

Parkside Action Group
Response to St Helens Council Local Plan Scoping Consultation
February 2016



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1 Purpose

This document provides a response to the St Helens Local Scoping Plan Consultation January 2016 on behalf of Parkside Action Group.

2 Introduction

PAG was formed in 2006 to protect the land around the site of the former colliery from unsuitable development.

PAG previously campaigned to object to changes to Green Belt as part of the development of the St Helens Council Local Development Framework Core Strategy adopted in November 2012. The development of the Core Strategy ran from 2007 with the initial Preferred Options consultation followed by a further 3 public consultations. These are well documented in the Local Development Framework Evidence base. During this period across the four consultations approximately 6000 objections were made to changes to the Green Belt. It is therefore extremely disappointing and quite frankly insulting to the community to find that the Council are once again pursuing release of Green Belt in just over 3 years since the Core Strategy was adopted.

The Council should be aware that PAG and our community will vigorously campaign against a new Core Strategy that promotes the use of the Parkside for an HGV distribution centre that threatens to place thousands of vehicle movements on our local roads. The now redundant North West Regional Spatial Strategy, which PAG contributed to, made it clear that Parkside should not be used for such a purpose. The currently adopted Core Strategy CAS 3.2 contains several criteria relevant to Parkside's potential use, in particular that the site must only be used for a rail connected interchange and not simply an HGV distribution centre.

PAG will not tolerate the pre-release of Green Belt at Parkside on any grounds. To do so pre-empts the consideration of potential use and proper consideration of special circumstances detailed in UK planning regulations.

In addition the proposal to extend the period of the Local Plan to 2033 or beyond is unsound. For a start it is erroneous to forecast that far into the future. Secondly the approach appears to be simply a scam to justify the release of additional Green Belt up front. In spite of the so called evidence of need, to state that only 37ha were needed just over 3 years ago, and now 214ha is needed extremely difficult to believe, especially given the observations highlighted later in this document.

Development need alone would not justify the special circumstances requirements detailed in UK planning policy to release Green Belt. Hence the employment need evidence put forward by the Council. This evidence appears highly dubious and is discussed next.

3 Evidence Papers

3.1 Employment Land Needs Study

This document is unsound in several areas:

- The report identifies 3 potential forecasts for employment needs based on several factors (Section 8.0, Objectively Assessed Needs). The higher of the forecasts is recommended based on a hypothetical idea that a move to logistics will generate higher employment rates than has been shown in all previous years. There must surely be a high risk of this decision being incorrect.
- Although acknowledged, there are no metrics provided to show the impacts of relocation or 'in' movements for the St Helens borough. This is particularly relevant given that Parkside borders both Warrington and Wigan and has commute options from Manchester and Liverpool and surrounding area. The evidence is highly focussed on St Helens as a separate entity. As such the resultant calculations are highly likely to be flawed.
- Metrics for immediate local capacity appear not to have been factored into equations. For instance the Omega web site currently states further capacity is available:
 - 1.3m sq ft of further consented manufacturing/ logistics space is available
 - 1.5m sq ft of office development can be delivered – outline planning consent is in placeIf capacity is so short, why has this space not been snapped up yet?
- An additional 30-40ha of land appears to have been added to the total requirement based on land required to satisfy 340ha of Super Port dependency. The author has been unable to validate the authenticity of the 340ha (section 8.59, '*Attempts to contact the authors of the report to **clarify the demand methodology** were unsuccessful due to the consultant firm, NAI Haywards, being bought by another firm, Avison Young in 2014, with a resulting restructuring in the firm*'). Yet the data is still factored into the final equation. Surely this again is another element that would indicate that the final calculations are at high risk of being incorrect and unsound.
- Plotting the trend based on the 214ha estimate provided in the evidence paper and the 178.5ha requirement mentioned in Q14 on the response form, provides the following graph.



The yearly uptake in land is $214/21$ (2037-2016 years) = 10.19ha /year. However even the maximum forecast scenario in table 46, which is based on previous growth periods, places the demand at 7.5ha/year. Therefore what this document is proposing that the area will experience 25% more demand, than has ever been seen before, consistently year on year over the next 21 years. *This is simply not credible.*

In summary for the reasons highlighted above, this report is highly flawed because it makes choices that over-inflate the employment need requirement significantly and which conflict with previous averages and trends. It also fails to provide real metrics that would compensate for relocation and 'in' movements into the St Helens borough. Additionally it fails to incorporate metrics for remaining capacity at nearby developments such as Omega, only 2 miles from Parkside, or metrics for pending developments in other boroughs in the immediate vicinity.

4 Consultation Format

The consultation format consists of:

- 21 questions with varied terminology that most people would fail to understand
- Employment Land Needs Study, 140 pages
- St Helens Allocations Plan – Economic Evidence Base Paper, 27 pages

Even though a briefing paper was produced for the consultation form, the feedback we have is that the terminology is confusing, the volume too great and in general very difficult to understand. It leaves people thinking that the Council is attempting to bury key information and decisions rather than communicate in plain English.

5 Specific Comments on Employment Land Needs Study Evidence Paper

5.1 Page 4, section viii

Parkside is not a large flat site. It has a huge slag heap on it. It is not ideally situated at present. There are no current links with the motorways, and the difficulty of connecting to the motorway is well known as experienced by the previous Prologis application. The rail connection would have to be to the Liverpool-Manchester line. Freight movements would therefore potentially congest passenger traffic both on the Liverpool-Manchester line, and the West Coast Main Line

5.2 Page 5 section xii

Did the OAN take into account that Parkside is directly adjacent to both Wigan and Warrington? Employment potential is flawed unless this is also take into consideration given that employment could easily come from either of these directions.

5.3 Page 7, section 1.7

Was Wigan consulted? Wigan borough is directly adjacent to Parkside.

5.4 Page 34 section 2.73

As we have stated many times in the past road to rail may reduce CO₂ emissions, but the location at Parkside, as per the Prologis application has the potential to put thousands of HGVs onto our local roads, and pollute our air quality. There are already two identified AQMA areas in the immediate vicinity of the site.

5.5 Page 34 section 2.75 & page 25 section 2.79

I have never seen any real evidence to support the freight level increase quoted (310%). It is quite simply fictitious as I have mentioned on several previous consultation responses. Evidence papers need to state where data is sourced from, and that does not just mean another document. The data has to be real, measured, and audited.

5.6 Page 51, section 4.12

'As such facilities usually operate 24 hours a day, sites next to housing or other sensitive uses are not desirable.' Parkside is immediately adjacent to several residential areas. We agree, not a sensible place to locate a 24x365 HGV distribution centre!

Page 58, section 4.32

This is complete nonsense. Why would Peel build a huge port at Liverpool if all the freight would still be sourced from the South? The whole point of the Super port is to bring in freight directly to the North West. There are also other nearby facilities, such as the RFI at Runcorn. In addition why would someone take a container off a ship in Liverpool and put it on a train to Parkside. This would just not be economical compared to road. The whole point about containers is that they are secured at the point of despatch, and the person who ordered it expects to see that security seal intact when it arrives at their door step.

5.7 Page 78, section 6.13 and section 6.15

'Respondents were asked about the potential implications of the SuperPort and Parkside projects for their business.' Yes, Beneficial, 15 and No, not beneficial 181. Says it all really!

Of note the author quotes the reasons why the 15 respondents who thought it would be a good idea, but somehow forgot to mention why the other 181 thought it would not be beneficial. Odd that isn't it?

5.8 Page 98, section 8.21 and page 121 section 9.6

'Transport and storage was significantly the largest growth sector in the Cambridge modelling over the study period'. The graph in the preceding section shows a value (?) of 1380 for Professional, Scientific and Technical, 1317 for Arts and entertainment, and 1249 for Transportation and Storage. So the statement that Transport and Storage is the largest growth sector is incorrect? Why is the Council not considering the other two growth areas as possible candidates for employment? They would provide highly skilled jobs compared to logistics.

5.9 Page 112, section 8.44

'The land demand projections of Tables 57-59 would be met both within St Helens and outside, as resident workers would continue to commute outside of the local authority area for employment. It does not account for demand generated by a growing resident population in neighbouring areas, which would influence demand for employment land in St Helens (in-commuters).'

The report has not indicated the impact of these effects. These are very important, particularly given Parkside's location, bordering Warrington and Wigan, and commute options.

5.10 Page 115, section 8.52

'These factors influencing demand are business demand driven, that is the demand for additional employment land would be driven by an upsurge in employment opportunities in St Helens as businesses seek to establish a position locally in response to improved freight infrastructure or logistics opportunities. Therefore the most appropriate methodology to adjust is the Model 2, employment demand model.'

Surely this is circular reasoning? The model (evidence) says use one value, but if we have big warehouses, we should to take a higher value. This reasoning is not sound. Simple calculation here please, this many people means this many warehouses, not this many warehouses means this many people! If the reports logic were to apply, the previous yearly trend would be exponential. The report needs to stick to realistic figures based on previous trends.

5.11 Page 119, section 8.65

So here the author has added in a fictitious figure of 30-40ha for 'Additional land demand and major projects', based on a report specified in section 8.60, where the author has been unable to contact the company or author who originally provided the data to validate its accuracy. And you expect us to believe this fairy tale?

6 Specific Comments on St Helens Allocations Plan – Economic Evidence Base Paper

6.1 Page 24, section 5.1.2

This table should include Parkside and also state 'No access to site from A580/M6/M62 via 'A' roads strategic and/or primary freight network' (A roads connecting Parkside should be excluded because they connect urban areas).