



St. Helens Council

# TOWN AND COUNTRY PLANNING ACT 1990

## CONSULTATION ON APPLICATION

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Application Number:	<b>P/2020/0061/HYBR</b>
Proposal:	<b>Hybrid Planning Application for the following development (major development); (i) Full Planning Permission for the erection of a B8 logistics warehouse, with ancillary offices, associated car parking, infrastructure and landscaping; and (ii) Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices and associated access infrastructure works (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval)</b>
For:	<b>Hybrid Planning Application</b>
Location:	<b>Land To The West Of Omega South &amp; South Of The M62 Bold St Helens</b>

### Policy

Core Strategy policies relating to trees and landscape that are relevant to this development are: -

- CQL2 Trees and Woodlands
- CQL3 Conservation and Geology
- CQL4 Heritage and Landscape

Retained UDP policies related to tree issues that are relevant to this development include: -

- ENV11 Tree Surveys
- ENV12A + 12B Development Affecting Existing Trees
- ENV13 New Tree Planting on Development Sites

The site also lies within the Bold Forest Park Area Action Plan Adopted July 2017 area and as such the policies within this plan are relevant to this area, particularly:-

- BFP1: A Sustainable Forest Park
- BFP INF6: Creating an Accessible Forest Park
- BFP SN1: Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park
- BFP ENV1: Enhancing Landscape Character
- BFP ENV2: Ecological Network
- BFP ENV3: Heritage

The site also lies within the area covered by the Sankey Catchment Action Plan.

## **Introduction**

The following comments are made in relation to the proposals in this hybrid application. They will make observations on key aspects of the application including impact on woodlands on site, wider ecological issues, landscape details and specifications, landscape visual impacts and access.

We are though objecting to this application primarily due to the impacts on protected woodlands and the area designated as Bold Forest Park. We also have other concerns in relation to landscape impacts (including the medieval deer park area, mitigation and ecology). In addition to this we also believe the proposals conflict with the proposals within the Council's own Draft Local Development Plan. These will be detailed within these comments and also be summarised at the end. It must be stressed that whilst objecting to the proposals, these comments will still make observations about the specific details submitted and also make recommendations in terms of improvements that could be made to the proposals. Addressing these improvements though will not though address our overriding concerns about this application and its impacts on the local environment but rather indicate that should this application gain approval, what we would still expect to be incorporated into the proposals.

## **Arboricultural Implications and Loss of Woodlands and Hedgerows**

The proposed layout both within the full application and outline application will result in the loss of significant areas of woodland and hedgerows, including the loss of three protected woodlands. It will also result in the loss of other habits strongly associated with this site including numerous ponds and ditch areas as well as streams. A Tree Constraints Plan has been submitted but there is very little to indicate that trees and woodlands have been considered as constraints in any of the layouts proposed. There is effectively little evidence of any changes to layouts being made so as to seek to retain important woodland habitats and associated features. As such this application fails to address the approach recommended within Mitigation Hierarchy, as identified within the Planning Practise Guidance, which advocates avoidance as the first principle?

The site lies within the Bold Forest Park Area Action Plan area and contains a network of protected woodlands, which were protected back in 1958 as part of tree preservation order TPO 5/2 which sort to protect the woodlands on the former Bold Estate. Historic maps show these woodlands being more or less in place as illustrated in these plans (circa 1849) and clearly show woodlands that would have been well established as woodland features by this date, indicating they are most likely to be a remnant of the historic medieval deer park. Many of these woodlands are also interconnected with other narrower woodland strips and hedgerows and connected by ditches and in some cases streams. They are an important part of the landscape character of the area being of value not just for their individual merit but as part of a wider network of parkland / farmland landscape. The proposals as they stand will require the removal of protected woodland W17 and the partial removal of W7 for the full application part of the hybrid site and the removal of the rest of woodland W7, all of woodland W6 and most of woodland W5 for the outline part of the site (the Arboricultural Implications Report uses different references for their report and relates only to the full application part of the site).

Habitat figures indicate that of 7.99 ha of woodland on site 5.63ha will be lost. Whilst 8.06 ha of new woodland will be created elsewhere on site this does not address the impact on the landscape or biodiversity of the site. (There is reference to Biodiversity Net Gain but this is simply a figure showing the additional woodland planted and is not biodiversity net gain. If the applicants wish to demonstrate biodiversity net gain they should consider an approach such as using the DEFRA Biodiversity Net Gain Metric which takes a more holistic approach to assessing biodiversity net gain). This also does not meet a minimum of 2 for 1 replacement as required by policy and so additional planting should be carried out (only as a last resort should off site mitigation be considered and for this a figure would be needed for mitigation for woodland creation / habitat improvement).

The Council has recently declared a Climate Change Emergency and as such I do not believe we should be supporting the removal of long established, mature woodland, particularly protected woodland, as even though there is a net gain in area of woodland shown as being planted it would take until the new woodland fully matured before there was any gain (or even neutral effect) of carbon sequestration (probably hundred years or so after the carbon neutral date of 2040 set out in this declaration).

The proposals show little consideration if any of woodlands as constraints. Whilst we will discuss this in more detail under the reference of the Draft Local Plan I would raise here that the building scale for the unit in the full application part of the site is of a scale that gives little scope for reducing impacts, though it could have been reduced in size and located further to the east. Its carpark also does not have to be located as shown and this also could have been located on the eastern side of the development so allowing for a better buffer zone to be created alongside the Booths Brow Local Wildlife site as well as give scope for retaining more protected woodland. The outline site simply indicates a series of large buildings with no variation in size, shape or location and indicates that there has been no consideration at any attempt to retain important woodland features? The outline part of the site in particular has effectively been treated as a blank canvas with constraints simply removed and disregarded (this includes ponds and streams as well as woodlands habitats. By simply restricting development to the area recommended for development within the St.Helens Draft Local Plan would result in almost all the key habitat features, particularly the protected woodlands being retained within any development proposal. It is therefore this desire to extend the site beyond the area for which a considered approach had been taken within this Draft Local Plan for development that is resulting in such significant habitat loss.

With regards the specifics of the Arboricultural Implications Assessment, Method Statement and Tree Protection Plan we would make a number of observations:-

The annotations on the Tree Constraints Plan are also poor and very hard to read. The public may very well wish to view these plans and so clear referencing on the plans is required.

We note that the report was prepared after only one site visit and we are surprised such a report was able to be fully prepared after only one visit? It took two of us two visits to simply look at the site and we were not taking measurements or making specific assessments of individual trees. It therefore concerns us that a full assessment has been made?

An example of this is the reference to Woodland W1 (which is the Local Wildlife Site Booths Wood) in the survey. It states in the Tree Schedule under General Observations:-

“TPO 5/2 Woodland 8 – located outside the site redline boundary with dividing water course separating.....”

However the red line of the plan shows parts of the woodland within the red line of the site. On the north side of Booths Wood the tree protection plan shows some of the woodland on the north (site side) of the stream which is within the red line. Inspecting it on the ground we found a number of trees alongside the brook on the north side within the riparian zone. These are features we would want retained and protected. However the schedule has not acknowledged them and I would be concerned the development proposals would impact them. The Tree Protection Plan submitted shows the location of the tree protection fencing set back from the ditch, which if the Root Protection area of 7.8 metres is accurate should protect these trees. However, the tree protection plan has not given consideration to the construction of the east west footpath / cycleway link running through the site. Construction of this route could have a significant impact on the root protection area of trees on the north side of the stream that are part of Booths Brow Wood. As such the Tree Protection Plan needs amendment so that the fencing encompasses this proposed path and also details how tree protection will be addressed when it is constructed, as it will also affect trees along the boundary of the site not within the area shown within the tree protection plan (in the area referred to as the landscape mitigation buffer). More detailed and accurate tree protection plans, that fully consider all the impacts of the development proposal, are therefore required including locations and detailed specifications for no dig methodologies to be used if required.

We would like more information as to exactly how the consultants arrived at a Root Protection Area of between 4.8 and 7.8 metres for the woodland areas?

Under Section 4.2 it refers to Warrington Borough Council confirming the site is not within a Conservation Area and that some of the woodlands are covered by a tree preservation order. This is a relatively straight forward oversight but it is best to make it clear they checked with the correct authority i.e. St.Helens Council as otherwise the statement is correct.

Under 6.5 Site Monitoring the report that it is not considered that on-site arboricultural monitoring is necessary during construction. Whilst we would not expect a permanent site presence a scheme of this nature must have an Arboricultural Consultant fully engaged in a programme of ongoing monitoring and supervision. This report must have an Arboricultural Supervision Method statement included. It should indicate protocols and procedures for arboriculture supervision including site meetings, briefings and liaison and frequency and nature of monitoring visits. With developments of this nature there is a high risk of changes occurring to tree protection installed or issues arising and there needs to be a clear protocol for how these issues will be addressed. It must also make clear how the Council, particularly the St.Helens Trees and Woodlands Officer will be communicated with and updated on site issues. It is also likely that this arboricultural supervisor will need to liaise with other key workers such as an ecological clerk of works and other site ecologists involved in the project.

Under 6.6.5 refers to access facilitation pruning and it says that if required must be approved by the project arboriculturist. Whilst this is acceptable I would say that as there is a high chance it will be protected trees affecting the development it may require additional consent for work if it has not already been approved. I would therefore advise that the applicant provides further information in Table 5 Recommended Tree Works specifying exactly what pruning work will be required on any retained trees as if it is not specified a separate application would have to be made (which otherwise can take 6 to 8 weeks to gain consent for if approved). For example would any trees need pruning to facilitate boundary fences or paths / roads constructed close to them?

With regards hedgerows we would see them as integral to the site and would object to their removal, particularly where they are strongly associated with existing woodlands, ponds and ditches throughout the site.

## **Landscaping**

The following are observations relating to the landscape strategy and landscape plans submitted as part of this application and notwithstanding we are objecting to the proposal in this planning applications they are comments specifically relating to observations made of these particular documents.

The general principles and approach identified within these landscape proposals are sound and outline the principles of the design and principles of management. However part of this application is for full consent and there should be detailed information provided as to how these areas will be managed and maintained and this information must be submitted as part of this application .e.g. what management regimes will be in place to manage wetlands and grasslands etc. as without this the landscaping will degrade, how will retained woodlands be managed e.g. rhododendron and Himalayan balsam removal as well as ongoing work? This is not something that should be conditioned but be something that is clear and detailed as part of any full submission.

Whilst the general principles of the species specifications are fine I am concerned that some of the species specifications are not appropriate for the location. In particular I would want to see the following changes:-

*Quercus petraea* is not a species common to the area being a tree more typical of more upland environments. *Quercus robur* is the dominant species and we would want to see most of the *quercus petraea* replaced by *quercus robur* (2% *petraea* is probably the typical distribution of this tree in the area).

*Tilia platyphyllos* should be replaced with *tilia cordata* which is the principle native species of lime tree generally present in the area (though some *platyphyllos* are present in woodlands in the locality).

*Ulmus glabra* is wych elm and whilst an excellent tree for wildlife it is highly susceptible to Dutch elm disease which is having a resurgence in the area and as such I would not advise planting it. I would try and replace with Dutch elm resistant varieties where individual trees are specified and in woodland environments replace it with *carpinus betulus*.

*Fagus sylvatica* is proposed and whilst present in the area I would only plant where sites are dry. Overall we suspect this site will be a wet one and so it would be better to replace with *quercus robur* (there is no issue with having woodlands that are 20 to 25% *quercus robur* as this would not be an untypical mix within the locality).

The native hedgerow mix is not typical of the locality. The plan proposes a 40% *Crataegus monogyna* (hawthorn) mix but hawthorn is the dominant species in the locality. Whilst some hedges are just monocultures we would still expect a native hedgerow in the area to be dominated by this species. I would therefore suggest a mix of 80% *Crataegus monogyna*, 5% *Corylus avellana*, 5% *Viburnum opulus* and 5% *Ilex aquifolium* and 5% *Rosa canina*. Planting in blocks of species is also not typical. Effectively the native hawthorn forms the matrix in which the other species are randomly scattered within it. The hedgerow should then have standard root balled trees, secured with tree stakes and ties every 10 to 20 metres using key species such as *Betula pendula*, *Quercus robur*, *Sorbus aucuparia*, *Acer campestre* and *Tilia cordata* along the hedgerow.

The general principle of the distribution of hedges is acceptable but I am concerned that an opportunity to extend a native hedge along the motorway boundary has been missed. This will give better connectivity and some limited screening. There is a short section proposed but we would want to see it along its entire boundary with the motorway. Tree species also need to be incorporated within it along this boundary and should be heavy standard. At present the landscape plan shows retained trees along the motorway boundary within the curtilage of the motorway. However, these are all ash trees and it is extremely likely that at least 95% of these trees will die from ash dieback disease within the next 10 years. Whilst we do not expect the hedge and trees to screen the development we would expect a soft boundary with scattered trees to break up and soften the boundary and appearance of the development from the motorway. This can be done with the hedge mix I have proposed and scattered trees without compromising the adjacent SUD's scheme. These details need to be added to the Preliminary Landscape Proposals plans Sheet 1 of 3 and 2 of 3.

Detailed Planting Plan POE\_199\_005 Revision A Shows landscaping along the cycle corridor. As much as we would like to see good habitat and landscape connectivity we would be concerned that the woodland mixes proposed WE 6, 7, 8, 9 and 10 may end up creating a dense scrubby corridor that may become difficult to manage and potentially intimidating to users of the path. We would recommend the hedges are kept and the woodland mixes removed. We would though recommend that the mixes are replaced with more individual heavy standard root balled trees, secured with tree stakes and ties so there is still a wooded corridor but it is one that is more open creating good habitat connectivity whilst leaving a more open corridor that feels safer to user and be easier to maintain.

The landscape plans have not included any landscape enhancements for retained features, particularly the woodlands (e.g Plain Plantation and parts of Booths Brow Wood). These need to be incorporated into the landscape plans as well as any management plans that also need to be submitted for the full application part of the site. Without addressing enhancement of retained features there is the risk of creating management problems for the new features being created? In particular I would want plans to show the entire rhododendron being removed from the retained woodland and the woodland understorey then being planted up with new native understorey (e.g hazel, holly, yew etc) and canopy species, ponds and ditches within the woodland may need Himalayan balsam removing and new native marginal plants introduced?

More information is required as to how the grassland habitats will be created. Whilst the species mixes offer diversity they can be difficult to establish and maintain. This is particularly the case on highly fertile farmland areas. Therefore we need to know how the site will be prepared so that low nutrient environments can be created that will support a sustainably managed diverse meadow environment into the future. This needs detailing in the landscape proposals with additional information in and management plans submitted for the full application part of the site.

There should be an improved buffer to the Local Wildlife Site, Booths Brow Wood. The proposed parking areas are close to the woodland and stream edge and also have a cycleway and associated features also close to this edge. The plan is treating Booths Brow Wood as part of the buffer rather creating a landscape buffer between it and the area of development activity. This will create a greener corridor for the cycleway as well as enhanced marginal habitat of benefit to breeding birds as well as foraging bats. The wider this green corridor the greater benefit to the public using it. There is a risk that a relatively narrow intimidating environment will be created between security fences and this may discourage use and linkage to the Bold Forest park Area.

It would be beneficial to have more detailed landscape plans so that it is possible to more accurately assess the location and extent of features proposed. This is particularly the case for the cycleway corridor which could do with designs more akin to the scale and detail shown on the Unit 1 landscape

plans. This detail is required so that we can assess surfacing and construction standards as well as whether features such as access controls are Disability Discrimination Act compliant. Landscape specifications for the construction detail of the proposed footpaths and cycleway are required and more detailed information, including cross sections for the construction of ponds on site would also be required.

We would be happy to discuss these details and comments with the applicant's landscape architects.

### **Ecology / Biodiversity / Invasive Species**

It is important that any comments made by Merseyside Environmental Advisory Service are given full consideration. We would though make the following observations:-

There are several references to Biodiversity Net Gain within the submitted documents. There has though been no assessment of Biodiversity Net Gain. It is true that larger areas of woodland are being created on site (albeit not meeting a minimum of 2 for 1 replacement in terms of area of woodlands lost) but the woodlands being removed are mature and long established in the locality (continuous woodland for hundreds of years). You cannot mitigate for these woodland area losses as well as other habitats by just planting larger areas. For example many of the woodlands contain old mature trees, with dead wood and cavities. These are essential for many breeding species including a wide variety of bats, invertebrates, birds and also vital for fungi. The new woodlands created would take at least 150 years to begin to develop over mature trees with dead wood and cavities and so it is not a simple case of providing Biodiversity net gain by planting more woodland. Biodiversity gain must therefore not be confused by using a simple area calculation.

Whilst section 15 of the NPPF (2019) deals with conserving and enhancing the natural environment, paragraph 175 sets out the principles which local planning authorities such as St Helens should follow when determining planning applications. The NPPF is clear (in paragraph 170) that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. Whilst there are elements of the design which address this there has not been an assessment of biodiversity net gain for this application. The best mechanism for doing this is the DEFRA metric for calculating Biodiversity Net Gain and so if the applicant's wish to evidence they are providing Biodiversity Net Gain they are best to use this approach to evidence this.

We would though still emphasize that we do not believe this application addresses the approach that should be taken to mitigation as identified in the Planning Practise Guidance, which advocates avoidance as the first principle, before mitigation and compensation are considered.

Whilst invasive species have been identified no programme for removal has been included with this application. This is required for the full part of the application site and need to look to remove rhododendron and Himalayan balsam and indicate how it will be managed to prevent its return. The landscape plans also need to show replacement planting within the woodland areas.

No wintering bird survey has been provided with this application. Farmland sites can provide important wintering bird sites for a wide variety of species and a survey should have been carried out so as to fully assess the importance of the site for such birds (there is reference to one having been carried out for the EIA Scoping Report but no wintering survey is included within this or anywhere else in this submission). Whilst we visited the site we noted relatively large flocks of wintering farm birds which included linnets and yellowhammers (at least 12 of the latter species in one flock). The site also has the potential for tree sparrow and corn bunting that is also present in the locality.

The breeding bird surveys did not seem to pick up on barn owls. The site is highly suitable to barn owls and they have been recorded in the area. We would want to see barn owl boxes provided as part of any mitigation a seven if the site is developed the ditches and grassland corridors as well as adjacent farmland provide excellent foraging habitat for these birds. If the boxes cannot go in buildings or retained woodlands then they need to go on telegraph poles within suitable habitat. They will though need

nest boxes to be provided (the only one suggested is only really suitable for tawny owl, which though still required there should also be barn owl box provision).

There is a lack of information as to how the developers propose to mitigate the impacts of the proposed development. Landscape plans do show new habitat being created but little of this will benefit existing farmland species on the site. There will be a significant loss of farmland habitat used by farmland breeding birds (as well as other habitats) and the proposals to mitigate this need to be clearly set out in any full application (not as stated being detailed, within a Construction Environmental Management Plan. This needs to be provided with the application for the full application part of the site. Do the applicant's propose any off site mitigation? This may require financial contribution for farmland bird enhancement and / or programmes of funding for farmland bird feeding in partnership with local farmers? This needs further clarity and we are happy (subject to MEAS's comments) to explore options with the applicant.

I do not believe the impacts on species such as brown hare will not be adverse. This area is one of the strongholds for hares in the borough. Brown hares were more evident in the area before the adjacent Omega site was built. However hares are still regularly seen in the fields (the survey surprisingly had only one sighting?). On our site visits which were not surveys we observed 8 hares (6 definite separate hares seen within only 20 minutes of going on site) and 4 brown hares on a second visit at the western end and so we believe there needs to be greater consideration of this species and mitigation considered. Fencing design also needs to consider this species and gaps are required beneath security fencing to allow hares and other species to pass beneath so they can still access the wider farmland environment around the development).

There are bird and bat box proposals but many are shown as being put up along the north side of Booths Brow Wood. Whilst there are some trees on the north side of the ditch this does not completely coincide with where they are showing boxes being erected. Whilst I support the provision of such boxes are there trees in this location on the north side of the ditch and if they are on the south side does the applicants have control of the south side i.e. are the boxes going up on the applicant's land as they may be outside of the red line of the site. This needs confirming? Clearly this needs mitigating especially with so much woodland being removed much of which contains good nesting, roosting and breeding sites for breeding birds. It may be a mitigation programme is required for offsite provision in addition to the boxes proposed, particularly if they cannot be erected as shown?

With regards the assessment of bat roosts on site I feel there needs to be more information provided. Section 9.3.67 of the Environmental Statement says that 169 bat roosts were identified as having low / moderate / high potential and yet it was concluded that after further survey work only 3 roosting sites of which only one was on site were identified? This seems an extremely low figure considering how many potential sites were identified. From our inspection of the site, which was not a survey, we observed that there were a significant number of good moderate and high potential roosts sites throughout the woodland areas on site, including those woodlands proposed to be removed. In surveying to assess bat roosts it is particularly time consuming, often requiring multiple, trained observers for each potential tree as observation of as emerging and returning to roosts is very difficult to do. We would therefore expect to know more about where these potential roosts were, exactly how and when they were surveyed and by whom? It also needs to be acknowledged that bats are highly transitory in how they use woodland roost sites and are likely to move locations, sometimes from day to day so the presence of these roosts, especially the medium and high potential roosts. We also require similar supporting information for how the transects were conducted and by whom? The edge of Booths Brow Wood is identified as being of low value but this edge needs to be treated as being of higher value as it is clearly being used and is in association with other habitats such as ponds and streams. With further landscape enhancement as proposed it could become more important and so a good buffer strip with suitably designed lighting is important particularly along this boundary.

As with arboricultural supervision an ecological clerk of works / ecologist will need to supervise key aspects of the work on site and a methodology for this will be required.

### **Landscape and Visual Impact Assessment**

The methodology for this assessment has been carried to the industry standard guidelines and is of an acceptable standard. It includes photomontages that are a representative sample of views to give an accurate picture of the proposed development. The assessment of impacts is comprehensive in scope

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and generally, the conclusions on the severity of impacts can be accepted as accurate. We do though have some concerns about the overall conclusions, which seem to place an over reliance on the ability of the landscape measures proposed as part of this development to mitigate the impacts of the proposed development. There are a number of major / adverse effects from properties and areas of open space such as Griffin Wood and also key routes in Bold Forest Park. It is though clear from a number of the photomontage images provided that regardless of how tall new woodland areas and landscaping get they will have limited impact on mitigating these major / adverse effects. What has not been considered within any of the proposed mitigation measures is the scale of the proposed building in the full application part of the site. It is clear from the photomontages provided that from many of the viewpoints the views of the existing buildings are limited whilst the proposed building is clear visible within the landscape. Many of the existing buildings are around 30 metres in height and this clearly indicates that the scale of the proposed building is of a magnitude beyond these (41.6 metres). Clearly a reduction in this height would be a highly effective way in reducing these major / adverse impacts.

### **St.Helens Local Plan 2020-2035 Submission Draft January 2019 / Greenbelt**

Of particular concern is that the St.Helens Local Plan 2020-2035 Submission Draft January 2019 has indicated a development site in the locality LPSD Ref: 1EA Omega South Western Extension, Land North of Finches Plantation, Bold. This allocation has a western boundary that falls considerably short of where this development is proposing the extent of development. We therefore cannot support this application, as many of the key detrimental impacts of this proposal on the landscape and ecology of the area stem from the scale and extent of the proposal. Were the development to be confined to the area proposed in the Draft Submission then the ecological and landscape impacts would be greatly reduced. The need to remove any protected woodland would almost be negated and the number of ponds lost would be greatly reduced.

I am also concerned about the statement in 7.16. c) of the Planning Statement, which states that “there is a strong prospect of the site being allocated for development in the new Local Plan.....”. This statement is misleading as it is only a proportion of the site on the eastern side of this application site that is proposed for development within the Draft Local Plan.

The Planning Statement submitted also states in 7.16. d) that “the application site will result in a new defensible, long term boundary for the greenbelt and not result in the release of additional land for development”. It could be argued that the existing greenbelt boundary does this but accepting that the Draft Local Plan has identified a new Greenbelt boundary we would argue that the greenbelt boundary proposed in this document is a strong greenbelt boundary being made up mainly by well established, mature woodlands hedgerows, streams and ditches, which are often in combination making for a clear and distinct greenbelt boundary. If this boundary was respected rather than exceeded, as this application is proposing, then, as already stated, most of the key landscape features would remain intact, so greatly reducing the detrimental impacts of the proposed development on the local landscape and ecology of the area.

### **Bold Forest Park / Heritage / Access**

The site lies within an area covered by the Bold Forest Park Area Action Plan, which is a statutory document which sets out detailed policies and actions to develop and sustain the Forest Park. Bold Forest Park is seen as a place for outdoor recreation and activity providing a platform for economic growth and rural entrepreneurship, principally in the visitor economy, whilst providing leisure opportunities for the community and wider region.

Policy BFP ENV3: Heritage states that “St.Helens Council will protect the heritage of Bold Forest Park by protecting designated and undesignated assets.... and “ensure that all new developments respect the significance and, where possible enhance the distinctiveness of the built and historic environment of the Forest Park area in their location, design and layout”. However, this proposal extends into the area designated as the medieval Deer Park and will remove key features of this landscape, particularly the protected woodlands and as such does not respect or conform to this policy. Had development been restricted to the zone identified in the Draft Local Plan for development this would not be the case (assuming the development was to a scale appropriate to the location).



We have already discussed impacts of the proposal on landscape and ecology and clearly from these comments it is clear that this development does not meet the requirements of policy BP ENV1: Enhancing landscape Character or Policy BFP ENV2 Ecological Network.

Policy BFP INF6: Creating an Accessible Forest Park looks to see the network of routes both enhanced and protected. This includes the development of a proposed bridleway. This route would have used the farm bridge that will be truncated by this proposed development. Removing this link will effectively remove the potential to create this route (though we would acknowledge that any route proposed would rely on the support of landowners to deliver it. An alternative east west cycle route / footpath is proposed and it would be ideal to have this designed to not only provide access for cyclists and pedestrians but also provide access for horse riders. This would require modest modification of the route corridor to facilitate this. To provide ongoing linkage it would still require negotiation with other landowners (or land acquisition) but by at least designing in the propensity of the route to accommodate horse riders it will at least provide the opportunity for the development of a bridleway network.

Whilst it is important to promote sustainable development and use of the site it may be beneficial to provide some public car parking for members of the public to use so they can access any new landscape / ecological areas. This is particularly important for any people with mixed abilities or designated as being disabled. The provision of some public car parking (which is absent from most of the current Omega) would be beneficial, especially if any paths created can also be Disability Discrimination Act compliant.

To some extent the same issues arise with cycling. Whilst we support the idea of a cycle route it will at present be truncated by only connecting to a public footpath at its western end. I would still encourage the idea of the route being a multi user route as the proposed ecological / woodland area at the western end of the site, in combination with the woodland at Griffin Wood on the north side of the motorway may still provide a destination for pedestrians and cyclists, particularly those linking from estates in Warrington to the east who to date have not been able to access the area due to the lack of historical linkage that is a legacy of the area having been a secure airbase area for many years. It will be important though to make sure these routes are clearly signed and promote Bold Forest Park as part of any signage strategy for these routes (including the potential for a heritage trail).

Policy BF Econ1: Supporting Economic Growth supports the idea of developing the local economy but says it should comply with national and local planning policies, particularly with regard to greenbelt policy. Therefore, despite wishing to support sustainable development within the Forest Park, for the reasons already stated, we cannot support the proposals in this application, particularly as we feel this development proposal does not conform with Policy BFP1: A Sustainable Forest Park. This is also evident when assessing the effect against policy BFP SN1: Meeting the development needs of the Borough in a manner appropriate to the Forest Park as clearly we do not believe this development is not resulting in the loss of critical infrastructure elements of the Forest Park (particularly though its impact on existing woodlands).

Policy BFP SN2: Planning Obligations requires development to contribute to the infrastructure of the Forest Park. Whilst there are some onsite elements proposed such as new footpath / cycleway, improvements and some mitigation for landscape and biodiversity that must also be a development contribution. This will require an appropriate sum to be paid that can be used for the improvement in the infrastructure of Bold Forest Park as well as further enhance and mitigate landscape and biodiversity. Funds should therefore be provided for access improvements, signing, interpretation and habitat creation and management within the Forest Park as the impacts of this development are far reaching within the forest park. Also, as already illustrated some improvements will have a limited effect if enhancements cannot be made beyond the site boundary. How for example will cyclists get to the cycleway if coming from the north at Gorsey Lane, signing would be required as well as other physical enhancements (also are there other potential links to the proposed path)? At present there is no information as to what this funding would be and so needs further discussion and agreement as part of any development proposal for this site (this also needs to be linked to the shortfall in habitat mitigation on site).

### **Sankey Catchment Plan**

The site lies within the area covered by the Sankey Catchment Action Plan 2018 and so any development should therefore contribute positively to catchment management objectives and enhance riparian habitats. Our concern would therefore be that not only are significant changes proposed to

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existing water courses but significant areas of pools and ponds are proposed to be removed. Therefore any SUDs schemes or changes need serious consideration in terms of these impacts. As many of these water course areas are integral to the woodlands that we are objecting to being removed we would therefore expect existing pools and watercourses in relation to these features be retained and enhanced as part of any development proposals for the site. The comments of the Ifa consultees for the Council therefore need consideration.

### **Phasing of work**

Particularly in relation to the full application part of the site we would like more information to be submitted clarifying the phasing of works on site, particularly in relation to proposed habitat creation and landscaping / access works. It would be important to fully establish any new habitats and infrastructure created at the earliest opportunity.

### **Summary**

We are objecting to this application primarily due to the impacts on protected woodlands, as well as other associated habitats such as ponds and streams and believe there will be a detrimental impact on the area designated as Bold Forest Park, as well as greenbelt, including key landscape features such as the medieval deer park area. The proposals are therefore not in keeping with a number of the policies detailed in the Bold Forest Park Area Action Plan. We also believe that the application does not respect the proposals put forward for development in the locality within the St.Helens Local Plan 2020-2035 Submission Draft January 2019 and the extension of development beyond the limits shown in this plan are the primary reason for significant habitat loss, particularly the removal of protected woodlands.

Aside from our objection the application plans as submitted also require modification even as they currently stand (these comments are made in the event that our reasons for objection to the wider proposal are not given consideration). Further information is required as part of the Arboricultural Report submitted and landscape plans need amendment in terms of additional features, layout and also inclusion of removal of invasive species within habitats and enhancement of retained woodlands. In addition Landscape Management plans are also required so as to give clarity as to exactly how the site will be managed in perpetuity.

The scale of proposed buildings, particularly for the full application site needs consideration so as to reduce major / adverse effects on Bold Forest Park and a number of residencies in the locality.

Further information is required in relation to ecological information submitted, particularly in relation to the bat surveys and in particular assessment of bat roots on site. Brown hares also need greater consideration and information is required as to how invasive species will be controlled. As with arboricultural supervision, a methodology for an ecological clerk of works / ecologist will be required as part of any full submission. Additional information is required in terms of biodiversity net gain if claims of biodiversity net gain are being made within an application. Impacts on the Sankey Catchment also need consideration.

As with offsite mitigation there needs to be a financial package agreed as part of any proposal for a contribution to Bold Forest Park.

**Michael Roberts**

**Countryside Development and Woodlands Officer**

**and**

**Anthony Brandreth**

**Trees and Woodlands Officer**