



St Helens Borough Local Plan 2020-2035 Examination

7<sup>th</sup> May 2021

**Comments on Matters for Week 1**

Dear Inspectors,

Please find below feedback on *insp007-inspectors-matters-issues-and-questions.pdf* with respect to matters scheduled for week 1. We have also attached our closing statement and SRFI paper from the Parkside inquiry as these provide background to our challenge around certain policies in the proposed Local Plan.

**Issue 1: The extent and type of consultation and community engagement**

The Council will surely allege that they have followed due process, however, the process has been far from satisfactory. As far as we are aware not once has the Council held any workshops or public meetings to canvas opinion. Making the plan available in the Newton-le-Willows public library and organising a questions and answers for one day does not constitute proper consultation. In contrast PAG did organise a public meeting in Newton-le-Willows to make people fully aware of the Local Plan and its proposals for Parkside. Approximately 400 people attended. None of the elected local councillors at the time were able to attend. There was considerable opposition from the audience to removal of land at Parkside from the Green Belt and objections to the proposals for the development of an SRFI. This is reflected in the hundreds of letters submitted during the consultation period.

**Issue 2: The DTC and in particular addressing development needs in the Housing Market Area and dealing with infrastructure constraints, particularly transport.**

***Liverpool SDS, SRFI Employment Uplift, and Effective Working with Other Strategic Policy-Making Authorities***

From the information available currently, the programme appears to focus mainly on housing, but since the subject raises the question of strategic alignment, we would wish to highlight the following points with regards Parkside.

Firstly, the strategic nature of the site. This was identified in the North West Regional Spatial Strategy in 2008. PAG participated in the panel at the time. Notably the RSS identified both Parkside West and East as having unique transport characteristics and therefore should be reserved expressly for inter-modal road to rail operations and not for road-to-road operations. The Local Plan makes no strategic consideration of Parkside West, there is no policy, and it is simply allocated as employment land. The currently adopted Core Strategy sets out strategic objectives and specific environmental constraints in policy CAS 3.2 to

ensure strategic objective alignment as opposed to the current plan which promotes speculative development having a blank canvas for Parkside West.

With regards employment uplift, in general terms SRFI offer a low jobs profile (100 or less) when considering just the operation of the terminal itself. The current Parkside Phase planning application which is the subject of the recent inquiry focusses on B8 development. The inquiry demonstrated a huge variance in B8 job density based on occupier, evidence being drawn by the Council themselves from the established Warrington Omega development. With ever increasing moves towards logistics automation, job densities are more likely to be on the low side. In addition, Parkside is directly adjacent to the Wigan and Warrington boundaries, so St Helens employment numbers should be factored accordingly. Logistics operators are looking to consolidate smaller distribution centres into purpose built larger ones, the implication is that job relocation is likely to pay a significant factor. There is clear evidence now that Florida Farm only produced a few hundred rather than the thousands of jobs predicted which supports the previous points. In conclusion we believe any forecasted employment land uplift for the SRFI must surely be suspect.

Secondly the Council made much hype at the recent inquiry around Parkside West not being viable for use as an SRFI. However, in their own feasibility study included a part of the Local Plan evidence base, 3 out the 4 possible options presented focussed entirely on Parkside West. The claim now is that Parkside West will not support 770m trains and is therefore not viable. This is not true, the only restriction it would appear would be partial construction impacts potentially on Gallows Croft historic asset. In fact, the former colliery track ran into Parkside West for the movement of coal. In addition, a previously withdrawn planning application by Prologis in 2010 proposed full use of Parkside West for intermodal use making use of Parkside West for 450-600m trains, and utilising Parkside East for longer trains. It is simply nonsense not to consider Parkside West as a strategic inter-modal asset. Parkside West represents approximately 50% of the site. We suspect the SDS covers none of this?

Thirdly much play has been made by the Council in the past that Parkside will serve the port of Liverpool as a distribution base. Can we really believe that it is cost and time effective to take a container off a ship in Liverpool, place it on a train to Parkside, and then offload it to truck and/or warehouse? Quite ridiculous in our opinion. It is well known and generally accepted that road to rail is only cost and time effective over large distances. Again, will the SDS cover this aspect?

Finally, at the inquiry and through recent press announcements the Council socialised that Parkside had been approved as a freeport as part of the Liverpool freeport application. We have had this confirmed by a reliable parliamentary source as untrue. The freeport initiative applies to sea-born ports only and not inland ports.

So, in summary strategically the only tentative link to the Port of Liverpool is road to road transport to provide distribution warehousing. Is this really a good strategic solution given the associated environmental impacts of road freight? At the Parkside Inquiry Wigan Borough Council objected to the Parkside proposals mainly on grounds of traffic impacts. The Mayor of Manchester also objected on similar grounds. It is clear there is no alignment with WBC or GMC.

#### *Employment Land Need*

We have made comments previously in our written submissions which we believe have been taken into account and represented by other parties such as CPRE and SHGBA.

*11. What is the up-to-date position on cooperation in terms of delivery of key motorway junction improvements, taking into account any SOCG with Highways England?*

Highways England were represented at the Parkside inquiry and made it clear that they had validated and approved both the Parkside Link Road and Parkside Phase 1 planning application traffic assessments. The Parkside Link Road runs from the A49, dissects Parkside West, utilises the existing M6 bridge on Parkside Road, dissects Parkside East, and connects with the A579 close to M6 J22 at Winwick. In this respect not only does the link road facilitate development either side of it but it also facilitates the use of the entire surrounding local road infrastructure for use by traffic from future developments, with associated air quality impacts. Some routes are totally unsuitable in our view with narrow and low bridges and chicanes that will cause issues for long vehicles.

The inquiry also demonstrated that road routes to the North of the site would be extremely challenged with Lane Head effectively already at capacity. Of course, the traffic to the Port of Liverpool would need to make use of these congested routes. Golborne Dale Road (A573) and Lane Head lie within the Wigan borough. As stated, earlier WBC have objected to the proposals based on traffic and noise concerns. The other route to the North West of the site would be the A49 which runs through Newton High Street. The High Street is an AQMA and a main thoroughfare for school children who we know are highly susceptible to health conditions caused by traffic pollution that endure into later life. Promoting a solution for the Port of Liverpool which depreciates air quality and people's health is not acceptable.

The previous Prologis planning application proposed to move the existing J22 further North to location of the existing Parkside Road M6 bridge used by the Link Road. This move was approved by Highways England in 2009 (TR110). The advantage of the solution was that development traffic could be forced to use the M6 rather than the local road infrastructure. The cost of moving the junction was quoted at approximately £40M at the time, which is approximately the construction costs for the link road today. The Local Plan makes no reference to the Link Road proposal, and how potential associated impacts will be mitigated. In our view the Link Road will have a huge and potentially damaging impact on surrounding communities.

Issue 3: The SA, its consideration of reasonable alternatives and proposed mitigation measures.

*19. Air Quality*

We have little evidence that the Council is taking air quality seriously. At the inquiry we requested the data that underpinned the planning application air quality assessments so that we could review the findings presented in the applicants reports. The Council refused to provide the data (note the Council are the applicant for the Link Road). We are extremely concerned about the potential impacts to air quality caused by cars, LGV & HGV arising from future developments. The location is wholly unsuitable for use of a road only based distribution facility.

*Landscape*

At the inquiry all parties generally acknowledged the potential damage to landscape on Parkside East caused by the proposed developments. Parkside East has terrific views to the North and the Pennines and is used regularly by walkers.

*Heritage Assets*

The inquiry examined the potential damage to the registered battlefield of Winwick Pass. Both the Link Road and Phase 1 planning applications transverse the registered battlefield. The lack of any specific policy for Parkside West as highlighted previously means that specific protections for this important asset have not been properly considered by the plan.

Issue 4: Habitats Regulations Assessment (HRA)

*Recreational Mitigation Strategy (RMS)*

We would wish to highlight one or two key points in this area. Bold Forest Park is not easily accessible by the majority of people in Newton-le-Willows and surround communities. What we have learnt from Covid is that the only place we can walk is on our local streets i.e. precious few green open spaces remain. Developing Parkside East will remove a significant recreational opportunity. The Parkside site borders Highfield Moss SSSI. The recent Parkside inquiry examined biodiversity and other social mitigations for proposed development. The Council's only solution put forward was to plant trees many miles away from our communities. No solutions were proposed for the mitigation of habitat destruction, restoration of wildlife corridors, or recreational facilities. We do not believe the Council are committed to any form of RMS in our area.

I hope you find this information useful. Please do not hesitate to contact me if you need any clarification or supporting evidence.

Yours faithfully,

Dave Tyas  
Co-Chair PAG