

Parkside Action Group  
PAG Response to St Helens Local Plan Submission Draft  
January 2019  
Non-Technical Summary, March 2019



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- 2. A49 near Parkside Entrance (proposed Langtree Warehouse Development)*
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## Document History

Version/Date	Author	Updates
Draft D1 18-Feb-2019	Dave Tyas	New document
Draft D2 23-Feb-2019	Dave Tyas	Updated following initial feedback
Final 10-Mar-2019	Dave Tyas	Updated following feedback

## Glossary

Term	Description
AQMA	Air Quality Management Area
EIP	Examination in Public
ELNS	Employment Land Needs Study
ES	Environmental Statement
NPPF	National Planning Policy Framework
PLR	Parkside Link Road
RSS	(North West) Regional Spatial Strategy
SHC	St Helens Council
SRFI	Strategic Rail Freight Terminal
TA	Traffic Assessment

## Document References

Ref	Filename/Description
1	PAG Response to St.Helens Local Plan Preferred Options December 2016 Final 1.0
2	Employment Needs Study (ELNS), Addendum Report, October 2017, Amended January 2019
3	Green Belt Review December 2018
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## **1 Purpose**

- 1.1 This document provides a response to the St Helens Local Plan Submission Draft January 2019.

## **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 has previously responded and contributed to several consultations and planning applications including:

- North West Regional Spatial Strategy including Examination in Public, 2006 thru 2008.
- Newton Park Farm Planning Application including NPPF considerations, 2007.
- St Helens LDF Core Strategy 2009 thru 2012.
- St Helens Local Plan (Preferred Options) 2016.
- Astral/Prologis Parkside Planning Applications 2006 thru 2009.
- Parkside Phase 1 Planning Application Feb 2018 & Jan 2019
- Parkside Link Road Planning Application April 2018

## **3 Local Plan Parkside Policy**

- 3.1 PAG understand that the next stage of the Local Plan process will be an 'Examination in Public' of the Draft Submission. With this in mind this document is structured into topics that we would request the EIP Planning Inspector review and bring before relevant hearing panel as deemed appropriate. The topics build on our previous response to the Preferred Options Draft of the Local Plan (ref 1) and additional evidence submitted by the Council to support the Draft Submission.

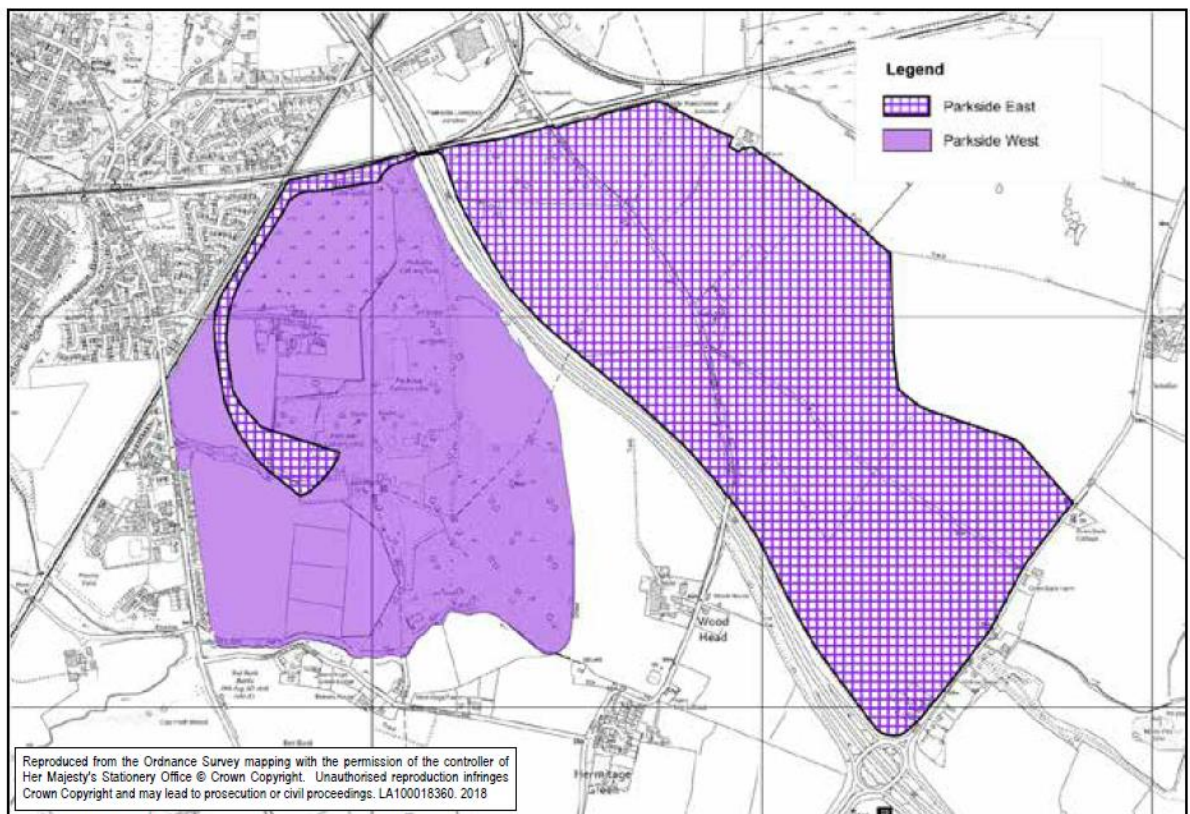
- 3.2 As stated in several Council documents associated with the Draft submission two planning applications are currently awaiting determination related to Parkside. The first Parkside Phase 1 targets approximately 50% of Parkside West for road freight distribution use making use of local roads for access. The second proposes to build a link road from the A49 to the M6 J22 to facilitate promotion of development at Parkside West and East. In both cases the applicant is in effect St Helens Council. In the case of Parkside Phase 1 the applicant is Langtree Developments. The Council are in partnership with this developer and have loaned the company millions of pounds to fund their application. In the case of the Link Road, the Council are the applicant. The net outcome is that the Council are in the position of 'marking their own homework' for both applications. When considered along side the Local Plan where the Council are also the author, the opportunity for fair and unbiased consideration for local community and environmental impacts is perceived to be almost non-existent.

- 3.3 References to individual planning applications should be removed from the Draft Submission document and/or evidence papers because they may never happen or may change. They represent implementation proposals and not strategic or policy-based information.

- 3.4 Both Parkside East and Parkside West are currently allocated as Green Belt as specified in the adopted St Helens Core Strategy. In the Core Strategy, Policy CAS 3.2 protects Parkside East and West from release of Green Belt unless a specific set of conditions are met. The goal of the Core Strategy was to protect a 'strategic' site for use of a Rail Freight Terminal and also protect against other impacts of potential development such as use of local roads for site traffic. PAG and the local community fought hard to get these conditions incorporated into the local plan and protect the Green Belt from inappropriate development.

- 3.5 The Submission Draft has no specific policy for Parkside West. The conditions specified in CAS 3.2 have been removed which we strongly disagree with, particularly protection of local roads from site traffic, associated impacts to air quality, and protection of local heritage (additional details provided in the summary at the end of this document).
- 3.6 The Local Plan now specifies Parkside West as 'employment development land' rather than being set aside for use as Rail Freight Terminal. In doing so the capability for Rail Freight and Inter Modal operation has in effect been at least halved assuming Parkside West is approximately the same size as Parkside East. **PAG have never supported the use of the site as a Rail Freight Terminal**, however, as early as 2006 in the North West Regional Spatial Strategy, the site was recognised as strategically important for rail freight as later supported by SHC Core Strategy Policy CAS 3.2. Of note a planning application in 2007 for 32 houses in support of Newton Park Farm refurbishment was approved by a Planning Inspector but the decision was overturned by the Secretary of State at the time because the development may prejudice a freight terminal. So why then has the Council sacrificed a significant proportion of the site for non-rail related activities in direct opposition to previous government direction? If we are to believe previous strategic documents, policies and planning decisions on this matter, Parkside as a location is of national importance and the land should be safeguarded.

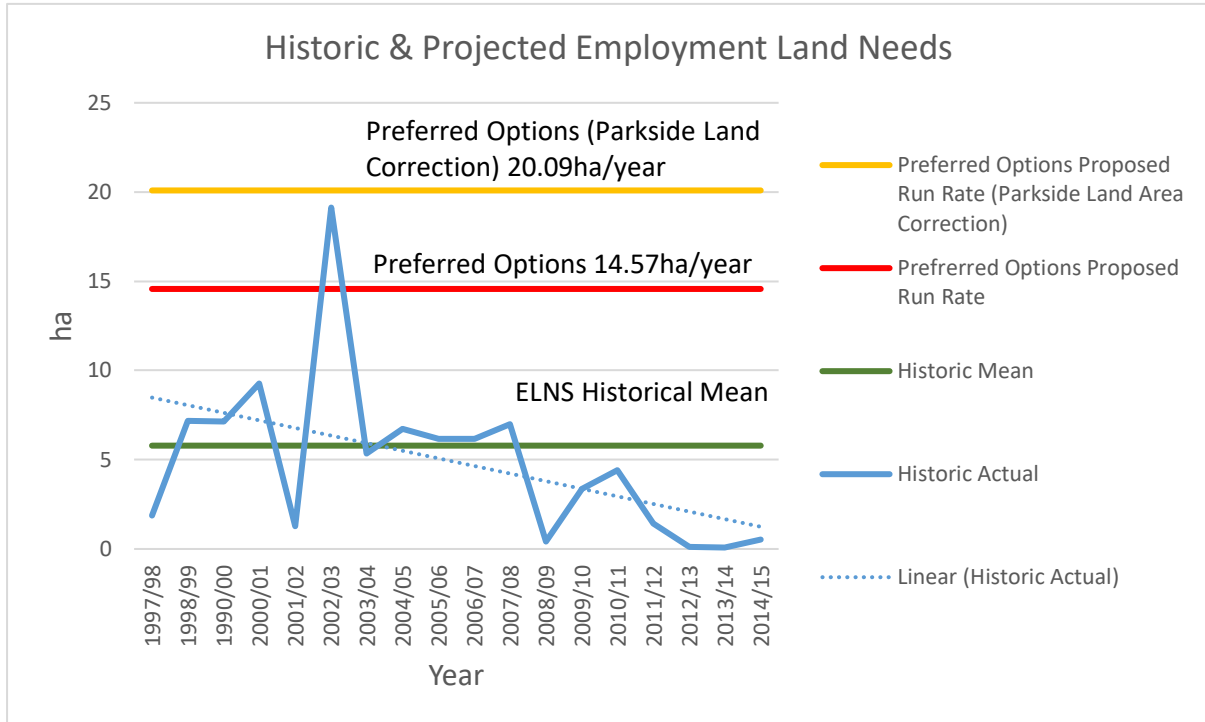
Parkside East & Parkside West



- 3.7 Turning to Parkside East this is an area of open countryside never associated with the former colliery and hard standing areas on Parkside West. Unlike the Core Strategy this is now the only land reserved by the Local Plan for a Rail Freight Terminal (other than a rail spur strip on Parkside West to allow bidirectional train traffic to access Parkside East).
- 3.8 In order to open up the area for development the Council have submitted a planning application for a Link Road which links the A49 with M6 J22. The Link road is touted as

alleviating traffic for the local area, when in effect all it will do is facilitate the movement of site traffic onto the local road network. Some of the local country roads are highly unsuitable for heavy good vehicle traffic with tight bends, narrow sections, and low railway bridges subject to strikes.

- 3.9 The proposed route for Link Road also dissects Parkside East and reduces the land area for Parkside East, significantly limiting the flexibility for Rail Freight use. Of note the Link Road was never considered as part of the freight terminal topology options presented in the evidence base with the Local Plan Preferred Options stage, meaning that a very significant assumption has been made that a Freight Terminal is actually viable on Parkside East, particularly with regards to loading space, and 770m siding operation.
- 3.10 We also note that evidence presented with the Draft Submission states that 770m capability is a 'soft requirement'. This is a very strange assertion given that Network Rail have spent the last few years adding 770m capability to the entire UK rail network? A non 770m freight terminal would again offer reduced capability.
- 3.11 In summary the removal of Parkside West and the Link Road route have severely reduced the capability as strategic rail freight site with available land being reduced by as much 60-70% approximately in total.
- 3.12 So why has this approach being taken by the Council? The Council are looking to capitalise on the recent change from high street to internet shopping. This has generated an anticipated demand for warehouses from which the Council can earn revenue in the form of business rates. The drive for additional revenue appears to exceed all other national strategic & local environmental considerations.
- 3.13 In order to justify their approach, the Council have attempted to build a case that land is required to satisfy employment needs. In this respect PAG pointed out obvious errors and flaws in their calculations at the Preferred Options stage. This has resulted in a revised ELNS document, Ref 2, provided with the Draft Submission. The revised ELNS attempts but fails miserably in our view to explain excessive employment needs forecasts to justify the need to remove Parkside from Green Belt. In our Preferred Options response, Ref 1, we presented the following graph which showed just how unrealistic the estimates were.



- 3.14 Para 2.9 of the revised ELNS , Ref 2, states '*Having this additional two years of information enables the average take-up levels used in the ELNS to be updated, summarised in Table 5. It is apparent that the most recent two years do not represent a return to growth comparable to the peak period of 1998-2008 (averaging 7.5 ha per annum), the basis of the Growth Period scenario in the ELNS. Therefore, this Growth Period scenario forecasting will not have changed from the ELNS.*' **In other words, things have not picked up as expected but we are still going to use a small band of data from over 20 years ago as the basis for our future forecast.**
- 3.15 The revised ELNS goes on to try and explain how the Council plan to compensate for over employment capacity caused by the scale of their development proposals.
- 3.16 Para 5.5 states '*Therefore, it is apparent that the traditional working age population of St Helens would not be sufficient to service a growing employment demand, assuming all other factors remain the same (e.g. unemployment rate, economic activity rate, etc.).*'
- 3.17 Para 5.12 sates '*In order to maintain the same number of employed persons aged 16-64 in the borough based on the baseline population forecasts, there would need to be an increase in the economically active rate and a decrease in the unemployment rate.*' **In other words, in order to meet the employment projections, caused by our developments we will assume people will work longer (past typical retirement age) and assume unemployment nationally to be very low over a long period of time.** The ELNS makes huge assumptions that are bordering on being fictitious.



- 3.18 In summary the Council's equation appears to be as follows:
- We need lots of warehouses to generate revenue.
  - To justify this, we need to create a picture of high employment needs
  - However, having done this we will not have enough employable people to meet the scale of warehouses we want to build, so to get around this we will make some wild assumptions about people working beyond their normal retirement age and booming national economy for the next 15 years to balance the demand.
  - Once we've done all this, we can then justify the release of huge chunks of Green Belt, especially close to motorways and key trunk roads. Additionally, we can justify sacrificing strategic rail freight capability too because it is easier to attract warehouse occupiers than raise interest in constructing a freight terminal.
- 3.19 We would advocate that the above reasoning does in no way meet the 'special circumstances' requirements for release of Green Belt as defined in National Planning Policy. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.
- 3.20 The Green Belt Review document included with the Draft Submission, Ref 3, builds on the fictitious employment demand calculations highlighted earlier and attempts to identify suitable land.
- 3.21 With regards Parkside East, page 51 of the Green Belt review states *'The 2018 SA concluded that development of the parcel for employment use would have a mixed impact on the achievement of SA objectives. **Such development is likely to have a negative effect on air quality and biodiversity, as it would generate additional HGV vehicular movements within an existing AQMA and the parcel is only 144m from a SSSI.'***
- 3.22 Page 272, states *'Parcel GBP\_039 (Parkside East) **continues to make a strong contribution to the purposes of Green Belt land.'***
- 3.23 Therefore, the Green Belt Review recognises the value of Parkside East as Green Belt. A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.
- 3.24 The Draft Submission lays out conditions of use for Parkside East in Policy LPA10. Para 4.36.6 states *'The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres).'* As we have pointed out many times before such statistics do not differentiate bulk e.g. aggregates vs non-bulk freight. Parkside would not have any bulk capability typically therefore quoting such figures is erroneous and misleading. The paragraph should be removed or corrected.
- 3.25 LPA 10 also states *'The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However, for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.'*
- 3.26 In effect the Council are saying here that a nationally significant location identified for use as a freight terminal can be reduced to just 60ha or less than 50% of its actual potential for



Parkside East and only 25% of its potential for the combined area of Parkside East & West in order to accommodate warehouse development.

#### 4 Summary

We would ask the inspector to examine the following areas based on our previous discussion herein:

1. Has the strategic nature of Parkside for use as a rail freight terminal been compromised?
  - a. Reduced freight terminal capability caused by not making use of the full potential of Parkside West (the actual site of the former colliery). In 2001 Rail Track produced a planning application for a freight terminal that was entirely based on Parkside West. The previous Prologis planning application in 2010 made use of both Parkside East and West and fully promoted inter-modal capabilities for the transfer of freight from road to rail. The Local Plan Draft submission makes no mention of inter-modal requirements of site occupiers for Parkside West.
  - b. Reduced freight terminal capability due to a reduction in available land from 227ha to just 60ha on Parkside East to meet further warehouse developments?
2. Does policy LPA 10 offer enough protection for the environment and impacts to the local community?

The currently adopted Core strategy CAS 3.2 condition 7 states '*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;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

CAS 3.2 condition 9 states '*9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

The CAS 3.2 condition 11 states '*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;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.

3. Do the ELNS employment demand calculations actually stack up?

The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.

4. Have the Council properly considered the views of the local community?

Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.

4.1 PAG would ascertain that the Local Plan is unsound for the following reasons:

- The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal.  
[Not consistent with National Policy – protection of Strategic Sites]
- Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate.  
[Not consistent with National Policy – Green Belt Protection]
- Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment.  
[Not positively prepared – not sustainable, unacceptably high environmental & health impacts for what is proposed]
- Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick.  
[Not positively prepared – not sustainable, unacceptably high environmental & health impacts]
- Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council.  
[fails duty to cooperate]

The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.