

Parkside Action Group
Response to St.Helens Local Plan Preferred Options
December 2016



Table of Contents

1	Purpose	4
2	Introduction	4
3	Errors in Employment Land Calculations	5
4	Green Belt Review.....	11
5	Sustainability Assessment.....	14
6	Parkside Logistics and Rail Freight Interchange Study.....	19
7	LPA02 Spatial Strategy	22
8	LPA04/LPA04.1 A Strong and Sustainable Economy.....	22
9	LPA05 Meeting St. Helens Housing Needs.....	23
10	LPA10 Development of Strategic Rail Freight Interchange.....	25
11	LPAD09 Air Quality.....	27
12	LPD11 Health and Wellbeing	27
13	Effectiveness of Public Consultation.....	27
14	Conclusions	29

Pictures Front Page Top to Bottom:

- 1. Summer Parkside East (proposed rail freight container depot)*
- 2. A49 near Parkside Entrance (proposed Langtree Warehouse Development)*
- 3. Winter Parkside East*
- 4. Summer Parkside East adjacent to the M6*

Glossary

Term	Description
ELNS	Employment Land Needs Study
SRFI	Strategic Rail Freight Terminal
NPPF	National Planning Policy Framework

Document History

Version/Date	Author	Updates
Draft 0.1/22-Jan-2017	Dave Tyas	New document
Draft 0.2/27-Jan-2017	Dave Tyas	Updated following feedback
Final 1.0/28-Jan-2017	Dave Tyas	Final Updates

1 Purpose

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

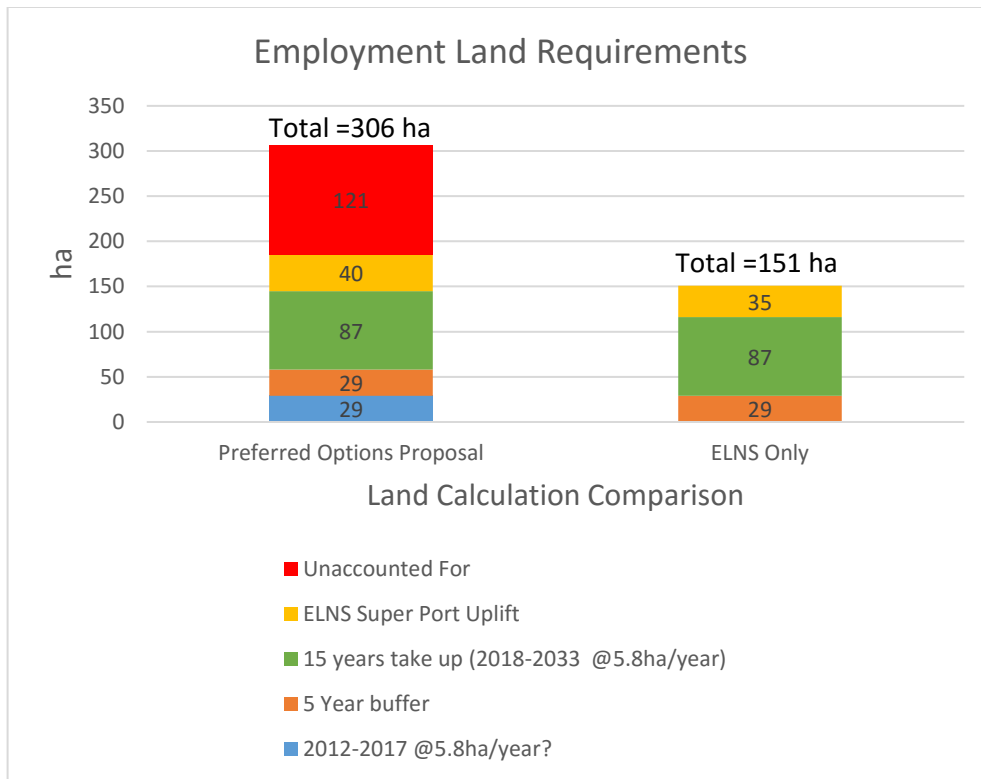
2 Introduction

- 2.1 PAG was formed in 2006 to protect the land around the site of the former colliery from unsuitable development.
- 2.2 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 other 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.
- 2.3 Following Examination in Public, the Core Strategy was adopted in early 2013. The plan took an approach not to remove land around Parkside from the Green Belt, but additionally specified restrictions for development associated with commitment to an SRFI through policy CAS 3.2.
- 2.4 In January 2016 PAG and its supporters were disappointed to find the Council once more attacking the Green Belt through a Local Plan Scoping Consultation, only 3 years after completing its last plan. Tediously and frustratingly PAG yet again campaigned to protect the status of the Green Belt.
- 2.5 A high number of comments were raised at the Scoping stage, however, at the time of compiling our response the Council had failed to produce the outputs from the Scoping Consultation, making it impossible to judge whether the Preferred Options content reflected those comments or not, and if not why the Council had steered the Preferred Options document in the direction it had.
- 2.6 Following a Freedom of Information request, the Council released the Summary of Representations on St. Helens Local Plan Scoping Consultation 20th January – 2nd March 2016 on the 24th January 2017, 5 days before the closing date of the Preferred Options consultation and 10 months after the closing date of the Scoping Consultation itself. As far as we know the public have not been notified of its release, nor had sufficient time to review it.
- 2.7 In agreement with the Planning Office we will be providing a letter post Preferred Options closing date to provide further comments. We have provided further commentary on the implications of the late release of the Scoping document later in our response.
- 2.8 Employment land need estimates appear to have been increased by 121ha over and above the ELNS recommendations allegedly based on the feedback received from the Scoping Consultation. This significantly diminishes the effectiveness of the Preferred Options consultation given that the Council's estimating assumptions cannot be validated and tested.

3 Errors in Employment Land Calculations

- 3.1 There appear to be a number of errors and non-evidence based assumptions presented in policy LPA04. These calculations underpin the proposed Green Belt deallocation and are therefore critical.
- 3.2 The ELNS used the period 2012 to 2017 in its calculations as detailed in para 4.74 of the Preferred Options document. This period is outside the scope of the plan i.e. outside the timeframe 2018-2033, and should therefore be removed from the forecast, especially as a 5 year contingency buffer has also been added.
- 3.3 Para 4.77 states '*Responses to the Local Plan Scoping Consultation (2016) suggested ... at least 70ha of land for logistics over and above levels of demand*'. Please see para 2.5 thru 2.7 of this document for an explanation of why it has not been possible to validate this statement (missing Scoping outputs)
- 3.4 Para 4.78 states '*... the comments received from consultees during the Local Plan Scoping Consultation (2016) into consideration, it is considered that the employment land requirement for the Plan (306ha) has been set at a level that allows ...*' Please see para 2.5 thru 2.7 of this document for an explanation of why it has not been possible to validate this statement (missing Scoping outputs)

3.5 The overall commercial strategic sites position detailed in policy LPA04 is summarised by the chart below. The chart is an attempt to illustrate how the Preferred Option document accounts for the total land for the strategic sites (306 ha total), and as a comparison what the ELNS predicts following corrections for the incorrect addition of 29ha for a period between 2012 and 2017 in the ELNS.



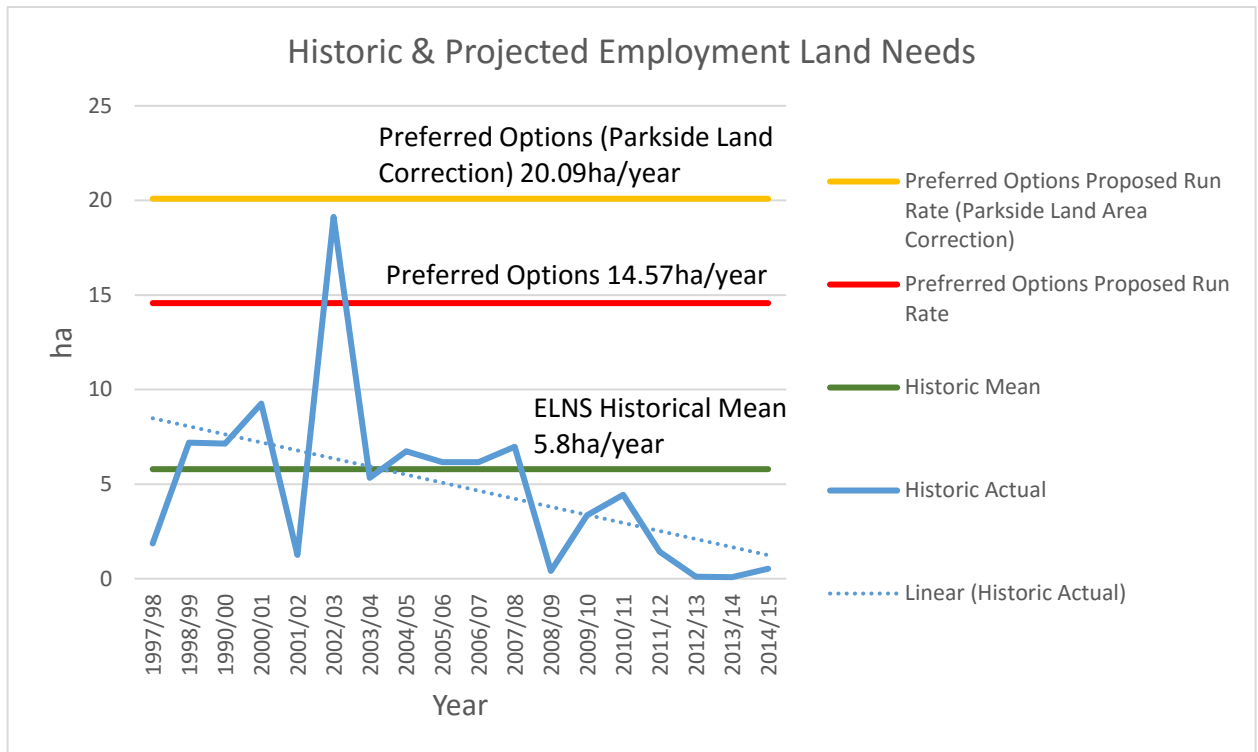
3.6 The stacked bar to the left illustrates a breakdown of the land that is required for the strategic sites listed in policy LPA04 (a total of 306ha). The breakdown is described as follows:

- i. 29ha for a period 2012-2017 as described in the ELNS that has been inherited by the Preferred Option document mistakenly. This period is outside the life time of the plan and should not be part of the forecast.
- ii. 29ha that the ELNS recommended as a 5 year buffer.
- iii. 87ha calculated by multiplying the ELNS recommended historic mean of 5.8ha/year by the life time of the plan 15 years.
- iv. 40ha recommended by the ELNS to account for demand from the Port of Liverpool. In fact the ELNS recommended 30-40ha, so in the second stacked bar on the right we have taken the mean of this value at 35ha.
- v. 121ha that are partly unaccounted for. Para 4.77 states '*Responses to the Local Plan Scoping Consultation (2016) suggested ... at least 70ha of land for logistics over and above levels of*

demand'. Therefore we assume that 70ha of this unaccounted amount is a component of the 121ha, but this still leaves 51ha unaccounted for? Please also see para 3.3 of this document regarding the credibility of the 70ha too.

- 3.7 The stacked bar to the right shows only the ELNS recommendation for the period of the plan. This is made up of:
- a. 29ha that the ELNS recommended as a 5 year buffer.
 - b. 87ha calculated by multiplying the ELNS recommended historic mean of 5.8ha/year by the life time of the plan 15 years.
 - c. 40ha recommended by the ELNS to account for demand from the Port of Liverpool. The ELNS recommended 30-40ha, so we have taken the mean of this value at 35ha.
- 3.8 The Preferred Options document therefore is proposing approximately twice as much land as the ELNS recommended. This is clearly excessive. Growth forecast of this proportion should be correctly justified and accounted for.
- 3.9 The land allocation for Parkside East and Parkside West are shown as 64.55ha and 79.57ha respectively in the table in policy LPA04, or a total of 144.12ha. The previous Prologis Planning application which targeted the same plots measured a total land allocation as 272ha therefore the areas quoted appear incorrect.
- 3.10 In the Green Belt Review Appendix 2, Parcel ref 39 and 41 which represent Parkside East and West are quoted as having land areas of 127.6ha and 100.5ha respectively making a total of 228.1ha. This is a different number again. The Preferred Options material is inconsistent with its information.
- 3.11 There is lack of clarity around the term 'employment land'. Does employment land mean the site of the development itself, or the total size of the land required i.e. total to be removed from Green Belt?
- 3.12 The entire land size which needs to be removed from Green Belt should be used and incorporated into land deallocation calculations and be appropriately presented.
- 3.13 It is clear from 3.6, 3.7, & 3.11 above that the table in LPA04 is quoting the size of the development rather than the size of the total land occupied or to be removed from Green Belt. This means that the total amount of land required at 306ha is under stated.
- 3.14 The footnote to the table in LPA04 states '*a further 60ha will be required on the site to deliver the necessary rail and road infrastructure and landscaping*'. The document needs to make clear the total amount of land required for the site, and not falsely disguise the real need, otherwise the total amount of Green Belt de-allocation is not properly presented.

3.15 The chart below illustrates historic and projected Employment Land Needs:



A net decline in historic land take up can be seen (plotted through the in-built Microsoft Excel Trend feature).

The Green line shows the ELNS recommended historic land take up mean of 5.8ha/year.

The Red line shows a strategic land take up rate of 14.57ha/year based on the Preferred Options allocation of 306ha over the period of the plan.

The Yellow line shows a land take up of 19.24ha/year based on a recalculated size of land for Parkside East and Parkside West of 272ha less 12.1ha for the colliery soil heap (detailed in the footnote to the table in LPA04) which the document says will no longer be developed. The rate will be even higher if the land requirements for other sites have been incorrectly understated.

3.16 From the above it is clear that the Council’s anticipated employment land needs of 306ha are highly inflated and badly estimated. The estimate is in conflict with rejected options in para 4.90 and 4.91 in the Preferred Options document:

4.90 Alternative Option 3: Provide significantly more employment land than the identified employment land requirement. 4.91 Reason for Rejection: A significant oversupply of employment land could result in pressure for more housing, create labour supply difficulties and could therefore result in unsustainable commuting. It could also result in a large oversupply of development land, with many of the allocated sites remaining vacant. A significant oversupply of development land in St. Helens could also undermine the delivery of employment land in neighbouring authorities.

- 3.17 Additionally approximately 80% of required employment land listed as strategic sites and 37% of housing allocation is targeted at Newton-Le-Willows and Haydock. This is in conflict with rejected options in para 4.53 and 4.54 in the Preferred Options document.

4.53 Alternative Option 7: Focus all Green Belt release for residential development towards the areas of the borough where employment development is concentrated (i.e. the east of the borough around Haydock and Newton-le-Willows) to link new residential opportunities to new employment opportunities. 4.54 Reason for rejection: There is unlikely to be enough suitable Green belt land in the Haydock and Newton-le-Willows areas to meet both employment and housing needs, leading to less suitable land (in Green Belt release terms) being released, potentially leading to merging of settlements . This may also lead to harmful impacts on local shared infrastructure (i.e. roads). If land was restricted to that with the least Green Belt impact (as is currently the case), then there would not be enough land to meet the employment and housing targets.

- 3.18 Para 4.75 contains the calculation $190.8 - 32.6 = 223.4$. If this is to be taken as subtraction, the calculation is clearly not correct. The title of the table also specifies the period 2012-2038 which is outside the scope of the plan and therefore taking account of the other errors and inaccuracies mentioned herein, the statements concerning residual land are unclear and not helpful.
- 3.19 The commercial land requirement presented is purely based on growth expectations which appears unsubstantiated in some parts. The case for sustainable development which is required to be demonstrated for the special circumstances required for Green Belt release is not presented.
- 3.20 Warehouse floor space requirements for the duration of the plan are not presented. The Greater Manchester Spatial Framework have detailed forecasted floor space requirements, including allocations at M6 J24/J25. These appear not to have been taken into account by the plan. The relationship between employment potential, floor space, and land should be presented as part of a sustainable argument.

3.21 From our own research the Warrington Omega development appears to have generated low rates of local employment:

Facility	Employment Details	Net Local Employment
ASDA A 618,000 sq ft State of the art, fully automated distribution centre. Relocated from Marus Bridge - 11.6 miles away.	Most of the 400 staff transferred to the Omega site with some taking VR	Minimal
Travis Perkins A 700,000 sq ft distribution centre Relocated from Appleton Thorn - 9.7 miles away.	105 staff transferred to Omega	Minimal
Brake Bros 198,000 sq ft distribution centre Relocated from Preston Brook - 12 miles away	The Preston Brook distribution centre was closed down with the loss of around 120 jobs	Unknown, but likely to be minimal
Hermes 153,000 sq ft distribution centre Relocated from Warrington South Distribution Park - 9.3 miles away		60 new jobs

A total of 1.7 million square feet of logistics warehousing has therefore generated approximately 60 new jobs. The Council's logistics strategy is therefore unlikely to meet employment needs for the borough.

3.22 The Warrington Omega site, only a 2-3 miles from Parkside, has 900,000 sq feet of approved warehouse and office space waiting for occupiers. The Omega development has a 25 year fulfilment plan. Remaining capacity does not appear to have been factored into the requirements of the plan.

3.23 In summary the suggested land take up rate is far in excess of what would appear to be a reasonable estimate, especially when the correct land allocations are taken into account. The arguments presented appear to suggest a 'top-down' approach rather than 'bottom up approach' i.e. start with the total amount of land required for a list of prospective sites, and then make the numbers and argument fit that total (only they do not as we have shown earlier). This is not an acceptable way to justify release of land from the Green Belt, nor does it present a convincing growth model.

4 Green Belt Review

- 4.1 Para 1.11 in the Green Belt Review indicates any changes to Green Belt *should only be made once in a generation*. Which government document specifies this?
- 4.2 The NPPF makes clear that local authorities should adjust Green Belt boundaries once for the life time of the plan. The implication, however, of this approach is that once modified, developers may submit applications for deallocated land as soon as the plan is adopted, and face no challenge around special circumstances. It follows that rather than land being consumed gradually over the lifetime of the plan it could be consumed rapidly with little focus on brownfield opportunity. The lack of a phased approach to release with monitoring and assessment at each phase means that there is an extremely high risk of inappropriate use, and lack of demonstrable sustainable benefits. This is something PAG will take up with government representatives, but the Council should also be putting forward a phased, monitored, and reported on approach in their plan. If you don't measure and report, how do you know you got there?
- 4.3 The five stated purposes of Green Belt are detailed in para 1.16 of the Green Belt Review document:
1. To check unrestricted sprawl of large built-up areas;
 2. To prevent neighbouring towns from merging into one another;
 3. To assist in safeguarding the countryside from encroachment;
 4. To preserve the setting and special character of historic towns; and
 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 4.4 Para 3.13 in the Green Belt Review document makes the statement '*The Borough has no nationally recognised historic towns or villages*' (see para 4.2 above). This is incorrect. Newton-Le-Willows has several historic features including the Huskisson Memorial, Newton Park Farm, historic battle fields¹, and two historic railway stations. Several Green Belt parcels in the assessment are in or at border Newton-Le-Willows. The Council's own signage at the borders of Newton-Le-Willows' states 'Welcome to the Historic Town of Newton-Le-Willows'
- 4.5 Para 3.10 makes reference to a 'desk based assessment'. How can the value of Green Belt parcels be properly realised without a visual inspection? Parkside East for example could be classified as an area of Outstanding Natural Beauty. It has clear views to Winter Hill and the Pennines. Some pictures from Parkside East can be found on the first page of this document.

¹ The battle of Maserfeld (Maserfield) August 642AD King Penda of Mercia who killed King Oswald of Northumbria, at King Oswald's Winter Palace located at Woodhead farm location - source Bede: who wrote King Oswald died to save his army at and where now is St Oswald's Well a registered monument and grade II listed. The Battle took place in and around the Winwick area including what became called Newton Park.

- 4.6 Para 3.15 states '*PAS guidance (see footnote 7) confirms that if the Green Belt has achieved the purpose of looking at land within the urban areas first, "then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.*' Is this statement trying to justify omitting Green Belt purposes 4 & 5 as listed in para 4.1 above from the assessment? This does not make sense. A Green Parcel within a Historic Town may very well *preserve the setting and special character* of the Town (also specifically called out in planning guidance). A visual inspection would be required to ascertain this. Purpose 4 especially should have been included in the assessment.
- 4.7 Of note the Greater Manchester Spatial Framework evaluated and scored all 5 purposes.
- 4.8 Where is footnote 7 referred to in Para 3.15? It is certainly not at the bottom of the page pertaining to that paragraph?
- 4.9 Multiple referencing is used to refer to Green Belt Parcels and land areas. This is confusing and very difficult for the reader to follow. For example for Parkside West and East the following references are used:
- a) EA8 and EA9
 - b) E11, E12
 - c) GBS_028 (this appears to be a joint reference for both Parkside West and Parkside East)
 - d) Location 26 (this appears to be a joint reference for both Parkside West and Parkside East)
 - e) Parcel 39 and 41
- 4.10 Appendix 2 has no column to indicate strategic site reference. They are difficult to find?
- 4.11 Appendix 2 has no key to indicate the shading is not included in the Appendix so it is difficult for the reader to understand its meaning.
- 4.12 Appendix 2 Parcel 39 is Parkside East. Whereas this land does not directly border Newton-Le-Willows, Winwick, Lowton & Golborne, it provides a natural break between those settlements. It therefore should not be given the lowest rating for the Purpose 1 & 2 scores. As the land could be described as an 'area of Natural Beauty', a higher score than moderate should be applied for purpose 3, we would suggest the highest score.
- 4.13 Appendix 2 Parcel 41 is Parkside West. Parkside West is formed of a reasonably small hard standing area the site of the former colliery, with the remaining land returned to its natural habitat. Certain areas are open and areas of natural beauty. The score for purpose 3 should not be the lowest and should be much higher.
- 4.14 The above comments clearly indicate that parcels have been scored too lowly. This may stem from using a desk top survey rather than knowledge or visual inspection of an area. All areas should be visually inspected by an impartial party and rescored. This activity should be performed by an impartial party and not by a planning consultancy employed by the Council which normally composes cases to support developers and has an agenda to support the Council's case for developing huge areas of the Green Belt.

4.15 NPPF 7 defines sustainable development:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

*- **An economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

*- **A social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*

*- **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

4.16 NPPF para 82 states that if proposing a new Green Belt, local planning authorities should show what the consequences of the proposal would be for sustainable development.

4.17 How can a strategy for growth around logistics and warehousing meet the criteria in para 4.15 above?

The growth strategy of the plan fails to meet the social role of sustainable development. Warehouses and logistics bring increased traffic, noise and associated pollution and are detrimental to the social role.

4.18 The growth strategy of the plan fails to meet the environmental role. Warehouses do not contribute to protect or enhance natural, built and historic environment or improve biodiversity, use natural resources prudently, or even help with climate change given that they are predominantly focussed on moving goods by road.

4.19 In summary therefore the plans growth strategy completely fails two of the NPPFs sustainable development criteria, and therefore the proposed strategic sites, including Parkside, listed in policy LPA04, fail to satisfy 'presumption in favour of sustainable development' with regards Green Belt deallocation.

4.20 Of note Langtree Development which are looking at uses for Parkside West are currently promoting the site predominantly for road distribution rather than its original strategic purpose of rail freight.

4.21 There is no strategy in the plan underpinning the growth strategy. For examples there is no strategy to cover local transport, roads, and other amenities such as schools and health centres. This also undermines the requirement for sustainability.

4.22 There is also no underpinning strategy around controls for air pollution. There are two existing AQMA areas in Newton-Le-Willows. Again this undermines the requirement for sustainability.

5 Sustainability Assessment

- 5.1 The Sustainability Appraisal Interim SA Report fails to give proper consideration to Council's growth strategy of promoting NDC & RDC warehousing and logistics. Many of these facilities are likely to be road freight based. Such a strategy has the following potential impacts:
- a) Significant increases in traffic caused by HGV, LGV and employee vehicle movements
 - b) High impacts to air pollution not just near to the site but in the surrounding area of the site because the traffic is likely to use local roads with adjacent high levels of population, including families and children.
 - c) Impacts to health from the above. More and more evidence is emerging, including dementia and asthma.
 - d) Impacts to climate change caused by high levels of CO² generated from vehicles. Of note only Parkside East has any potential to offset this as Langtree have said that Parkside West is to be a road freight facility.
 - e) Impacts on landscape, recreation, and visual amenity. Large warehouses with large footprints that replace open landscape, ruin visual amenity, and prevent recreational activities such as walking and cycling.
- 5.2 The above impacts need to be properly tested against all the SA criteria. They have largely been ignored or diminished and not properly presented. The result is in conflict with the requirements of NPPF 7 (see para 4.15 in this document).
- 5.3 With this in mind the overall picture presented in Table 5.2 is not accurate.

5.4 We note the following paragraphs, however with regards section 7.5 Traffic, Congestion and Air Quality:

Paragraph	Comments
<p><i>7.5.6 The allocated strategic employment sites under Policy LPA04 (Strategic Employment Sites) are located close to primary transport routes. Whilst positively located in terms of accessibility, the increased number of employees and goods vehicles using the associated junctions could add to congestion and air quality issues in these areas. There are concentrations of development towards M6 Junction 23 (Haydock) and Junction 22 (Parkside), and so an assessment of cumulative effects here is critical. This should include consideration of strategic opportunities in Wigan along the M6 (J24 and J25) and the A580 and along the M62 in Warrington. A number of very large employment opportunities have been put forward as part of the draft Greater Manchester Strategic Framework – given the close proximity to the developments proposed at J22 and J23, it is important to consider these cross boundary effects.</i></p>	<p>Completely agree. It is madness to allow a ‘trolley dash’ for logistics development around Haydock, M6 J23, and Parkside without a proper thought out and evidence based strategy for the road infrastructure. With regards the Strategic Network a nod from the Highways Agency by the coffee machine is not adequate or acceptable. With regards the local roads a thorough and publicised traffic impact assessment and forecast is required.</p>
<p><i>7.5.11 There are air quality management areas within close proximity to allocated employment sites at M6 Junction 23, and development at Parkside SRFI could potentially increase trips through Newton-le-willows (possibly affecting the high street AQMA).</i></p>	<p>Agreed, but other routes may also be impacted. AQMA are typically areas where air quality levels have already been exceeded and should not be considered in isolation.</p>
<p><i>7.5.12 In the short-term, the construction of the SRFI may therefore cause disruption to road networks, and until a direct access to the M6 is secured, there could be negative effects upon local traffic flows (with associated air quality implications). However, the plan policies seek to minimise such disruption by requiring a phased approach to development, network management, ensuring collaboration with the Highways Agency, and promoting alternative modes of travel.</i></p>	<p>Disagree, no phased plan is presented. It would not be acceptable to bring the A49 to breaking point with traffic from Parkside West and have no measures to control traffic to local roads.</p>

Paragraph	Comments
<p><i>7.5.13 In the long term, the development of Parkside SRFI is predicted to have a positive effect on both air quality and congestion. Such infrastructure would enable the transport of heavy goods by rail, freeing up capacity on the road network from HGVs. The operation of the rail system, once constructed, is also likely to result in fewer associated air emissions from the transport of such goods. A direct link to the M6 on the eastern phase of the SRFI would help to minimise negative effects in the longer term.</i></p>	<p>Disagree, the previous Prologis planning application projected 17,000 vehicle movements per day for Parkside East & West. Whereas an SRFI may have a positive but minimal effect on national conditions, it would have a very high negative impact on local roads and the residential areas that surround the site. The SA should capture and present this aspect. It is dishonest and deceptive not to do so. AECOM you are not funded by a developer here, you are funded through the public purse! There are no firm commitments for a link to the M6. Until there is it is immoral to increase pollution levels in an AQMA.</p>
<p><i>7.5.34 The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Newton le Willows and Earlestown. Increased traffic in these areas could have negative effects upon levels of congestion with knock-on adverse effects upon air quality.</i></p>	<p>Disagree with the term ‘strong’ road links. The M6 and A580 are heavily congested at certain times and lack the capacity to deal with all the planned development. Today an incident on one of these roads tends to cause total grid lock to an extensive area including local roads.</p>
<p><i>7.5.36 In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have positive effects for the wider region with regards to a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed. An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.</i></p>	<p>Disagree see, see comments for 7.5.13. We note <i>An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.</i> There is no underpinning plan for this supporting infrastructure.</p>

5.5 The SA Technical Appendix Site Appraisals makes the statement '*Not applicable to employment sites*' under several assessed criteria including:

Criteria	Comment
<i>SA7. To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.</i>	Parkside East could be considered as an area of Natural Beauty. It is incorrect not to assess impacts for this criteria for employment sites. In the case of Parkside East developing the site would severely depreciate the landscape and countryside. Other developments may have a positive impact. The criteria should be assessed to provide the full picture.
<i>SA9. Ensure Access to and protection and enhancement of high quality open space and natural greenspace.</i>	Parkside East is an area high quality open space and natural green space. It is frequently used by walkers. Other developments may have a positive impact. The criteria should be assessed to provide the full picture.
<i>SA12 To improve health and reduce health inequalities.</i>	Many of the employment sites will be used for road freight with severe impacts on air quality and people's health. Other developments may have a positive impact. The criteria should be assessed to provide the full picture.
<i>SA13. To improve education and skill levels of the population overall</i>	Employment sites have the potential to generate new education and skills. The Council's policy to base the majority of their strategy on road freight will have a neutral or negative impact in this area. The criteria should be assessed to provide the full picture.
<i>SA14. To ensure local residents have access to employment opportunities</i>	Employment sites have the potential to generate local employment. The Council's strategy however to concentrate on NDC & RDC logistics is likely to have a low beneficial impact on local employment due to relocation effects (see also para 3.21 of this document). The criteria should be assessed to provide the full picture.

5.6 In the SA Technical Appendix Site Appraisals, site GBS_007 Florida Farm, SA3 to improve air quality in St Helens is scored 'Unlikely to have significant effects'. A logistics distribution operation that includes HGV, LGV and employee car movements would have a detrimental impact on air quality. Stating that an AQMA is 1.7 km from the site as justification is quite frankly deceitful. AQMA are designated areas where typically air quality has already exceeded acceptable limits.

Just because a site may not impact a nearby AQMA does not mean to say it will not diminish air quality in the area. The justification also only mentions HGV and no other forms of transport that may use the facility e.g. LGV and cars.

- 5.7 In the SA Technical Appendix Site Appraisals, site GBS_007 Florida Farm, SA5 mitigate and adapt to the impacts of climate change, is scored 'Unlikely to have significant effects'. A logistics distribution operation that includes HGV, LGV and employee car movements would have detrimental impact on climate change by contributing significant amounts of CO₂.
- 5.8 Site GBS_028.1 Parkside West – mitigate the impacts of climate change – set to Green. Langtree Development in their latest public consultation in January made it clear they intended to develop a road and office facility and not a rail freight facility at the site. There is therefore no rail freight climate advantage to factor into this. The score should be red due to the CO₂ generated from HGV, LGV, and employee traffic.
- 5.9 The points covered in 5.6, 5.7, 5.8 above apply equally to some other sites which also need to be amended and criteria adjusted accordingly.
- 5.10 In addition some employment sites have scores set to 'Unlikely to have significant effects' for impact to biodiversity which clearly cannot be correct. Concreting over large green spaces must have some impact to biodiversity?
- 5.11 The technical Appendix Site Appraisals details GBS_028 (Parkside East & West) and GBS_28.1 (Parkside West), but there appears to be no separate appraisal for Parkside East. Is GBS_028.2 missing and if not the rationale needs explaining?

6 Parkside Logistics and Rail Freight Interchange Study

- 6.1 The road access assessment on page 7 is a fair assessment of the challenges that need to be overcome to make an SRFI a viable prospect. Many of the challenges were highlighted by the previous Prologis planning application.
- 6.2 The report fails to mention that Prologis also recommended changes to 17 local road junctions to accommodate the expected traffic from their scheme.
- 6.3 At the recent Langtree consultation in January, Langtree made it clear that the predominant use of the site would be for road freight or office use.
- 6.4 Of note in their plan and schematics shown in the Local Plan, a portion of land has been reserved for a rail track on the Parkside West side. It is clear that the intention here though is to allow trains from the East access to Parkside West as they would not be able to directly turn into Parkside West when arriving from the East. This would be its sole purpose rather than provide rail connected warehousing which previously the Council and developers have championed i.e. the strategic prominence of the site as an RFI for Parkside West.
- 6.5 Langtree avoided committing to rail connected warehousing or a commitment for occupiers to commit to rail freight in their recent January consultation.
- 6.6 The track layout proposed by Langtree and as shown in policy LPA10 may in fact prejudice a medium or large scheme, as it may be sub-optimal for inter-model operational purposes. Prologis had a detailed design for movement of freight around both sites and their integral use.
- 6.7 A planning application to build a small number of houses in support of the restoration of Newton Park Farm in 2007 was approved at a Public inquiry but over-ruled by the Secretary of state at the time for this very reason. It was shown at the time that a previous Rail Track proposal worked around Newton Park Farm, but the Secretary of State was not convinced that even a small housing development would not prejudice a future Rail Freight scheme on Parkside West.
- 6.8 Page 10 of the Interchange Study states '*Because of this east west connectivity we suggest that consideration is given to the modification of Core Strategy CAS 3.2 to achieve a development which aligns with our conclusion that a medium scale or larger facility is appropriate for this area. Both the east and west sides of the M6 at the Parkside Site will be required for this scale of development.*'
- 6.9 The implication therefore is that Parkside West should not be developed until a complete SRFI plan is available that correctly describes a working inter-model operation.
- 6.10 The Interchange Study itself is like a worn out record in some areas with common themes inherited from previous studies. These include:
 - a) Promoting the case for national CO² reduction at the expense of poisoning our community with increased CO² and air pollution.
 - b) Not presenting properly the real impact a shift to rail freight will have nationally i.e. the amount of freight that will be moved will be a fraction of a percent of existing road haulage volumes. There will be absolutely no visible or net material impact to HGV movements on

the road network.

- c) Completely under stressing the poor commercial model that exists for moving freight by rail over short distances in the UK. This is widely accepted as a major challenge by the rail freight industry to increasing their growth.
 - d) Not adequately describing North West RFI capacity versus availability. In para 3.8.1 the Study recommends that Parkside could 'compete' with other RFI in the North West that already have capacity for example Runcorn and Port Salford. Green Belt should not be released to create a competitive state that may not be sustainable.
 - e) Not adequately articulating the environmental impacts that an SRFI would have. Previous planning guidance has advised that RFI should not be built next to adjacent residential areas.
 - f) Underplaying the part the Port of Liverpool would have in reducing movements of rail freight from the South. At the moment there are some issues with the Panama Canal improvements to cope with the larger container ships that the Port of Liverpool has been designed to handle. Once these restrictions are lifted the benefits of shipping freight to Liverpool rather than the South will be realised. Why would Peel invest so strongly in the facility if this were not the case?
 - g) Not providing any evidence of how a prospective freight model would properly integrate Port of Liverpool with Parkside.
 - h) Increases in rail freight forecasts quoted in high percentages that include bulk freight which would have nothing to do with Parkside e.g. on page 119. This misleads the reader completely.
- 6.11 Section 3.7 of the Study presents the results of a survey into whether respondents thought that Parkside represented a good location for an SRFI. Of note respondents were probably unaware that rail access to the site is from the Chat Moss line and therefore constrained by commuter traffic on that line. Did AECOM really need to ask this question based on a view of only a map?
- 6.12 Some comments in the Study document are not helpful 'An expert stated ..', 'A Logistics Company stated ...', 'A Construction Company stated ' etc. how can we be sure of the credibility of such statements?
- 6.13 Section 3.9 of Study states '*It is clear from the market demand and supply assessment and stakeholder engagement that there is sufficient demand for a SRFI in the North West.*' How exactly is it clear? Table 3.2 on page 50 shows a list of RFI with spare capacity that hardly justifies this statement. Why are AECOM making a statement that contradicts their own evidence?
- 6.14 Section 6.6 of the Study provides expected HGV movements for an SRFI provided by Highways Agency computer modelling. This data does not include LGV and employee site movements. LGV volumes are likely to be significantly higher than HGV movements for a logistics operation. The previous Prologis application anticipated 17,000 vehicle movements from their scheme as opposed to the circa 4045 HGV movements quoted in the table for the 4.5M square feet scenario.

- 6.15 Page 85 of the study states *“There may be an issue of increasing traffic on the local network however we need to think strategically. If Parkside doesn’t get built then all of this traffic will be on the road!”* UK Rail Freight Operator. This comment is really is not very helpful. Thinking strategically would mean we would have a plan for how the traffic could actually be properly accommodated on our roads!
- 6.16 Pages 99 to 112 discuss the economic viability of four RFI options. All four options are shown not be economic due to the high up front infrastructure costs. This is likely to be the main reason Prologis withdrew their previous application and not market conditions.
- 6.17 Page 114 of the Study comments on Landscape, but fails to mention Parkside East at all! Convenient that AECOM forgot to mention this given its openness, and natural beauty.
- 6.18 Page 115 of the Study under Air Quality states *‘Under the Parkside Strategic Rail Freight Interchange Environmental Statement Vol 2 35 the predicted concentrations of nitrogen dioxide, PM10 particulates and sulphur dioxide for a worse case, ‘with development’ scenario result in only a slight increase of air pollutants which is not thought to require mitigation.’* We presume this information was extracted from the original 2006 Astral Planning application. As such that information was superseded by additional air quality information in updates to the planning application in 2010. Even then Prologis were unable to provide particulate evidence. Therefore this statement is completely false.
- 6.19 In summary we disagree with the conclusions of the report for the following reasons:
- a) Without government investment an SRFI scheme would not be commercially viable due to the upfront infrastructure costs. This is evidenced in the Study document.
 - b) Moving ahead with a phased development on the West side is likely to prejudice operational requirements of a larger scheme as supported by the Secretary of State previously (see para 6.7 of this document).
 - c) It is immoral to make use of the A49 as the main access route for an early phase of the scheme. The report makes clear that the route is already stressed. Air quality would be a major concern and put people’s health at risk in an existing AQMA.
 - d) There is no clear road strategy for a larger scheme. It is clear that traffic statistics are under reported in the Study and not properly modelled.
 - e) As time goes by rail paths are going to become more constrained on the Chat Moss line due to uptake of passenger traffic and the enhancements of Newton-Le-Willows station as a commuter hub. It is clear this will undermine the flexibility and viability of freight movements to the site.
 - f) The road to rail argument is continuously over stated. The net impact to road haulage volumes that Parkside would introduce through 8 trains/day which the Study arrives at in its conclusion will have virtually nil impact to road freight volumes in the North West and nationally. For our community increases in HGV and LGV traffic will have intolerable impacts on our daily lives and health.

7 LPA02 Spatial Strategy

- 7.1 We strongly disagree with point 5 in focussing the majority of development in the vicinity of the M6 and M62. Over 80% of strategic employment sites and 37 % of house numbers are in the Newton-Le-Willows and Haydock area.
- 7.2 A strategy to promote large scale logistics will also bring with it heavy levels of traffic and air pollution.
- 7.3 The policy makes no provision for:
- Underpinning transport infrastructure
 - Underpinning road infrastructure
 - Underpinning social infrastructure such as schools and health centres
 - Air quality monitoring and reporting, especially as AQMA exist in these areas
- 7.4 Releasing 15 years of Green Belt in one go will encourage a 'trolley dash' by developers for Green Field Sites rather than Brown Field sites. There appear to be no controls in the plan to prevent this.
- 7.5 There is no view presented for how the strategy will be monitored, measured and assessed over the 15 year period. How will the Council ensure that release of Green Belt has delivered its intended aims and met the needs of Special Circumstances?
- 7.6 The release of Green Belt should be phased, monitored, reviewed and plans revised say every 5 years. This would ensure that a valuable asset was not abused and delivers its expected value. We understand the NPPF lifetime of the plan requirement, but we would suggest that a phased allocation could be proposed and still meet the NPPF requirement. A phased approach would allow regular assessment of underpinning infrastructure capability and environmental impacts.

8 LPA04/LPA04.1 A Strong and Sustainable Economy

- 8.1 This policy is founded on employment land estimates which appear to be highly inflated and erroneous as detailed in section 3 of this document.
- 8.2 Until the employment land estimates have been properly presented (see section 3 of this document) it is not possible to comment on the options of this policy.
- 8.3 The land sizes shown in LPA04 for EA8 and EA9 are suspect. Please see para for 3.9 thru 3.14.
- 8.4 Parkside West should be specified for use as an SRFI and not B2, B8 in the policy for the reasons explained in sections 6.3 thru 6.9
- 8.5 Having said that the designation of EA8, EA9 as an SRFI is extremely dubious given that AECOM Study found that having examined four possible SRFI configurations from small to large, all configurations proved financially unviable.

9 LPA05 Meeting St. Helens Housing Needs

- 9.1 The FOAHN identified a requirement for 451 dwellings per year. The Plan adds a further 20% 'buffer' to the requirement and other factors to bring the number to 570 dwellings a year.
- 9.2 We are concerned that a disproportionate amount of housing is targeted for the Newton-Le-Willows. From the Preferred Options document, Table 4.4, 1542 houses are planned to be built in Newton-Le-Willows and Haydock, or 37% of the total housing 4093 planned to be built across the authority. This excludes further amounts listed under safeguarded allocations.
- 9.3 The population of St Helens has been falling for the last 30 years, as shown by the official census figures:

1981	190,800
1991	181,100
2001	176,800
2011	175,300

The council claims St Helens' population will rise. Yet their predictions show the population of St Helens will still be lower in 2037 than it was in 1981.

The council has offered no explanation as to why it believes the population of St Helens will increase, reversing a 30 year trend.

- 9.4 The council has used unreliable estimates in its calculations to predict population growth. The council acknowledges that from 2001 to 2011 these estimates consistently overstated the actual population by 400 people per year (4,020 over the period). Yet it continues to use the same estimates in their figures.
- 9.5 The council's unreliable population figures suggest the population of St Helens will increase by 6,843 people in the future.

Yet the council wants to build at least 13,110 new houses with no explanation why this many additional houses are needed.

The council is suggesting St Helens needs almost two new houses for every one additional person.

- 9.6 St Helens Council's figures show there will be an extra 15,000 people aged 65 or over. There will be 8,000 fewer people under 65.

The council wants 60% of the new housing to be three or four bedroom homes. Just 5% of the new housing will be bungalows. Only 20% of the new housing will be designed to 'Lifetime Homes Standard', which lets older people live in their own homes.

St Helens has an ageing population. The housing plan does not reflect that.

- 9.7 The council has failed to supply any guide to how the borough would cope with additional housing on this scale, therefore, it is impossible for the public to judge the Preferred Options fairly and accurately. There is no underpinning plan for supporting infrastructure.

9.8 The strategic housing site allocations indications illustrate 25 to 30% affordable housing footprint, with 70% being larger and higher price dwellings. We question whether this strategy really addresses the true needs or the borough? If it is exceeding local needs the Plan needs to make this clear in terms the number and type of houses that are being supplied to meet needs outside the borough and the justification for that. If this situation exists it would also conflict with the statement made in para 4.109 of the Preferred Options document that states that estimates have not included requirements outside the borough.

9.9 The adopted Core Strategy states: "As St Helens has such a high level of PDL, it is considered that a target of 80% of housing completions on PDL throughout the plan period as a whole is both achievable and realistic."

This was approved council policy just four years before the Preferred Options in the Local Plan were produced. The council has not explained what happened in those four years to merit such a dramatic change to that policy.

9.10 The Council has not properly explained how the deallocation of Green Belt land to meet housing needs has met 'Special Circumstances'.

9.11 Releasing 15 years of Green Belt in one go will encourage a 'trolley dash' by developers for Green Field Sites rather than Brown Field sites. There appear to be no controls in the plan to prevent this.

10 LPA10 Development of Strategic Rail Freight Interchange

- 10.1 We disagree with the reasoned justification of the policy on pages 80 and 81 of the Preferred Options document for the reasons outlined in para 6.19 of this document.
- 10.2 The prescriptive layout of track and other development on Parkside West may prejudice the operation of an SRFI (see para 6.7 of this document for reasoning)
- 10.3 The AECOM scheme options put forward are 'possible' models. They do not represent a 'template' that a developer must use to bring forward an SRFI. If that were the case a more detailed and prescriptive design would need to be produced. Not one of the AECOM options put forward was shown to be commercially viable. The Prologis model relied on land to the West to service its inter-model capability and therefore was very prescriptive of its use of that land.
- 10.4 The currently adopted Core Strategy, previous Inquiries, and the Regional Spatial Strategy 2006 make it clear that Parkside West should also only be set aside for the purpose of an SRFI. In conjunction with para 7.2 and 10.3 of this document earlier, the Council are therefore wrong to exclude the majority of the area for Parkside West from the SRFI scope.
- 10.5 This was also endorsed at the Examination in Public for the adopted Core Strategy in 2012. In the Inspectors final report, para 46 he stated *'It would not be sensible to require only that development is "commenced" first on the land to the west of the M6 as this could result in some 'token' works on this land with the major part of the SRFI being developed only to the east of the motorway.'*
- 10.6 It is clear that a strategy to remove the majority of land to the West from its original intended purpose as an SRFI is there purely to support The Council's relationship with Langtree Development. The Council gave Langtree £6M of public finances in 2011 to purchase the land from Prologis and come forward with a prospective scheme. Of note the AECOM Study for Parkside was funded through European investment and not Langtree. Langtree have failed to come forward with anything substantial, and failed to justify the value of the funding given to them. By allowing Langtree to build a limited warehouse and office development on Parkside West (something they are more familiar and comfortable with), the Council may be able to claim some recompense from their investment potentially, however, this approach is conflict with a wider strategic view to use the site for an SRFI.
- 10.7 With regards removal from Green Belt, we disagree with the reason for rejection of Option 3 in para 4.193 of the Preferred Options document. Removing the site from Green Belt to allow the site to be more attractive for developers does not satisfy the requirements of Special Circumstances.
- 10.8 We would contest that Option 3 aligns with the Inspectors recommendation i.e. Special circumstances may only be assessed when a specific scheme comes forward and it is not acceptable to pre-determine the Green Belt position.
- 10.9 The question of whether Parkside East or West forms part of the overall employment land needs is subject to correct land assessment needs as detailed in section 3 of this document.
- 10.10 With regards the criteria specified in point 4. Of Policy LPA10.

- i. 4a) The Network Management Plan does not exist. We have frequently requested it but it has never been forthcoming. If it does not exist, or is out of date and/or not relevant it is erroneous to mention this as a criteria.
- ii. 4b) Mitigate any adverse impacts on the surrounding road network; The original working in CAS 3.2 of the adopted Core Strategy has been depreciated and should be reinstated and replaced with *'The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;'*
- iii. The CAS 3.2 condition *'6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;'* has been omitted and should be reinstated.
- iv. The CAS 3.2 condition *'7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;'* has been omitted and should be reinstated.
- v. The CAS 3.2 condition *'9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;'* has been omitted and should be reinstated.
- vi. The CAS 3.2 *'11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St.Helens local authority area;'* has been omitted and should be reinstated.

10.11 Para 33 of the Inspectors final report for the adopted Core Strategy Examination in Public in 2012 also makes reference to the future planning assessment process for an SRFI, 'Amendments MM9-08 and MM9-14 reflect the fact that a development of the scale envisaged would be considered by the Major Infrastructure Unit of the Planning Inspectorate and would be the subject of a ministerial decision.' LPA10 needs to reflect this position and any requirements thereof.

11 LPAD09 Air Quality

11.1 We whole heartedly support this policy.

12 LPD11 Health and Wellbeing

12.1 We completely support this policy

13 Effectiveness of Public Consultation

13.1 The consultation process has been poor once again in certain areas.

13.2 The material supplied by the Council runs to hundreds of pages of detailed information. Eight weeks is simply not long enough for working people to read, digest, and comment on the material. Given the weight of documentation 12 weeks would have been a more reasonable consultation period.

13.3 The consultation was run over the Christmas period when people are typically taking holidays with their family. This is unfair and either the consultation should have been extended or postponed to start in January.

13.4 Two important documents were omitted from the consultation. The first, the outputs from the Local Plan Scoping Consultation (Summary of Representations on St. Helens Local Plan Scoping Consultation 20th January – 2nd March 2016) should have been published as a pre-requisite of the Preferred Options Consultation. The scoping consultation focussed on Green Belt and we know many comments were sent by the public. The Preferred Options document makes explicit reference to feedback received in the employment land calculations (see para 3.3 & 3.4), but yet the public have no sight of this feedback. As those calculations completely underpin the requirements for Green Belt deallocation, those proposals too are brought into question.

13.5 We requested the output report from the Scoping Consultation on two occasions by email to Mr G. Woods and the planning department but received no reply. In addition we were told by planning officers that the document would be made available by Christmas but it never materialised. In January 2017 we submitted a Freedom of Information Request to secure the document which was released on the 24th January 2017, 5 days before the closing date of the Preferred Options consultation and 10 months after the closing date of the Scoping Consultation itself. The situation is not acceptable.

13.6 We also requested the report produced from a consultation commissioned by the Council in summer which looked at potential options for addressing potential stress at the junction M6 J23. As we have received no response for this either we have also requested this also through a Freedom of Information Request. This report could be particularly important in relation to the Preferred Options consultation in assessing the viability of the planned developments and housing surrounding J23. The document should have been provided in the evidence base for the consultation.

13.7 The date of the public consultation was announced on the 5th December but letters were only sent out on the 15th and received by most people on the 19th effectively reducing the consultation period for many people.

- 13.8 Overall the implication from the above is that the Council have failed in its obligations to NPPF para 1 and we will be escalating this.
- 13.9 On a more positive note we would like to propose holding a one to two day workshop for the key community groups for future consultations. This would allow key questions to be asked of the planning officers to clarify certain aspects and also allow the planning officers and Council representatives to listen and respond to key concerns. This would be far more effective than the current one directional 'fire and forget' process that we have to live with today and better aligned to consultation process outlined in NPPF para 1.

14 Conclusions

- 14.1 On the 18th of January PAG organised a Public meeting in Newton-Le-Willows focussed on the Local Plan and Parkside. Over 400 people attended. Most people were extremely concerned about the huge amount of development and housing that is planned for our area, increased levels of traffic on roads that are already congested, and the impacts to air quality and people's health.
- 14.2 We have brought attention to the following points in this document:
- 14.3 Employment land needs appear to have been over-inflated to justify sites that we suspect potential developers 'may' have shown an interest in.
- 14.4 Vital evidence that is referred to in the Preferred Options document and which underpins the employment land calculations has not been provided.
- 14.5 The proposed Green Belt deallocation for commercial development is almost entirely hinged on the employment land calculations. Green Belt deallocation should only be justified on Special Circumstances and not speculative development opportunities.
- 14.6 Not enough evidence has been provided to show strategic sites are sustainable. The entire approach is focussed on perceived growth but little is demonstrated of expected sustainable returns particularly around the unaccounted land estimate highlighted in section 3.
- 14.7 Housing estimates are over-inflated. They are above the requirements of the borough and no explanation is given as to what purpose additional housing is being supplied.
- 14.8 There appears to be no underpinning strategy for supporting infrastructure to support development, for example Transport, Roads, Schools and Health centres. This severely puts at risk the viability of proposed developments and makes the plan unsound.
- 14.9 Key criteria have not been assessed for employment sites in the Sustainability Assessment. Some of the scoring is suspect because we suspect a visual inspection was not carried out or the authors may be lacking in knowledge of the area concerned. Specific examples have been provided in our document.
- 14.10 The Green Belt review fails to properly assess proposed parcels of land again because it appears to have been desktop based. Specific examples have been provided in our document.
- 14.11 We are very concerned about a 'trolley dash' by developers for Green Field sites that is likely to occur if Green Belt is removed at the levels proposed. The approach will dissuade developers from using Brown Field sites. This applies equally for strategic employment and housing sites.
- 14.12 We do not believe Green Belt 'Special Circumstances' have been properly demonstrated for any of the sites including Parkside East and Parkside West and therefore the need to release Green Belt justified.

- 14.13 Not enough attention has been paid to monitoring, measurement and reporting requirements to validate that the value proposition of the plan meets its expectations. Of note the annual monitoring report supplied in the evidence base is from 2011, 6 years ago, and two years before the current adopted plan. There needs to be a commitment in the plan to produce the report annually. There should also be a commitment to consult the public annually on the monitoring report to test its content and validity.
- 14.14 There appears to be no commitment to monitor and report on air quality. This commitment needs to extend beyond existing AQMA given the high levels of traffic growth anticipated on local roads.
- 14.15 We are very concerned that Langtree want to develop Parkside West for road freight distribution purposes and the congestion and air pollution this would cause on the A49 and connected roads. There is already an AQMA in the immediate vicinity of the A49.
- 14.16 Developing Parkside West as a road only based facility contradicts with previous guidance from the Secretary of State that the site should only be used for road to rail operations. We object to both options, but use of the site for as a road only facility is surely the worse of the two options.
- 14.17 We are very concerned that the Council are insistent on developing Parkside East as a rail container depot. This land which could be classed as an area of Natural Beauty could be turned into an industrial wasteland in a rural community. It would also bring heightened traffic levels to the area and associated impacts.
- 14.18 We believe the case for an SRFI at Parkside is extremely tenuous given that the AECOM study shows that not one of the four configuration options it put forward is financially viable. In addition the report shows that other North West RFI have capacity for the foreseeable years ahead.
- 14.19 We would genuinely like to work with the Council to find a suitable solution for the Parkside site, but continuously get presented with unpalatable ultimatums rather than being properly consulted.
- 14.20 The overall consultation process is poor and needs improving. We have suggested holding a workshop for similar consultations to improve the situation and build public confidence.