



St Helens Borough Local Plan 2020-2035 Examination

21st May 2021

Comments on Matters for Week 2

Dear Inspectors,

Please find below feedback with respect to matters scheduled for week 2.

Matter 4, Issue1: Parkside East (7EA) and Parkside West (8EA), Newton-le-Willows

We acknowledge and appreciate many of the inspectors' questions for this issue. We have covered many of the areas in our previous responses and recent submissions. To summarise, however, we would draw your attention to the following points relevant to this session:

- At the Parkside Inquiry it was shown that Parkside West could be regarded as only having a small proportion of previously developed land, the remainder being either farmland or natural scrubland. It is not a brownfield site.
- Parkside East is almost entirely farmland with some good grade soils. It also has terrific views to the North and Winter Hill. Barrow Lane dissects Parkside East and the land itself is adjacent to Highfield Moss SSSI. As well as an area of local outstanding natural beauty the site is also a well-known in the North West for ornithology and nature appreciation. The Greater Manchester records centre which provides data to the British Trust for Ornithology and which in turn is used for government statistics has records for Barrow Lane and Highfield Moss dating back 20 years since 2000. These records are extensive and include 23 red listed schedule 1 bird species and Highfield Moss is known nationally for its botany is one of the few areas in the UK to host the Marsh Gentian.
- Parkside provides a natural break between Newton-le-Willows, Hermitage Green, Winwick and areas in Lowton, one of the key aims of Green Belt.
- We believe the Green Belt assessments undervalued the land in respect of the above.
- Parkside East and West has a very good protection policy in CAS 3.2 of the currently adopted local plan, only allowing Green Belt release for an SRFI. The Council's view is that Parkside West is part of the 15-year employment land need pot, however, as covered in our previous responses and by others we believe the employment land need analysis to be flawed and over-inflated. In the new Local Plan there are no specific policies for Parkside West. The land is simply allocated as

employment land. No explanation for exceptional circumstances is provided.

- From a UK government perspective there does not appear to be a clear steer on SRFI scale in terms of overall demand, but there is quite clearly an opportunity to develop intermodal capabilities on both Parkside West and East. Simply allowing B8 development on Parkside West depreciates the overall intermodal road to rail opportunity and its inherent climate change benefits. Parkside West could quite comfortably accommodate a small SRFI with minimum infrastructure costs unlike Parkside East.
- The proposed Parkside Link Road is not covered by the Local Plan. The Link Road facilitates access to local roads by future developments as opposed to a ring-fenced dedicated motorway junction. The use of the local road system will depreciate air quality. The removal of green space and the destruction of historic assets such as the registered battlefield on Parkside West mean that the overall costs outweigh the benefits.
- Warrington Borough Council have stated specific constraints on the scale of B8 development on Parkside West should the Link Road not come forward or be delayed.
- Wigan Borough Council have objected to both the Link Road and Phase 1 planning applications on traffic concerns.
- We have commented on rail capacity in the feedback on the Freight Interchange Capacity Study below.

Parkside Strategic rail Freight Interchange Capacity Study

This capacity study report was submitted in Spring 2021 after the other consultation stages for the local plan. In our view it contains many discrepancies and omissions and brings into question the viability of an SRFI. The points below are supported by our paper PAG BP05 Written Statement Strategic Rail Freight Terminal Proposition and Viability Rev 1.0 submitted for the Parkside Inquiry and EIP. This paper highlights some of the potential challenges of building an SRFI on Parkside East rather than the West and associated infrastructure & construction costs.

1. Erroneous Train Routing Assumptions

The diagram on page 6 of the capacity study report shows trains entering Parkside from all directions. Trains arriving from the North and East cannot access Parkside East directly. This is the reason why a section of land in the Local Plan allocation map has been reserved on Parkside West to accommodate a reversing spur to Parkside East. Another complication with this arrangement is that the reverse shunting operation will tie up the main Chat Moss line a second time to handle the reverse movement. The document makes no mention of this. Clearly two movements on the Chat Moss line to accommodate train arrival from these directions will have a higher impact on available paths. An extra shunting line from West to East along the Chat Moss line could be implemented but there are potentially high-cost complications with this as modifications are likely to the M6 and Parkside Road bridges. These points are covered in our SRFI briefing paper which we submitted for the Parkside Inquiry and EIP. It seems incredible that the study document completely misses these

important considerations.

2. **Viability and Constraining Factors of 775m Train Lengths**

The Council are promoting Parkside East as the only viable option for an SRFI in spite of the fact that numerous previous planning applications have proposed the use of Parkside West. As we have covered in our previous responses, Parkside as a site, which includes Parkside East and West, was in previous years identified as a nationally strategic site which should only be used for intermodal road to rail capabilities. By reserving Parkside West for development and not specifically for an SRFI, the Local Plan effectively sacrifices half of the strategic site. *Our view is that the decision to allocate the land in this manner suits the Council which simply wants to support Parkside Regeneration with B8 development on Parkside West (Parkside Phase 1 & 2) (road only logistics).* Of note the Council have loaned monies to Parkside Regeneration to the tune of millions of pounds.

At the Parkside inquiry the Council stated that Parkside West was not viable for an SRFI because it could not accommodate 775m trains as the length of line required would have an impact on Gallows Croft a site of historic interest. However, the Council was quite content with supporting B8 development for Parkside Phase 1 (Parkside West) which would largely concrete over the site of a registered battlefield (battle of Winwick Pass). Their argument about the unviability of Parkside West for use as an SRFI is hypocritical and unsound. The previous Prologis planning application in 2009 recognised the limitations of train lengths on Parkside West but also saw the benefits of integrating with longer lines on Parkside East. Turning to the recent Freight study document, this in fact calls out the lack of current capability to support 775m train lengths on the UK rail network and also uses the word 'ideally' in defining the requirement for such train lengths for an SRFI; in other words, the implication is that shorter train lengths would not impact viability. Many freight terminals in the UK operate quite effectively with 450m and 600m train lengths, both of which could be accommodated on Parkside West.

Page 7 discusses lack of places to hold 450m trains. If 775m trains were such a strong requirement why did the author not consider space to hold 775m trains?

At the Parkside Inquiry the Council's QC questioned why PAG was supporting an SRFI, but very conveniently failed to grasp the logic of our argument, instead using our stance as a weapon to belittle our point. The fact is Parkside West and East have equal strategic importance. The currently adopted Local Plan recognises this in policy CAS 3.2 only allowing release of Green Belt for specific strategic intent. The proposed Local Plan diminishes the nationally strategic opportunity.

3. **SRFI Development Position**

The study document mentions the Council are working with iSec Group LLP to bring forward an SRFI on Parkside East. Of note there is currently no planning application submission, at least none that the public have visibility of. For the sake of completeness, and to head this off at the pass for the EIP, at the Parkside inquiry the Council's planning consultant stated that land had been purchased on Parkside East for an SRFI, however, our enquiries with the associated farm owners shortly after the inquiry revealed that they had not been approached. Clearly a wild statement at the time and at a minimum quite misleading. In the past there have been reports supported by the Council illuding to Rolling Stock manufacturing from Spain and other schemes all designed to show progress on Parkside development, but all these schemes later evaporated. Here we see another show with

iSec to support the Council's case for an SRFI East only option.

4. Omission of Port of Liverpool

The study document covers routes for the major UK based seaports *except Liverpool*, and yet the Council are promoting a strong relationship between the Port of Liverpool and Parkside?

5. Path Availability & Infrastructure Constraints

The study document presents path availability from trains approaching from different directions. The claim is made that 4 paths are available from all directions, but close examination shows that paths are more limited in the daytime (08:00am to 06:00pm Green RAG status) for most routes:

Route	Daytime Paths
Route1: Parkside SRFI to Preston Ribble Junction (to WCML North)	1
Route1: Preston Ribble Junction to Parkside SRFI (from WCML North)	0
Route3: Parkside SRFI to Winsford South Junction (to WCML South)	4
Route3: Winsford South Junction to Parkside SRFI (from WCML South)	2

Is this a good solution for freight customers that may wish to deliver goods during the day? It also demonstrates that limited paths are available. The report fails to analyse expected commuter growth for the Chat Moss Line. Common sense says that commuter growth will be significant given that the line connects the conurbations of Manchester and Liverpool and also provides connections North and South via the WCML. When this growth is factored in, we would suggest that far from proving that sufficient paths exist, the reality is that very few paths may be available at all. A proper independent study needs to be undertaken. There is a high risk that without significant investment in supporting rail infrastructure an SRFI will actually not be attainable at all. In this respect I suppose we should be grateful that Parkside East is indirectly protected from development by its explicit allocation purpose in the Local Plan. But seriously the soundness of the plan is questionable in this respect and the study report appears to represent a shot in the foot for the Council.

Yours faithfully,

Dave Tyas
Co-Chair PAG