

Secretary of State (SoS)
for
Ministry of Housing Communities and Local Government (MHCLG)

PARKSIDE

INQUIRY

**WRITTEN STATEMENT
STRATEGIC RAIL FREIGHT TERMINAL
PROPOSITION AND VIABILITY
DAVE TYAS, BEng**

PARKSIDE ACTION GROUP



PARKSIDE LINK ROAD (PLR)
Planning Inspectorate References
St Helens BC : APP/H4315/V/20/3253230
Warrington BC : APP/MO655/V/20/3253232
St Helens BC (SHBC) Planning Application Reference : **P/2018/2049/FUL**
Warrington BC (WBC) Planning Application Reference:
2018/32514 & 2019/34719

Document History			
Date	Version	Status/Purpose	Author
07-Dec-2020	Rev 1.0	Initial document release	DT

Contents

1	Executive Summary.....	3
2	About the Author	3
3	Purpose	4
4	Degradation of Strategic Site.....	9
5	Summary.....	19

Definitions

- AQMA Air Quality Management Area
- ELNS Employment Land Needs Study
- EIA Environmental Impact Assessment
- ES Environmental Statement
- NPPF National Planning Policy Framework
- PLR Parkside Link Road (see section 1 of this document for planning application references)
- Phase 1 Phase 1 Planning Application (see section 1 of this document for planning application references)
- RSS (North West) Regional Spatial Strategy
- SHC St Helens Council
- SRFI Strategic Rail Freight Terminal
- TA Traffic Assessment
- WBC Warrington Borough Council

Document References	
Ref	Filename/Description
1	RSS EIP Panel Report, Planning Inspectorate, 2007
2	St Helens Council Core Strategy, St Helens Council, 2013
3	Parkside Logistics and RFI Study, AECOM, 2016
4	Railway Group Standard, GC/RT5021, Issue Five, Date December 2011

1 Executive Summary

This paper examines the prospects and viability of an SRFI coming forward in the future given the proposals for Parkside Phase 1 and Parkside Link Road. The proposals for Phase 1, Phase 2 and the Link Road would occupy Parkside West in its entirety and largely prohibit rail operations in that location. Parkside East is being promoted as the preferred location for a freight terminal, however, that location has many significant limitations compared to Parkside West especially as the Link Road also places constraints on layout and operations on Parkside East. The paper shows that the combination of both Phase 1 and the Link Road severely depreciates the value and attractiveness of the site for a freight terminal and the possibility of it coming forward. This is also set in the context of national policy which aims to protect rail freight locations from other development given that such locations are at a premium within the UK.

2 About the Author

2.1

[Redacted text block containing approximately 12 lines of blacked-out content]

3 Purpose

- 3.1 This document provides the PAG background evidence which examines whether the strategic precedence of the site to be reserved for the use as an SRFI has been depreciated by the proposed developments detailed in the PLR and Phase 1 planning applications
- 3.2 PAG attended and contributed to the Examination in Public of the North West Regional Spatial Strategy in 2008. The RSS clearly positioned Parkside as a strategic site of national significance being one of only a small number of sites in the UK having good rail and road links required to support inter modal operation.
- 3.3 The RSS EIP Panel Report stated in para 5.56 *'It is not for us to come to a decision about the allocation of land for an inter-modal freight terminal at Newton-le-Willows, or about the present planning application in respect of Parkside Colliery. Those are essentially matters for the local planning authority, who will take account of detailed operational considerations and environmental impacts. However, we consider that if a site is to be identified for such a purpose in a local development document, this would almost certainly necessitate a local review of the Green Belt boundary. **We consider that such a review would be justified in order to accommodate the development of an inter-modal freight terminal, but not for other forms of development, including large scale storage and distribution uses that are not directly required to facilitate the interchange of freight between road and rail'**.*

- 3.4 RSS Policy W2A Inter-Modal Freight Terminals provides a strategy statement specifically with regards RFI. The policy states: *'Sites should be allocated planning permission granted only where **the local planning authority is satisfied that interchange between transport modes is the primary purpose of the development.** A review of the Green Belt boundary in the local development framework would be justified in order to accommodate an inter-modal freight terminal in accordance with this policy. If Land is removed from a Green Belt in accordance with this policy, the relevant development plan document **should include a presumption against its development for the purposes other than an Inter-modal freight terminal.***
- 3.5 An outline planning application for an SRFI with associated warehouses was submitted in 2006 by a company called Astral, later to be superseded by a larger US conglomerate Prologis. The Prologis master plan is shown below.



Figure 1 Astra/Prologis Master Plan

- 3.6 The topology of the rail infrastructure utilised both Parkside West and East, with integrated inter-modal capabilities.
- 3.7 Prologis withdrew their application in 2010 due to the commercial viability of the scheme.
- 3.8 In 2013 the currently adopted St Helens Core Strategy in 2013 built on the outputs of the RSS through policy CAS 3.2 which maintained the Green Belt status of the site, and set criteria to protect site for future exclusive use as an SRFI.
- 3.9 **Criteria 8 in CAS 3.2 states 'All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site'**
- 3.10 In 2005 a planning application (P/2005/0586) was submitted for 32 houses at Newton Park Farm on Parkside West. The development included provision for the refurbishment of Newton Park Farm listed buildings.
- 3.11 In 2008 the application was called in (PNW/5093/219/28). St Helens Council opposed the application on grounds that it would prejudice an SRFI coming forward in support of the Astral/Prologis plan shown earlier which proposed to relocate the listed buildings.

3.12 PAG played a neutral role at the inquiry in respect of the Green Belt position but demonstrated that an SRFI was viable without impacting Newton Park Farm as evidenced by a previous application by Rail Track in 2001 as shown below.



Figure 2 Rail Track 2001 Master Plan Parkside West

3.13 The inspector agreed with PAG and granted the housing application, however, *the Secretary of State at the time over-ruled the inspector because she agreed with the Council that on balance the scheme may prejudice an SRFI coming forward.*

3.14 The Secretary of State decision shows the importance of Parkside West in respect of SRFI capability and viability.

Key Points



3.15 The Phase 1, Phase 2 (entire Parkside West development) and PLR proposals make no reference to inter-modal operation and appear to be orientated entirely towards a road logistics proposal.

3.16 The Phase 1, Phase 2 (entire Parkside West developments) and PLR proposals are in direct conflict with previous planning policy and Secretary of State direction for the site in respect of exclusive allocation for an SRFI and not compliant with the currently adopted St Helens local plan (Core Strategy).

4 Degradation of Strategic Site

4.1 As part of the development for a new local plan in 2016, St Helens Council commissioned a study by AECOM for SRFI viability and options at Parkside.

4.2 Four different options covering different topologies for an RFI using Parkside West and East were presented.

Option	Site Usage
1	Parkside West only
2	Parkside West only
3	Parkside West with option for manufacturing spur to the East
4	Parkside East only

4.3 The emerging St Helens Local Plan makes no reference to Parkside West for use as an SRFI and allocates Parkside West solely for employment development.

4.4 The emerging Local Plan designates Parkside East for use as an SRFI.

4.5 The Phase 1 and Phase 2 planning applications make no reference to SRFI capability for Parkside West, other than a future shunting rail spur to allow freight trains to access Parkside East.

4.6 Option 4 is the only one in the 2016 RFI Study that target Parkside East. The schematic below shows option 4 with the PLR overlaid in light blue on the rail infrastructure topology.



Figure 3 RFI Study 2016 Option 4 Parkside East

4.7 As can be seen from the schematic, the PLR spans the rail sidings and loading area on Parkside East. Therefore, the option as detailed in the report is not valid. The other options in the RFI Study as detailed earlier are focussed on Parkside West.

4.8 It is obvious on paper that the rail sidings and loading area could potentially be moved East of the PLR towards point A, however, the following aspects have not been addressed:

- (i) Whether the rail ingress point to the site from the Chat Moss line could be moved further East?
- (ii) Whether there would be sufficient space to accommodate the rail sidings and loading area once moved further East?
- (iii) Whether there would be impacts to Highfield Moss SSI shown at the top of the schematic adjacent to [10] given the closer proximity of tracks and rail movements.

4.9 The picture below shows the railway cutting at point A on the Chat Moss line shown in Figure 3 earlier.



Figure 4 Parkside Road Chat Moss Line Intersection

4.10 The land to the right of the wall is where the rail curve and sidings are shown in Figure 3. This land is approximately 4m higher than rail racks shown in the picture.

4.11 The picture below shows a train running along this section of track. The height of the train provides a good guide and evidence as to the height of the land on the right.



Figure 5 Train Chat Moss Adjacent to Parkside East

4.12 Access to the rail curve and the sidings shown in Figure 3 earlier would require a new cutting and incline to be constructed from the Chat Moss line onto Parkside East.

4.13 Railway Group Standard, GC/RT5021, Issue Five, Date December 2011 mandates requirements for track geometry, track system, track components and switches and crossings (S&C) to provide for the safe guidance and support of rail vehicles.

- 4.14 Para B.1.2 states ‘To avoid problems with available tractive effort, it is considered good practice that the design value for track gradient for freight traffic should be not steeper than 1 in 100.’
- 4.15 Para B.1.3 states ‘The design of track gradients should take into account horizontal track curvature as horizontal curvature also increases the resistance to traction and braking.’
- 4.16 Therefore, assuming the track were to be inclined at a gradient of 1 in 100 then approximately 576m of track would be needed to reach the natural level of the land on Parkside East (shown by the orange line marked 576m in Figure 3). The length is made up of 176m for the curve and 400m for the incline. It is assumed the curve would not be part of the incline. The curve length (radius) is based on the Earlestown curve which is known to be at the extreme limit of allowed track radius.
- 4.17 It is reasonable to assume that the incline would need to start after the end of the curve given the recommendations on horizontal track curvature specified in GC/RT5021 mentioned earlier.
- 4.18 Loading and inter-modal operations for warehouse locations 8, 9, 10, and 11 would be compromised being adjacent to the track incline.
- 4.19 At the end of the incline there would be limited track length compared to the original solution envisaged.

Key Points



- 4.20 *The 2016 AECOM RFI Study did not include an assessment of a an RFI configuration that coexisted with the PLR as the PLR proposal came forward after the report.*
- 4.21 For configuration option 4 in the study, it is clear the track and sidings will need to be relocated further East
- 4.22 *The study failed to address the significant land height variation challenges from the Chat Moss line to Parkside East necessitating large scale earth works to accommodate a rail track incline. Addressing the issue is likely to be extremely costly. The requirement for an incline will also reduce siding lengths and prohibit loading and inter-modal operations adjacent to the incline.*

4.23 The AECOM RFI Study was written before the inception of the PLR. The document examined how road access between Parkside West and Parkside East could be facilitated. One of the options examined was the possibility of converting a track for road usage next to the Chat Moss line that passes under the M6 motorway. The picture of the track taken from the RFI Study Figure 6.2 is shown below (see Figure 3 point B):



Figure 6 Access Track Running Next to Chat Moss Line

4.24 In the AECOM RFI Study option 4, as shown in Figure 3, freight trains originating from the East or North need to do so by first entering the shunting track on Parkside West, and then reverse onto Parkside East.

4.25 The Chat Moss line has two tracks, one for each direction. Therefore, as things stand, trains entering from the East or North would tie up the Chat Moss line twice, once to enter the shunting track on the West, and then again to shunt back onto the East.

- 4.26 The Chat Moss line is strategic East-West rail route linking the cities of Manchester and Liverpool. It has seen a steady increase in commuter services over recent years. Adding unnecessary congestion would appear to be a poor decision.
- 4.27 The AECOM RFI Study did not examine whether an additional line could be constructed along the path of the track shown in Figure 6. The space appears to be limited. An extra line would allow trains shunting back from the West to do so without tying up the Chat Moss line.
- 4.28 In respect of constructing a road at this point the Study did say, *'However it is envisaged that to fully take advantage of this access the embankment underneath the M6 will need to be removed. However, the use of this alignment is not recommended due to a number of challenges and conflicts. Firstly, there is significant uncertainty over the abutment type and the foundations used on the bridge. There would also need to be significant evidence to support that works on a new retaining feature under the existing structure would not impact the structural integrity and undermine the foundations. There could also be major risks during the construction stage with possible limitations on the size of plant used and how this would affect the construction of large retaining features to support the ground conditions and bridge foundations. Additionally, the interactions between both Highways England and Network Rail would be challenging to overcome due to the effects construction could have on their live infrastructure assets (e.g. closure of the M6 at certain times)'*.

Key Points



- 4.29 Without additional rail infrastructure rail access to Parkside East from the North and East would cause unnecessary congestion on the Chat Moss line. Constructing an additional passing rail track under the M6 is likely to be extremely expensive.

4.30 The table below summarises rail routing for different rail origins:

Origination	Parkside East Route	Parkside West Route
From WCML South	WCML-> Earlestown-> Chat Moss -> Parkside East	WCML-> Earlestown-> Chat Moss -> Parkside West
From West	Chat Moss -> Parkside East	Chat Moss -> Parkside West
From WCML North	Chat Moss -> Parkside West -> Chat Moss -> Parkside East (assuming no passing line under M6)	WCML -> Chat Moss -> Parkside West
From East	Chat Moss -> Parkside West -> Chat Moss -> Parkside East (assuming no passing line under M6)	Chat Moss -> Parkside West

Table 1 Comparison of Rail Routing Parkside East & West

4.31 Without a passing line under the M6 the North and East origins represent sub-optimal routes for Parkside East as transfers tie up the Chat Moss line twice. This is an important consideration when considering impacts to commuter journeys.

4.32 The table below illustrates the limitations of bringing forward Parkside East versus Parkside West as an RFI.

Issue	Parkside East RFI	Parkside West RFI
Construction of cutting and rail incline	Significant cost. Potential compromises for intermodal operation.	Not required
Construction of Chat Moss passing line under M6 to avoid excessive use of Chat Moss line for North & East origins	Significant cost. High risk construction project given potential impacts to M6 and Chat Moss line.	Not required
Construction of shunting line on Parkside West required for North & East origins	Required – additional costs	Not required
Construction of shunting line level crossing required for access to Newton Park Farm	Required – additional costs	Not required
High maintenance required to avoid noise from tight shunting curve on Parkside West close to residents	Required – additional operational costs	Not required
Inter-model options and flexibility	Poor due to space available given rail incline and PLR location	Good
Impacts to or removal of Parkside Road A573	Loss of a major local road route	Not applicable

Table 2 Rail Access Viability Comparison Parkside East & West

Key Points

4.33 The Phase 1 and Phase 2 proposals will occupy the entire land at Parkside West. This therefore precludes an RFI coming forward at Parkside West.



4.34 Parkside West is the better option in terms of cost and operational flexibility.

4.35 The additional costs to implement Parkside East and significantly impaired operational flexibility are likely to discourage an RFI coming forward.

5 Summary

- (i) The Phase 1 and PLR planning applications conflict with currently adopted Local Plan (Core Strategy)
- (ii) Previous regional planning strategy identified the strategic nature of the site specifying policies that protected both Parkside West and Parkside East from development other than an SRFI.
- (iii) There is previous SoS precedence from the Newton Park Farm Inquiry that supported the strategic nature of the site. A small housing development on Parkside West was refused by the SoS because it may have prevented an RFI coming forward on Parkside West.
- (iv) The PLR proposal effectively reduces the available land and operational flexibility for an RFI on Parkside East.
- (v) The AECOM 2016 RFI Study commissioned to support the emerging local plan failed to address several issues with regards the viability and suitability of Parkside East for an RFI. In particular the Study failed to properly address rail access to Parkside East where the Chat Moss line runs in a cutting which is significantly lower than the rest of the land where the terminal is proposed.
- (vi) Additional costs and impaired operational flexibility are likely to prohibit an RFI coming forward at Parkside East. As the Phase 1 and Phase 2 proposals effectively prohibit a terminal coming forward at Parkside West, the situation effectively severely degrades the prospects on a RFI coming forward at all. Other solutions like the previous Railtrack 2001 and Prologis proposals relied on Parkside West. Three out of the four options examined in the AECOM Study utilised Parkside West. We suggest that if the SoS considers Parkside to be a strategic site for an SRFI, and given there are only limited locations where such sites exist in the UK, then granting the

Phase 1 and PLR applications is likely to severely reduce the possibility of an SRFI coming forward in the future.