and Warrington (but not others) was historically greater. Liverpool has a city centre and port - no port in St Helens! Warrington has far better road and public transport communications, and the benefits of new town development including good quality housing and an environment far more attractive for higher quality employment. This means it is not possible to compare arbitrary local authority areas on this basis.

ELNA considered past take-up of employment land and job forecasts as the preferred basis of the forecasting of the employment land need, and this has some merit. However, this past take-up has not been constant, with lower growth before 1998 and little after 2008. Therefore, longer historical take-up periods are the most appropriate for the forecasting as they smooth out boom and bust. ELNA arbitrarily chose 1997-2012, as from 2012-2015 there was a significant decline in employment land take-up in the Borough. This was attributed to a lack of sites, although ELNA presented no evidence as to why this might be the case. This is important as from 1997-2015 147 ha were taken (4.9 ha/y), but 1997-2012 take up was 174 ha (5.8 ha/y). Given that 2015 is more recent than 2012, it seems logical and more scientific that the 4.9 ha/y figure for the period 1997-2015 is used<sup>2</sup>.

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<sup>1</sup> Liverpool SuperPort is in Liverpool rather than St Helens.

<sup>2</sup> Central Government offered a comparable example of unscientific use of statistics in 2019 by choosing to ignore new household formation statistics because the outdated figures fitted their political policy better.

### 3.1.3 Five-year buffer

ELNA also included a five-year buffer. National Planning Policy Framework (NPPF) mentions the need to make provision for employment land. It mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion that there needs to be a buffer for employment land.

### 3.1.4 Need for 'Major sites'

ELNA 2.3 suggests '*Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation*'. Estate agents would say this, wouldn't they! This is simply hearsay, not scientific and should have no place in a report that purports to provide an 'objective' assessment. Or perhaps estate agents should write the housing policies too?

ELNA also added '30-40ha' for '*additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends*'. No justification was provided for either 'major projects' need or why 30-40 ha was chosen. In the submission draft 30-40ha figure has been arbitrarily inflated to 65ha, without justification.

Given that other local plans and GMSF intend to allocate land for major projects, this is an issue that should be settled at a regional level. It is possible that a 'Major Site' is needed in St Helens. Given the lack of evidence to establish need (which is not the same as demand) there is no justification to simply add the areas for a major site onto a calculation of need. On this basis, allocation of land for 'major projects' fails the 'Duty to Co-operate' test.

### 3.1.5 Actual need for employment land

The table below shows several alternative ways of using past demand data to estimate how much land should be allocated for employment uses. A more objective view suggests that the methodology adopted in the submission draft grossly overestimates both need and demand.

In a scenario with realistic growth, no buffer (which is not required by NPPF) and no additional allowance for major sites (which have not been agreed regionally anyway) assumed, then the Councils' allocation exceeds need by a massive 158 ha, or 329%. The Council figures are not credible.

*Table 1 Employment land needed under different scenarios*

(All ha)	5.8 ha/y	4.9 ha/y	5y buffer	SuperPort Parkside	Adjustment	Allocation required	Difference to draft
<b>Submission draft 2012-2035</b>	133.4	-	29	65	-2.7 -9.3	227.4	0
<b>2020-35 using ELNA and higher demand</b>	87	-	29	65	+5.8 -9.3	177	-50
<b>2020-35 ELNA methodology</b>	-	73.5	24.5	65	+4.9 -9.3	158.6	-68.8
<b>2020-35 ELNA methodology, no 5y buffer</b>	-	73.5	0	65	+4.9 -9.3	134.1	-93.3

<b>2020-35 ELNA methodology, no 5y buffer or major sites</b>	-	73.5	0	0	+4.9 -9.3	69.1	-158.3
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### 3.2 Employment and related issues

Employment density refers to the average floorspace (in m<sup>2</sup>) per full-time equivalent (FTE) member of staff. Excluding construction jobs which are temporary, a Regional Distribution Centre houses just one job per 77m<sup>2</sup>. It is widely accepted that increased automation is having a particularly significant effect on distribution. There is a drive towards greater automation to increase the speed and efficiency of multi-product order picking, which at present is largely manual. As racking techniques and stock management software advance there will be further reductions in jobs.

Unemployment in St Helens appears relatively low compared to historic levels, but this is disguised by a harsh social security regime that deters claimants, and the absolute unemployment level hides low pay, increasing casualisation of work, low productivity, under employment<sup>3</sup> and poverty. The proportion of residents without any qualifications (12.4%) is 58% above the national average (7.6%). Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages. St. Helens declined from the 51<sup>st</sup> to the 36<sup>th</sup> most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics.

The Liverpool City Region LEP: Growth Scenario, November 2016 was intended to present an upbeat picture of potential growth in order to attract central Government funding. This approach is flawed because all regions (including Warrington/North Cheshire and Greater Manchester) have to present high growth to access funding otherwise lack of his funding will ensure the area falls further behind – a Catch 22 situation. Other issues with the Growth Scenario include:

- Higher in-migration to the City Region is assumed without any evidence where the people will come from or what they will do. Will Manchester empty out?
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through '*transformational developments*'.

It is understood that '*transformational developments*' means 'logistics'. Of 10,000 jobs expected to be created, about 80% are in logistics warehousing and support services and associated transport. It remains to be seen if logistics jobs result in a rush of bright, well-educated, enthusiastic people into St Helens who will transform the economy.

The growth forecasts deliberately underestimate job displacement. The number of logistics jobs for import and distribution of a given amount of goods is relatively fixed although the locations are footloose. This means additional logistics jobs in St Helens would otherwise have been located elsewhere. If logistics jobs are truly additional for the sector, then they probably represent:

- Additional imports– in which case jobs are being displaced in UK manufacturing
- Growth of internet shopping – in which case jobs are being displaced in traditional shops

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<sup>3</sup> ELNA 5.16 suggests underemployment in St Helens is 'hard to quantify', so doesn't bother.

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests '*Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...*'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

## 4 Green Belt

### 4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that '*The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment.*' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'.

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen '*large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand*'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside.

### 4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration.

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

ensure that it is developed. Given the uncertainty and volatility of the logistics sector, and the significant oversupply of employment land explained in 3.1.5 of this document it is neither necessary nor prudent to take this land out of the Green Belt now.

## 5 Parkside East, West and rail interchange

### 5.1 What is Parkside?

One of the problems with discussing 'Parkside' is that it means different things to different people. 'Parkside colliery' includes just the footprint of the original colliery buildings to many but usually also includes the spoil heaps and ancillary infrastructure much of which is now green and home to more biodiversity than when the land was agricultural. The 'Parkside area' includes additional land between the M6, the A49, the Chat Moss rail line and Warrington which was never affected by colliery activity and has remained open and agricultural. St Helens consider land to the East of the M6, as 'Parkside East' although this is clearly a misnomer and intended to convey the impression that it is either previously used or otherwise suitable for development. It is not related to the Parkside Colliery area and will probably attract different types of employment.

The whole site is currently Green Belt. Mining and associated activity was allowed through a special license and there was a clear understanding that the land remained Green Belt during this activity, and that it should be restored to a land-use compatible with its Green Belt designation when coal-related activity ceased. The preferred use at the time was agriculture, although now other uses could be compatible with Green Belt designation. 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 removal of land from the Green Belt.

Part of Parkside West is currently subject to a piecemeal, speculative planning application known as 'Parkside Phase 1'. An analysis of this suggests that the development will create a few low paid and low-skilled jobs; no development alternative have been considered that would lead to higher skilled, better paid jobs. An objective assessment suggests that just 100 new jobs would be created.

### 5.2 Parkside and the Green Belt

The Green Belt is designated for five reasons:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging recycling of derelict and other urban land.

In the northwest urban regeneration was the most important reason for Green Belt designation. In this case the Green Belt performs an important role in separating Newton-le-Willows and north Warrington/Winwick. The proposal for Parkside East particularly would constitute very significant encroachment into the countryside and narrow the gap between settlements unacceptably.

While some of the land in Parkside West could be considered derelict or brownfield, a large part of it is not, the site is essentially rural. Warehouses next to a motorway are not 'urban regeneration'.

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

### 5.3 Parkside and other plan policies

Parkside fails Policy LPA03: Development Principles '3. *Improve the economic well-being of the Borough's residents by a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people*'. Parkside does not create 'a range of employment and training' – it continues the dominance logistics jobs, provides almost no training opportunities at all, and is certainly not '*readily accessible by non-car modes of transport*', being a motorway-based site inevitably poorly served by public transport and with a hostile local environment for walking and cycling.

### 5.4 Rail connection at Parkside?

Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) '*with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes*'. Of the proposed allocation of 124ha of land at Parkside East it is estimated that 64.55ha will contribute to employment land with the remaining 60ha being required to provide related rail access. This is used as a justification for removal from the Green Belt.

Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing rail-based logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

4.6.12 suggests Parkside 'will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort.' St Helens is 13 miles from Liverpool, which already has excellent existing rail and road links to the docks, so it is hard to see how development at Parkside could add to Liverpool SuperPort. Similarly, the region already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. There are other currently underused rail links (for instance in Halton and Knowsley).

4.36.1 states that there is '*a long-standing history of developer interest in providing a SRFI*' near the former Parkside Colliery. There may have been interest, but for a variety of reasons including transport, planning, environmental and viability there has been no serious and viable scheme put forward in almost 20 years of activity. There is no reason to suggest that this has changed. The



‘reasoned justification’ for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

It is not obvious how a rail link would be funded. The promoters (effectively St Helens Council) wish to go ahead with a first phase of development at Parkside West now, without this providing any contribution towards a rail connection. If, as seems likely the sites are developed piecemeal, then there is no prospect of a rail connection, or significant use if it is provided.

## 5.5 Battle of Winwick

The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively 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 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.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

## 6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

- A574 from Risley through Culcheth and Glazebury to the A580. Vehicles cannot get out onto the A580, which is itself completely jammed by the traffic escaping from the M6.
- B5207 from Culcheth to Lane Head (Golborne) has cars backed up to Culcheth village centre.
- Kenyon Lane, Stone Pit Lane/Sandy Brow Lane, and Heath Lane/Mustard Lane from Lane Head to Winwick/Birchwood via Kenyon and Croft, with static queues in both communities.

The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards ‘just in time’ logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.

The area already suffers from air pollution including designated air quality management areas. NPPF para 7 suggests that planning has an environmental role – *‘using natural reserves prudently, minimising waste and pollution, and mitigate and adapt the climate change including moving to a low carbon economy’*. The designation of Parkside East and West will:

- Use fossil fuel reserves profligately and encourage climate change gas production
- Encourage production of air quality pollutants (mainly NO<sub>x</sub>, but also particulates) through the current exclusive use of diesel engines in goods vehicles.

Para 17 suggests that local authorities should *‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’*. Parkside East and West would be difficult to access except by car. Walking and cycling in the area is already inconvenient, indirect, and dangerous due to traffic speed and volumes and poor air quality

NPPF suggests that planning should *‘Support the transition to a low carbon future’*. Parkside East and West is wholly based on road transport that creates more carbon emissions than either rail transport – which in this location would be powered by electricity and increases the likelihood that goods will travel long distances to their destination. It will therefore increase carbon emissions.

NPPF also suggests that development should *‘Contribute to conserving and enhancing the natural environment and reducing pollution’*. A currently open and mainly green site will be covered with an urban sprawl, and the main access method will be by diesel heavy goods vehicles that will produce particulates and oxides of Nitrogen that are known to cause hundreds of early deaths each year in the St Helens area, and thousands nationally.

End of document appendix follows

Appendix Battle of Winwick battlefield site

