

Fw: Objection to planning application P/2020/0061/HYBR

Jennifer Bolton to: Planning

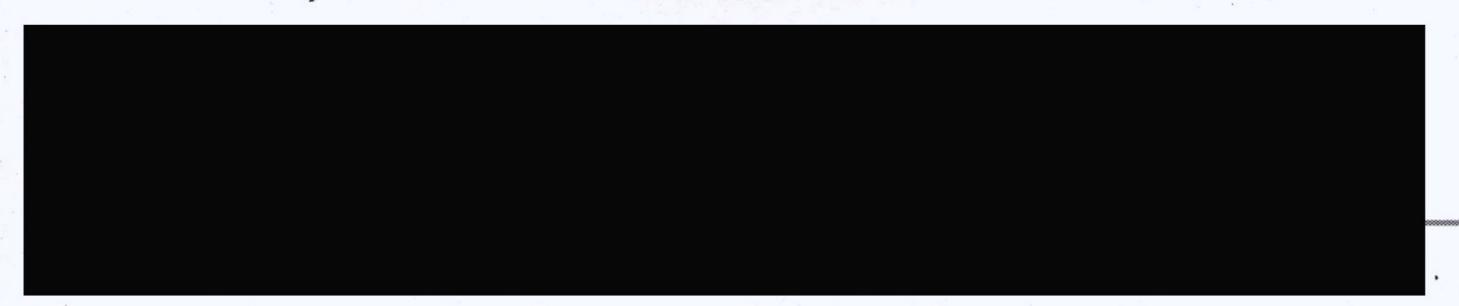
09/03/2020 09:33

Objection received from Bold Parish Council

Thanks

Jennifer Bolton Senior Planning Officer Development Control St Helens Council 01744 676184

---- Forwarded by Jennifer Bolton/CEXEC/STHMBC on 09/03/2020 09:32 -----



Jennifer, please find attached my objection to planning application P/2020/0061/HYBR.

I would be grateful if you could acknowledge receipt of this objection.

I would like to thank you personally for the extension granted to the people of bold, this has given the community chance to assess and make comment within a reasonable timeframe.

Best regards

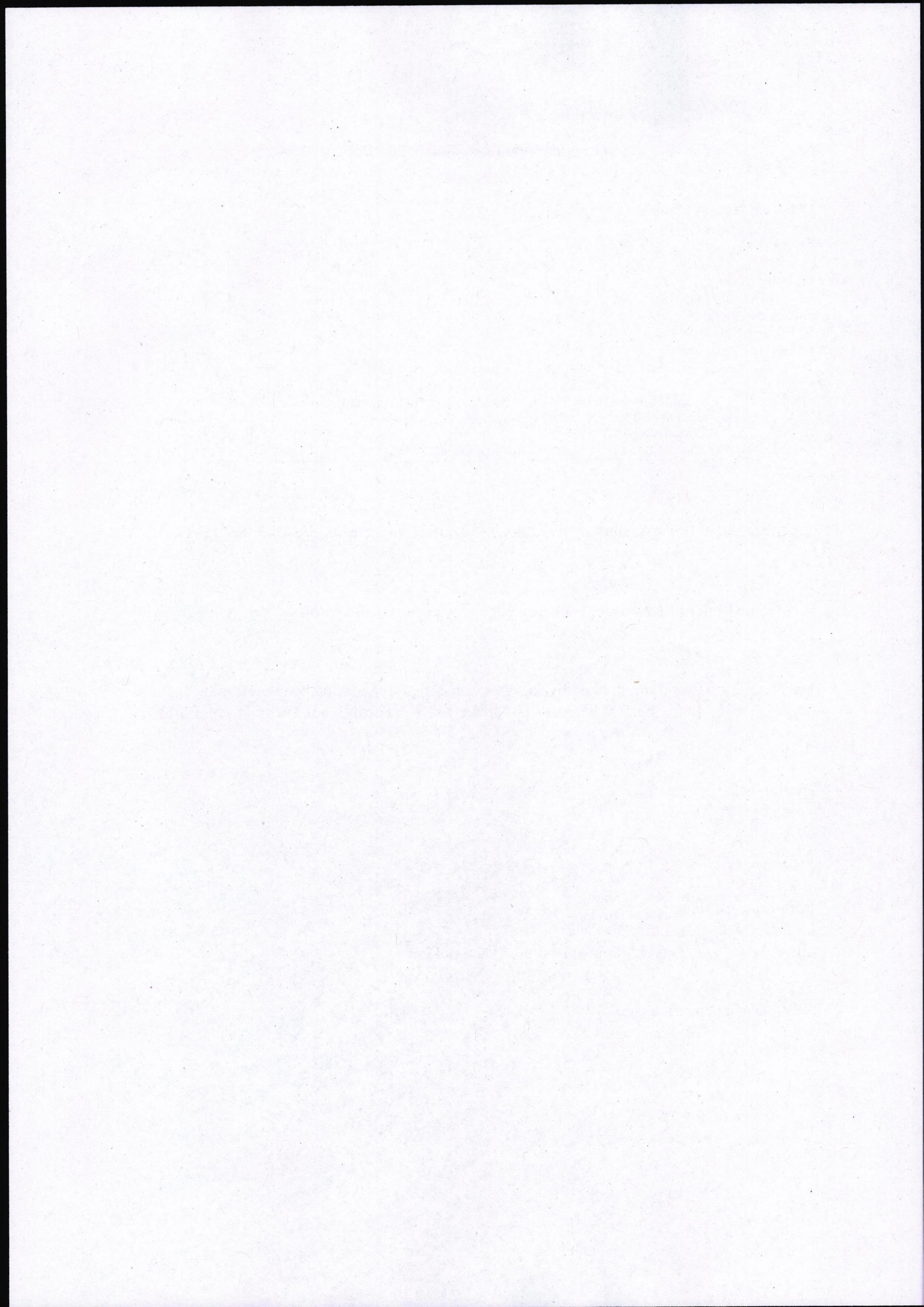
Bold Parish Council.

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- Omega objection.docx



Jennifer Bolton Case Officer, Development Management St Helens Council Town Hall, Victoria Square St Helen, WA10 1 HP

By Email: jenniferbolton@sthelens.gov.uk

15/02/2020

Dear Jennifer,

I am writing to object to planning application P/2020/0061/HYBR Omega 8.

I wholeheartedly support job creation in St. Helens and would like to thank the council for their efforts in taking their time to investigate all potential employment opportunities. However, I feel that this application fails to justify the 'very special circumstances' required to release prime greenbelt land for development and would argue that this application would have a detrimental effect on the area surrounding the proposed development.

Employment Land

The inflated Employment Land Need identified in St Helens, and in all authorities across the region, depends wholly on the release of Green Belt land to be viable. The SHELMA is procedurally flawed as it assumed Green Belt release, without assessing the actual harm of doing so. In this sense the SHELMA is invalid. The SHELMA notes that "the *Growth Scenario is quite aspirational in nature*" for Liverpool and St Helens (*Para 5.3*).

The NPPF section 11 states that local plans should "make as much use as possible of suitable brownfield sites and underutilised land. The Brownfield Register does not record all the suitable brownfield land in St Helens that could come forward for B8 warehousing." This development does not make effective use of the land identified.

Independent studies done on behalf of the St Helens Greenbelt Association by Kirkwells and Peter Black of Black Friars concluded that the employment land need to be overestimated by 329% and that the figures quoted by St. Helens council are not credible.

Employment Figures

The application states that around 3000 jobs will be created at the site. The warehouse, once completed will be 878,012 sq. Ft. If we look at solstice park in Wiltshire, a home bargains distribution centre completed in May 2017, the total size of the development is

1,000,000 sq. Ft and employed 1200 people at the time. There is a discrepancy between these two developments even though the activities will be the same at both sites. Automation of the distribution industry will also have a detrimental effect on these jobs in the coming years with projections of 40% or more loss of jobs.

The Florida farm development (application P/2018/0254/OUP) quoted the creation of 3500 permanent jobs on its application. Now completed the whole site employs just 320 people and has brought the area around the development to a standstill during peak times due to the amount of traffic.

I contest the projected employment figures quoted in this application as we have seen time and time again that these developments do not deliver on their proposed figures.

Duty to cooperate

There has been an absence of a joined-up spatial planning approach by neighbouring authorities concerning the cumulative harm to Green Belt from several speculative large B8 employment applications along the whole of the M62/M60 corridor. These include, but are not limited to: Birchwood J11 M62; Haydock Point and Florida Farm Junction 23 with A580; Winwick Road J9 M62; Lymm and Appleton J20; 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); sites in the Greater Manchester Spatial Framework; Airport City and Wigan at South Lancs Industrial Estate Ashton and Leigh. Development in the Green Belt on this scale is unsustainable. The road-based schemes are increasing traffic significantly to the detriment of the local transport network and national motorway network.

Greenbelt and the Bold Forest Area Action Plan

The Bold Forest Area Action Plan was adopted by St. Helens council in 2017 and therefore must be considered in any future planning applications. It sets out a vision for the Bold Forest park to transform it into an economically diverse, prosperous and high-quality environment. The vision states...

"The vision for the Forest Park is to provide a high-quality setting to stimulate tourism and provide a platform for local businesses to grow and develop and for the establishment of new businesses. The area will also provide opportunity for a diverse range of outdoor activities to create a critical mass of activity that the local economy will thrive upon.

The Area Action Plan has been developed through a partnership making use of neighbourhood planning principles but in the context of a formal development plan. It is therefore breaking new ground on how areas should be planned in the future. This has been to such an extent, that it has drawn particular interest at the European level and is one exemplar project as part of the Pure Hubs Programme funded by European Union programme Interreg IVB."

"By 2030 Bold Forest Park will be at the heart of a thriving diverse economy, providing a hub for family leisure and adventure sport. The natural environment and cultural environment will be rich and diverse. A network of open spaces and routes accessible to all connects the Forest park to the wider countryside and links to our local communities."

The proposed development is in direct conflict with many of these objectives and the aim of the forest park and therefore must be rejected.

Policy BFP1: A Sustainable Forest Park

The Bold Forest Park Area Action Plan does have an economic focus, but this must be balanced with environmental sustainability. Policy BFP1 ensure that any, 'built development is of an appropriate scale for its location.' It is designed to be, 'safeguarding and expanding the range of leisure and visitor facilities.' The development of 75.3 hectors for logistic warehousing all within the boundary of the forest park, covering an area designated for a new bridleway is not an appropriate scale or safeguarding or expanding leisure and visitor facilities.

Policy BFP ECON1: Supporting Economic Growth

'Any proposal which would reduce the range and quality of businesses or tourism attractions and facilities will be resisted unless it can be demonstrated that there will be no adverse impacts upon the local economy, the environment or on the quality of the visitors experience.'

The development of 75.3 hectors will have an unprecedented impact on the environment, not only on physical space, but also air and noise pollution. Even more so when it is considered the Local Wildlife Site with ancient woodland at Booths Wood, which runs adjacent to the proposed development.

Conclusions

The Omega 8 Planning Application can in no way be considered to protect and enhance the natural environment of the Forest Park. The implications of this development will have a severe impact on the visual amenity and biodiversity within the Forest park and therefore the success of the sustainable development of the Forest Park. The development will also jeopardise the recognition as a Landscape Asset and therefore any potential funding associated with the regeneration initiative.

The application proposals are based on Employment Land Need that is not objectively assessed and is not credible. There is no evidence of duty to cooperate between St. Helens and Warrington borough councils and no public consultation has taken place. The application will also promote the merging of these two towns going against national planning policy.

This application, in no uncertain terms, meets the 'Very special circumstances' required for removal of large areas of greenbelt and the destruction of ancient woodlands and diverse ecological systems, priority habitats and removal of priority species and therefore the Application should be refused.

