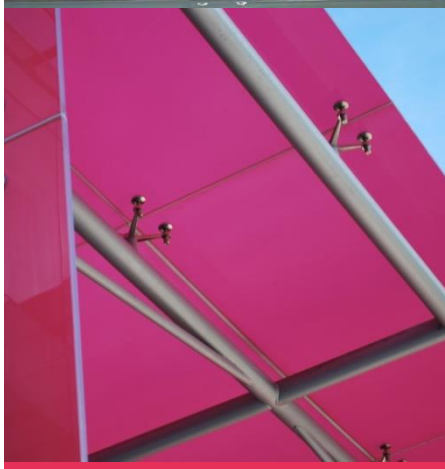
Appendix 1: Transport and Movement Statement



St Helens Local Plan

Parkside West (8EA) and Parkside East (7EA) Hearing Statement Traffic and Transportation

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Appendices

Appendix A – Parkside Phase 1 Public Inquiry Location / Accessibility Plans

1.0 Introduction and Background

1.1 Introduction

1.1.1 Curtins has been appointed on behalf of Parkside Regeneration LLP to provide traffic and transportation advice in relation to the proposed Parkside West (8EA) strategic employment allocation that is included within the St Helens Local Plan 2020-2035 Submission Draft.

1.2 Purpose of this Document

1.2.1 This document is a Hearing Statement prepared for the Local Plan Examination which focuses solely on traffic and transport matters relating to Site 8EA.

1.2.2 It seeks to demonstrate that the proposed allocation is appropriate and deliverable whilst also responding to more specific traffic and transport questions set out in Matters 1 and 4 provided by the Inspector.

1.3 Background

1.3.1 Curtins recently represented Parkside Regeneration LLP at a Public Inquiry in January 2021 which considered an outline application for employment floorspace on part of Parkside West.

1.3.2 The concurrent Public Inquiry also considered an application by St Helens Council for the Parkside Link Road, albeit Curtins was not commissioned to provide evidence in support of that application.

1.3.3 The outcome of both Inquiries is not yet known. However, this Statement draws on evidence provided at the Inquiries to demonstrate the suitability and deliverability of the Parkside West (8EA) allocation.

1.4 Structure

1.4.1 This statement is structured as follows:

- **Section 2** considers relevant transport planning policy with regard to Site 8EA Parkside West;
- **Section 3** considers site 8EA Parkside West and the recent Phase 1 planning application;
- **Section 4** considers the remainder of site 8EA Parkside West which is known as Parkside Phase 2;
- **Section 5** draws conclusions from Sections 2, 3 and 4; and
- **Section 6** considers the specific questions raised by the Local Plan Inspectors.

2.0 Planning Policy

2.1 Introduction

2.1.1 This section of the Statement considers the relevant transport planning policy so that the proposed allocation can be adequately assessed against this in later sections of this Statement.

2.2 National Planning Guidance

2.2.1 In advance of the Phase 1 Inquiry, it was agreed between parties that the relevant National Planning Policy Framework (NPPF) policies from a traffic and transport perspective are:

Paragraphs	Chapter Topic	Description
8 and 9	Achieving Sustainable Development.	Three objectives – economic, social and environmental
		Planning decisions should play an active role in guiding development towards sustainable solutions.
10, 11 and footnote 6		Presumption in favour of sustainable development.
82	Building a strong competitive economy	Recognise and address specific locational requirements of different sectors. This includes storage and distribution operations at a variety of scales and in suitable accessible locations.
102 and 103	Promoting sustainable transport	Transport issues should be considered from the earliest stages of development proposals, including the environmental impacts of traffic and transport infrastructure, and opportunities to promote walking, cycling and public transport use. Focus of significant development on locations which are or can be made sustainable.
107		Proposals for new distribution centres to make provision for sufficient lorry parking to cater for their anticipated use.
108		Appropriate opportunities to promote sustainable transport modes; safe and suitable access to the site for all users; and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.
111		Development that will generate significant amounts of movement should be required to provide a travel plan, and the application supported by a transport assessment.

2.2.2 Paragraphs 109 and 110 should also be referenced in the above table.

2.2.3 Para 109 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

2.2.4 Para 110 states that applications should 'give priority first to pedestrians and cycle movements', facilitate 'access to high quality public transport where possible.', 'create places that are safe, secure and attractive', 'allow for efficient delivery of goods' and 'be designed to enable charging of plug-in and other ultra-low emission vehicles.'

2.2.5 Curtins' interpretation of the NPPF as a whole is that there is a clear presumption in favour of sustainable development as set out in Para 11, with sustainability a further important requirement of Paras 102, 103, 108 and 110. The sustainability of Site 8EA is therefore fundamental to the acceptability of proposals, and from a traffic and transport perspective this largely relates to accessibility.

2.2.6 The NPPF confirms that if development can be demonstrated to be sustainable, it should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

2.2.7 The term 'severe', in the context of highway capacity, was first introduced with the NPPF in 2012. Its introduction provided a major change in transport planning policy with the term 'severe' setting a very high bar for applications to be refused on highways grounds, when compared to PPG13, the previous transport policy document.

2.2.8 Whilst the NPPF does not provide a definition of precisely what constitutes 'severe', numerous appeal decisions have determined that in many cases, queuing, delay, driver inconvenience, and congestion are matters that are experienced by many people across the UK as part of a daily commute, particularly in built up urban areas. An increase in congestion, delay, or queuing may not even be perceptible to existing users, may result in a marginal impact, or may only occur for a brief period of time each day. For many transport professionals this is considered to be a long way from 'severe'.

2.3 Local Policy

2.3.1 There are currently three relevant documents that form the statutory development plan:

- St Helens Local Plan Core Strategy (CS), October 2012;
- St Helens Unitary Development Plan (UDP) 1998 (Saved Policies); and
- Joint Merseyside and Halton Waste Local Plan (WLP) July 2013.

2.3.2 The three key traffic and transport policies from the Core Strategy are summarised below, but the UDP and WLP do not directly relate to relevant traffic and transport matters.

2.3.3 Policy CIN 1 partly relates to traffic and transport and requires developments to be located where there is appropriate infrastructure in place or to meet the needs of any development, or it requires developers to provide the necessary infrastructure.

2.3.4 Policy CSD 1 is linked to NPPF Para 11, and the presumption in favour of sustainable development already covered above. This states in Para 1 that the Council will take a 'positive approach that reflects the presumption in favour of sustainable development' and will work to ensure that 'proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.'

2.3.5 Policy CP 2 is a wide-ranging policy that seeks to create an accessible St Helens. It sets out 6 key elements relating to a choice in mode of travel, access to local facilities, safe and adequate access, sustainable locations for significant traffic generators, reducing adverse impacts on the local community caused by traffic, and supporting Local Transport Plan priorities.

2.4 Emerging St Helens Metropolitan Borough Council (SHMBC) Local Policy

2.4.1 The Submission Draft of the St Helens Borough Local Plan 2020 – 2035 was published on 17th January 2019.

2.4.2 Site 8EA Parkside West is specifically covered under Policy LPA04.1: Strategic Employment Sites. This states in Section 2 that:

'Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least:

a) amount of development and proposed uses;

b) phasing of development across the whole site;

c) indicative layout and design details for the whole site, that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;

d) measures to provide good levels of accessibility to the whole site by public transport, pedestrian and cycling links;

e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;

f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way;

g) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;

h) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;

i) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and

j) how development of the site as a whole would comply with other relevant policies of the Local Plan.

2.4.3 Parts D and E again relate to accessibility and sustainability in a similar way to national policy, and Part I relates to infrastructure enhancements which could include highways mitigation.

2.4.4 The policy goes on to state in sections 4 and 5 that:

4. Development within Strategic Employment Sites will be required to, subject to compliance with Policy LPA08, provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on-site or off-site and must be provided in time to meet the needs of the development. Where the specific development proposal would only cover part of the Strategic Employment Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in paragraph 2 of this Policy.

5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA,6EA,2EA and 8EA) and Policy LPA10 (in the case of site 7EA).'

2.4.5 Appendix 5 referenced above sets out specific requirements for Site 8EA. This states that:

'Access to an initial phase of development can be provided off the A49 (Winwick Road).

Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).

The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.

Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.

Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the St.Helens Borough Local Plan 2020-2035 Submission Draft, January 2019 surrounding area.

Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.

The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.'

2.4.6 Compliance with National, Local, and Emerging policy requitements is considered in the following sections.

3.0 Site 8EA Parkside West Phase 1

3.1 Introduction

3.1.1 An Outline Planning Application (P/2018/0048/OUP) for employment development at the former Parkside Colliery was originally submitted in 2018. The planning description is provided below:

'Outline application (all matters reserved except for access) for the construction of up to 92,000 m2 of employment floorspace (Use Class B8 with ancillary B1(a)) and associated servicing and infrastructure including car parking, vehicle and pedestrian circulation space, alteration of existing access road including works to existing A49 junction; noise mitigation; earthworks to create development platforms and bunds; landscaping including buffers, works to existing spoil heap; creation of drainage features; works to existing spoil heap; creation of drainage features, substations and ecological works.'

3.1.2 This application was known as Parkside Phase 1 and covers circa half of Site 8EA.

3.1.3 The Parkside Link Road (PLR) did not form part of the Phase 1 Planning Application and was promoted by St Helens Metropolitan Borough Council (SHMBC) as an entirely freestanding application. Phase 1 is in no way reliant on the PLR.

3.1.4 The Phase 1 application also excluded the remainder of Site 8EA (Phase 2) and the entirety of Site 7EA (Phase 3), albeit a level of cumulative impact assessment was undertaken with regard to Phase 2.

3.1.5 Preparation of the Phase 1 planning application was extensive, and detailed discussions with the relevant Authorities spanned a period of almost five years. Prior to determination of the Phase 1 application, agreement was reached with SHMBC, Warrington Borough Council (WBC), and Highways England (HE) that the proposed Phase 1 development would not give rise to unacceptable traffic and transport impacts, subject to the implementation of agreed mitigation.

3.1.6 A summary of the transport impacts was included in Para 7.181 of the committee report[1]. This stated that the proposed development would 'not have a severe impact on the highway network and complies with the NPPF…' and 'appropriate forms of sustainable transport can be used to access the development site. Such that the proposed development complies with the relevant parts of NPPF and policies CSS1 and CP2.'

[1] SHMBC Committee Report 17th December 2019

3.1.7 The application received a resolution to grant permission by SHMBC (subject to Secretary of State review) in December 2019. However, SHMBC received notification that the Secretary of State had decided that the application be referred to him, and a Public Inquiry was held in January 2021.

3.1.8 In advance of the Inquiry, a Highways Statement of Common Ground[2] was prepared between Mott Macdonald acting on behalf of SHMBC Highways and the Applicant. This clearly set out that all traffic and transportation matters were agreed, and there were no areas of disagreement between the two parties.

3.1.9 On the basis that WBC Highways and HE had no objection to the proposals, no evidence was provided by either party at the Phase 1 Public Inquiry. Wigan Council (WC) Highways maintained that written objections received during the determination period remained valid, but they did not attend the Inquiry and no evidence was provided.

3.1.10 Notwithstanding the above, Curtins prepared a detailed Proof of Evidence to address Phase 1 traffic and transport matters predominantly raised by local residents and the Parkside Action Group (PAG). The Proof of Evidence is available on the planning portal as Alex Vogt Proof of Evidence CD 7.36[3] with the appendices contained as CD 7.30[4].

3.1.11 The Proof of Evidence considered all relevant traffic and transport matters and fundamentally sought to demonstrate that:

- Firstly, does the Phase 1 development represent sustainable development in accordance with the NPPF and the Development Plan, as set out in Section 2; and
- Secondly, will the Phase 1 development result in an unacceptable impact on highway safety or residual cumulative impacts that are severe as set out in NPPF Para 109.

3.1.12 Extensive evidence was presented to demonstrate that the development does represent sustainable development and will not result in residual cumulative impacts on the road network that would be severe. A summary of this evidence and the key findings is provided below with references to more detailed information where appropriate.

[2] Highways Statement of Common Ground between Mott Macdonald/St Helens and Curtins – APP/H4315/V20/3253194 Parkside Phase1 Inquiry 08.12.19

[3] Alex Vogt Proof of Evidence Parkside Phase 1 Public Inquiry 07.12.20 - Planning Inspectorate Reference: APP/H4315/V20/3253194

[4] Alex Vogt Proof of Evidence Appendices Parkside Phase 1 Public Inquiry 07.12.20 - Planning Inspectorate Reference: APP/H4315/V20/3253194

3.2 Site Location and Highway Network

3.2.1 A series of plans contained in the Proof of Evidence Appendices demonstrate that the Phase 1 site is exceptionally well located in between the major conurbations of Liverpool and Manchester and in close proximity to St Helens, Wigan and Warrington. The site is also well located in relation to the Strategic Highway Network. These plans have been reproduced and included as **Appendix A.**

3.2.2 The plans demonstrate that the M6 (a major north / south route between Scotland and the Midlands) is accessible circa 3.6km to the north of the site (M6 Junction 23) or circa 3.9km to the south east of the site (M6 Junction 22). The M62 (a major east / west route between Liverpool and Manchester) is also accessible circa 2.8km to the south of the site (M62 Junction 9). The above junctions are accessible via the A49, which is a major intra-urban movement route that runs to the immediate west of the site.

3.2.3 Having three major motorway junctions providing access to the north, east, south, and west, within circa 3-4km (circa 5-10 minutes' drive time) makes the site ideally suited to serve the logistics industry and the movement of goods across the North West, Midlands, and further afield.

3.3 Accessibility by Sustainable Modes

3.3.1 The accessibility of the Phase 1 site was considered in detail in Section 6 of the Phase 1 Transport Proof of Evidence (Mr Alex Vogt), and key points are reproduced below. The Plans in **Appendix A** should also be referred to.

3.3.2 A key element of National and Local policy is to ensure that new developments are located in areas where sustainable modes of travel are available. It is important to ensure that developments are not isolated but are located close to complementary land uses. This supports the aims of integrating planning and transport, providing more sustainable transport choices, and reducing overall travel and car use.

3.3.3 In this instance, the primary complementary land uses are residential areas where the local labour force is likely to reside.

3.3.4 A review of Socio Economic Technical Paper 6 prepared by Amion and included in the original Phase 1 Planning Application Environmental Statement reveals that almost 40% of employees who worked in the two nearest Middle Super Output Areas (MSOA) in 2011 also lived in St Helens. A further 24% lived in Wigan with 8% in Warrington. This means that over 70% of employees were potentially located within an acceptable walking, cycling, or public transport catchment of the Phase 1 site.

3.3.5 Furthermore, the paper goes on to state that the above '….does not reflect any interventions to increase the proportion of local employees working at the site.'

3.3.6 The Amion Paper suggests that the development could generate circa 313 short term jobs per annum in St Helens, associated with construction. Table 6.2.1 then goes on to state that there could be 1,592 longer term operational phase direct and indirect jobs in the St Helens area as a result of the development.

3.3.7 A number of initiatives are suggested by Amion to ensure that these jobs go to people in St Helens. It is therefore important to ensure that sustainable modes of travel are available to connect the site with local residential areas.

Accessibility by Foot

3.3.8 To assist in summarising the accessibility of the site by foot, indicative pedestrian catchment plans were produced and included in the Phase 1 Transport Assessment and Proof of Evidence (See Appendix A).

3.3.9 The 500m catchment includes a pair of existing bus stops which are located approximately 90m south of the site access junction on the A49, 400m west of Plots A/C, D, and circa 650m from Plot B. These stops are in a simple 'flag & pole' arrangement and offer bus timetable information.

3.3.10 The 500m catchment also includes some residential properties accessed directly from the A49 or Cholmley Drive (60m) to the south of the site access. Red Bank Farm Shop and Butchers is located 400m south of the site. The Farm Shop provides groceries as well as operating a café for breakfast and lunchtime meals, which Parkside employees may benefit from.

3.3.11 There are a range of additional services and facilities accessible within a 1,000m walking catchment of the site. This includes the Millstone public house (circa 800m), an Esso petrol station, shop and car wash (circa 950m), and the recently upgraded Newton-le-Willows Interchange which is accessible via a continuous footway on the eastern side of the A49.

3.3.12 There are also several additional residential areas within the 1,000m catchment which may represent a potential source of future employees. This includes Wayfarers Drive (circa 490m), Newton Park Drive (circa 530m), Pennington Drive (circa 700m), and Mill Meadow (circa 780m) amongst many others to the north of the site.

3.3.13 Within 2,000m of the site, the entirety of Newton-le-Willows High Street is readily accessible. Newton-le-Willows High Street includes the Stocks Tavern (1,250m), The Firkin (1,475m), and The Oak Tree (1,800m) public houses, Verona (1,420m), Chouxchouxbedoo (1,510m), and Ariete (1,700m) restaurants, and the Kirkfield (1,250m), all of which may provide convenient facilities for future employees. There is also a Spar Convenience Store (1,575m) and Subway (1,560m) located on High Street, as well as Patterdale Lodge High Street Surgery (1,510m).

3.3.14 The 2,000m walking catchment also encompasses many of the residential areas in Newton-le-Willows town centre to the north of the site and elements of Wargarve to the west. The Amion Paper demonstrates that these are some of the most deprived areas of St Helens that could benefit from the job creation offered by the site. The 2,000m catchment also extends to the south of the site and includes Winwick village.

3.3.15 2011 journey to work data demonstrates that there are circa 2,500 dwellings located within a 2km walking distance of the site, and this presents a significant labour pool.

3.3.16 To access the above areas, there are existing footways on both sides of the A49 Winwick Road that provide direct connections to Newton-le-Willows in the north and Winwick in the south. The footways to the north are well lit, at least 2m wide, and are of a good standard. The footways that extend to Winwick are generally lit and whilst the width can be variable, the condition of the footways is considered to be acceptable and represents an opportunity that some employees may choose to take.

3.3.17 The Illustrative Masterplan also shows a permissive pedestrian route through the site, that is known as a ‘heritage trail’. This trail runs along the western and southern perimeter of the site (past Units A-C) and could be used by employees and the wider general public. The provision of this may encourage staff to walk on their lunch break and in turn could encourage walking to the site / local bus stops in place of private car usage.

3.3.18 In addition to the above, there is an existing Public Right of Way (PROW) located 460m south of the site access, known locally as Vulcan Way, which connects the A49 with the Wargrave area of Newton-le-Willows. The path is almost entirely paved and well maintained, thus representing an acceptable route for future site employees and visitors.

3.3.19 It should also be noted that a condition has been agreed between parties, which would see further enhancement of this route by providing improvements to the footways and cycle ways that run north / south along Newton Brook and east / west between the Sankey Canal, through the Bradleigh Road Estate and Vulcan Village. Curtins is of the view that these links are already good, but improvements to this area would enhance east / west connections between the site and the northern and western parts of Newton-le-Willows. A plan showing the area in question is included as Plan AV007.

3.3.20 Additional improvements are proposed in the form of new pedestrian crossings in Newton-le-Willows. It has been agreed with SHMBC that signalised pedestrian crossing facilities could be introduced on the A49 High Street (or Ashton Road) and on the A572 Crow Lane approach arms of this junction by means of condition. The new crossing facilities would operate ‘on demand’ and enhance pedestrian safety and amenity at these locations.

3.3.21 Similar to the above, it is proposed to introduce a new signalised pedestrian crossing facility at a suitable location on the A49 to the immediate south of the Park Road North junction.

3.3.22 On the above basis, walking is a realistic mode of travel for those employees that live within 2km of the site, or employees who want to access local facilities at lunchtime, before work, or after work. Furthermore, whilst existing infrastructure is of a good standard, opportunities for improvements have been identified and will further enhance the existing network.

Accessibility by Bicycle

3.3.23 In order to assist in assessing the accessibility of the site by cycle, an 8km cycle catchment for the site has been considered (See Appendix A). The 8km (5-mile) cycling distance refers to a recommendation by Cycling England in the document 'Integrating Cycling into Development Proposals' (2009), which states 'most cycle journeys for non-work purposes and those to rail stations are between 0.5 and 2 miles, but many cyclists are willing to cycle much further (i.e. for work, a distance of 5 miles should be assumed)'.

3.3.24 8km equates to a journey time of around 40 minutes, cycling at a speed of 12kph. The catchment extends as far as Ashton-in-Makerfield in the north, Leigh to the east, Warrington in the south, and the outskirts of St Helens town centre to the west.

3.3.25 The whole of Newton-le-Willows and the large residential areas of Golborne, Earlestown, Lowton, Burtonwood, Vulcan, Winwick, Orford, and Dallam are also accessible.

3.3.26 Whilst there are limited defined cycle facilities in the immediate vicinity of the site, there are a number of suggested off-road cycle tracks and suggested cycle routes that all fall within the 8km cycle catchment and could be utilised by employees and visitors.

3.3.27 There is an extensive network of cycle routes to the west of the site. These routes are accessed via the off-road cycle track located 460m south of the entrance to the site which extends to Vulcan Village and Newton Brook. As mentioned above, there is also a condition agreed between parties that would seek improvements to this link.

3.3.28 On the above basis, cycling is a realistic mode of travel for those employees that live within 8km of the site and perhaps some who live even further away. Based on the Amion paper referenced above and the 2011 journey to work data, this catchment could include up to 70% of future employees.

3.3.29 It is considered that the site's location in relation to the existing cycle network is in compliance with the Development Plan and NPPF policies, particularly as a result of the proposals to enhance the existing cycle facilities within the site and to the west of the site.

Accessibility by Bus

3.3.30 Guidance from the Chartered Institution of Highways and Transportation (CIHT) document 'Guidelines for Planning for Public Transport in Development' indicates that ideally, a bus stop should be located within 400m from a new development albeit 'direct and simple' routes are more important than walking distance for some people.

3.3.31 As discussed above, the nearest existing bus stops to the proposed development are located as a pair on the A49 Winwick Road, approximately 90m south of the site access junction, 400m west of Plots A / C, D and circa 650m from Plot B. They are accessible via continuous, well-lit footway provision and the stops are in a flag and pole arrangement, with timetable information present.

3.3.32 The stops are currently served by bus service numbers 22, 22A and 360, which provide access to key destinations such as Warrington, most parts of Newton-le-Willows, and Wigan for staff and visitors to the site.

3.3.33 The Phase 1 Applicant has agreed to a condition which would see upgrades to the two existing bus stops on the A49 (S10028A & 10028B), to provide Access Kerbs and shelters, as well as new bus stop information, signage, and road markings.

3.3.34 Whilst the site is currently considered accessible by bus, the Appellant is also prepared to support the provision of a new shuttle bus that would provide a connection between the site, the interchange and the most deprived areas of St Helens.

3.3.35 A bespoke shuttle bus of this nature is considered to be the most effective and tailored proposal for the site, and it could be instrumental in connecting employees with the site at times when access is actually required, rather than a traditional bus service that may not even be operational during traditional logistics shift start and end times.

3.3.36 SHMBC Highways are supportive of the principle of the service and it was agreed during post submission discussions that the service should be developed further in terms of timings, financial backing, routing, and frequency once more information is known on end user travel patterns and individual occupier requirements. It has also been agreed with SHMBC that the service could be secured via a suitably worded 'Travel Planning Condition'

Accessibility by Rail

3.3.37 The nearest train station is Newton-le-Willows Railway Station, which is located approximately 675m to the north of the site access and 820m from the centre of the site. As such, travel by rail is considered a very realistic mode of travel for employees.

3.3.38 The station provides regular and frequent services to key destination such as Manchester and Liverpool, as well as many of the nearby local stations.

3.3.39 The Station has recently been upgraded to provide an efficient bus / rail interchange facility which would be extremely useful for employees and visitors at the Parkside site. The Station reopened to the public in January 2019 and was funded by the Local Growth Fund and Merseytravel, as part of the Long-Term Rail Strategy and Growth Deal for the Liverpool City Region Combined Authority. It is understood that the Parkside development was partly used to justify and secure this funding.

3.3.40 The Interchange is a significant investment at the existing railway station to provide passengers with improved facilities, easier access, and better links between local, regional, and national transport. It builds on the improvements to services following the electrification of the line between Liverpool and Manchester and the introduction of new trains by Northern.

3.3.41 It is Curtins' view that rarely, if ever, a B8 development has been as well situated as Parkside is, due to its location adjacent to the bus and rail interchange. The possibility of linking a shuttle bus to the interchange would further offer significant enhancements to the existing situation, thus enhancing opportunities for sustainable travel.

3.3.42 With regard to accessibility and sustainability, it is concluded that the proposals represent sustainable development in accordance with Policy CSD 1 of the SHMBC Core Strategy, Paragraph 11 of the NPPF and the 'presumption in favour of sustainable development', Paragraphs 102, 108, 110 of the NPFF, and Policy LPA04 in the Submission Draft of the Local Plan.

3.4 Means of Access

3.4.1 The access arrangements for Parkside Phase 1 are shown on the Means of Access Plan (Ref B064334.000_501 C) submitted with the application. However, to assist the Inspector at the recent Public Inquiry, this drawing was developed further to show swept path analysis for an articulated vehicle and some key dimensions. The drawings is included as Appendix AV003 in the Proof of Evidence Appendices.

3.4.2 The proposed access arrangement seeks to implement a new three arm traffic signal controlled junction arrangement in place of the existing three arm priority controlled junction.

3.4.3 The layout includes dedicated turning lanes into and out of the site which are achieved by widening the highway. The access also incorporates signalised pedestrian crossing facilities on all arms with large 3m wide central refuge islands. The existing footways on the A49 will be extended into the site, and the width will increase to 4m to provide shared pedestrian/cycle lanes. There is also space on all three arms to accommodate advanced cycle stop lines.

3.4.4 The proposed access is considered appropriate for the intended use, and this was an agreed position between the Appellant and SHMBC at the Inquiry.

3.4.5 Whilst the Phase 1 access proposals are in no way reliant on the delivery of PLR, the access has been developed in conjunction with the PLR team to ensure that the route and design of the PLR accords with the Phase 1 plans and neither scheme is prejudiced.

3.4.6 The access proposals onto the A49 are considered to be fully compliant with the NPPF Paragraph 108 regarding 'safe and suitable access'. The proposals are also considered to be compliant with Policy CP2 of the SHMBC Core Strategy and the specific policy requirements set out in Policy LPA04 of the Submission Draft of the Local Plan.

3.5 Highway Safety

3.5.1 The November 2018 Transport Assessment Addendum that was prepared to support the Phase 1 application concluded that there were no existing and unusual safety issues on the highway network that were likely to be exacerbated by the proposals.

3.5.2 The analysis was updated during post submission discussions and again during preparation for the Inquiry. The results again concluded that there are no unusual highway safety issues on the highway network that would be exacerbated by the proposals.

3.6 Traffic Forecasting

3.6.1 The traffic forecasting that informed the Parkside Phase 1 planning application was all undertaken on the basis that Phase 1 will come forward without the PLR, and the PLR is not necessary to deliver Phase 1.

3.6.2 With regard to the geographic scope of assessment, a list of 23 junctions was agreed during pre-application discussions with Highways Officers at SHMBC, WBC, WC and HE. A plan of the agreed junctions is included as Plan AV012 in the Proof of Evidence Appendices and included in **Appendix A**.

3.6.3 Traffic surveys were undertaken at all of the above junctions in 2015 or 2017 for a two-hour period covering the traditional morning and evening peak periods. The peak hour flows were then derived from these surveys.

3.6.4 Section 7 of the Proof of Evidence prepared to support the Inquiry provides a detailed account of how the surveyed flows were used to forecast the future year traffic flows. However, this is considered to be too detailed to reproduce here in its entirety and the Proof should be referred to for additional evidence on:

- Assessment Years;
- Traffic Growth;
- Committed Development;
- Trip Rates; and
- Trip distribution.

3.6.5 As a summary, it is worth noting that neither SHMBC Highways, WBC Highways, or HE expressed any objection to the above assessment parameters.

3.6.6 WC Highways did not attend the Inquiry and did not present any evidence, although objections on highways grounds received during the determination period were confirmed to remain. These objections queried some of the above parameters, but no alternative assessment was provided, and there was nothing presented at the Inquiry that would impact Curtins' conclusion that the assessment parameters were robust and appropriate.

3.7 Summary of Junction Modelling and Mitigation

3.7.1 The parameters set out in the previous section were used to undertake junction modelling at nine locations in St Helens, seven locations in Warrington, and seven locations in Wigan. Three of the junctions were also classified as Highways England junctions. This is considered to be an extensive scope of assessment.

3.7.2 The results are set out in detail in Section 7 of the Phase 1 Proof of Evidence, but the analysis is considered too detailed to reproduce here. Notwithstanding, it is worth noting that at the time the application was recommended for approval and at the time of the Inquiry, SHMBC Highways, WBC Highways, and HE were all content with the modelling and offered no objection.

3.7.3 The modelling results helped to inform the development of a mitigation strategy which focused on the A49 corridor. Mitigation was agreed at the site access, three locations in St Helens along the A49 High Street corridor, and four locations in Warrington along the A49 corridor. The mitigation consists of a series of junction improvements and pedestrian connectivity enhancements, and full details are set out in Section 7 of the Proof of Evidence.

3.7.4 All of the mitigation is captured in suitably worded planning conditions. Whilst the detailed design required by the conditions has not yet taken place, Curtins is content from a review of the drawings, site visits, discussions with Highways Officers at SHMBC and WBC, and a review of highway boundary data that the principles set out in the above schemes can be delivered.

3.7.5 It is concluded that the identified mitigation will offer benefit to the highway network and will ensure it operates in a safe and suitable manner without a severe impact in accordance with para 109 of the NPPF. This is a view shared by SHMBC Highways, WBC Highways, and Highways England.

3.8 Conclusion

3.8.1 In conclusion, the Proof of Evidence prepared for the Public Inquiry demonstrated that the site was sustainable, and there would not be a severe residual cumulative impact arising from traffic associated with the proposed development. Therefore in line with the NPPF and particularly Paragraph 11 and 109, the proposed development should not be refused on transport grounds.

3.8.2 The proposals are also considered to be fully compliant with the Core Strategy policies and the site specific policies set out in Policy LPA04 and Appendix 5 of the Local Plan Submission.

3.8.3 Nothing throughout the course of the Inquiry altered this conclusion, and Phase 1 is considered to be fully deliverable.

3.8.4 In addition to the Phase 1 Inquiry information summarised above, it is also worth noting that the Parkside Phase 1 site has been considered in the St Helens Local Plan Transport Impact Assessment prepared by WSP in 2019. Whilst Curtins was not involved in the preparation of this document, it is understood that no insurmountable traffic and transport issues were identified that would prevent delivery of Phase 1.

4.0 Site 8EA Parkside West Phase 2

4.1 Introduction

4.1.1 The remainder of Site 8EA Parkside West is known as Parkside Phase 2. It is broadly comparable in size to the Phase 1 site.

4.1.2 Phase 2 has not been the subject of a planning application or Public Inquiry, although the potential traffic and transport impacts have been considered as part of the PLR application submitted by the PLR team. This was done on the basis that Parkside Phase 2 would predominantly be accessed via the PLR and would only come forward once the PLR had been constructed.

4.1.3 Whilst the same level of detailed analysis undertaken for Phase 1 has not been undertaken to date by Curtins, the following sections of this report consider the deliverability from a traffic and transport perspective, by drawing on Phase 1 information, the PLR application / Inquiry information, and consistency with the NPPF and Local Plan policy requirements.

4.2 Parkside Link Road

4.2.1 The PLR is a new road that was conceived and designed to enable the Local Plan proposed logistics development comprising Parkside Phase 1 and 2 and the Parkside Strategic Rail Freight Interchange (SRFI) (Phase 3), to be connected 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.

4.2.2 It is Curtins understanding that the PLR is fully funded and construction ready, subject to the granting of planning permission.

4.2.3 Curtins were not directly involved in the design of the PLR or the application. Instead, Ramboll was commissioned by Balfour Beatty Construction Services Limited (BBCSL) on behalf of SHMBC to prepare a Transport Assessment and supporting documents to support the planning application for the PLR.

4.2.4 As the Proposed Scheme crosses two local planning authority areas, that of SHMBC and WBC, applications were made to both borough councils. The planning application to SHMBC was registered and validated on 11th April 2018 (application ref: P/2018/0249) with the planning application to WBC registered on 23rd March 2018 (application ref: 2018/32514) with the submission of additional supporting information in March 2019 (referred to as ES Addendum 2019 – P/2018/0249/FUL & ES Addendum 2019 – 2018/32514) to address comments received from Statutory Consultees. The PLR was considered at planning committee meetings held by SHMBC on 17/12/19 and WBC on 18/12/19.

At these meetings, both Councils resolved to approve the scheme subject to confirmation from the Secretary of State. As with Phase 1, the Proposed Scheme was called in on 21st May 2020 by the Secretary of State for Public Inquiry.

4.2.5 Whilst there were no highway objections from SHMBC, WBC or HE, Proofs of Evidence were prepared by the PLR team and SHMBC to address all highways matters. The most relevant documents are the Proof of Evidence of Mr Nigel Roberts[5] on behalf of the PLR team and the Proof of Mr Edward Mellor[6] on behalf of SHMBC Highways.

4.2.6 On the basis that the PLR information and analysis have been reviewed and accepted by the key Local Highway Authorities and Highways England, Curtins is content to draw conclusions from the analysis. The following sections of this report therefore utilise information prepared by the PLR team, and this is considered to be proportionate evidence for the Examination in Public (EiP).

4.3 Phase 2 Site Location and Highway Network

4.3.1 The Phase 2 site is located immediately to the north and east of the Phase 1 site, therefore many of the locational characteristics enjoyed by Phase 1 are present for Phase 2. This includes vehicular access onto the A49 in the west and direct access via the PLR to the M6 Junction 22 in the east.

4.3.2 As set out in Section 3, there is excellent connectivity to the motorway network with three major motorway junctions providing access to the north, east, south, and west, within circa 3-4km (circa 5-10 minutes' drive time). The construction of the PLR will only enhance this connectivity and provide a direct link between Junction 22 of the M6, the Phase 2 site, and the A49.

4.4 Phase 2 Accessibility by Sustainable Modes

4.4.1 As set out in Section 3, the Phase 2 site benefits from the same locational advantages as Phase 1 including access to sustainable modes of travel, residential areas where the workforce lives, and key local facilities.

4.4.2 With regard to walking, the Phase 2 site shares the same access onto the A49 as the Phase 1 site. This in turn connects to existing pedestrian infrastructure that extends uninterrupted in a northerly direction towards Newton-le-Willows town centre, a southerly direction towards Winwick, or a westerly direction towards key residential areas.

[5] Mr Nigel Roberts Proof of Evidence - APP/H4315/V/20/3253230 - A49-A573 LINK ROAD (St Helens) December 2020
[6] Mr Nigel Roberts Proof of Evidence Transport Appraisal - APP/H4315/V/20/3253230 - A49-A573 LINK ROAD (St Helens) December 2020

4.4.3 A 2km catchment from the centre of the Phase 2 site covers broadly the same areas as the Phase 1 site, therefore the Phase 1 conclusion that access by foot is realistic and appropriate remains true for Phase 2.

4.4.4 With regard to cycling, the A49 access again provides a connection to existing infrastructure that provides connections to key areas where the workforce are likely to live. The 8km catchment area for both Phase 1 and 2 are comparable. Phase 2 also benefits from a connection to the east via the PLR.

4.4.5 With regard to public transport, some parts of Phase 2 are marginally further away from the existing A49 bus stops than Phase 1. However, an extra walking distance of circa 100-200m is unlikely to deter some users given the frequency of the services and destinations served.

4.4.6 It must also be noted that the shuttle bus proposed to support Phase 1 is equally applicable and beneficial to Phase 2. There are also opportunities for buses to use the PLR in the future.

4.4.7 With regard to rail travel, an extra 100-200m walk is again unlikely to deter some users given the nature of the interchange facilities available. If the walking distance is a concern for some users, the shuttle bus will provide a regular service between the site and the station.

4.4.8 The infrastructure improvements proposed as part of Phase 1 to enhance accessibility by sustainable modes would all offer benefits for Phase 2, and in due course, an application for Phase 2 may further enhance these facilities.

4.4.9 During the Phase 1 Public Inquiry, it was an agreed matter between all highway authorities and the applicant that the site was sustainably located, and it is considered that the same conclusion must apply to Phase 2. On this basis, the site is considered to be accessible and sustainable in accordance with the NPPF Para 11 and Policy LPA04 of the Submission Draft of the Local Pan.

4.5 Phase 2 Means of Access

4.5.1 The Phase 2 site would be accessed via the PLR. This connects to the Phase 1 site and the access onto the A49 in the west and the PLR extends to the east.

4.5.2 The Phase 1 access onto the A49 was designed to accommodate the Phase 1 site and the PLR. The suitability of the access has been assessed by SHMBC Highways and has been found acceptable by virtue of the planning resolution to grant permission by SHMBC for the Phase 1 application and the PLR application.

4.5.3 The site specific requirements set out in Policy LPA04 Appendix 5 state that Phase 2 is to be accessed via the PLR and the proposals accord with this.

4.6 Phase 2 Highway Safety

4.6.1 As set out in Section 2, highway safety was considered as part of the Phase 1 application. This did not identify any unusual or significant clusters that would be exacerbated by the proposals. As the highway network likely to be impacted by the Phase 2 proposals is largely comparable to Phase 1, the same conclusion is considered reasonable.

4.6.2 A review of the 2020 Updated Transport Assessment[7] for the PLR submitted in 2020 just before the Inquiry demonstrates that the PLR team reached a similar conclusion.

4.7 PLR/Phase 2 Traffic Forecasting

4.7.1 Whilst the PLR application was not seeking consent for Phase 2, best estimates regarding the traffic it could generate were included by the PLR team as part of the PLR application. The PLR assessment therefore considers Phase 2 albeit in a cumulative manner with Phase 2, 3 and numerous other committed, 'near certain', and 'more than likely to occur' developments.

4.7.2 To assess the impact of the PLR, the PLR team agreed with SHMBC, WCC, WBC and HE that 13 junctions required consideration. These 13 junctions are as follows:

- Existing A49 Newton Road / Hollins Lane Signalised Junction;
- Existing A49 Newton Road / Delph Lane Signalised Junction;
- Existing A49 Newton Road / A49 Winwick Link Road Signalised Roundabout;
- Existing A49 Newton Road / A573 Golborne Road Priority Junction;
- Existing M62 Junction 9 / A49 Newton Road / A49 Winwick Lane Signalised Roundabout;
- Existing M6 Junction 22 / A579 Winwick Lane Roundabout;
- Existing A49 Mill Lane / A572 Southworth Road Signalised Junction;
- Existing A572 Southworth Road / A572 Newton Road / A573 Parkside Road / A573 Golborne / Dale Road Staggered Priority Junction;
- Existing A580 East Lancashire Road / A573 Warrington Road / A573 Bridge Street Roundabout;
- Proposed A49 Newton Road / PLR West Signalised Junction;
- Proposed A573 Parkside Road / PLR West Signalised Junction;
- Proposed A573 Parkside Road / PLR East Roundabout; and
- Proposed A579 Winwick Lane / PLR East Roundabout.

[7] PLR Transport Assessment Update October 2020 APP/H4315/V/20/3253230 - A49-A573 LINK ROAD (St Helens)

4.7.3 To consider the impact at the above junctions, a SATURN model was developed by the PLR team. This is known as the PLR Traffic Model (PLRTM).

4.7.4 The application documentation for the PLR includes a Local Model Validation Report 2020[8] (LMVR) which presents the methodology used to build, calibrate, and validate the SATURN model. The LMVR seeks to demonstrate that the PLRTM is a sufficiently robust model that reflects the existing road network in the Parkside study area in terms of flows and journey times and is suitable for assessing the transport, environmental, and economic impact of the proposed Scheme. The PLR team concluded that it gives a good comparison between observed and modelled data and is suitable for scheme appraisal. Neither SHMBC Highways, WBC Highways, or HE dispute this.

4.7.5 Once validated, the model was used to consider the impact of various future year scenarios. The scenario that is most relevant to this exercise is the Core Plus Scenario. This is described in the PLR 2020 Transport Assessment as follows:

'Core Plus Scenario – This scenario will form the core basis for analysis of the PLRTM in this TA. This scenario considers the most likely estimate of trip generation for the full PRD (phases 1, 2 and 3) and all committed development classified as 'near certain' and 'more than likely' within the study area as detailed in the Parkside Uncertainty Log (agreed with SHMBC and WBC). The Core Plus Scenario includes Phase 1 of the PRD in the OY (2024) and Phases 2 and 3 in the DY (2034). This scenario assesses the potential impact on the highway network of traffic redistribution due to the Link Road and the incorporation of future local development.'

4.7.6 It is clear that the above scenario considers Phase 1, 2 (Site 8EA), and 3 (Site 7EA) of the Parkside strategic allocations as well as committed development and the possible impact of reassignment associated with the PLR.

4.7.7 It is understood that key parameters regarding trip generation, traffic growth, assessment years, and committed development were agreed with SHMBC, WBC, and Wigan Council Highways. Parameters were also agreed with the HE in relation to the strategic network. A review of these parameters suggests that they are robust, perhaps overly so, with consideration of almost 20 years of background growth and utilisation of relatively high trip rates.

4.7.8 The agreed parameters and the Core Plus Scenario model were then run in a do-minimum (no PLR) and do-something (with PLR) scenario to consider the impact of the PLR.

[8] PLR Local Model Validation Report October 2020 APP/H4315/V/20/3253230 - A49-A573 LINK ROAD (St Helens)

4.7.9 The above process was subject to extensive scrutiny during the application determination period and at the recent Public Inquiry. Whilst the outcome of the Inquiry has not been determined at the time of writing, the modelling was robust enough that neither WBC, SHMBC, HE or any of their consultants expressed concern that it was inappropriate.

4.8 Summary of Phase 2 Highway Impact Based on PLR Modelling

4.8.1 It is clear from the PLR application documentation and Public Inquiry material that the PLR will provide a new access to the Phase 2 site in addition to the access already proposed from the A49 as part of Phase 1.

4.8.2 The PLR is envisaged to become the primary access into Phase 2 with the access onto the A49 potentially diminishing in importance.

4.8.3 With regard to capacity implications, Curtins' interpretation of the PLR modelling is that:

- All four of the new junctions along the PLR and its connections to the existing highway network are predicted to operate within capacity with the addition of Phase 2, 3, committed development, and the PLR in a future year of 2034.
- Excess capacity is also available in the 2034 future year at all of the junctions along the PLR and particularly the junctions to the east that would predominantly serve Phase 2.
- All junctions along the A49 corridor improve as a result of the PLR and its mitigation as traffic reroutes from the A49 to the link road. Some of these junctions have existing capacity and operational issues which the link road improves as again traffic reroutes away from these junctions.
- The remaining junctions either operate in an acceptable manner, have mitigation proposed to ensure that the junctions operate in an acceptable manner, or operate no worse than a 'No PLR' scenario, with the addition of Phase 2, 3, committed development, and the PLR in a future year of 2034.
- The 2020 PLR Transport Assessment concludes that 'On review it is considered that overall, the proposed scheme will not result in significant transport related issues or impact on the operation, safety or amenity of local transport networks.' This is a conclusion supported by SHMBC Highways, WBC Highways, and HE, and Curtins has no reason to doubt the validity of the conclusion.

4.8.4 It must be stressed that all of the results summarised above include Parkside Phase 3 as well as Phase 2. Phase 3 represents well over 50% of all Parkside development, and if the movements associated with this phase were removed from the PLR analysis, then the impacts of Phase 2 would significantly reduce. It is Curtins' view that Phase 2 and the PLR in isolation would be unlikely to have a severe impact, and there is scope to mitigate any impacts that do occur.

4.8.5 Whilst the PLR analysis and conclusion is reasonable based on the proportionate evidence available at this time, it must be noted that the PLR assessment primarily considers the impact of the PLR, with future phases of Parkside included only as part of a cumulative assessment. Any proposed development at Parkside Phase 2 or 3 will need to be subject to separate planning application and independent assessment of traffic impacts on the local highway network.

4.9 Future Planning Application

4.9.1 As noted previously, the PLR analysis includes consideration of a do-minimum (no PLR) and do-something (with PLR) scenario to consider the impact of the PLR. Whilst it includes Parkside Phase 2, it also includes Parkside Phase 3 and numerous other committed, 'near certain', and 'more than likely' developments.

4.9.2 Whilst conclusions can be drawn from the results and the analysis is considered robust and proportional for the EiP, it is fully acknowledged that an Application which considers the impacts of Phase 2 in isolation as well as cumulatively will be required in due course. This application will need to be prepared in strict accordance with the policies set out in Policy LPA04 and Appendix 5 in the Submission Draft of the Local Plan. Parkside Regeneration Ltd are committed to undertaking that analysis in due course.

4.9.3 Whilst the precise scope of the application cannot be pre-determined until discussions with the Local Highway Authorities have taken place, it is envisaged that an assessment in accordance with the NPPF, National Planning Practice Guidance (NPPG), and the various Local Authorities' internal guidance documents may result in less onerous parameters than those originally used in the PLR analysis.

4.9.4 An application for Phase 2 is likely to require new traffic surveys or sensitivity analysis of traffic flows in a post-COVID-19 world. Some initial analysis undertaken by Curtins suggest that the level of traffic growth that was assumed in the PLR analysis may not have occurred, and less onerous assumptions could mean that the PLR analysis represented a worse-case scenario. Utilisation of relatively high trip rates, consideration of a future year of 2034, and the fact that some of the committed developments included have either not come forward, will not come forward, or have come forward in a different way, adds further weight to the assertion that PLR analysis was robust.

4.9.5 On the above basis, there is nothing to suggest that a future application for Phase 2 would encounter insurmountable obstacles. Whilst mitigation may be required at some junctions, this is not unusual for a development of this scale, and it is Curtins' view that Phase 2 is entirely deliverable.

4.10 Conclusion

4.10.1 In conclusion, the Phase 2 sites share many of the locational benefits of Phase 1 in terms of access to the highway network, accessibility by sustainable modes, and access. The Phase 1 application documentation and Public Inquiry evidence demonstrates that Phase 1 is sustainable, therefore the same conclusion must apply to Phase 2 as a result of its adjacency.

4.10.2 With regard to highway impact, the PLR modelling team considered the impact of the PLR in detail as part of the recent application and Public Inquiry. This includes consideration of Phase 2 and 3.

4.10.3 The results demonstrated no severe impact as a result of the PLR, and the 2020 PLR Transport Assessment concludes that 'On review it is considered that overall, the proposed scheme will not result in significant transport related issues or impact on the operation, safety or amenity of local transport networks.' This is a conclusion supported by SHMBC Highways, WBC Highways, and HE, and Curtins has no reason to doubt the validity of the conclusion.

4.10.4 Whilst interpretation of the PLR analysis is considered to be proportionate evidence for the EiP, it must be noted that the PLR assessment primarily considers the impact of the PLR, with future phases of Parkside included only as part of a cumulative assessment. Any proposed development at Parkside Phase 2 or 3 will need to be subject to separate planning application and independent assessment of traffic impacts on the local highway network.

4.10.5 Curtins is of the view that whilst the precise scope of any Phase 2 application cannot be pre-determined until discussions with the Local Highway Authorities have taken place, it is envisaged that an assessment in accordance with the NPPF, NPPG, and the various Local Authorities' internal guidance documents may result in less onerous parameters than those originally used in the PLR analysis.

4.10.6 On the above basis, there is nothing to suggest that a future application for Phase 2 would encounter insurmountable obstacles. Whilst mitigation may be required at some junctions, this is not unusual for a development of this scale, and it is Curtins' view that Phase 2 is entirely deliverable and in accordance with key NPPF and Development Plan policies.

5.0 Site 8EA Conclusions

5.1 Introduction

5.1.1 This section of the report draws conclusions from the previous 3 sections.

5.2 Summary and Conclusion

5.2.1 Paragraphs 11, 102, 103, 108, and 110 of the NPPF all refer to the importance of sustainability and accessibility by sustainable modes. This is further emphasised in Policy CSD 1 and CP2 of the SHMBC Core Strategy and Policy LPA04 and Appendix 5 in the Submission Draft of the Local Plan.

5.2.2 The information submitted as part of the Phase 1 planning application and Public Inquiry, as summarised in this note, clearly demonstrates that Phase 1 is located in an accessible location that would benefit from existing and proposed walking, cycling, and public transport infrastructure. This is a view shared by SHMBC Highways.

5.2.3 By virtue of its geographic location adjacent to Phase 1, the same conclusion is considered to be appropriate for Phase 2, and it is concluded that the entirety of Site 8EA is accessible and sustainable.

5.2.4 If a development is considered to be sustainable, it should only be refused if there are unacceptable highway safety impacts or the residual cumulative impacts are severe.

5.2.5 With regard to highway safety, the information submitted as part of the Phase 1 and PLR planning applications, plus the concurrent Public Inquiry, as summarised in this note, has not identified any highway safety issues that would be exacerbated by the development of site 8EA. In fact, mitigation measures proposed as part of the Phase 1 application and the introduction of the PLR are likely to enhance highway safety, particularly for non-motorised users. The entirety of Site 8EA is therefore considered to be acceptable with regard to highway safety.

5.2.6 With regard to highway capacity, detailed and robust assessments submitted as part of the Phase 1 and PLR planning applications, plus the concurrent Public Inquiry, as summarised in this note, have not identified any severe cumulative impacts that could not be resolved. Furthermore, mitigation and the introduction of the PLR actually offers benefits at many of the junctions on the network when compared to the do nothing scenario.

5.2.7 Whilst a detailed application for Phase 2 will be required in due course, there is nothing at this stage to suggest significant issues. Whilst mitigation may be required at some junctions, this is not unusual for a development of this scale. It is Curtins' view that Phase 2 is entirely deliverable.

5.2.8 The entirety of Site 8EA is therefore considered to be acceptable from a highway capacity perspective and particularly Paragraph 109 of the NPPF.

6.0 Inspectors Questions

6.1 Introduction

6.1.1 This section of the Statement considers the specific traffic and transport questions raised by the Inspectors. For ease, the Statement provides the question in bold and the response of Parkside Regeneration LLP underneath.

6.2 Matter 1 – Introduction to the Hearings, Legal Compliance, Procedural Requirements, and the Duty to Cooperate

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

9. Is there sufficient evidence that the Council has cooperated effectively with infrastructure providers and technical consultees on relevant issues such as transport, flood risk and utilities?

6.2.1 Curtins was first appointed to the Parkside Phase 1 project in 2015 and identified early on that there could be traffic and transport impacts not only in St Helens, but also in Warrington, on the SRN, and potentially in Wigan.

6.2.2 Initial scoping discussions with Highways Officers at SHMBC, Warrington Borough Council (WBC), Wigan Council (WI), and Highways England (HE) took place almost immediately and continued until submission of the application in 2018.

6.2.3 Following submission, consultation responses were received from SHMBC, WBC, HE, and WI which either requested additional information, clarity on submitted information, different assessment parameters, and consideration of one new junction.

6.2.4 Curtins sought to resolve the comments set out in their highways consultation response as a priority, and a series of responses were prepared to provide clarity on the submitted information, minor corrections, sensitivity testing, and discussions regarding mitigation and triggers.

6.2.5 Following a review of the above information, all highways matters were fully resolved with SHMBC, WBC, and HE offering no objection.

6.2.6 It is clear from the above that the Council and adjacent Authorities undertook significant traffic and transport engagement regarding the Phase 1 planning application. It is also clear from the PLR application documentation and particularly the EIA that a significant amount of engagement took place regarding the PLR.

6.2.7 This included assessments of Phase 2 and 3, and therefore it is concluded by virtue of the applications that both sites 8EA and &EA have been subject to more scrutiny than is usual for a Local Plan allocation.

10. Is there evidence that this cooperation will continue so that the necessary infrastructure will be delivered in a timely fashion?

6.2.8 The Phase 1 and PLR applications both contain numerous obligations and planning conditions to secure mitigation that will enable all traffic and transport impacts to be mitigated. This mitigation is summarised earlier in this report and full details are provided in the suite of application documentation.

6.2.9 The conditions will be discharged by SHMBC in the usual manner and there is nothing to suggest that cooperation would not continue as it has done for the past 5-6 years.

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?

6.2.10 The motorway junction mitigation required to deliver Parkside Phase 1 and the PLR is limited to improvements at the M6 Junction 22 that would be delivered as part of the PLR scheme via planning condition. If the PLR is approved, the junction works will be completed as part of that project within the next few years.

6.2.11 Based on the PLR modelling results, additional motorway junction mitigation is unlikely to be required for Phase 2 and possibly Phase 3, albeit this is subject to further analysis as part of future planning applications.

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

19. Does the Plan include adequate mitigation measures to address these?

Specifically, the potential adverse impacts include:

a. Air quality and the Air Quality Management Area (AQMA) close to the Parkside allocation and Junction 22 of the M6 (Newton-le-Willows) and potential issues that might arise as a consequence of the levels of planned development. b. Potential negative effects on landscape in relation to housing and employment allocations in the Green Belt. c. Potential impacts that may arise regarding growth in locations that are likely to attract high levels of car usage and the suggestion that monitoring of impacts will be important.

6.2.12 Site 8EA Parkside West has been the subject of detailed traffic and transport analysis, planning applications, and Public Inquiries as set out throughout this statement. The site has therefore been

subject to significant scrutiny, and traffic and transport mitigation has been developed that has satisfied SHMBC Highways, WBC Highways, and Highways England.

6.2.13 There is nothing to suggest any unacceptable highway impacts would occur.

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

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

4. 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?

6.3.1 As per previous responses, Site 8EA Parkside West has been the subject of detailed traffic and transport analysis, planning applications, and Public Inquiries as set out throughout this statement. The sites have therefore been subject to significant scrutiny, and traffic and transport mitigation has been developed that has satisfied SHMBC Highways, WBC Highways, and Highways England.

6.3.2 There is nothing to suggest any unacceptable highway impacts would occur, and the site is consistent with the NPPF and Policy LPA04.

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 during the Plan period?

6.3.3 The Parkside Phase 1 application that covers circa half of Site 8EA was progressed on the basis that the PLR and a connection to J22 was not necessary. The suite of documentation prepared for the application and the Public Inquiry concluded that mitigation along the A49 would be sufficient to enable development. This position was supported by SHMBC, WBC Highways, and HE.

6.3.4 The PLR application which included consideration of Sites 7EA and 8EA in their entirety assumed that the PLR would be in place, but modelling was undertaken to consider a with and without PLR scenario. The results of this assessment coupled with knowledge from the Phase 1 application suggest that the PLR or an alternative would certainly be required to accommodate Phase 3 and most likely required to accommodate Phase 2.

Appendix A – Parkside Phase 1 Public Inquiry Location / Accessibility Plans