

DRAFT STATEMENT OF COMMON GROUND

PLANNING MATTERS

PINS APPLICATION REFERENCE: APP/H415/V/20/3253230 (St Helens)
APP/0655/V/20/3253232 (Warrington)

ST HELENS BOROUGH COUNCIL REFERENCE:

Planning Application: P/2018/0048/OUP

WARRINGTON BOROUGH COUNCIL REFERENCE:

Planning Application: 2018/32514

DATE OF INQUIRY: 5 January 2021

SITE ADDRESS

LAND BETWEEN A49 WINWICK ROAD TO A573 PARKSIDE ROAD AND LAND FROM A573 PARKSIDE ROAD TO A579 WINWICK LANE CONNECTING TO M6 JUNCTION 22

APPLICANT: St Helens Borough Council

RULE 6 PARTY: Parkside Action Group

LOCAL PLANNING AUTHORITIES: St Helens Borough Council
Warrington Borough Council

INTRODUCTION

1. This Statement of Common Ground has been prepared to identify matters agreed and matters which are not agreed between the Applicant, the Parkside Action Group (“PAG”), and the Local Planning Authorities.
2. The Parkside Link Road (“PLR”) would provide a road link from Parkside and the site of a proposed Strategic Rail Freight Interchange (SRFI), to Junction 22 of the M6 Motorway. The PLR is necessary infrastructure to enable the development of Parkside Phase 2 and the SRFI.
3. Various documents relating to development proposals at Parkside refer to parts of the Parkside site using different terms. For clarity:
 - “Parkside Phase 1” refers to the land comprised in the “called-in” application APP/H4315/V/20/3253194 (“the Parkside application”);
 - “Parkside Phase 2” refers to future development excluding Strategic Rail Freight Interchange;
 - “Parkside Phase 3” refers to land intended for future Strategic Rail Freight Interchange;
 - “Parkside West” comprises the land including Parkside Phase 1 and Parkside Phase 2; and
 - “Parkside East” is identified in the emerging St Helens Local Plan Submission Document as a site suitable in principle for development of an SRFI but also for other forms of B2/B8 employment provided they are rail served or would not prejudice the development of an SRFI or other rail served development on at least 60 hectares of the site in the future.
 - “The Parkside Strategic Site” refers to all of the components of the proposed development at Parkside.

THE SITE AND SURROUNDING AREA

4. The application site comprises 37.7ha of which 12.7ha falls within Warrington’s administrative boundary. The road development (excluding the temporary area identified for construction compounds and other services) would be 0.37ha in Warrington and 2.73ha in St Helens. The whole of the application site is within the Green Belt.

5. The site covers areas with different characteristics. The western part of the site incorporates part of the A49 Winwick Road and an area of the former Parkside Colliery. The application site within the former colliery runs west to east and initially follows the colliery's access including a band of land to its south until it reaches a concrete pad and an electricity substation. The access road comprises a bit mac road and is still in situ. The wider area of land to the south is woodland. This area is also part of a Registered Battlefield.
6. Beyond the substation, the application site crosses an area of scrub and hardstanding and then incorporates a raised area of land which is a spoil heap now colonised by trees and scrub. The site then crosses into Warrington Borough, where it includes a triangular agricultural field to the north of Woodhead Farm until it meets the A573 Parkside Road and crosses the M6 motorway and enters back into the Borough of St Helens.
7. On the eastern side of the M6 motorway, the site follows the A573 north until it reaches a collection of former agricultural buildings which have been converted into residential use. The site then runs south east across an agricultural field to the south of Barrows Lane which is a public right of way (PROW) until it meets the A579 Winwick Lane and Junction 22 of the M6 motorway.
8. The A579 and Junction 22 of the M6 are in the Warrington Council administrative area. There are five properties and the access to a quarry within Warrington on the eastern side of the A579, and two properties on the western side of the A579 which lie within the Borough of St Helens.
9. Parkside is adjacent to Newton-le-Willows. St Helens Borough has a number of areas that are ranked poorly in the national indices of multiple deprivation and some of the most deprived places are parts of Newton-le-Willows and Earlestown.

THE PROPOSED DEVELOPMENT

10. The PLR is part single carriageway and part dual carriageway. It would link the A49 Winwick Road to the A579 Winwick Lane enabling access to Junction 22 of the M6. The route of the proposed road can be broken down into the following elements:
 - 1.45km of new single carriageway extending eastwards from the A49 Winwick Road to the A573 Parkside Road including a new three arm signalised junction in broadly the same location as the existing access that

served the former colliery. To cater for the signals and for right turning vehicles there would be a new dedicated left turn on the northern approach to the junction and a right turn ghost island to the south. There would also be new pedestrian refuge islands and crossing facilities to the north of the junction with the A49 (known as Parkside Link Road West; partly within St Helens, partly within Warrington);

- 1.3km of new single carriageway road east of the M6 linking the A573 Parkside Road to a new roundabout on the A579 Winwick Lane (comprising 800m Parkside Link Road East, 250m Parkside Road West and 250m Parkside Road South; within St Helens);
- 300m of new dual carriageway road extending westwards from the new roundabout mentioned above to the M6 at junction 22 (known as Winwick Lane South; within St Helens with the exception of Winwick Lane and part of junction 22), including the demolition of Rough Farm, on the north side of Winwick Lane (in St Helens);
- 295m of new single carriageway road extending eastwards from the new roundabout to tie in with the existing A579 Winwick Lane (known as Winwick Lane North; within St Helens);
- Reconfiguration of access to the properties on the south side of the A579 Winwick Lane (within Warrington);
- A grass verge and shared cycle and pedestrian route along the entirety of the proposed road. There would be a foot and cycle way on the northern side of the road with sections on the southern side;
- Lighting along the whole of the carriageway;
- Drainage to Hermitage Green Brook/Oswalds Brook (to the west of the M6) and drainage to either Cockshot Brook or soakaways (to the east of the M6); and
- An ecological mitigation area (within Warrington).

11. There is no constraint to the delivery of the PLR in the event that planning permission is granted.

THE APPLICATION

12. The PLR applications to both St Helens and Warrington were submitted on 16 January 2018.
13. The PLR application to St Helens Borough Council was considered by the Planning Committee on 17 December 2019. The Committee resolved to grant planning permission for the PLR application subject to various conditions.
14. At the same meeting, the Committee also resolved to grant planning permission for the Parkside Phase 1 application (“the Parkside application”), subject to conditions and a Section 106 Planning obligation.
15. The PLR application to Warrington Borough Council was considered by the Development Management Committee on 18 December 2019. The Committee resolved to grant permission for the PLR application subject to conditions and a planning obligation.
16. The applications were referred to the Secretary of State. They were “called-in” on 21 May 2020.
17. The PLR applications have been subject to an Environmental Impact Assessment. This Assessment took account of the cumulative environmental impacts from the Parkside application and future anticipated developments at Parkside West and Parkside East.
18. The documents comprising the applications are identified in the scheme appended to the Statement.

THE DEVELOPMENT PLAN

19. The development plan relevant to the application site falling within St Helens Borough comprises the following:
 - The “saved” policies of the St Helens Unitary Development Plan (1998) (“the St Helens UDP”);
 - The St Helens Core Strategy Local Plan (2012) (“the St Helens Core Strategy”); and

- The Joint Merseyside and Halton Waste Local Plan (2017) (“the Waste Local Plan”)
20. Relevant “saved” policies within the St Helens UDP are as follows:
- S 1 - Green Belt
 - GEN12 - Lighting and Security Apparatus
 - GB 1 - General Criteria for Development Control in the Green Belt
 - GB 2 - General Criteria for Development Control in the Green Belt
 - ENV 4 - Statutory Site Protection
 - ENV 5 - Sites of Community Wildlife Interest and Local Nature Reserves
 - ENV11 - Tree Surveys
 - ENV12 - Development Affecting Trees
 - ENV 13 - New Tree Planting on Development Sites
 - ENV 23 - Archaeology
 - ENV 25 - Listed Buildings
 - ENV 26 - Contaminated Land
 - ENV 30 - Drainage
21. Relevant policies within the St Helens Core Strategy are as follows:
- CSS 1 - Overall Spatial Strategy
 - CIN 1 - Meeting St. Helens' Infrastructure Needs
 - CSD 1 - National Planning Policy Framework - Presumption in Favour of Sustainable Development
 - CAS 3.1 - Newton and Earlestown Strategy
 - CAS 3.2 - Development of a Strategic Rail Freight Interchange (SRFI)
 - CP 1 - Ensuring Quality Development in St. Helens
 - CP 2 - Creating an Accessible St. Helens
 - CE 1 - A Strong and Sustainable Economy
 - CQL 2 - Trees and Woodlands
 - CQL 3 - Biodiversity and Geological Conservation
 - CQL4 - Heritage and Landscape
22. Relevant policies within the Waste Local Plan are as follows:
- WM8 - Waste Prevention and Resource Management
 - WM9 - Sustainable Waste Management Design and Layout of New Development

23. The development plan relevant to the application site falling within Warrington Borough comprises the following:
- Warrington Local Plan Core Strategy (2014) (“the Warrington Local Plan”).
24. Relevant policies within the Warrington Local Plan are as follows:
- CS1 – Delivering Sustainable Development
 - CS2 – Quantity and Distribution of Development
 - CS4 – Transport
 - CS5 – Green Belt
 - PV3 – Strengthening the Borough’s Workforce
 - QE3 – Green Infrastructure
 - QE4 – Flood Risk
 - QE5 – Biodiversity and Geodiversity
 - QE6 – Environmental and Amenity Protection
 - QE7 – Ensuring High Quality Place
 - QE8 – Historic Environment
 - MP1 – General Transport Principles
 - MP3 – Active Travel
 - MP5 – Freight Transport
 - MP7 – Transport Assessment and Travel Plans
 - MP8 – Waste
 - CC2 – Protecting the Countryside

THE EMERGING LOCAL PLAN FOR ST HELENS

25. The St Helens Borough Local Plan 2020-2035 (“the emerging local plan”), was submitted to the Secretary of State for examination on 29 October 2020.
26. The emerging local plan proposes removing the Parkside application site, adjoining land to the north and land to the east of the M6 Motorway from the Green Belt and allocating it for employment purposes and for the provision of a SRFI.
27. Representations have been made to the draft plan objecting to the employment land requirement and the proposed Parkside allocations. The emerging plan is not at a stage where material weight can be attached to it in the determination of this application.
28. The evidence base for the emerging local plan is a material consideration in the determination of this appeal. Specifically, the evidence base indicates that Core

Strategy Policy CE1: A Strong and Sustainable Economy is out of date insofar as it identifies the quantum of economic development required over the plan period (2012 to 2027).

THE EMERGING LOCAL PLAN FOR WARRINGTON

29. The Warrington Proposed Submission Version Local Plan 2017-2037 was published in March 2019. The Regulation 19 consultation period ended in June 2019. The draft plan has yet to be submitted to the Secretary of State for examination. The emerging plan is not at a stage where material weight can be attached to it in the determination of this application.
30. The emerging local plan for Warrington does not refer to or identify the PLR proposal.

OTHER RELEVANT POLICY

The National Policy

31. The National Planning Policy Framework (2019), (“the NPPF”), and the Planning Practice Guidance (“the PPG”), are material considerations. Substantial weight should be given to the NPPF in the determination of the appeal.

Other Approved Policy

32. The following St Helens Supplementary Planning Documents (“SPDs”) are relevant to the application:
 - Design Guidance (September 2007)
 - Trees and Development (June 2008)
 - Design & Crime (October 2009)
 - Ensuring a Choice of Travel (June 2010)
 - Biodiversity (June 2011)
 - Local Economy (November 2013)
33. The following Warrington Supplementary Planning Documents (“SPDs”) are relevant to the application:
 - Design and Construction SPD
 - Environmental Protection SPD
 - Planning Obligations SPD

Other National, Regional and Local Strategy

34. Other relevant National, regional, and local strategy documents are as follows:
- National Policy Statement for Ports (2012) [CDX]
 - National Policy Statement for National Networks (2014) [CDX]
 - The Northern Powerhouse Strategy (2016) [CDX]
 - The Northern Transport Strategy (2017) [CDX]
 - Transport for the North Strategic Transport Plan (2019) [CDX]
 - Liverpool City Region Local Enterprise Partnership Growth Strategy (2016) [CDX]
 - Liverpool City Region SuperPort Market Analysis Land and Property (2014) [CDX]
 - St Helens City Growth Strategy 2008-2018 (2007) [CDX]

OTHER MATTERS AGREED

Policy Support

35. The NPPF states that planning policies should proactively encourage economic growth and to meet anticipated needs.
36. The need for economic development in St Helens Borough is substantial. There is also significant demand. There is a lack of suitable sites in St Helens to accommodate the need and demand.
- PAG dispute the evidence of need for economic development because **(set out reasons)**.
37. The PLR benefits from policy support from the NPPF paragraphs 80 to 82 which state that significant weight should be placed on the need to support economic growth and productivity, taking account of local businesses and wider opportunities for development; that plans should positively and proactively encourage sustainable growth; that barriers to investment such as inadequate infrastructure should be addressed; and that there should be recognition of the specific locational requirements of different sectors and decisions should respond to those requirements.
38. A strength of the Parkside Strategic Site is that it is in a highly accessible location, adjacent to the M6 Motorway, close to the M62 Motorway and adjacent to the West Coast main railway line and the Liverpool to Leeds railway line.

39. The PLR would be consistent with the Planning Practice Guidance paragraph: 031 Reference ID: 2a-031-20190722, which states that the logistics industry plays a critical role in enabling an efficient, sustainable, and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements.
40. The development of an SRFI at Parkside is a longstanding policy objective that was identified in the Regional Spatial Strategy and in the current development plan for St Helens.
41. RSS Policy RT1 supported integrated transport networks, Policy RT7 referred to capitalising on the opportunities to shift from road-based transport, Policy RT8 referred to the allocation of land at Newton-le-Willows, with access to the West Coast Main Line and Chat Moss rail route, for the development of an inter-modal freight terminal. The location identified at Newton-le-Willows is Parkside.
42. Core Strategy Policy CSS 1 indicates that land at Parkside is identified as a strategic location for a SRFI and Policy CAS 3.2 indicates that subject to caveats being satisfied, land at Parkside will be considered favourably for removal from the Green Belt through the Allocations Local Plan to deliver an SRFI.
43. The current proposal departs from what was anticipated in the Core Strategy in that the site of the SRFI is now proposed on land to the east of the M6 Motorway. The PLR provides necessary road infrastructure.
44. The PLR enables further development at the Parkside Strategic Site beyond the current Parkside Phase 1 application.
45. The PLR would result in an investment of approximately £31.5 million of construction related expenditure and provide the equivalent of 40 full time jobs. It would also facilitate the provision of an SRFI and further development at the Parkside Strategic Site and the employment benefits associated with those developments.
46. The location of the Parkside Strategic Site close to Newton-le-Willows where there are identified areas of multiple deprivation is an important matter when judging the weight to be accorded to the economic benefits that would be unlocked by the PLR.

47. Warrington Borough would benefit from the creation of jobs associated with the construction of the proposed development as well as indirect benefits including employment opportunities at Parkside phases 2 and 3 for residents of Warrington and beyond.

Green Belt

48. The PLR is transport infrastructure and an engineering operation. There is a difference between the position of St Helens Borough Council and Warrington Borough Council as to whether the PLR is by definition inappropriate within the Green Belt. Warrington take the view that it is inappropriate development. St Helens consider that it is not inappropriate by definition because it is a development for infrastructure. However, having regard to NPPF paragraph 146, the PLR would be inappropriate because it would impact on the openness of the Green Belt. It is agreed by St Helens and Warrington Councils that it is necessary for very special circumstances to be demonstrated for the PLR.
49. Regarding the openness of the Green Belt, the impact of the PLR would vary along its length. To the west of the M6 Motorway comprising the Parkside colliery site, and the land within Warrington, the PLR would have a limited adverse impact. To the east of the M6 Motorway, the PLR would have a significant adverse impact. Substantial weight should be attached to the harm to the openness of the Green Belt in balancing the merits of the application. The overall impact on the openness of the Green Belt for the whole scheme, would be moderate.
50. The PLR would not harm the Green Belt purposes checking the unrestricted sprawl of large built up area, of preventing neighbouring towns merging into one another, of preserving the special character of an historic town, or the purpose of assisting urban regeneration. The PLR would harm the purpose of assisting in safeguarding the countryside from encroachment.
51. The impact of further development at Parkside including Parkside Phase 2 and the SRFI would harm the openness of the Green Belt and conflict with purposes of including land within Green Belt. As the purpose of the PLR is to facilitate further development, this should weigh against the proposed development in the planning balance.
52. Having regard to the harm to the openness of the Green Belt and harm to the purposes of the Green Belt, the need for the PLR, the Parkside development, including the SRFI,

and the benefits arising from it are capable of amounting to very special circumstances to justify development.

53. If the Inspector draws the conclusion that there are very special circumstances to justify development within the Green Belt, the PLR application would be compliant with the Green Belt policies within the development plans and Green Belt policy within the NPPF. There would be no grounds within Green Belt policy to withhold planning permission.

Heritage

54. The PLR has the potential to harm the following heritage assets:

Within St Helens:

- The Registered Battlefield of the Battle of Winwick (1648)
- Newton Park Farmhouse (Grade II Listed),
- Newton Park Farm Barn (Grade II Listed) which is within the site of the former colliery but to the north of the Parkside application site,
- Rough Farm Barn and Rough Cottage (non-designated); and

Within Warrington:

- The Registered Battlefield of the Battle of Winwick (1648)
- Woodhead Farm, Parkside Road (Grade II listed)
- Woodhead Barn, Parkside Road (Grade II listed)
- St Oswald's Well, Parkside Road (Grade II listed and SAM)
- Monk House, Parkside Road (locally listed)
- Oven Back Cottage, Winwick Lane (locally listed)

55. The PLR application would harm the setting of the Listed Buildings at Newton Park Farm. It would also harm the Registered Battlefield, and Rough Farm Barn and Cottage. Within St Helens the harm in each case would be "less than substantial".

56. In Warrington the PLR application would have a neutral effect on Oven Back Cottage (undesigned heritage asset). The impact on Monk House (undesigned heritage asset) would be "less than substantial" harm with the impact being negligible. The significance of the asset is considered to be low. The impact on St Oswald's Well (Grade II listed and scheduled monument) would be neutral on the asset and its setting during

construction, therefore no impact on the asset's significance during construction. The impact during the operational phase is considered to be moderate beneficial as a result of changes in traffic flows on Parkside Road. The significance of the asset is considered to be high. Regarding Woodhead Farm and Barn (both Grade II listed) the impact would be "less than substantial" harm to both assets with the effect considered to be minor adverse. The significance of both assets is considered to be high. For the Battle of Winwick Battlefield, harm would be "less than substantial" with the effect being negligible. The significance of the asset is considered to be very high.

57. PAG assert that the level of harm to the Listed Buildings and the Registered Battlefield would be "substantial".
58. If the Inspector concludes that the PLR would achieve substantial public benefits, the harm to heritage assets would be outweighed, irrespective of whether the harm was "substantial" or "less than substantial".

Amenity

59. The PLR application would impact on the amenity of homes in the vicinity of the route. There would be some impact arising from noise, activity and visual impact. The harm to residential amenity should weigh against the application in the planning balance.

Future Development at Parkside and the SRFI

60. Each application at the Parkside Strategic Site, including the SRFI, will be treated on their own merits having regard to the detail of each application, development plan and other material considerations.

Signed on behalf of the Applicant	Signed on behalf of St Helens Borough Council as Local Planning Authority
Date	Date
Position	Position

Signed on behalf of Warrington Borough Council as Local Planning Authority	Signed on behalf of the Parkside Action Group
Date	Date
Position	Position