

Parkside Action Group Response to St Helens Draft LDF Core Strategy May 2009

Background Paper - Fact or Fiction?

This paper supports the Parkside Action Group (PAG) formal response to the St Helens LDF Core Strategy Publication Version – May 2009. It contains detailed comments, observed errors, and suggested changes to the Core Strategy and its background papers.

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Key



It appears that this narrative is inaccurate or incorrect











The narrative only tells part of the story













The narrative is misleading or contradictory.

CAS3.2






PAG Ref.	Section	Comments
CAS 3.2-I1	LDF Core Strategy May 2009 Policy CAS 3.2 Page 56 Para 1 	In the St Helens UDP (v2) page 188 para 6.2 it implies the size of the site is 34ha, whereas CAS 3.2 quotes the size as 54.02ha?
CAS 3.2-I2	LDF Core Strategy May 2009 Policy CAS 3.2 Page 56 Para 1, 3, 4 	This paragraph establishes the term ‘the site’ and implies its area is 54.02 ha. Para 3 goes on to say ‘the site will be removed from the Green Belt ...’ Para 4 discusses the approach for an enlarged area. The term ‘site’ is therefore ambiguous and needs tightening. The position with regards PPG2 is not covered.
CAS 3.2-I3	LDF Core Strategy May 2009 Policy CAS 3.2 Page 56 Condition 2. 	The A572 and A579 are omitted and need to be included. If omitted HGV & LGV vehicles would be allowed to enter from the north and east using the local road infrastructure. <i>Suggest replacement of this condition with: Access to any potential development on the site by HGV, LGV and other commercial vehicles must not make use of the A49, A573, A572 and A579. Evidence of how this will be legally enforced will need to be produced.</i>




PAG Ref.	Section	Comments
CAS 3.2-14	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Condition 3. 	The word 'unacceptable' needs qualifying.
CAS 3.2-15	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Condition 5. 	The word 'unacceptable' needs qualifying.
CAS 3.2-16	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Condition 6. 	This condition does not adequately protect the location from unsuitable development. The essential consideration here is what <i>should</i> happen and what actually <i>will</i> happen. The wording should be ' All uses within the site must have the prime purpose ...' <i>An additional condition and sentence should be added – tenants will not be allowed to occupy premises without evidence that they intend to meet the prime purpose.</i> <i>An additional condition should be added 'Waste must not be imported to the site'</i>
CAS 3.2-17	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Condition 7. 	Section 9.34 of CAS3.2 provides stronger words about the landscape to the East of the site than detailed in this condition. The words here should reflect and be consistent with the emphasis in 9.34.
CAS 3.2-18	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Condition 10. 	Typo - ;and at the end of the paragraph.
CAS 3.2-19	LDF Core Strategy May 2009 Policy CAS 3.2 Page 57 Para after condition 11.	Suggest '... in the context of the Green Belt designation', should say '... in the context of the Green Belt designation <i>as detailed in the proposals map</i> '








PAG Ref.	Section	Comments
CAS 3.2-I10	LDF Core Strategy May 2009 Policy CAS 3.2 Page 59 Section 9.21 	See I1 for question on size of site (54ha?) – Also the document uses 54ha rather than 54.02ha elsewhere. Inaccuracies on the bullets: <ul style="list-style-type: none"> i) The previous Rail Track RFI application in 2001 was based entirely on land to the West of the M6 and a proposed a link road to the existing M6 J22. Therefore it is incorrect to suggest that an enlarged area to the East would be required to secure access to the M6. ii) SES Volume 1 section 2.2.2 details information of 770m sidings to be provided on the West of the development. Therefore it is incorrect to say an enlarged area would be required to the East to accommodate the length of trains within the site. (Note too 770m length trains are only an aspiration of the industry currently as the rail infrastructure does not have the passing loops or signalling end to end on the network to support this length of train. Recent expansion at Ditton RFI installed 550m sidings perhaps indicating a lack of confidence in 770m network capability?). iii) In Astral’s plan an enlarged area to the East is proposed for further warehousing, but the proposal also includes warehouses to the West of the M6 that are larger than anything else constructed in the UK, and footprint that is larger than any other RFI in Europe. Therefore the suggestion that an enlarged area would be required to meet RFI warehouse demand appears difficult to believe.
CAS 3.2-I11	LDF Core Strategy May 2009 Policy CAS 3.2 Page 59 Section 9.23 	Note the word ‘review’, not ‘remove’. The broad location can still be protected by appropriate policy as per the 11 conditions in CAS 3.2.
CAS 3.2-I12	LDF Core Strategy May 2009 Policy CAS 3.2 Page 59 Section 9.25 	<ul style="list-style-type: none"> a) ‘... close to the major origins and destinations of freight in the North West’. The Parkside site is not close to any major origin or destination. Every single item of freight would have to arrive and leave by road and travel by road significant distances to/from Parkside. There is likely to be no net HGV freight saving to the North West. Any HGV saving will be relative the South of the UK outside the North West region. b) The Regional Freight Strategy promotes the concept of domestic rail freight movements between UK RFI but in practice this concept has not gained any momentum due to the relatively small distances involved in the UK and relative cost (both in time and money) of road to rail logistics compared to road only over short distances (not due to the lack of available RFI!!)









PAG Ref.	Section	Comments
CAS 3.2-I13	LDF Core Strategy May 2009 Policy CAS 3.2 Page 60 Section 9.26 	It is likely that the North West future requirement has already been met by the proposed or existing facilities at Ditton, Trafford Park, Birkenhead, Seaforth, Port Wirral, Port Warrington and Port Salford.
CAS 3.2-I14	LDF Core Strategy May 2009 Policy CAS 3.2 Page 60 Section 9.32 	TP47 section 5.11 details that a projected 136,000 sq m of additional warehousing that will be required by St Helens between 2006 and 2025. The Astral proposal aims to provide 715,000 sq m of warehousing. This represents over five times the St Helens requirement over a 20 year period. Given the scale of warehousing proposed, it is highly likely that Astral's business plan will focus on acquiring existing logistics and distribution businesses, in turn implying job relocation. The net effect would be detrimental to other boroughs. West Lancashire District Council has already objected to the Astral scheme on these grounds.
CAS 3.2-I15	DF Core Strategy May 2009 Policy CAS 3.2 Page 61 Section 9.35 	Good point, but neither should other possible entry points be acceptable e.g. via the A573 from either direction.
CAS 3.2-I16	DF Core Strategy May 2009 Policy CAS 3.2 Page 61 Section 9.36 	What about the A49 and A572? Is there a presumption here about access to the site and roads most likely to be impacted? The likelihood is that all local roads around the site will be impacted in some way or other. Picking just two of them appears to be flawed.
CAS 3.2-I17	DF Core Strategy May 2009 Policy CAS 3.2 Page 61 Section 9.37 	Should state that Manchester – Liverpool commuter rail traffic may be impacted.
CAS 3.2-I18	DF Core Strategy May 2009 Policy CAS 3.2 Page 61 Section 9.38, Point (ii) 	Point (ii) '... of the proposed application site boundary' – what application? The LDF should not be presumptuous about a particular application. With this in mind surely it is impossible to specify distance from a boundary.
CAS 3.2-I19	DF Core Strategy May 2009 Policy CAS 3.2 Page 61 Section 9.39 	Need to be specific on source of job estimates e.g. 'The developer estimates ...' The current statement implies a prediction from the LDF itself.


Parkside Background Paper

PAG Ref.	Section	Comments
PBP-I1	LDF Core Strategy May 2009 Parkside Background Paper Cover page 	The photograph on the front page is extremely old and presents a false picture of the site today. It misleads the reader into thinking the site is essentially brown-field. Much of the hard standing area is now overgrown and has returned to its natural Greenfield appearance. The grade II agricultural land to the East of the M6 is hardly visible, but yet this land represents approximately 50% of the area present in the Astral proposal.
PBP-I2	LDF Core Strategy May 2009 Parkside Background Paper Section 2.1 	Need to be clear on scope of area 34ha - 52ha (or 52.02ha) is used extensively in CAS 3.2.
PBP-I3	LDF Core Strategy May 2009 Parkside Background Paper Section 2.1 	'... the green belt maintains its five functions and the degree of permanence' – what does this mean?
PBP-I4	LDF Core Strategy May 2009 Parkside Background Paper Section 3.4 	How does moving freight reduce the need to travel (by car)?
PBP-I5	LDF Core Strategy May 2009 Parkside Background Paper Sections 3.5-3.8 	Not clear why specific paragraphs from PPG2 are referenced and others omitted? What point is being made here?

PAG Ref.	Section	Comments
PBP-16	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (v) 	<p>The concept of moving domestic freight by rail between UK RFI has not gained any momentum over previous years. This is due to the relatively small distances involved in the UK and associated costs (both time and money) of road to rail compared to road only logistics. Evidence exists to show that companies have little appetite for moving freight by rail over short distances. A strategy of a network of RFI to promote removal of HGVs from roads is therefore flawed.</p> <p>No detailed study of future North West freight requirements exists today. North West Regional planning groups appear to pursue a 'just in case' approach of promoting as many RFI as possible in whatever form even if they are not potentially needed when compared to existing freight handling capabilities in the region. A 'just in case' approach does not support the case for disposition of huge areas of Green Belt from the region.</p> <p>Note the Dft Rail Utilisation Strategies (RUS) do not have sufficient detail to assess North West RFI requirements. What is actually needed is a study to discover what future types of freight and associated processing are required in the North West (including rail served warehousing). Such a study may show that the North West already has sufficient rail freight handling capability (existing or in the pipe line) to meet the North West requirement without Parkside.</p>
PBP-17	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (v) 	<p>'... much of the material contained in chapters 4, 5, 6, and 7, is still relevant. For this reason DfT have retained the document on their website as a source of advice and guidance'. Where is the evidence for this? Is this the author's opinion here? Did someone just leave it on the Dft web site by mistake or as background information maybe?</p>
PBP-18	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (vi) 	<p>'... carrying some 43% of UK rail freight and serving the West Midlands, the North West and Scotland.' – What type of freight is this referring to? A major proportion of rail freight is bulk freight (aggregates etc). It is fairly common for rail literature to include bulk freight in their statistics to overinflate importance of freight transport in relation to RFI which only have non-bulk capability.</p>

PAG Ref.	Section	Comments
PBP-I9	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (vi)  	'The WCML Strategy identifies provision of capacity for up to 60-70% more trunk freight paths ...' Although the WCML has recently completed a major upgrade program, effective capacity has been increased only in discrete locations. For example some sections of track in the midlands have been upgraded from two to four tracks. Some sections of track have had little or no modification as part of the programme. An example of a two track section of track is that located near Weaver junction just south of Warrington. This means the effective capacity is limited at this point despite the WCML upgrade. Network Rail has aspirations to improve the working time table (WTT) to increase rail paths, but this is unproven. In the end squeezing more trains into the same time period increases risks and has the potential to impact the schedules for commuter services. Virgin Trains are placing extreme pressure on freight paths due to increased passenger demands and clearly specified efficiency objectives. Because passenger trains run significantly faster than freight trains, any increase in passenger services has a high impact on freight paths (passenger traffic can't wait for slower freight trains and passing loops are limited – virtually non-existent for 770m trains!).
PBP-I10	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (vii) 	Agreed, but it identifies possible locations; it does not state specific or all locations <i>have</i> to be developed in order to meet the requirement.
PBP-I11	LDF Core Strategy May 2009 Parkside Background Paper Section 3.11 (vii) 	Possible typo 'part'- should this be port? A large proportion of inter-continental container freight is too large to carry on the UK rail network (requires W12 gauge – WCML only cleared to W10). This would include much of the freight to be imported at the new facility at Seaforth in Liverpool for instance.
PBP-I12	LDF Core Strategy May 2009 Parkside Background Paper Section 4.3 	'Local Development Framework may provide for detailed changes in Green Belt' The operative word here is may not must.
PBP-I13	LDF Core Strategy May 2009 Parkside Background Paper Section 5.3 	The aspirations of the Northern Way are to promote the concept of East to West freight movements. The use of rail to achieve this goal is severely constrained by the fact that the trans-Pennine route is not cleared to W10 gauge (currently W8). This means that all Trans-Pennine container traffic needs to use special 'well' Wagons which are costly to operate and not attractive to freight operators. The limitations of the Trans-Pennine rail route are not generally recognised.
PBP-I14	LDF Core Strategy May 2009 Parkside Background Paper Section 6.3 	This paragraph does not to make sense (grammatically incorrect too) – what schemes are being referred to?

PAG Ref.	Section	Comments
PBP-I15	LDF Core Strategy May 2009 Parkside Background Paper Section 6.4 	Poor grammar again in this paragraph. In fact with respect to the Newton Park farm inquiry the Secretary of State refused the application on grounds of Green Belt and not being totally convinced that an alternative coexistence approach as proposed by PAG would prejudice a future RFI. So in this respect why on earth is this paragraph referring to 'Junction 22 MSA'? What is an MSA?
PBP-I16	LDF Core Strategy May 2009 Parkside Background Paper Section 6.5 	No – that is not the precise wording in the Inspectors report. Please quote the wording as stated there in and not an interpretation; otherwise you are misleading the reader.
PBP-I17	LDF Core Strategy May 2009 Parkside Background Paper Section 6.7 	'Inter-modal freight changes'??? Surely a typo?
PBP-I18	LDF Core Strategy May 2009 Parkside Background Paper Section 6.8 	This table is particularly irritating. What precise distance is being measured from where to where? What assumptions are being made about the amount of Green Belt removal at Parkside and boundary position? The table is confusing. It is obvious that if 272ha as specified by the Astral proposal is removed from the Green Belt at Parkside, the amount of green separation between Newton-le-Willows, Hermitage Green, Winwick, and Croft will be severely reduced. Section 3.7 quotes from PPG2 which states that Green Belts should be several miles wide.
PBP-I19	LDF Core Strategy May 2009 Parkside Background Paper Section 6.9 	Given that Parkside lies to the south east of Newton-le-Willows and Haydock lies on the other side to the north west, how would removing land from the Green Belt at Parkside impact any green separation between Haydock and Newton-le-Willows? Perhaps the author is trying to make the point that areas of green separation in the borough vary? So what!?
PBP-I20	LDF Core Strategy May 2009 Parkside Background Paper Section 6.11 	Horrendous grammar again (not comprehensible) – really not sure what points are being made here.
PBP-I21	LDF Core Strategy May 2009 Parkside Background Paper Section 6.12 	Can we infer from this statement that the amount of Green Belt de-allocation will be directly proportional to the amount of land a developer needs to cover any infrastructure costs? We would challenge this argument under the terms of the 'special circumstances' of PPG2?
PBP-I22	LDF Core Strategy May 2009 Parkside Background Paper Section 7.3 	There is an open bracket in this paragraph but no close bracket?

PAG Ref.	Section	Comments
PBP-I23	LDF Core Strategy May 2009 Parkside Background Paper Section 8.1 	<p><u>PAG Summary</u></p> <ul style="list-style-type: none"> • The document contains many areas of poor grammar to a point where some sections are incomprehensible. • The document does not separate the issue of site protection and Green Belt de-allocation. In fact it infers the two are inseparably linked as specified in the RSS. This is incorrect. • The document does not adequately justify why an area of land to the east of the M6 would be required to make an RFI viable.

Glossary

Term	Description
RFI	Rail Freight Interchange
SES	Astral Supplementary Environmental Assessment February 2008
TP47	St Helens Employment Land and Skills Review April 2009