ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

Matter 4, Issue 1: Parkside East (7EA) and Parkside West (8EA)

Hearing Statement prepared on behalf of iSec May 2021



CONTENTS

1.	Introduction 3
2.	Q1 & Q2: Green Belt Exceptional Circumstances
3.	Q3: Scale and Configuration of Parkside East5
4.	Q4: Adverse Impacts and Benefits
5 .	Q5: Site Policies (Positively Prepared and Effective)9
6.	Q6: Site Information (Justified and Effective) 10
7.	Q7: Supporting Infrastructure Delivery 11
8.	Q8: M6 Junction 22 Improvements
9.	Q9: Future Rail Network Capacity
10.	Q10: Deliverability
11.	Q11: Barriers to Delivery
12.	Appendix 1: WSP Note (Highways Matters)
13.	Appendix 2: Hatch Note (Freeport Benefits)



Introduction

OVERVIEW

- 1. This Hearing Statement has been prepared by CBRE on behalf of iSec, who are the promoters of the Strategic Rail Freight Interchange at Parkside East (Site 7EA).
- 2. The Statement specifically responds to questions identified by the Inspector under Matter 4 issue 1 relating to the proposed allocation of land at Parkside East for a Strategic Rail Freight Interchange (SRFI). Additionally, short technical notes, covering technical highways matters and economic benefits arising from the development of Parkside, are appended to this Statement to assist the Inspector in the responses provided.



Q1 & Q2: Green Belt Exceptional Circumstances

Do the Green Belt assessments support the allocation of Sites 7EA and 8EA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

If exceptional circumstances have been demonstrated, have these been clearly articulated in the Plan?

Response

3. The Council's Green Belt Review¹ is based on a clear staged methodology. For Parkside East (ref GBP 039), it confirms that²:

"... In 2016 the Parkside Logistics and Rail Freight Interchange Study identified Parkside as a site of national and regional significance in relation to relevant policy, market demand and need for the delivery of new and improved SRFIs. The Study found that the opportunities for rail access from the site are second to none in the North West. Consequently, whilst it is acknowledged that there would be a high impact on the Green Belt if Parcel GBP_039 were to be developed, taking into consideration all the above factors, there are exceptional circumstances to justify carrying the parcel forward to the Stage 2 assessment."

- 4. At Stage 2, Parkside was concluded as not being subject to prohibitive constraints and with good development potential. On this basis, and the acknowledged exceptional circumstances for the development of a SRFI at Parkside East, the site was recommended for removal from the Green Belt.
- 5. The exceptional circumstances to justify release of Parkside East from the Green Belt are summarised at 4.36.14 to 4.36.16 of the Local Plan. Other information, including that summarised elsewhere in Local Plan Section 4.36 and set out in SD024, provide further justification in this regard. Additionally, since the Local Plan submission, the proposed allocation at Parkside has been confirmed as part of the Liverpool City Region Freeport through which benefits have been further considered (also see response to Q4).



¹ Green Belt Review (December 2018).

² Green Belt Review (December 2018), paragraph 4.6, page 37.

Q3: Scale and Configuration of Parkside East

Is the configuration and scale of the allocations and safeguarded land justified taking into account development needs and the Green Belt assessments?

- a. Is the allocation of a SRFI of the scale proposed in the Plan justified?
- b. Would a facility of a smaller scale (for example handling up to 8 to 10 trains daily) achieve similar benefits whilst minimising potential impacts?
- c. Could the Plan's aim of seeking to maximise the opportunities of delivering an SRFI of regional and national significance still be achieved?

Response

- 6. The configuration and scale of the allocation at Parkside is appropriate and justified. There is an acknowledged national and regional need for the proposed SRFI, which in turn requires a rail freight interchange facility and employment floorspace to which goods can be delivered from the railway network, either directly or by means of another form of transport. For SRFIs to successfully function, they need to be on large, predominantly flat and regular shaped sites at points where the rail network intersects with the trunk road network. The NPSNN³ notes that, as a minimum, a SRFI should be capable of handling 4 trains per day and, where possible, be capable of increasing the number of trains handled.
- 7. The Parkside rail freight interchange area is expected to be within the northern part of the Parkside East allocation, so accessible to the main line and able to interface with any future rail facilities provided on the Parkside West site. The interchange facility will be supported by a range of employment buildings, several of which need to be large. These, and other requirements such as road infrastructure and adequate parking and service yard areas for employment buildings, are reflected on the illustrative masterplan prepared for Parkside East⁴.
- 8. The scale of opportunity at Parkside is aligned with other recent schemes endorsed by the Secretary of State in issuing Development Consent Orders (see Table 1 below).

TABLE 1: SUMMARY OF OTHER RAIL FREIGHT INTERCHANGES

Site (Date DCO coming into Force)	RFI Capacity	Employment floorspace (m2)
West Midlands Interchange (2020) Up to 10 trains per day Up to 743,200m2		Up to 743,200m2
Northampton Gateway SRFI (2019) Up to 16 trains per day Up to 468,000m2 (plus additional 1 mezzanine space)		Up to 468,000m2 (plus additional 155,000m2 of mezzanine space)
East Midlands Gateway RFI (2016)	Up to 16 trains per day	Up to 557,414m2
Daventry International RFI (DIRFT III) (2014)	Up to 32 trains per day	Up to 731,000m2

9. The design of the rail freight interchange is being developed further in discussion with the supporting anchor Rail Freight Operating Company (FOC), which is Freightliner, to meet the NPSNN minimum

⁴ Appendix 3 to Parkside East Delivery Statement [included as Appendix 2 to SD024 - The Parkside Strategic Rail Freight Interchange Background Paper (October 2020)



³ National Policy Statement for National Networks (December 2014)

requirements for 4 trains per day, as well as providing space to allow this number to grow in line with demand and network capacity. The FOC has indicated that in addition to generating new rail freight services to and from the region (as all operational SRFIs have done), it may also consolidate other services which currently operate into smaller and more constrained rail freight interchanges in the North of England, as suggested by the NPSNN⁵. The size of the rail freight interchange area requires to provide sufficient space for the trains, container interchange and storage areas and road vehicle circulation to expand into over time.

- 10. The NPSNN notes that the increasing performance and efficiency required of our logistics system would not allow reliance on an expanded network of smaller terminals⁶ as these cannot provide the scale economies, operating efficiencies and benefits of the related business facilities and linkages offered by SRFIs.
- 11. A smaller facility at Parkside capable of handling 8-10 trains per day would by definition not be capable of the same level of freight mode shift potential. Furthermore, it would not necessarily mean a substantial reduced scale of land needed, reduction in potential impacts. There is a need for substantial levels of employment development to support the delivery of the rail freight interchange and the most recently approved scheme at West Midlands Interchange is a good example of this.
- 12. For reasons of viability, the developer / operator needs to maximise throughput through the rail freight interchange (as this is capital intensive). This is driven in part by the capacity of the rail freight interchange itself, as well as by the scale of surrounding employment development. This principle also reflects the AECOM Report, with the largest rail terminal and employment floorspace option assessed which reflects the extent of the proposed Parkside allocations, concluded as being able to repay the capital costs of the rail freight interchange facilities earlier than other options.
- 13. Furthermore, Parkside is now identified as one of three Tax Sites as part of the Liverpool City Region Freeport. The scale of development and the employment and other benefits able to be achieved through the planned SRFI is an integral part of the Freeport (also see response to Q4).

⁷ Parkside Logistics and Rail Freight Interchange Study (August 2016), Option 4 pp109-112



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⁵ National Policy Statement for National Networks (December 2014), paragraph 2.58

⁶ National Policy Statement for National Networks (December 2014) Table 4: Options to Address Need, pp22 & 23

Q4: Adverse Impacts and Benefits

Would the adverse impacts of developing sites 7EA and 8EA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

Response

- 14. The significant benefits of the SRFI at Parkside East are set out through a substantial body of evidence produced by the promoter, the Council and others, also summarised in SD024. For reasons of brevity, these are not repeated here. Most recently however, the proposed SRFI at Parkside has been confirmed as an important part of the Liverpool City Region (LCR) Freeport⁸, and is noted as directly contributing to the Freeport's three core objectives:
 - Trade: The establishment of a Strategic Rail Freight Interchange (SRFI) allows non-fossil freight and helps to establish the LCR as low carbon;
 - Jobs: Parkside East is identified as a major employment site focused on renewable energy production and food manufacturing, spatially designed to leverage the SRFI; and
 - Innovation: The site includes land for an innovation and R&D centre to drive new developments in renewable energy and manufacturing and to train LCR residents.
- 15. As part of the Freeport bid, the LCR Combined Authority calculated the economic benefits from the various locations forming part of the Freeport, notably estimated numbers of jobs and GVA. The economic benefits for Parkside East identified by the Combined Authority are:

Gross Jobs: 4,676

GVA Estimate: £294,617,050

- 16. To provide a sense of the scale of the Parkside East contribution to the LCR Freeport, the Combined Authority estimate that gross jobs will make up 34% of all jobs on the LCR Freeport tax sites and contribute 39% of tax-site generated GVA annually.
- 17. Further information on the Freeport is provided in the Note prepared by Hatch at Appendix 1.
- 18. As confirmed in responses to questions 1 and 2, exceptional justification has been shown to support the removal of Parkside East from the Green Belt. In relation to other impacts noted in the question:
 - Landscape land sensitivity is noted as low to medium, with a medium for landscape visual sensitivity. Whilst there will be landscape impacts arising from the development of Parkside East, the very large size of the site allows for the provision of strategic landscaping which, together with the appropriate siting of buildings across the site, will help to reduce landscape and visual impacts;
 - There are no significant highways safety concerns associated with the development of Parkside East (also see WSP Highways note at Appendix 1);
 - The land at Parkside East is in Flood Zone 1. Fluvial flood risk at Parkside East is noted as being negligible and also that development could have positive effects for the Nitrate Vulnerable Zone¹⁰

¹⁰ Parkside Logistics and Rail Freight Interchange Study (August 2016), Table 8.34, page 114



⁸ The Government announced in the 2021 Budget the locations of eight new Freeports in England, one of which is the Liverpool City Region Freeport

⁹ St Helens Local Plan Green Belt Review Stage 2B Assessments (October 2020)

- Land immediately adjacent to the M6 is in an AQMA although the extent of the AQMA extending into the land at Parkside East is minimal¹¹. Whilst there could be localised air quality impacts, the site itself is separate from Newton-le-Willows and generally distant from sensitive receptors. As with other SRFI, Parkside East will have wider air quality benefits associated with the reduction of long haul road freight¹².
- 19. In conclusion, it is considered that the scale and breadth of benefits associated with developing Parkside East outweigh any potential adverse impacts. The proposed SRFI is acknowledged to be of national and regional significance. Additionally, it is also an integral part of the Liverpool City Region Freeport. Freeports are recognised as a flagship government programme that will play an important part in the UK's post-Covid economic recovery and contribute to realising the levelling up agenda, bringing jobs, investment and prosperity to some of the country's most deprived communities¹³. Furthermore, Local Plan Policy LPA10 and LPA04.1 set out a range of criteria to address / limit the potential impacts of development.

¹³ Freeports Bidding Prospectus, prepared by HM Treasury and HM Government (November 2020), paragraph 0.0.3, page 6.



¹¹ https://laqm.defra.gov.uk/images/aqma_maps/StHelens1.jpg

¹² The ES submitted for the Northampton Gateway SRFI identified that the development would have a beneficial impact on air quality at a regional and national scale, as a result of the transfer of freight from road to rail. The approval of the Howbury Park SRFI in South East London identifies that rail freight produces 90 per cent less PM10 particulates and up to 15 times less nitrogen dioxide emissions than HGVs for the equivalent journey.

Q5: Site Policies (Positively Prepared and Effective)

Are the requirements for sites 7EA and 8EA within Policies LPA04, LPA04.1 and LPA010 (Site 7EA) and Appendix 5 (Site Profiles) positively prepared and effective?

- 20. Main requirements for Parkside East (Site 7EA) are included in Policy LPA10. The proposed SRFI at Parkside East is acknowledged as a unique opportunity of regional and national importance and as noted in response to question 4, this is supported by a substantial body of evidence
- 21. The Parkside East Delivery Statement confirms that the site is deliverable¹⁴. Additionally, the proposition has been developed over a number of years in collaboration with the Freightliner (the proposed Freight Operating Company), the Council and others including the Liverpool City Region Combined Authority, the Local Enterprise Partnership, and Network Rail.

¹⁴ Part Six of Parkside East Delivery Statement, Appendix 2 to SD024 - The Parkside Strategic Rail Freight Interchange Background Paper (October 2020)



Q6: Site Information (Justified and Effective)

Are indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Table 4.1 justified and effective?

- 22. The footnote to Table 4.1 identifies that the Parkside East site has a gross area of approximately 124.55ha, of which at least 60 ha is reserved for development of a Strategic Rail Freight Interchange or other rail enabled use (see Policy LPA10¹⁵). The indicative site area of 64.55 ha in Table 4.1 is noted as representing the remainder of the site which may be developed for a "...wider range of employment uses subject to compliance with Policy LPA10".
- 23. In relation to the 60 ha reserved for a SRFI in Policy LPA10:
 - This will need to accommodate rail freight infrastructure including container interchange, sidings, handling and storage areas and road vehicle circulation which require a relatively large area of land;
 - The masterplan provided with the Parkside East Delivery Statement is illustrative to provide an indication of how the site could come forward, including how the rail freight infrastructure could be configured; and
 - The exact rail freight infrastructure in terms of land take and design is still being developed with Freightliner (the proposed Freight Operating Company). As such, the precise extent of area needed for this, and thus any residual land that may be available for rail-served employment within the 60 hectares defined within Policy LPA10, is not precisely known at present.
- 24. The overall approach to Parkside East in the Local Plan is considered to be both justified, based on an appropriate and evidenced strategy, and effective.

¹⁵ Policy LPA10 refers to the development of a SRFI or 'other rail served employment development'.



Q7: Supporting Infrastructure Delivery

Will Infrastructure to support the allocations be delivered in the right time and in the right place?

- 25. The proposals for Parkside East have been discussed with Network Rail, and are now the subject of commercial negotiations between the parties to develop the proposals in more detail, with emphasis on reinstatement of the former main line interface and associated engineering works and development programme. In terms of any offsite infrastructure works elsewhere on the network, it has been confirmed that at least 4 return paths per day can be found in all scenarios without the need for additional infrastructure¹⁶.
- 26. In the event that Network Rail were unable to deliver the rail connections in advance of the rest of the SRFI infrastructure, the Secretary of State noted in his granting of consent for the East Midlands Gateway SRFI that the construction of warehousing and the construction of a new railway will involve different timescales and considered it entirely reasonable that a commercial undertaking should seek to generate income from the warehousing facilities before the railway becomes operational. This principle has also been applied to the most recently consented SRFI at West Midlands Interchange.
- 27. It is also notable that, in the case of the two most recent SRFI to be developed, at East Midlands Gateway and iPort Doncaster, warehousing floorspace was constructed and occupied in advance of the rail freight facilities, both sites experiencing a sharp early rate of growth in rail freight services compared to other SRFI where rail facilities were installed ahead of the floorspace and occupiers.

¹⁶ Conclusion of the independent report undertaken by Steer for Liverpool City Region Combined Authority and St Helens Council [EMP012 - Parkside Strategic Rail Freight Interchange Capacity Study Final Report (April 2021)]



Q8: M6 Junction 22 Improvements

Would there be delivery implications for sites 7EA and 8EA if a suitable connection to J22 (whether via the proposed Link Road or an alternative link) is not delivered during the plan period?

- 28. Site 7EA (Parkside East) is likely to require an improved connection to M6 Junction 22 in order for it to be delivered within the plan period. The Parkside Link Road (PLR), as proposed, would provide an enhanced connection between Site 7EA and Junction 22 (closely following the alignment of Winwick Lane between Barrow Lane and the roundabout junction connecting to the Motorway).
- 29. However, were the currently proposed and funded PLR not to progress, then a similar scheme between Site 7EA and the Junction 22 to that proposed as part of the PLR could be implemented in order to provide suitable road access to enable development at Parkside East to be bought forward. This improvement is likely to be required due to increased volumes of traffic in general but also the likely increase in HGVs associated with the proposed Strategic Rail Freight Interchange (SRFI) on Site 7EA.
- 30. The delivery of Parkside East is not dependent on the completion of the full proposed Parkside Link Road. This is because the primary vehicular movements associated with Site 7EA will be between the site and M6 Junction 22. This is also recognised in the Council's response to the Inspector's Initial Questions and Comments¹⁷
- 31. Also see the WSP Highways note at Appendix 1 for further details.

¹⁷ SHBC005 - St Helens Borough Council's Response to Inspectors Initial Questions and Comments on Site Allocations and Safeguarded Land 7EA and 8EA Parkside East and West, response to question 9 (penultimate paragraph)



Q9: Future Rail Network Capacity

In terms of feasibility and deliverability, will the future capacity of the rail network be capable of facilitating the delivery of an SRFI at Parkside?

- 32. Please see response to Qu.7 (paragraph 25).
- 33. Additionally, the Steer report¹⁸ concludes that there is expected to be suitable paths found to and from Parkside to meet the minimum requirements for an SRFI over the next 30 years, with clear opportunities to find additional paths to the north and south of Parkside. With much of the traffic to and from Parkside anticipated to be routed via the West Coast Main Line (WCML) to the south, the Steer report also notes that HS2 will provide the opportunity to create extra freight paths on the southern half of the WCML, with Phase One of HS2 having the potential to release three freight paths per hour.

¹⁸ EMP012 - Parkside Strategic Rail Freight Interchange Capacity Study Final Report (April 2021)



Q10: Deliverability

What level of certainty is there that there will be sufficient capacity and is that sufficient to demonstrate that the proposed facility will be deliverable during the Plan period?

- 34. As noted, the independent Steer report has concluded that the Parkside SRFI scheme can achieve the threshold of 4 trains per day in all the scenarios modelled and without the need for additional infrastructure. Construction of HS2 phase 1 and in turn phase 2a will increase the overall capacity of the rail network. Network Rail alongside other stakeholders such as LCR and Transport for the North have strategies to support further growth in rail freight traffic and associated network capacity.
- 35. A fundamental component of the NPSNN is the work undertaken by Network Rail to produce a long-term strategy for freight growth predicated by the expansion of the network of SRFI, with the NPSNN acknowledging the approach as robust.¹⁹ Network Rail continues to invest in the network to cater for growth in freight traffic as set out in its Freight & National Passenger Operators Route Strategy, and delivered through the Strategic Freight Network (SFN) programme funded by the Department of Transport.
- 36. Recently, the COVID19 pandemic has created a seismic decline in the level of passenger traffic carried on the national rail network; DfT data indicates that rail passenger traffic is currently only 36% of pre-COVID levels.²⁰ Any structural reduction in passenger trains arising from changing travel patterns and the forthcoming restructuring of the passenger rail industry would also release additional capacity for freight traffic.
- 37. In conclusion, the Secretary of State in granting of consent for the SRFI scheme at Northampton Gateway, agreed with the Examining Authority panel that the uncertainty caused by likely constraints and competitions on the network and the unknowns regarding how the network will accommodate future growth has to be set against the Government's ambition, set out in paragraph 2.53 of the NPSNN, that it is important to facilitate the growth of the intermodal rail freight industry to support a low carbon sustainable system that is the engine for economic growth.²¹

Northampton Gateway Rail Freight Interchange Secretary of State Decision Letter, 9 October 2019, paragraph 32



¹⁹ National Policy Statement for National Networks (December 2014), paragraph 2.49

²⁰ https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic

Q11: Barriers to Delivery

Are there any barriers to sites 7EA and 8EA coming forward as anticipated?

Response

38. Please see responses to other questions in this Hearing Statement although it is not considered that there are any barriers to Parkside East coming forward as anticipated.



Appendix 1: WSP Note (Highways Matters)

See next page

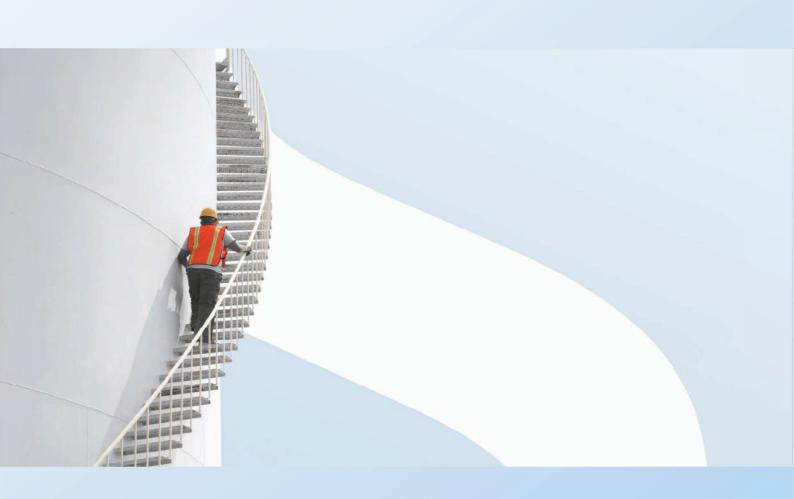




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PARKSIDE EAST

Transport and Highways Review





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Project No.: 70084001 | Our Ref No.: ParksideEast_iSec iSec

PUBLIC | WSP May 2021



CONTENTS

	INTRODUCTION	1
1	SITE AND LOCAL CONDITIONS	3
	SITE LOCATION	3
	PARKSIDE ROAD	3
	WINWICK LANE	4
	EXISTING CONDITIONS	4
2	PARKSIDE LINK ROAD	8
	SCHEME DESCRIPTION	8
	SCHEME FUNDING	8
	CAPACITY ASSESSMENT	8
	RELATIONSHIP TO PARKSIDE EAST	9
	SCHEME STATUS	9
3	M6 JUNCTION 22	12
	ROAD INVESTMENT STRATEGY	12
	ST HELENS LOCAL PLAN TRANSPORT IMPACT ASSESMENT	12
	PROPOSED IMPROVEMENT SCHEME	13
	HIGHWAYS ENGLAND POSITION	13
	RELATIONSHIP WITH PARKSIDE EAST	14
4	MATTERS, ISSUES AND QUESTIONS (MIQS)	16
	QUESTION 4	16
	QUESTION 8	16
	QUESTION 11	17



TABLES

Table 1-1 -	- Photos	of Existing	Access	Arrangemer	nt
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4

FIGURES

Figure 1 - Parkside East - Site Boundary	1
Figure 1-1 - Parkside East - Site Location Plan and Access Context	3
Figure 1-2 - Parkside Road looking south towards rail bridge	4
Figure 1-3 - Parkside Road looking north towards rail bridge	4
Figure 1-4 - Parkside Road looking south with public footpath (Barrow Lane) running acro site to east	oss 4
Figure 1-5 - Parkside Road looking north	4
Figure 1-6 - Parkside Road looking north, north of motorway bridge	5
Figure 1-7 - Parkside Road looking north, south of motorway bridge	5
Figure 1-8 - M6 Junction 22, Northbound entry slip	5
Figure 1-9 - M6 Junction 22, Southbound entry slip	5
Figure 1-10 - Approach to M6 Junction 22 from Winwick Lane	5
Figure 1-11 - Winwick Lane northbound, public footpath (Barrow Lane) to left	5
Figure 1-12 - View into footpath (Barrow Lane) from Winwick Lane	6
Figure 1-13 - View along Winwick Lane from Sandy Brow Lane	6
Figure 2-1 - Alignment of Proposed Parkside Link Road	10
Figure 3-1 - M6 Junction 22 Proposed Improvement Scheme (Ramboll)	13

PARKSIDE EAST
Project No.: 70084001 | Our Ref No.: ParksideEast_iSec
PUBLIC | WSP
May 2021

iSec

1

INTRODUCTION





INTRODUCTION

WSP have been appointed by iSec to provide transport consultancy advice on the Parkside East site in the North East of St Helens.

This report provides a summary of the work undertaken by WSP through this study, which has encompassed a site visit, substantial background reading and research and a consideration of local committed schemes and the nature of the proposed site allocation itself.



Figure 1 - Parkside East - Site Boundary

This report is divided into the following sections, following this Introduction:

- Site and Local Conditions
- Parkside Link Road
- M6 Junction 22
- Matters Issues and Questions for the forthcoming St Helens Local Plan Examination in Public
- Conclusions

PARKSIDE EAST
Project No.: 70084001 | Our Ref No.: ParksideEast_iSec
iSec

May 2021 Page 1 of 17

PUBLIC | WSP

1

SITE AND LOCAL CONDITIONS





1 SITE AND LOCAL CONDITIONS

SITE LOCATION

Parkside East is located in the north east of the Metropolitan Borough of St Helens and is bordered to the west by the M6 motorway, to the north by the Liverpool to Manchester rail line, to the east by the boundary with Wigan Metropolitan Council and to the south by the boundary with Warrington Borough Council.

In terms of road connections, the site is bounded by the A579 Winwick Lane, whilst Parkside Road bisects the site. M6 Junction 22 is located adjacent to the southern corner of the site.

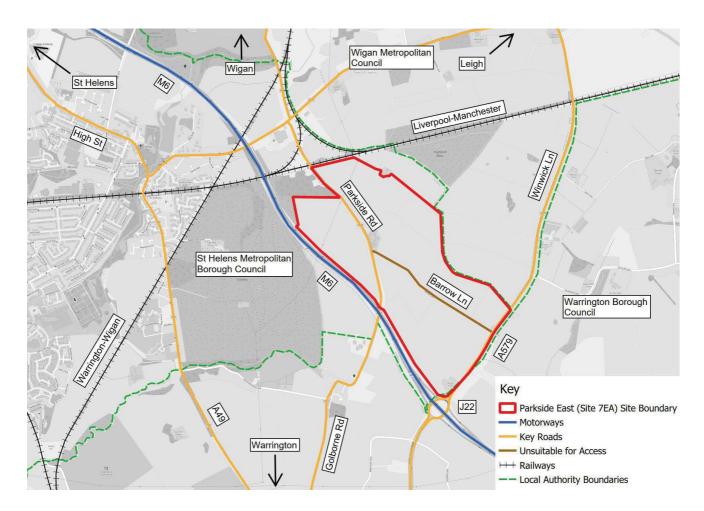


Figure 1-1 - Parkside East - Site Location Plan and Access Context

PARKSIDE ROAD

Parkside Road is a single carriageway route which is subject to the national speed limit along a large stretch within the site red line boundary, before reducing to a 30mph to the north or the route (where it is fronted by residential properties) and to the south (where it runs into Warrington and becomes Golborne Road). There is a footway on the western side of the route, and the route is predominantly bordered by fields.

PARKSIDE EAST
Project No.: 70084001 | Our Ref No.: ParksideEast_iSec

PUBLIC | WSP May 2021 Page 3 of 17



WINWICK LANE

Winwick Lane is a single carriageway route that sees relatively large volumes of traffic as it provides a direct link to the M6 Junction 22. The route meanders and there are bends that represent geometric challenges for fast moving vehicles and HGVs. Given the volumes of traffic that use it, the route would benefit from the upgrades included in the Parkside Link Road scheme (described in the next chapter of this report.

EXISTING CONDITIONS

Table 1-1 - Photos of Existing Access Arrangement





Figure 1-2 - Parkside Road looking south towards rail bridge

Figure 1-3 - Parkside Road looking north towards rail bridge





Figure 1-4 - Parkside Road looking south with public footpath (Barrow Lane) running across site to east

Figure 1-5 - Parkside Road looking north





Figure 1-6 - Parkside Road looking north, north of motorway bridge

Figure 1-7 - Parkside Road looking north, south of motorway bridge





Figure 1-8 - M6 Junction 22, Northbound entry slip

Figure 1-9 - M6 Junction 22, Southbound entry slip





Figure 1-10 - Approach to M6 Junction 22 from Winwick Lane

Figure 1-11 - Winwick Lane northbound, public footpath (Barrow Lane) to left







Figure 1-12 - View into footpath (Barrow Lane) from Winwick Lane

Figure 1-13 - View along Winwick Lane from Sandy Brow Lane

2

PARKSIDE LINK ROAD





PARKSIDE LINK ROAD 2

SCHEME DESCRIPTION

Parkside Link Road is a scheme being promoted by St Helens Metropolitan Borough Council (SHMBC) and is described as follows in the Transport Assessment report produced by Ramboll in October 2020:

"The Parkside Link Road (PLR) project (hereafter referred to as 'the Scheme'...is located to the east of the town of Newton-le-Willows and comprises a new road to link a proposed logistics development comprised of the Parkside Regeneration Development (PRD) (Phase 1 and Phase 2) and the Parkside Strategic Rail Freight Interchange (SRFI) (Phase 3), to the A49 road and the M6 motorway. In addition to this, the Proposed Scheme will link the A49 and the M6 at Junction 22".

The scheme includes the following features:

- 1.45km of new single carriageway road extending eastwards from the A49 Winwick Road to the A573 Parkside Road (both of which form part of the Local Road Network (LRN)). Access to the A573 will be via provision of a priority signal-controlled junction;
- 1.3km of new single carriageway road east of the M6 linking the A573 Parkside Road to a new roundabout on the A579 Winwick Lane (which forms part of the Strategic Road Network (SRN));
- 300m of new dual carriageway road extending Eastwards from the new roundabout on the A579 Winwick Lane to the M6 motorway at Junction 22;
- 295m of new single carriageway road extending eastwards from the new roundabout on Parkside Road to tie in with the existing A579 Winwick Lane; and
- Reconfiguration of the access to existing properties on the south side of the A579 Winwick Lane located close to M6 Junction 22.

In addition to the direct works associated with the construction of Parkside Link Road the applicant is also proposing to include a number of highway mitigation schemes which are summarised as follows:

- Installation of traffic signal control on M6 Junction 22 with Winwick Lane and Winwick Link Road;
- Capacity enhancement at Southworth Road/Mill Lane/Church Street; and
- Installation of traffic signals at Southworth Road/Parkside Road/Warrington Road/Newton Road

SCHEME FUNDING

The scheme has an estimated cost of £39.82m. In terms of how the scheme is funded, the Liverpool City Region Combined Authority (LCRCA) have approved Single Investment Fund (SIF) funding for £23.8m for the scheme. The LCRCA identify Parkside Link Road as a "Strategically Important Project" in their Transport Plan. In addition to the SIF funding, a further £6.17m is being contributed by SHMBC. The remaining £9.85m for the cost of the scheme is to be funded by private sector investment.

CAPACITY ASSESSMENT

The Ramboll Transport Assessment report included an assessment of the modelled performance of thirteen junctions looking at future network traffic growth and representative projections for B2/B8 logistics on the Parkside East and Parkside West sites. Of these thirteen junctions included within

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the assessment, nine are existing junctions and the impact of the PLR on those junctions can be summarised as follows:

- Three junctions on which the PLR impact is negligible;
- Three junctions on which the PLR impact is negative; and
- Three junctions on which the PLR impact is positive.

The three junctions on which the PLR is assessed as having negative impacts are the junctions that have mitigation measures proposed for them (listed above).

RELATIONSHIP TO PARKSIDE EAST

There is a clear relationship between Parkside Link Road and the Parkside East site, as it provides a comprehensive highways solution for the delivery of land at both Parkside West and Parkside East. The route, shown in Figure 2-1, provides a direct connection between the site and an upgraded A579 Winwick Lane. Without the link as proposed, local connections to Winwick Lane could be realised through potentially upgrading the hard standing Barrow Lane link onto Parkside Road and Winwick Lane (Barrow Lane is currently not suitable for through traffic and is designated as a public footpath), and improvements to Junction 22 of the M6 would potentially alleviate capacity concerns on the strategic road network. It is clear that the Parkside Link Road being implemented would be beneficial to the future development aspiration for Parkside East, although development is not exclusively dependent on its delivery.

This view is supported by SHMBC who provided the following response in Document SHBC0011:

Question 9. Is the Parkside Link Road essential for the development of both or one of the sites? Should a reference to the Road be included in Policy LPA10?

The planned delivery of the Parkside Link Road has the potential to support the timely development of Parkside East. However, the Parkside East site alone is not considered to require the full east-west Parkside Link Road connection to create a suitable access for the development, as it is able to link into Junction 22 without crossing over the M6 to the west side. For this reason, policy LPA010 does not include specific reference to the Parkside Link Road. Instead, in section 3b) it requires that 'proposals for development within site 7EA will be required to ... create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles"

SCHEME STATUS

The application for Parkside Link Road went to public inquiry in early 2021 and the Inspector's Report has yet to be published at the time of writing.

PARKSIDE EAST PUBLIC | WSP Project No.: 70084001 | Our Ref No.: ParksideEast iSec May 2021 iSec Page 9 of 17

¹ St Helens Borough Council's Response to the Inspectors' Preliminary Matters and Issues for the Examination, including some initial questions and comments, January 2021 - Document SHBC001



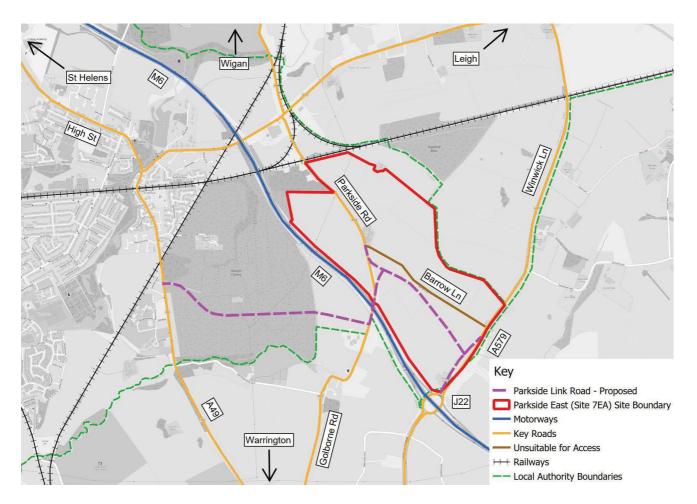


Figure 2-1 - Alignment of Proposed Parkside Link Road

3

M6 JUNCTION 22





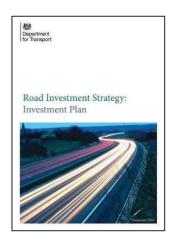
3 M6 JUNCTION 22

ROAD INVESTMENT STRATEGY

The Department for Transport first made reference to an improvement scheme for the M6 Junction 22 in their 2014 Road Investment Strategy (RIS). Little detail was provided on the nature of the scheme, beyond the following description:

"Improvements to Junction 22 near Warrington, improving access to nearby developments"

A scheme is also referenced in the 2020 Road Investment Strategy 2 (2020-2025), however it is referred to as a 'RIS 3 Pipeline Scheme', rather than anything more committed. Before being included on the list of schemes in the north the document states the following:



"We also expect that where a proposal enables significant development nearby, the developer will contribute to the cost of delivering the scheme. There is also potential for funding from other sources to support a developing proposal. Funding contributions will make a significant difference to the likelihood of government choosing to bring forward a proposal to the next stage, and ultimately to commit to it as part of the next RIS. We value the role that local partners, including local authorities, mayoral and combined authorities and LEPs, have played inn the past in marshalling such packages of support.

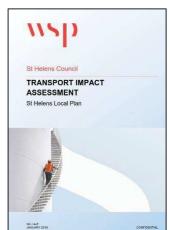


As a proposal is developed, our understanding of it is likely to change. In some cases, this may demonstrate a deeper or more urgent need for a particular piece of work, which may lead to it being prioritised for rapid deliver. In other cases, it may demonstrate that the case for investment is not strong enough to justify spending money at a large scale, or that the same outcome can be achieved through alternative means. Government will commit to the delivery of successful proposals through the publication of RIS3."

ST HELENS LOCAL PLAN TRANSPORT IMPACT ASSESMENT

The Transport Impact Assessment for St Helens Local Plan (WSP, January 2019), included consideration of an improvement scheme for M6 Junction 22, described as follows:

"There are three committed schemes identified on the Strategic Road Network, including Junction 22 capacity improvements: likely to consist of an additional circulatory lane".



PARKSIDE EAST
Project No.: 70084001 | Our Ref No.: ParksideEast_iSec iSec

PUBLIC | WSP May 2021 Page 12 of 17



PROPOSED IMPROVEMENT SCHEME

The application for Parkside Link Road included a junction design layout for M6 Junction 22 which was produced by Ramboll on behalf of Balfour Beatty. This improvement scheme is that which are referenced by the Inspector in the Matters, Issues and Questions (MIQs)². The main features of the design are the widening of overbridges on either side of the motorway in order to include a third circulatory lane, replacing the current arrangement which allows two vehicles to circulate but without formal road markings. The roundabout is also proposed to be signalised with four separate stop lines on the roundabout itself. This is shown in Figure 3-1.

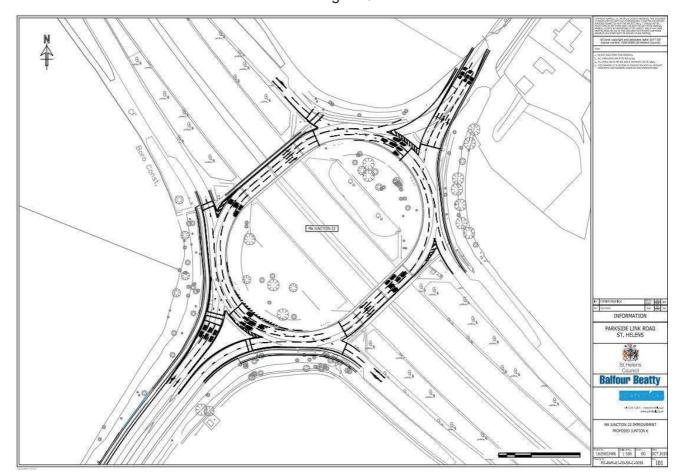


Figure 3-1 - M6 Junction 22 Proposed Improvement Scheme (Ramboll)

HIGHWAYS ENGLAND POSITION

It is understood that a draft Statement of Common Ground (SOCG) has been developed by SHMBC and Highways England which cover a range of matters relevant to the Local Plan and its interface

² St Helens Borough Local Plan 2020-2035 Examination – Matters Issues and Questions for the Examination and Hearing Sessions



with the road network for which Highways England are responsible for. This includes proposals for the M6 Junction 22. The SOCG will likely be refined up to and during Local Plan examination.

RELATIONSHIP WITH PARKSIDE EAST

If the proposals for Parkside West and the Parkside Link Road do not come forward within the necessary timescales for whatever reason, iSec would be prepared to work with Highways England, SHMBC and other stakeholders to provide a suitable mitigation solution to M6 Junction 22. The details of this would be worked through and confirmed at the appropriate time, if this situation should arise.

PARKSIDE EAST PUBLIC | WSP Project No.: 70084001 | Our Ref No.: ParksideEast iSec May 2021 iSec

Page 14 of 17

4

MATTERS, ISSUES AND QUESTIONS (MIQS)





MATTERS, ISSUES AND QUESTIONS (MIQS) 4

This section considers the Matters, Issues and Questions document that has been published and provides responses to questions that relate to transport and highways issues.

Matter 4 - Allocations, Safeguarded Land and Green Belt Boundaries Parkside and Newton-le-Willows/Earlestown

Issue 1 – Parkside East (7EA) and Parkside West (8EA), Newton-le-Willows

Questions 4, 8 and 11

QUESTION 4

Would the adverse impacts for developing Sites 7EA and 8EA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

There are not considered to be any negative highway safety effects that cannot be mitigated against through design and management of development of Site 7EA (Parkside East). Any development coming forward on this site would ensure that access conforms to appropriate local and national design standards, which would be subject to a four-stage road safety audit that would consider access designs at the following stages:

Stage 1 – Completion of Preliminary Design

Stage 2 – Completion of Detailed Design

Stage 3 – Completion of Construction

Stage 4 – Post Opening Monitoring.

In developing a planning application for the site (if allocated), the applicant would look to engage with St Helens Council's transport and development control teams in order to ensure that the proposals are acceptable in terms of highway capacity and highway safety. The Parkside Link Road scheme includes capacity and road safety improvements which would mitigate against any impacts of Site 7EA coming forward.

QUESTION 8

Would there be delivery implication for sites 7EA and 8EA if a suitable connection to J22 (whether via the proposed Link road or an alternative link) is not delivered within the Plan period?

Site 7EA (Parkside East) is likely to require an improved connection to M6 Junction 22 in order for it to be delivered within the plan period. The Parkside Link Road (PLR), as proposed, would provide an enhanced connection between Site 7EA and Junction 22 (closely following the alignment of Winwick Lane between Barrow Lane and the roundabout junction connecting to the Motorway).

However, were the currently proposed and funded PLR not to progress, then a similar scheme between Site 7EA and Junction 22 to that proposed as part of the PLR could be implemented in order to provide suitable road access to enable development at Parkside East to be bought forward. This improvement is likely to be required due to increased volumes of traffic in general but

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also the likely increase in HGVs associated with the proposed Strategic Rail Freight Interchange (SRFI) on Site 7EA.

The delivery of Parkside East is not dependent on the completion of the full proposed Parkside Link Road. This is because the primary vehicular movements associated with Site 7EA will be between the site and M6 Junction 22. This is also recognised in the Council's response to the Inspector's Initial Questions and Comments³ which stated that:

"The planned delivery of the Parkside Link Road has the potential to support the timely development of Parkside East. However, the Parkside East site alone is not considered to require the full east-west Parkside Link Road connection to create a suitable access for the development, as it is able to link into Junction 22 without crossing over the M6 to the west side. For this reason, policy LPA010 does not include specific reference to the Parkside Link Road. Instead, in section 3b) it requires that 'proposals for development within site 7EA will be required to ... create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles".

QUESTION 11

iSec

Are there any barriers to Sites 7EA and 8EA coming forward as anticipated?

There are not considered to be any traffic and access issues related to the development of Site 7EA that cannot be mitigated against in terms of appropriate scheme design and also through the progression of committed schemes such as the Parkside Link Road. Whilst the development and implementation of the Parkside Link Road will provide appropriate and suitable capacity and access between M6 Junction 22 and Site 7EA, were this scheme not to be implemented in time it would be possible for the applicant of the site to develop a similar scheme in order to mitigate against any adverse impacts.

PARKSIDE EAST
Project No.: 70084001 | Our Ref No.: ParksideEast_iSec

PUBLIC | WSP May 2021 Page 17 of 17

³ SHBC005 - St Helens Borough Council's Response to Inspectors Initial Questions and Comments on Site Allocations and Safeguarded Land 7EA and 8EA Parkside East and West, response to question 9 (penultimate paragraph)



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Appendix 2: Hatch Note (Freeport Benefits)

See next page





Parkside East, Liverpool City Region Freeport Proposal

This note summarises the role and economic contribution of Parkside East to the Liverpool City Region Freeport proposal.

A. Policy Context

In November 2020, the Government set out the bidding process and criteria for potential Freeport bids. Freeports are a central plank of national economic policy in the post-pandemic, post-Brexit era. Freeports are intended to introduce a step-change in the UK's ability to assemble and manufacture goods for export whilst also driving regeneration and job creation in deprived areas to level-up communities.

The government sought Freeport bids that achieved three objectives:

- Trade: Create national hubs for global investment and trade;
- Jobs: Promote widescale regeneration and job creation; and
- Innovation: Create hotbeds for innovation and future growth.

As part of the written application, bidders were required to assess the gross economic and job contribution following designation of a primary customs site and up to three separate tax sites.

Following submission of a Strategic Business Case (SBC), Liverpool City Region Freeport has been invited to submit an Outline Business Case (OBC), as announced in Budget 2021. The Liverpool City Region Freeport was one of eight accepted by the government.

B. LCR Freeport and Parkside East

The Liverpool City Region (LCR) Freeport application was led by Liverpool City Region Combined Authority (LCRCA) on behalf of the site-promoters and local authorities. Three tax sites were identified through a prioritisation exercise: Parkside (East and West), 3MG and the Wirral Waters site. The three tax sites total 300 ha of land and are all located within 20 km of the Primary Customs site (the Port of Liverpool).

Parkside East is central to the LCR Freeport proposition as it directly contributes to the three core objectives.

- Trade: The establishment of a Strategic Rail Freight Interchange (SRFI) allows non-fossil freight and helps to establish LCR as low carbon
- Jobs: Parkside East is identified as a major employment site focused on renewable energy production and food manufacturing, spatially designed to leverage the SRFI.
- Innovation: The site includes designated land for an innovation and R&D centre to drive new developments in renewable energy and manufacturing and to train LCR residents.

The Government acknowledges the Liverpool City Region's Freeport proposal (and Parkside East in particular) will play an important role in the long-term development of the regional economy and its recovery post-pandemic. The new jobs created at Parkside East support LCR's Local Industrial Policy (LIS) and Economic Recovery Plan as they target renewable energy production and technology-led manufacturing. This is supported by on-site community and training facilities that will further benefit regional GVA growth.

C. Economic Contribution of Parkside East

The economic contribution of Parkside East was assessed by LCRCA alongside constituent land sites included in the Freeport designation. The Government's standard methodology was applied to estimate direct, indirect (supply-chain) and induced (multiplier effect) jobs and GVA.

Based on this methodology, LCRCA estimated the economic benefits of the Parkside East as part of the Freeport SBC.

Table 1: Parkside East Economic Contribution

	Gross Sqm	Gross Jobs	GVA Estimate
Parkside East	303,970	4,676	£294,617,050

Source: LCRCA Freeport Submission

To provide a sense of the scale of Parkside East's contribution to the LCR Freeport proposition, the Combined Authority has estimated that Parkside East's gross jobs will make up 34% of all jobs on the LCR Freeport tax sites and contribute 39% of tax-site generated GVA annually. It should be noted that this is an estimate and may evolve as the detailed site masterplan and occupiers are finalised.

D. Environmental and Social Benefits

The Freeport Strategic Business Case was focussed on alignment with regional economic plans and the additionality of jobs and GVA enabled by customs and tax concessions. Of particular importance to the Government was assurance the proposals benefitted communities of deprivation and contributed positively to net zero targets. Parkside East was acknowledged to contribute directly these aims:

- Parkside East's SRFI provides LCR with the ability to create net zero-supporting logistics infrastructure to connect manufactured products with end-customers;
- Parkside East is noted as a major opportunity to build on existing regional R&D and support
 the transition to decarbonise foundation industries, as well as create on-side renewable
 energy.
- Parkside, along with the other two tax sites, are located next to areas of high relative deprivation (within the 10% most deprived nationally). These areas will benefit from close proximity to direct jobs on the Parkside East site as well as new 'induced' spending, as employees and visitors to the site spend money locally.