St. Helens Core Strategy

Report of and Council’s Response to Representations on the March 2010 Amendments to the Core Strategy

Tabled at Cabinet – 8\textsuperscript{th} December 2010
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Important note

Please note, no comments are invited on the Council’s comments, they are for the information of those who submitted representations in May 2010.

The St.Helens Core Strategy was published in May 2009 for representations to be made. Focused Changes and Minor Post publication Changes (“Amendments”) to the May 2009 Core Strategy were published in March 2010 for representations to be made.

It was decided to review and re-publish the Core Strategy to take account of some issues raised in the March 2010 representations, the Government’s announcement that it planned to abolish Regional Spatial Strategies and other changes in circumstances.

The Council is proposing to publish a revised Publication Core Strategy in January 2011 for people to make representations on prior to its submission to the Secretary of State for Examination by an independent Inspector.

Comments in the May 2009 and March 2009 will be available to the Inspector for information. However it is strongly recommended that people who have previously submitted representations review the new version of the publication Core Strategy and submit new representations if they consider that issues they have raised previously have not been resolved.

How Can I Get Further Information?

See http://localdevelopment.sthelens.gov.uk/site.do for more information or contact:

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<tr>
<th>Query</th>
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<tr>
<td>Planning Issues</td>
<td>01744 676190</td>
<td><a href="mailto:planningpolicy@sthelens.gov.uk">planningpolicy@sthelens.gov.uk</a></td>
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<tr>
<td>Website Issues</td>
<td>01744 676197</td>
<td><a href="mailto:kennethbowen@sthelens.gov.uk">kennethbowen@sthelens.gov.uk</a></td>
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Chapter 1 – Introduction

Diagram/Table -

Respondent  315762  Mrs Dianne Wheatley  Government Office for the North West

Representation  ACSPUB2_10
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_01_04

Legally Compliant?  Sound?  Reason why Unsound?
Yes  Yes

Have you raised this issue previously?  If yes, at what stage?
Yes  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
Welcome addition of dates on tables/diagrams

Summary of changes being sought
n/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
No change

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 369

Paragraph - 1.16 and 1.18

Respondent  81816  Mr P Sargeant

Representation  ACSPUB2_369
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_01_06

Legally Compliant?  Sound?  Reason why Unsound?
No  No

Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?
Yes  Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Amendment is misleading and contains errors in punctuation, alternative wording suggested.

Summary of changes being sought
Remove 1.16A and 1.18A and add 'These conclusions are set out in a supplement to the SA/SEA documentation, in the form of a letter.' to the former paragraph and 'These conclusions are set out in a supplement to the AA documentation, in the form of a letter' to the latter.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Punctuation and grammatical errors will be corrected as minor post publication changes. The additional sentences are not considered to be misleading.

Recommended Change
No change.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 1.29A

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<th>Mr P Sargeant</th>
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If you did comment previously, does the amendment address your previous concerns? Yes

Summary
The Council use terms which are inappropriate and not understood by the general public. The Core Strategy contains misspellings and grammatical errors.

Summary of changes being sought
Replace 'Errata' with 'lacunae' or 'left out' and 'cyclostyled' with 'pre-printed form'. Correct errors and inconsistencies in spelling.

Officer Recommendation
Comment Noted

Justification for Recommendation
Corrections will be made only where clarity is required.

Recommended Change
Ensure consistency in presentation of 'Newton-le-Willows'.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage? No

Paragraph - 1.29A

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If you did comment previously, does the amendment address your previous concerns? No

Summary
Representations have been summarised incomprehensibly. Suggested changes have been ignored or dismissed as inadmissible. Responses are at times patronising; woolly; unappreciative of the efforts of the representor; ill informed; fail to address issues raised; and not justified by available evidence. Corrections have caused contrictions elsewhere, which are difficult to track. Council's response indicates 'partly agree' when suggestion wholly accepted. Key Issues: Representations not given proper consideration.

Summary of changes being sought
Key Issues: Greater clarity needed in summaries; responses; and evidence.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Report of and Council's Response to Representation is to aid the Inspector's understanding of the main issues raised. Full copies of the representations are available both to the Inspector and general public. The Council will only make changes where they are needed for accuracy or clarity.

Recommended Change
Doubt is cast on the propriety of the Council's actions including non-compliance with the Statement of Community Involvement (SCI). Inadequacy of Regulation 27 Statement, and absence of any other report, to demonstrate compliance with SCI. Documents unavailable at deposit locations. Executive has not approved Parkside Background Paper. It places a greater area of land under treat without justification. Previous inconsistencies are not eradicated by replacement paper. Background Papers have been amended without production of a statement of changes. Further changes are now proposed irrespective of authorship and without consultation. The description ‘focused change’ raises how a change can be unfocused. Changes requested by Executive were overlooked whilst others were enacted. The omitted requested change was not corrected by the Portfolio Holder and was sanctioned retrospectively. Requests to see relevant internal responses have been refused. The origin of representation of support for Parkside development by applicant company was hidden behind personal name and its true origin was not brought to Executive's attention. Executive decision was taken without: knowledge of full extent of representation; its origins; weight of objection to Parkside; or knowledge of Network Management Plan and its limitations. Bibliography does not include whole evidence base. Proposed changes go beyond 'minor' raising questions of transparency and accountability. Key Issues: Council has acted improperly, essential information was not provided to Executive and changes have been made without authorisation or appropriate consultation.

**Summary of changes being sought**
Produce statement of changes to Background Papers. Undertake appropriate consultation.

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Documents were placed and replaced at deposit locations, and were also available via the internet at all times. Copies of all versions of the Background Papers are available for comparison. Whilst copies of internal authorisations are not required to be public documents, copies have been made available. The name under which representations are submitted is not controlled by the Council. Whilst all representations were not presented to the meeting of the Executive, all issues were covered in the report. The NMP covers those routes previously named individually and is more comprehensive. St.Helens has no statutory authority over highways outside of its boundaries. All evidence relied upon is referenced in the Core Strategy itself. The Bibliography is available on the internet. Minor changes have been included in the consultation to ensure transparency.

**Recommended Change**
Elements of the Parkside Background Paper will be clarified at submission.

**Object**

**Which rep? - What is the reference number of the representation affected?**

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Officer Recommendation
Comment Noted

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Object

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Summary
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Officer Recommendation
Comment Noted

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Recommended Change
Elements of the Parkside Background Paper will be clarified at submission.

Does the representor Support/Object/Comment..
Object

Which rep? - What is the reference number of the representation affected?
Summary

The perception exists that the environmental appraisals have been compromised by the use of Scott Wilson to help prepare the new Parkside BP.

Summary of changes being sought

Officer Recommendation

Comment Noted

Justification for Recommendation

There is no guidance against the use of the same consultants for both SEA/SA work and development of background evidence; both pieces of work were subject to competitive bidding and separate members of staff are involved.

Recommended Change

No change

Does the representor Support/Object/Comment..?

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 1.29A

Respondent 81816 Mr P Sargeant

Representation ACSPUB2_391

To which Part of the Core Strategy does this representation relate?

Change Ref. CSR_P_01_10

Legally Compliant? No

Sound? No

Reason why Unsound? Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? Yes

If yes, at what stage? Issues and Options; Preferred Options; Publication; Other

If no, why did you not comment earlier? Yes

If you did comment previously, does the amendment address your previous concerns? No

Summary

There is extensive non-compliance with commitments of the Statement of Community Involvement (SCI) including failure to: incorporate the views and aspirations of the wider community; inform the community how contributions have been incorporated; personally notify representors of how their comment has been integrated into the current document; prepare a report on compliance with the SCI; notify of the availability of the Report of Representations; consider the representations submitted; engage the public in the later stages of document production; accurately report where press notices have been published; demonstrate achievement of a minimum level of compliance, or include copies of correspondence to demonstrate the stated methods used. Key issue: the Council has not complied with commitments of the Statement of Community Involvement.

Summary of changes being sought

Officer Recommendation

No Change Recommended

Justification for Recommendation

The availability of the Report of Representations was included in a letter to all registered on the LDF Consultee Database and on the Council's website. Government guidance encourages frontloading of consultation at the earlier stages of the plan process. At Publication stage the plan is in a form that the Council wish to adopt. The format of St.Helens First Magazine was changed, restricting the type of articles permitted. The SCI will be amended accordingly. The Council must be prudent managers of finance and charging for copies of reports is not unreasonable. The SCI makes no commitment to providing documents free of charge. It is accepted that the Warrington Guardian is incorrectly referenced as the Warrington Reporter, the error is due to the paper being part of the Reporter Group, references will be updated.

Recommended Change

References to Warrington Reporter will be updated to Warrington Guardian in the Evolving the Core Strategy.
Background Paper.

Does the representor Support/Object/Comment..

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If you did comment previously, does the amendment address your previous concerns?

No

Summary

Hope Academy site cannot be identified for development until the site itself exists. Its identification as a Major Developed Site in the Green Belt is perverse. Key issue: Treatment of the Hope Academy site is a distortion of Green Belt policy.

Summary of changes being sought

Officer Recommendation

No Change Recommended

Justification for Recommendation

The objection referred to the use of the new site name as Hope Academy in advance of planning permission for its development having been granted. As acknowledged, events have overtaken the objection. The site is identified as a Major Developed Site in the Green Belt as it is an area where redevelopment is acceptable in principle, in line with Council aspirations.

Recommended Change

No change

Does the representor Support/Object/Comment..

Object

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If you did comment previously, does the amendment address your previous concerns?

No

Summary

The consultants recommendation on provision of a buffer to ease compatibility between residential areas and the Parkside "allocation", has been overlooked. To provide it would result in a decreased operational area within St.Helens boundary. Suggested alteration to the Background Paper to reconcile these differences should not be undertaken without further consultation. CAS 3.2 should be amended to make provision for the buffer zone. Key issue: Recommended buffer zone has not be accounted for.

Summary of changes being sought

CAS 3.2 should be modified to incorporate provision of a buffer zone
Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Criteria in CAS 3.2 require certain issues to be addressed e.g. 5, 7, 9 - buffers would assist in delivering these. However, given the importance of these, it is agreed that buffers be referred to directly and will be added into criteria

Recommended Change
Include additional criteria in CAS 3.2 to require provision of buffer zones.

Does the representor Support/Object/Comment...
Object
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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Failure to include suggested changes on Parkside is contrary to SCI. Policy CAS 3.2 should contain flexibility in the even the RSS designation does not go ahead. The Parkside Background Paper cover is out of date and misleading, does not show several significant developments or reclamation by nature. Third party comments are disregarded, undermining the public's efforts rather than encouraging it. Maintain view that the Parkside issue should be included within the Rural St.Helens section of the Core Strategy. There is no overriding argument for removing Parkside from the Green Belt, and the solution advocated by the Council does not meet with agreement. CAS 3.2 (9) is too vague, as it contains no detail of examples or assets worthy of retention. Para. 9.19 remains inadequately expressed. Classification of restored spoil heaps as previously developed land continues to be incorrect. RSS Policy RT8 continues to be misrepresent. Citing references to potential development at Parkside from other documentation does not legitimise what may prove to be unacceptable development. The current reasoned justification in unrealistically promotional. Executive has not approved the Parkside Background Paper. Questions still remain whether members are aware of dependence on land in Warrington, and the Consultant's quantification of land required for the buffer zone to Winwick Road. Key issue: Concerns raised previously have not been addressed. The policy and background paper misrepresent issues and make inadequate provision for futer consideration of proposals.

Summary of changes being sought
Cover to Parkside Background Paper should be updated. CAS 3.2 (9) should include examples and list assets worthy of retention. Paragraph 9.19 should be improved. Only 34ha footprint of former colliery should be described as previously developed land. The reasoned justification should be improved. Alternative wording of CAS 3.7 (now CAS 3.2) submitted.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Changes to the policy dealing with development of a Strategic Rail Freight Interchange (SFRI) at the former Parkside Colliery suggested at Preferred Options Stage were considered at that stage of engagement. The Council has considered all representation and has incorporated suggestion where these were considered to improve the policy. It is accepted that the cover of the Parkside Background Paper was not changed. The Council maintains that issues relating to Parkside are correctly located in the Newton-le-Willows chapter of the Core Strategy. As the site is of most concern to those living in and around Newton-le-Willows, this is where people would expect to find it. CAS 3.2 (9) does not need examples to make its meaning clear. The wording of para. 9.19 will be reassessed. The Council maintain that the spoil heaps are classed as previously developed land. The Council disagrees that the interpretation of RSS policy RT8 is incorrect. Development of a SFRI is key to many strategies. The acceptability of any scheme will be judged through the planning application process. The reasoned justification to CAS 3.2 and Parkside Background Paper demonstrate a thorough assessment of all issues before drawing conclusions and recommendations. Executive approval of the Background Paper was not sought as it is a supporting document, rather approval of the amendments resulting from the document were not approved. The current outline is intentionally fuzzy as it is indicative only, though it is likely that development proposals will involve land within
Warrington boundary. The alternative wording suggested by Mr Sargeant was considered at preferred options stage.

**Recommended Change**

Improve wording of Paragraph 9.19

**Does the representor Support/Object/Comment..**

Object

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No

**Summary**

Added text relating to the outcome of previous consultation will soon become dated.

**Summary of changes being sought**

Removed proposed additional text.

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

For transparency the outcome of the most recent consultation has been added.

**Recommended Change**

No change.

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<td><strong>If no, why did you not comment earlier?</strong></td>
</tr>
</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

Peremptory treatment of those representations hostile to redevelopment of Parkside site. Failure to report full extent of representation to Executive, or make members aware of extent of supplementary representations which were reported as several comments, but effectively doubling the response to Parkside. Executive effectively received less than half of the representations and no analysis of origins of representors. Misrepresentation of origins of support. Misattribution of membership of PAG and positions held within group, examples given, which demonstrate a herd prejudice. Inclusion only of suggestions with which the Council agree rather than those of wider community, contrary to SCI commitment. Issues raised have been missed or logged against only one of several points affected. Failure to report representations made six months earlier, given that late representations were reported. Errors pointed out have been ignored. Representors are forced to repeat previous submissions to react to changes made.
Valid concerns are dismissed as not relevant to planning process. Key Issues: Third party representations are given insufficient weight; were misattributed; and were not accurately reported to Executive. Valid issues have been missed or dismissed as irrelevant and errors have been ignored.

**Summary of changes being sought**

N/a

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

It is correct that all representations were not presented in the report to Executive, however, it is considered that all issues were covered. Misattribution of representations, both to PAG and to positions within that group, are a result of details within the database not being updated, and PAG forms being used to submit comments. The Report of and Council's Response to Representation is to aid the Inspector's understanding of the main issues raised. Full copies of the representations are available both to the Inspector and general public.

**Recommended Change**

Remove PAG classification from database to avoid perceived bias.

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Several

---

**Paragraph - 1.29A**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
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</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_388</td>
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</table>

**To which Part of the Core Strategy does this representation relate?**

Change Ref. CSRP_01_10

**Legally Compliant?**

Sound?

No

Reason why Unsound?

Justified?; Effective?; Consistent with National Policy?

No

**Have you raised this issue previously?**

If yes, at what stage?

Issues and Options; Preferred Options; Publication; Other

Yes

**If no, why did you not comment earlier?**

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

The Network Management Plan was not available at commencement of consultation and when made available was difficult to locate. No paper copies were available at deposit location. The document has not been open to public comment. Executive decision was taken without knowledge of the NMP and its limitations. The change to reliance on the NMP is unexplained and unauthorised and gives the impression of indifference to highway effects beyond St.Helens boundary. The Report to Executive and other documents have not been made publicly available. The lack of availability of the Employment Background Paper in May 2009 impeded assessment and rendered consultation invalid. Also the Report of Representations was not available at Newton-le-Willows contrary to SCI commitments. Key issues: Evidence document have not been made available and not considered by Executive.

**Summary of changes being sought**

Revert to use of identified roads rather than rely on Network Management Plan. All internal documentation should be available at deposit locations.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Whilst there was a short delay in making the NMP available electronically, paper copies were supplied where requested. CAS3.2 originally included reference to A49 & A573. Representations raised concerns that A572 & A579 had been omitted. It was considered that replacement of individually named routes with ‘traffic sensitive routes identified in the NMP’ would be more comprehensive and avoid omissions St.Helens Council as a highways authority has no statutory control over neighbouring authorities highways. The Network Management Plan is a developing document by St.Helens Council. Its introduction to CAS 3.2 was sanctioned by Executive decision 0138. The procedural reports, including the Executive report do not form part of the evidence base and were not put on public deposit, however, where requested, copies were made available. Whilst there was a two week delay in availability of the Employment Background Paper the consultation period was extended to compensate. Copies of all documents were supplied to Newton-le-Willows library and every other library in St.Helens. When the Council are notified of omissions they are replaced. Copies of all documents are available via the internet at all deposit locations.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 1.29A

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To which Part of the Core Strategy does this representation relate?

- Change Ref. CSRP_01_10

Legally Compliant? | No
Sound? | No
Reason why Unsound? | Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
- Yes
If yes, at what stage?
- Issues and Options; Preferred Options; Publication; Other

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
- No

Summary

Internal authorisation documents have not been made available. Failure to follow Executive's instruction to delete the word 'eventual' is not credible. Introduction of the Network Management Plan remains unauthorised and members were not made aware of its implications. Decisions on how to deal with omitted representations were taken at officer level and additional amendments were added after Executive decision in January 2010. The Council's actions lack clarity, as suitable authorisation was not in place.

Summary of changes being sought

Officer Recommendation

Comment Noted

Justification for Recommendation

The documents referred to are not public documents and copies were supplied where requested. The failure to delete the word 'eventual' was due to print deadlines and has been corrected. The NMP is considered to be authorised by Delegate Executive Decision 0138. Executive delegate authority to Chief Officers to make decisions on their behalf.

Recommended Change

No change

Does the representor Support/Object/Comment..

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 1.29A

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- Change Ref. CSRP_01_10

Legally Compliant? | No
Sound? | No
Reason why Unsound? | Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
- Yes
If yes, at what stage?
- Issues and Options; Preferred Options; Publication; Other

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
- No

Summary

Missing representations should have been published as a supplement and brought to public attention instead of hidden. Updates to the Bibliography are only available to web users. Agreement to corrections have not yet been implemented. The Core Strategy contains many miscellaneous problems, as detailed elsewhere. Key Issues: The chosen method of communicating information is unsatisfactory. The Core Strategy contains many infelicities.

Summary of changes being sought

Publish separate addendum to Report of Representation, replace references to 'Councils' in 9.18 to administrative areas
Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
The missing representations were published in an Errata document and copies made available at all deposit locations. All documents forming the evidence base are referenced in the Core Strategy itself. It is regrettable that the corrections agreed to were missed, they will be proposed as minor post publication changes.

Recommended Change
Replace references to 'Councils' in 9.18 with 'administrative areas'

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
The Councils February letter did not indicate the ‘consultation’ commencement date. The March Errata document disavows consultation and only invites comments on the March amendments to the February amendments. Responses to respondents provided at the earlier stages of the process have now been abandoned. Has the consultation process been undertaken satisfactorily? The lack of clarity together with jargon dissuades public engagement. Charging for documents deters involvement, alternative printing options are not always achievable. Documents that must be printed in colour to be understandable increases costs. Even when documents are available on the internet they are difficult to locate. There has been a lack of general publicity and engagement including failure to use the Council's magazine. Key issue: Through use of jargon, lack of clarity and charging for documents the Council as dissuaded public engagement in the planning process.

Summary of changes being sought
N/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
The February letter was written with a view to it being delivered on the first day of the consultation period. It is unfortunate that there is confusion over the meaning of the statement in the March Errata, the word 'amendment' has been erroneously repeated in one sentence. However, the document indicates at several other points that representation is invited on all amendments since publication in May 2009. Use of the term consultation was intended to help rather than confuse. Technically, at publication stage and beyond, the document is not issued for consultation, rather representation is invited on the document the Council wishes to adopt. Similarly, Government guidance encourages front loading of consultation at an earlier stage, when comments from the whole community can be fed into a final publication version. The consultation at earlier stages was therefore more interactive. Whilst the current stage is ‘an invitation to make representation on the soundness of the document’, the term consultation was used to provide continuity of terminology for those outside of the planning system. The Council must be prudent managers of finance, charging for documents is not considered to be unreasonable. It is accepted that the Council has not used the Council Magazine, St.Helens First, for publicity as anticipated. The format of St.Helens First Magazine was changed, restricting the type of articles permitted. The SCI will be amended accordingly. All other methods continue to be used.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
**Chapter 2 – Context**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
<th>Government Office for the North West</th>
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**Summary**

Previous concerns about incorporating Growth Point at late stage now addressed

**Summary of changes being sought**

N/a

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

No change

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**

CSPUB 248
Chapter 3 – Issues, Problems and Challenges

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</table>

If you did comment previously, does the amendment address your previous concerns? No

Summary
Lamentably poor expression. Rewrite.

Summary of changes being sought
Paragraph 3.13 should be reworded.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Sentence could be improved to suggest as minor post publication change.

Recommended Change
Improvements to the sentence.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Chapter 4 – St. Helens in 2025

Paragraph - 4.11

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_373

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_04_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary
Footnote inserted by amendment should be struck out, or apply to whole vision. If the text is to be retained, it should be rendered into proper English by substituting 'the implementation of development in the Parkside strategic location’

Summary of changes being sought
The footnote should be struck out. Include 'Implementation of all developments is on the understanding that the UK remains financially solvent in the intervening period’ into Vision. Substitute 'the implementation of development in the Parkside strategic location’ for existing footnote.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The footnote was inserted at the request of Members and is therefore reasonable.

Recommended Change
No Change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.5

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_372

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_04_02

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary
Sentence does not make proper sense.

Summary of changes being sought
Revert to original text of 4.5.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Sentence has been revised.

Recommended Change
Improvements to the sentence.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Which rep? - What is the reference number of the representation affected?
Chapter 5 – The Key Diagram

No representations made on the Key Diagram
### Chapter 6 – Overall Spatial Strategy

#### Policy - CSS1

**Respondent** 315762 Mrs Dianne Wheatley Government Office for the North West

**Representation** ACSPUB2_15

To which Part of the Core Strategy does this representation relate?

*Change Ref. CSR_P_06_01*

<table>
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<th>Legally Compliant?</th>
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<tbody>
<tr>
<td>Yes</td>
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</table>

Have you raised this issue previously?

*If yes, at what stage?*

| Yes | Publication |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Yes

Summary

The incorporation of Mid-Mersey Growth Point Programme into the Key delivery box meets GONW earlier concerns.

Summary of changes being sought

N/a

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

Comment Noted

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**

CSPUB 374

#### Policy - Policies CSS1(viii) and CAS 3.2

**Respondent** 315762 Mrs Dianne Wheatley Government Office for the North West

**Representation** ACSPUB2_13

To which Part of the Core Strategy does this representation relate?

*Change Ref. CSR_P_FC_06_01*

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</table>

Have you raised this issue previously?

*If yes, at what stage?*

| Yes | Publication |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Yes

Summary

Previous concerns regarding changes to the Green Belt, scale, consideration of exceptional circumstances, flexibility and delivery have now been addressed.

Summary of changes being sought

N/a

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

No change

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**

CSPUB252
Policy - CSS1

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_112
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR Ping FC_06_01
Legally Compliant? Sound? Reason why Unsound?
No No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent concerned about pre-empting the decision about Green Belt around Parkside / criticises information in
Parkside Background Paper drawn from the planning application
Summary of changes being sought
Respondent proposing to remove criterion 1.viii from Policy CSS1
Officer Recommendation
No Change Recommended
Justification for Recommendation
No comments to add.
Recommended Change
No Change
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CSS1

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_233
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR Ping FC_06_01
Legally Compliant? Sound? Reason why Unsound?
No No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
The allocation in the A&PM DPD is dependent on the outcome of a planning application. Site could be treated as
major developed site in the Green Belt.
Summary of changes being sought
Change in classification of site and greater restrictions on development.
Officer Recommendation
No Change Recommended
Justification for Recommendation
Current approach is in accordance with RSS policy RT 8. There would be no benefit in identifying the site as a major
developed site in the Green Belt.
Recommended Change
No change
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CSS1 paragraph viii

Respondent 82550 Mr Steven Broomhead Northwest Regional Development Agency

Representation ACSPUB2_202
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_P.FC_06_01

Legally Compliant? Sound? Reason why Unsound?
Yes, with minor changes Effective?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
NWDA have suggested a minor wording change for point viii of CSS1.

Summary of changes being sought
NWDA have suggested a minor wording change for point viii of CSS1.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
The wording of this policy (and CAS 3.2) has been changed as a result of other representations made and legal advice so that it is more compliant with PPG2 with regards to outlining the criteria for the granting of planning permission and secondly the criteria for removal of land from the Green Belt once a scheme is developed. We therefore consider that this approach is stronger and offers the Green Belt greater protection should scheme not be forthcoming.

Recommended Change
Wording of policy CSS1 and CAS 3.2 will be amended to be consistent

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Policy - CSS1

Respondent 81816 Mr P Sargeant

Representation ACSPUB2_232
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_P.FC_06_01

Legally Compliant? Sound? Reason why Unsound?
No Effective?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Policy CSS1 part (viii) should be reworded for clarity

Summary of changes being sought
Insert "all the requirements of" before "CAS 3.2" and insert a comma after "permission" in policy CSS1 part (viii).

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Clarity is required. The wording of CSS1 will be amended.

Recommended Change
The wording of CSS1 will be amended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CSS1

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_234
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_06_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The description of the site as derelict and previously developed land is misleading as some brownfield has reverted to greenfield.

Summary of changes being sought
A change in the description of the site.

Officer Recommendation
Comment Noted

Justification for Recommendation
It is accepted that only part of the site is brownfield. The background document accepts that the site has elements of both brownfield and Greenfield land and confirms that the brownfield element is the area of the former colliery.

Recommended Change
No change

Does the representor Support/Object/Comment?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CSS1

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_235
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_06_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The requirement of CSS1 viii contradicts the requirements of CAS3.2 as the latter requires the successful implementation of a scheme.

Summary of changes being sought
Rewording of the two policies CSS1 and CAS3.2.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
The wording of the two policies differs slightly. The wording of CSS1 has been revised.

Recommended Change
Amend wording of CSS1 to be consistent with CAS3.2

Does the representor Support/Object/Comment?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - Policy CSS1 part 1 (viii)

Respondent 316762 Mr Paul Taylor

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_06_01

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that no evidence is presented regarding the need for or viability of a SRFI at Parkside/ the Green Belt at this location should remain

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The objections are noted. However, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. The Parkside Background Paper prepared by Scott Wilson and Atkins explores the issues of need, scale, deliverability and viability.

Recommended Change
No change recommended

Does the representor Support/Object/Comment...
Object

Which rep? - What is the reference number of the representation affected?

Diagram/Table -

Respondent 364564 Ms Sam Turner 4NW

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_06_02

Legally Compliant? Sound? Reason why Unsound?
Yes

Have you raised this issue previously? If yes, at what stage?
Yes Other

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
We would like to stress that the figures in Table 6.1, Policy W3 of the RSS do include the strategic rail freight interchanges. However, the supporting text to Policy W3, para 6.8 incorrectly states "Policy W3 ... includes regionally significant economic development (but not inter-modal freight terminals)". I would reiterate our responses to previous informal consultations (on 29th January and 1st February 2010), which explained that para 6.8 is incorrect, and the figures in Table 6.1 do include strategic rail freight interchanges. This will need to be recognised in the final version of the Core Strategy.

Summary of changes being sought

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Parkside has now been factored back into the preferred forecast model. The forecast model has now been re-run by Regeneris Consulting to reflect changes that have occurred since the publication of the St Helens Employment Land & Skills Study in 2009. Changes include an extension of the plan period to 2027 changes the Boroughs annual housing target following the removal of the Growth Point Target and updated population growth figures. More weight has now been placed on the role of parkside in meeting the employment demands of the Borough. Whilst the RSS currently forms part of the St Helens Development plan it is the intention of the Coalition Government to revoke Regional Spatial Strategies

Recommended Change
Amend policy CE1 and justification as below: Providing at least 47 hectares of land for B1, B2 or B8 purposes to 2027. This will primarily be for B8 uses and will be met through: A review of the existing and identified land supply to identify which B2 site

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
N/a

**Which rep? - What is the reference number of the representation affected?**

<table>
<thead>
<tr>
<th>Diagram/Table -</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>364564</td>
</tr>
<tr>
<td><strong>Ms Sam Turner</strong></td>
<td>4NW</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>ACSPUB2_4</td>
</tr>
<tr>
<td><strong>To which Part of the Core Strategy does this representation relate?</strong></td>
<td>Change Ref. CSRP_06_02</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Sound?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Reason why Unsound?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Have you raised this issue previously?</strong></td>
<td>If yes, at what stage?</td>
</tr>
<tr>
<td><strong>Yes</strong></td>
<td>Other</td>
</tr>
<tr>
<td><strong>If no, why did you not comment earlier?</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Summary**
Do not object if Parkside SRFI and Omega SRS are left out of policy CE1, economic development figures and paragraph 6.6 but should clearly state this and explain why. Inclusion may result in a simpler, clearer overall picture. Paragraph 15.11 is incorrect as RSS policy W3 does include SRFIs.

**Summary of changes being sought**
Include or explain reasons for exclusion of Parkside SRFI and Omega SRS in policy CE1, economic development figures in CE1 and paragraph 6.6. Amend paragraph 5.11 to clarify that table 6.1 of RSS policy W3 includes SRFI.

**Officer Recommendation**
Agree Recommend Change

**Justification for Recommendation**
Parkside has now been factored back into the preferred forecast model. The forecast model has now been re-run by Regeneris Consulting to reflect changes that have occurred since the publication of the St Helens Employment Land & Skills Study in 2009. Changes include an extension of the plan period to 2027 changes the Boroughs annual housing target following the removal of the Growth Point Target and updated population growth figures. More weight has now been placed on the role of parkside in meeting the employment demands of the Borough. Whilst the RSS currently forms part of the St Helens Development plan it is the intention of the Coalition Government to revoke Regional Spatial Strategies

**Recommended Change**
Text referred to by 4NW has been removed. 15.11 reworded as below. “The proposed SRFI at Parkside, Newton-le-Willows is a regionally significant development. Parkside scenarios are included in the review to provide a greater understanding of the impacts on

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

<table>
<thead>
<tr>
<th>Paragraph - 6.14</th>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>315762</td>
</tr>
<tr>
<td><strong>Mrs Dianne Wheatley</strong></td>
<td>Government Office for the North West</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>ACSPUB2_16</td>
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<tr>
<td><strong>To which Part of the Core Strategy does this representation relate?</strong></td>
<td>Change Ref. CSRP_06_05</td>
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<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
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<tr>
<td><strong>Sound?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Reason why Unsound?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Have you raised this issue previously?</strong></td>
<td>If yes, at what stage?</td>
</tr>
<tr>
<td><strong>Yes</strong></td>
<td>Publication</td>
</tr>
<tr>
<td><strong>If no, why did you not comment earlier?</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Summary**

If you did comment previously, does the amendment address your previous concerns?
Yes
Amendment addresses previous concerns regarding the inclusion of CIL

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment Noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 377
Chapter 7 – St.Helens Core Area

No representations made on St.Helens Core Area
Chapter 8 – St Helens Central Spatial Area

### Policy - CAS 2

<table>
<thead>
<tr>
<th>Respondent</th>
<th>83458</th>
<th>Sainsbury's Supermarkets Ltd</th>
</tr>
</thead>
</table>

**Representation**

ACSPUB2_99

To which Part of the Core Strategy does this representation relate?

Chapter 8 - St. Helens Central Spatial Area Strategy

**Legally Compliant?**

Sound?

Reason why Unsound?

Have you raised this issue previously?

If yes, at what stage?

Yes

Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

Expresses concern about the policy being based on an increasingly out of date retail study.

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

DPP submitted a detailed retail assessment in 2007 as part of the application for the Stadium development. This has been checked by the Councils retained retail consultants.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

---

### Diagram/Table - Town Centre Development Management Boundaries

<table>
<thead>
<tr>
<th>Respondent</th>
<th>83458</th>
<th>Sainsbury's Supermarkets Ltd</th>
</tr>
</thead>
</table>

**Representation**

ACSPUB2_102

To which Part of the Core Strategy does this representation relate?

Change Ref. CSRP_FC_08_01 (formerly CSRP_FC_08_10)

**Legally Compliant?**

Sound?

Reason why Unsound?

Have you raised this issue previously?

If yes, at what stage?

Yes

Preferred Options

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Yes

**Summary**

Supports the identification of a Primary Retail Frontage and a Town Centre Boundary within St Helens Town Centre

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Supports the diagram

**Recommended Change**

No change required

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?
Diagram/Table - Primary Shopping Area

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
<th>Government Office for the North West</th>
</tr>
</thead>
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<tr>
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<td>To which Part of the Core Strategy does this representation relate?</td>
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<td>Change Ref.</td>
<td>CSRP_08_03</td>
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<td>Yes</td>
<td>If you did comment previously, does the amendment address your previous concerns?</td>
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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Summary</td>
<td></td>
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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Summary of changes being sought</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Officer Recommendation</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Justification for Recommendation</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Recommended Change</td>
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<tr>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>No</td>
<td>No</td>
<td>Does this representation withdraw or partially withdraw a representation made at publication stage?</td>
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<tr>
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<td>Which rep? - What is the reference number of the representation affected?</td>
<td></td>
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</table>

Paragraph - 8.1

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_374</td>
<td>To which Part of the Core Strategy does this representation relate?</td>
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<tr>
<td>Change Ref.</td>
<td>CSRP_08_07</td>
<td>Legally Compliant?</td>
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<td>No</td>
<td>Have you raised this issue previously?</td>
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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Summary of changes being sought</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Officer Recommendation</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Justification for Recommendation</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Recommended Change</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Does the representor Support/Object/Comment..</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Does this representation withdraw or partially withdraw a representation made at publication stage?</td>
</tr>
<tr>
<td>No</td>
<td>No</td>
<td>Which rep? - What is the reference number of the representation affected?</td>
</tr>
</tbody>
</table>
Chapter 9 – Newton Le Willows and Earlestown

The Council received 1165 representations on cyclostyled forms in relation to policy CAS 3.2. The text of the comment on the form is set out below, with the Council’s response beneath. A list of those submitting a cyclostyled form is included at appendix 1.

Parkside Action Group cyclostyled form:

“Summary of the latest LDF Green Belt Position:
(i) The policy states that land to the West of the M6 will be removed from the Green Belt on approval of an a Strategic Rail Freight Interchange (SRFI) planning application.

(ii) The policy states that land to the East of the M6 will be removed from the Green Belt if exceptional circumstances can be demonstrated.

(iii) Section 9.32 states that it is considered that exceptional circumstances have already been demonstrated.

Net result: Land to the east and west of the M6 may be automatically removed from the Green Belt on approval of a rail freight terminal planning application.

I object to the latest draft of the LDF Core Strategy (February 2010) Policy CAS 3.2 because:

I disagree with the approach of the policy CAS 3.2 to predetermine the terms for the removal of Green Belt and effectively completely bypass any existing protection as detailed in National Planning policy such as PPG2. (.i.e. the LDF should make no changes to the existing Green Belt boundaries).

The policy fails to adequately to demonstrate the case for Green Belt ‘exceptional circumstances’. The policy attempts to pre-empt the contents of a potential planning application and justify exceptional circumstances on the basis of a vision of the makeup of a rail freight terminal. In practice a developer may make a case that any kind of development content is rail orientated and of course that content may be completely non compliant with the terms of exceptional circumstances as detailed in PPG2 – for example a waste incinerator plant (with a railway line of course). The exceptional circumstance case should only be addressed as part of regular planning process (through LPA committee and/or public inquiry), where actual content submitted can be properly considered and assessed. It is not acceptable to predetermine the content and assessment of a fictitious planning application as part of local planning policy.”

Council’s response to the issues raised in the PAG cyclostyled form:

“It is acknowledged that the policy as worded in March 2010 is not worded clearly enough to state the full intentions which has led to some confusion. As a result of other representations the policy will be reworded to a) outline the circumstances in which the Council would look favourably on granting planning permission for an SRFI and b) to identify the correct trigger point for reassessment of Green Belt boundaries i.e. following full development of the site.

With regards to issues surrounding other uses of the site, the criteria in the policy clearly state that any proposals for other uses which would prejudice the use of the site as an SRFI will be refused. With regards to comments around waste incineration, such uses and allocations are dealt with separately through the emerging Waste DPD document. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. The cost of a rail line being laid into the site is so expensive that a developer would not be able to do this unless the end uses of the site required a rail line otherwise it would be unviable to do so.

The policy is perhaps confusing as worded in March 2010 with regards to very special and exceptional circumstances as defined in PPG2. The policy is to be reworded to make the approach clear and consistent with PPG2.”
**Additional issues raised on the Cyclostyled forms**

In addition to the issues raised above, additional points were added to the cyclostyled forms.

**A summary of these additional points made is attached at Appendix 2.**

<table>
<thead>
<tr>
<th>Additional issue raised on cyclostyled form</th>
<th>Council Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loss of land to development &amp; impact on environment</td>
<td>There would be loss of agricultural land, open space and countryside, however the Council consider that the need for the development outweighs this. Furthermore, policy CAS 3.2 requires significant mitigation through landscape and green infrastructure enhancement.</td>
</tr>
<tr>
<td>Detrimental to the environment; Loss of Wildlife habitat; Catastrophic environmental and ecological effect on all adjacent areas for generations to come</td>
<td>Policy CAS 3.2 requires significant mitigation through landscape and green infrastructure enhancement, plus positive management of existing and new environmental assets.</td>
</tr>
<tr>
<td>Loss of Green Belt; Green Belt 'exceptional circumstances' not demonstrated</td>
<td>The policy requires that “very special circumstances” be demonstrated for any development, in line with PPG2.</td>
</tr>
<tr>
<td>More ecologically sound to revitalise former industrial areas.</td>
<td>Existing employment sites are not suitable for a SRFI</td>
</tr>
<tr>
<td>Impact upon heritage; Concerned about the destruction of a site of historical importance.</td>
<td>Policy CAS 3.2 now requires the special regard to the desirability of preserving listed buildings at Newton Park Farm, with relocation if necessary</td>
</tr>
<tr>
<td>Will add to global warming</td>
<td>Transferring freight from road to rail should help reduce CO2 emissions</td>
</tr>
</tbody>
</table>

**Impact on local area & residents**

<p>| Residential amenity; Impact of quality of life of residents; Light pollution | Policy CAS 3.2 requires there to be no unacceptable impact from the development or associated road or rail access |
| Loss of visual amenity | Policy CAS 3.2 requires no unacceptable visual intrusion |
| Pollution; Air quality | Newton High Street and the M6 corridor are Air Quality Management Areas, therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. |
| Impact on health; detrimental to welfare, safety and health | Policy CAS 3.2 requires no unacceptable impacts on the local community. Any proposal would need to be supported by an Environmental Impact Assessment at planning application stage. |
| Site lies within Lightshaw Water Borehole Catchment Area and could lead to contamination of water with radon gas. | Any proposal would need to be supported by an Environmental Impact Assessment at planning application stage. |
| Noise pollution | Policy CAS 3.2 requires no unacceptable noise impacts. The detailed design of the scheme will need to take account of this. |
| Road safety | The detailed design of the scheme will need to |</p>
<table>
<thead>
<tr>
<th>Concerns over house prices</th>
<th>This is not a material consideration in planning</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact on local businesses</td>
<td>The Council is unaware of any specific adverse impacts on local businesses.</td>
</tr>
<tr>
<td>Concerns over social uncertainty</td>
<td>This is not a material consideration in planning</td>
</tr>
<tr>
<td>Impact upon character of Newton; Would alter the residential nature of the town forever</td>
<td>Policy CAS 3.2 requires no unacceptable impacts on the community</td>
</tr>
</tbody>
</table>

**Disagree with need**

| Dispute evidence of need | The Council considers that the background paper sets out the latest evidence on the need for the SRFI. |

**Alternative sites are available**

| More suitable sites have been identified; availability of sites within St.Helens | There are no more suitable sites in the region or in St.Helens; this site was identified in the Regional Spatial Strategy |
| Use Deacon Trading Estate | Deacon Trading estate is not suitable for a SRFI |
| Consider Ocean Gateway Project | The Council considers that there is a need for Parkside SRFI even with other schemes in the Ocean / Atlantic Gateway area (Peel Holdings land along the Manchester Ship Canal) such as Ditton 3MG and Port Salford |

**Traffic impact**

| Traffic issues; congestion; impact of HGVS on local roads, cumulative impact of traffic congestion (new housing at Vulcan Works) | The policy requires that access to the site will be taken directly from the M6, avoiding use of traffic sensitive routes, so the impact from HGVs on local roads should be minimal. |
| Concerns over network capacity; Rail networks cannot stand the proposed traffic; The rail network, in particular the west coast line and other feeder lines will not be able to operate efficiently, due to their limited capacity. | There is no evidence of a lack of rail capacity - Network Rail have not expressed concerns over the capacity of the rail network |
| Develop Manchester Ship Canal | The Council considers that there is a need for Parkside SRFI even with other schemes in the Ocean Gateway area (Peel Holdings land along the Manchester Ship Canal) such as Ditton 3MG and Port Salford |

**Dispute benefits of the development**

<p>| Will not offer real productive employment; job density in warehouse parks are low and require little skill | There will be a range of jobs sustained and created in construction and in the operation of businesses on the SRFI. |
| Job figures do not add up | Latest job creation estimates are based on the best available information |
| Concern over the allocation of new jobs | This is not an issue that can be considered in the Core Strategy |</p>
<table>
<thead>
<tr>
<th>Concern over process</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Concern over the amount of weight afforded to public opinion; Proposal ignores the wishes of the majority of people in Newton-le-Willows.</td>
<td>The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.</td>
</tr>
</tbody>
</table>

| Disagree with the overall attitude of pre-determination of terms and policies | The policy does not pre-determine a planning application. It sets out the criteria, amongst others, which will be used to assess it. |
| Infrastructure Planning Commission should consider application | Any future planning application will go to the IPC or it’s successor |

<table>
<thead>
<tr>
<th>Doubts over viability</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding is an issue with little available for speculative commercial schemes and Network Rail cutting funding over the next 10 years</td>
<td>Viability and funding changes over time and is hard to predict and a long term view needs to be taken in the Core Strategy.</td>
</tr>
<tr>
<td>Concerns over the need for road warehousing and distribution.</td>
<td>Development is unlikely to commence without market demand</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other issues</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Land will be open to other developers should the SRFI application not go ahead.</td>
<td>Policy CAS 3.2 is clear that the site should only be used for rail freight</td>
</tr>
<tr>
<td>Impact upon neighbouring authorities</td>
<td>Policy CAS 3.2 to minimise impact on neighbouring authorities through several criteria</td>
</tr>
<tr>
<td>Doubts rail element of proposal</td>
<td>Policy CAS 3.2 requires the development to be rail related.</td>
</tr>
<tr>
<td>LDF should comply to the National Planning Policy</td>
<td>The Core Strategy policy aims to complies with National Policy – any specific issues highlighted by comments have been considered.</td>
</tr>
<tr>
<td>Concern over further development</td>
<td>There are no plans for further development beyond what is set out in the policy. Changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take.</td>
</tr>
<tr>
<td>The development of a ‘Rail Freight Terminal’ is a ‘front’ for planning purposes</td>
<td>Policy CAS 3.2 is clear that the site should only be used for rail freight</td>
</tr>
<tr>
<td>Exploitation of the existing boundary laws.</td>
<td>Any issue regarding land ownership is not a material consideration in planning</td>
</tr>
<tr>
<td>Improve Newton station</td>
<td>This is not necessary for the SRFI</td>
</tr>
<tr>
<td>Develop Parkside for housing</td>
<td>There are limited suitable sites for SRFI so it would not be logical to use the site for housing which can be located in many other locations</td>
</tr>
<tr>
<td>People who support it don't live here</td>
<td>This is not a valid planning consideration</td>
</tr>
<tr>
<td>This is illegal! Once it has gone we can't get it back.</td>
<td>This is not a valid planning consideration</td>
</tr>
<tr>
<td>Commercial development is being encouraged for greed</td>
<td>This is not a valid planning consideration</td>
</tr>
</tbody>
</table>
Policy - CAS3.2

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West
Representation ACSPUB2_14
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
Yes Yes
Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes
Summary
Concerned that wording of third paragraph of CAS3.2 requires developer to demonstrate exceptional circumstances for both east and west of M6. This requires clarification.
Summary of changes being sought
Concerned that wording of third paragraph of CAS3.2 requires developer to demonstrate exceptional circumstances for both east and west of M6.
Officer Recommendation
Partly Agree Recommend Change
Justification for Recommendation
The inconsistency in the policy is acknowledged.
Recommended Change
The inconsistency in the policy is acknowledged.
Does the representor Support/Object/Comment..
Support
Does this representation withdraw or partially withdraw a representation made at publication stage?
Partially Withdraw
Which rep? - What is the reference number of the representation affected?
CSPUB 256

Policy - CAS 3.2 redraft

Respondent 316776 Mrs Alison Holt
Representation ACSPUB2_30
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Publication; Other
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Object to Parkside development as it would have a detriment effect on surrounding neighbourhoods; the environment; landscape; wildlife; health; and lifestyles. Also object to loss of Green Belt and impact on transport network
Summary of changes being sought
Withdraw the proposal to use proposed greenbelt land for such a large scale freight development
Officer Recommendation
No Change Recommended
Justification for Recommendation
The study undertaken explores the issues of scale, need, deliverability and viability. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan.
Recommended Change
No change

Does the representor Support/Object/Comment.. 
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
<thead>
<tr>
<th>Policy -</th>
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<td>To which Part of the Core Strategy does this representation relate?</td>
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<tr>
<td>Change Ref. CSRP_FC_09_01</td>
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<tr>
<td>Legally Compliant?</td>
</tr>
<tr>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Have you raised this issue previously?</td>
</tr>
<tr>
<td>No</td>
</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
</tr>
<tr>
<td>I have only just seen it.</td>
</tr>
<tr>
<td>If you did comment previously, does the amendment address your previous concerns?</td>
</tr>
<tr>
<td>No</td>
</tr>
<tr>
<td>Summary</td>
</tr>
<tr>
<td>Concerns about traffic increase on surrounding roads, reductions in air quality, lack of mitigation measures for the Wigan area, impact on visual amenity and the Green Belt.</td>
</tr>
<tr>
<td>Summary of changes being sought</td>
</tr>
<tr>
<td>N A</td>
</tr>
<tr>
<td>Officer Recommendation</td>
</tr>
<tr>
<td>No Change Recommended</td>
</tr>
<tr>
<td>Justification for Recommendation</td>
</tr>
<tr>
<td>Given the significance of the scheme at a national and regional level, it is considered that &quot;exceptional circumstances&quot; exist in line with PPG2 and this is fully explained in the Parkside SFRI Background Paper. The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection.</td>
</tr>
<tr>
<td>Recommended Change</td>
</tr>
<tr>
<td>No change</td>
</tr>
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<td>Respondent</td>
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<td>To which Part of the Core Strategy does this representation relate?</td>
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<td>Change Ref. CSRP_FC_09_01</td>
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<td>No</td>
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<td>No</td>
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<td>If no, why did you not comment earlier?</td>
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<td>I have only just found out about the amendments</td>
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<tr>
<td>No</td>
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<tr>
<td>Summary</td>
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<tr>
<td>Respondent concerned about various issues relating to Parkside planning application, including: contrary to PPG2/loss of GB/urban sprawl/pollution/congestion/traffic/visual amenity/local heritage/agricultural land/environmental habitat/noise &amp; disruption/road freight/job displacement/other locations not considered/vibrations/drainage/QOL</td>
</tr>
<tr>
<td>Summary of changes being sought</td>
</tr>
</tbody>
</table>
Officer Recommendation
No Change Recommended

Justification for Recommendation
The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<tr>
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<td>If yes, at what stage?</td>
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<td>No</td>
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<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns?

Summary
Objects to Parkside SRFI and release of land from the green belt. Highlights environmental, lifestyle and health implications.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.32M
| Respondent | 82174 Mr Dave Tyas |
| Representation | ACSPUB2_113 |
**To which Part of the Core Strategy does this representation relate?**

Change Ref. CSRP_FC_09_01

**Legally Compliant?**

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<tr>
<th>Sound?</th>
<th>Reason why Unsound?</th>
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<td>Justified?; Effective?; Consistent with National Policy?</td>
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**Have you raised this issue previously?**

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<td>Issues and Options; Preferred Options; Publication</td>
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</table>

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**

No

**Summary**

Responder concerned that para. 9.23M is not aligned with the Parkside Background Paper/ disagree that special circumstances have already been demonstrated / need, size, function of a RFI not been justified in comparison to other operations in the NW

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Council considers that there is robust evidence in the Background Paper to support the need for a facility.

**Recommended Change**

No Change

**Does the representor Support/Object/Comment...**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

No

---

**Paragraph - 9.32D**

**Respondent** 82174 Mr Dave Tyas

**Representation** ACSPUB2_120

**To which Part of the Core Strategy does this representation relate?**

Change Ref. CSRP_FC_09_01

**Legally Compliant?**

<table>
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<tr>
<th>Sound?</th>
<th>Reason why Unsound?</th>
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<td>No</td>
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**Have you raised this issue previously?**

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<td>Issues and Options; Preferred Options; Publication</td>
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</tbody>
</table>

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**

No

**Summary**

Responder concerned that para. 9.23M is not aligned with the Parkside Background Paper/ disagree that special circumstances have already been demonstrated / need, size, function of a RFI not been justified in comparison to other operations in the NW

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Council considers that there is robust evidence in the Background Paper to support the need for a facility.

**Recommended Change**

No Change

**Does the representor Support/Object/Comment...**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

No

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**Policy - CAS 3.2**

**Respondent** 363300 Mr Simon Jenkins ProLogis

**Representation** ACSPUB2_91

**To which Part of the Core Strategy does this representation relate?**
Legally Compliant? Yes
Sound? Yes, with minor changes
Reason why Unsound?
Have you raised this issue previously? Yes
If yes, at what stage? Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? Yes, in part

Summary
Supports Policy CAS 3.2 seeking some amendments.

Summary of changes being sought
Change wording in paragraph 9.32C relating to the first phase of development to allow for the release of land on both sides of the motorway. Add "On this site" after "And demand for the facility" to the third paragraph of Policy CAS 3.2.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The wording change outlined by the Consultee fails to add anything to the policy.

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.32A
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_114
To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary
Respondent questioning source of information for para. 9.32A
Summary of changes being sought
Respondent requesting source of information for para. 9.32A to be provided
Officer Recommendation
No Change Recommended
Justification for Recommendation
This is sourced from the Background Paper and is Scott Wilson/Atkins view.
Recommended Change
No Change
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.32B
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_115
To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Summary:
Respondent concerned about misleading figures at para. 9.32B

Summary of changes being sought:

Officer Recommendation
No Change Recommended

Justification for Recommendation
The source of the data and the data range are clearly identified in the paragraph.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.26A

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_116

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent requesting clarification on Parkside's designation in 2009 at para. 9.26A

Summary of changes being sought:

Officer Recommendation
No Change Recommended

Justification for Recommendation
This was reaffirmed in NWDA Regional Sites Study of 2009.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.32A

Respondent 82174 Mr Dave Tyas
 Representation ACSPUB2_117

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?
If you did comment previously, does the amendment address your previous concerns?

No

Summary

Respondent seeking clarification on para. 9.32A

Summary of changes being sought

Officer Recommendation

Partly Agree Recommend Change

Justification for Recommendation

Greater clarity needed in relation to the type of High Cube containers being referred to and the minimum size of gauge clearance needed. International ISO Containers are built to standard dimensions. They are normally either 20' or 40' in length, 8’ wide (2.438m) and 8’6” high (2.591m). Containers might also be 45’ in length. Increasingly, deep sea traffic is carried in standard ISO containers which are 9’6” high (2.896m). These are referred to as “High Cube” containers. In addition short sea traffic often uses Pallet wide containers of 40’ or 45’ length. These containers are 2.484m externally. All of these types of standard international containers can be carried by rail in the UK. Standard 8’6” high containers can be carried on normal deck height wagons over W8 loading gauge routes. They can be carried over W7 routes on Megafret wagons which have a slightly lower deck height of 0.825m. 9’6” High Cube containers require a loading gauge of W10 for normal deck height wagons. However, High Cube containers can be carried on W8 routes on small wheeled or well type container wagons such as lowliners or pocket wagons. All routes will accept containers up to 2.5m wide which includes pallet wide containers. There is diversity in size for some short sea intra European containers. Increasing numbers are 2.55m or 2.6m wide. Containers of such width may not be carried on W10 routes on standard wagons but would require W12 gauge. Network Rail is planning the development of W12 routes for freight (Network Rail Freight RUS Section 6). In 2005, the SRA published a Gauging Policy which addressed the need for W11 and W12 loading gauges on some routes to cater for the limited but increasing use of wider intra-European containers. In September 2009, the Department for Transport published a “Strategic Rail Freight Network: The Longer Term Vision” which also endorsed the need to develop W12 loading gauge routes to cater for larger containers (Section 20.4).

Recommended Change

Change the last bullet point in Policy CAS 3.2 from “Necessary large gauge clearance within the site and for routes to the site to accept high cube containers” to “Necessary large gauge clearance (as a minimum W10 gauge) and for routes to the site to acce.

Does the representor Support/Object/Comment...

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<th>Paragraph - 9.32B</th>
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<td>If no, why did you not comment earlier?</td>
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If you did comment previously, does the amendment address your previous concerns?

No

Summary

Respondent seeking clarification on para. 9.32B

Summary of changes being sought

Officer Recommendation

No Change Recommended

Justification for Recommendation

No further comment necessary. The operation of an SRFI is a commercial business enterprise in a competitive market. Freight users would principally be attracted from road or other competing modes but the terminal might also provide a more commercially attractive option from ports and transport routes presently used by customers. An SRFI at Parkside would also compete commercially with other intermodal and road only freight terminals in the North West.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..?

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<td>Summary</td>
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<td>Respondent contests para. 9.32C</td>
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<td>Summary of changes being sought</td>
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Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment..?

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Summary
Support for use of former Parkside Colliery for Strategic Freight interchanges subject to mitigation measures to protect and enhance for Highfield Moss SSSI.

Summary of changes being sought
Mitigation measures to protect and enhance for Highfield Moss SSSI.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Any scheme that comes forward will need to satisfy the requirements of Core Strategy Policy CQL 3 which deals with the protection of species and habitats and the need for suitable mitigation measures.

Recommended Change
No change

Does the representor Support/Object/Comment..?

Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

**Paragraph - 9.32J**

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<th>Mr Dave Tyas</th>
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If you did comment previously, does the amendment address your previous concerns? No

Summary

Respondent claims the conclusions drawn in para. 9.32J and the Parkside Background Paper are flawed.

Summary of changes being sought

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Council considers that the Background Paper is robust and adequately covers all issues.

**Recommended Change**

No Change

**Does the representor Support/Object/Comment..** Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Paragraph - 9.32K**

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<th>Mr Dave Tyas</th>
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<tr>
<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns? No

Summary

Respondent questions the quoted jobs figure in para. 9.32K

Summary of changes being sought

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Core Strategy makes its own assessment of likely jobs to be created by a potential scheme. This is independent of any work by Prologis/Astral.

**Recommended Change**

No Change

**Does the representor Support/Object/Comment..** Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?
Paragraph - 9.32G

Respondent: Mr Dave Tyas
Representation: ACSPUB2_121

To which Part of the Core Strategy does this representation relate?
Change Ref.CSR_P_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent disagrees with statement in para. 9.32G and seeking clarification

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No further comment necessary. This statement remains valid. The comparative and competitive size of SRFIs is discussed in the Parkside SRFI Evidence Base Background Paper, sections 2.1, 4.2 and 5.3.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment.?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent: Mr P Sargeant
Representation: ACSPUB2_238

To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_P_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The word eventual should be removed from paragraph 4 to protect from unwanted effects and/or prejudice.

Summary of changes being sought
Rewording of paragraph 4 and removal of the word 'eventual'.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
‘Eventual’ was accidentally omitted in February 2010 but this oversight was corrected in the Amendments to Core Strategy Publication Version March 2010.

Recommended Change
Wording to be corrected in the Amendments to Core Strategy Publication Version March 2010.

Does the representor Support/Object/Comment.?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_241
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with.

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The statement of requirements need improvement.

Summary of changes being sought
Rewording of the statement of requirements.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Individual elements addressed as raised.

Recommended Change
Address elements.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2 paragraph 3

Respondent 82550 Mr Steven Broomhead Northwest Regional Development Agency
Representation ACSPUB2_205
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
Yes, with minor changes Effective?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Supports changes but proposes that wording in paragraph 3 be amended.

Summary of changes being sought

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Due to other representations made the policy has been reworded to make it clearer. The rewording will therefore likely address some of the points made but in some respects supercedes these comments.

Recommended Change
No changes

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS3.2

Respondent 316561 Miss Rachael Bust The Coal Authority
**Summary**

The Coal Authority withdraws its objection to Policy CAS 3.2 as the Council’s proposed amendment incorporates our recommended wording.

**Summary of changes being sought**

N/A

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

Comments noted

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**

CSPUB 857

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**Paragraph - CAS 3.2**

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<th>Respondent</th>
<th>81816 Mr P Sargeant</th>
<th>CSPUB2_258</th>
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If you did comment previously, does the amendment address your previous concerns?

Yes

**Summary**

The two new paragraphs after 11 contradict CSS1, in the stage at which Green Belt revision will be triggered. Both paragraphs should be deleted. Any formal amendment is best deferred indefinitely.

**Summary of changes being sought**

Deletion of the two paragraphs after point 11.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Disagree that there is a contradiction. The paragraphs explain how the site will be dealt with in future documents and will be retained.

**Recommended Change**

No change.

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**

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**Paragraph - 9.17 iA**

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<th>81816 Mr P Sargeant</th>
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If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

The two new paragraphs after 11 contradict CSS1, in the stage at which Green Belt revision will be triggered. Both paragraphs should be deleted. Any formal amendment is best deferred indefinitely.

**Summary of changes being sought**

Deletion of the two paragraphs after point 11.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Disagree that there is a contradiction. The paragraphs explain how the site will be dealt with in future documents and will be retained.

**Recommended Change**

No change.

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Withdraw

**Which rep? - What is the reference number of the representation affected?**
Change Ref. CSRP_FC_09_01

Summary
Punctuation.

Summary of changes being sought
Corrections to punctuation of 9.17 iA

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Corrections to punctuation will be picked up as minor post publication changes.

Recommended Change
Corrections to punctuation of 9.17 iA

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Policy - CAS 3.2

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_236

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant?
No

Sound?
No

Reason why Unsound?
Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes

If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.23B contains grammatical inaccuracies, and inconsistencies with references elsewhere, alternative wording suggested. Reference to percentages should be backed up by statistics.

Summary of changes being sought
Corrections to punctuation, alterations to the presentation of dates and improvement of grammar. Suggests rewording of the last sentence of the paragraph and actual figures to be cited possibly in a footnote. Calls for consistency within the text.

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Every effort will be made to remove grammatical inaccuracies as part of minor post publication changes.

Recommended Change
Correction of grammatical errors.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Legally Compliant?  Sound?  Reason why Unsound?
No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?
Yes  Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The growth in the western area from 54 to 85 ha is objectionable. It is for prospective developers to demonstrate the need.

Summary of changes being sought
Change to policy CAS 3.2 to reduce western land take to 54ha.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Council are required to set out the likely scale of the proposal envisaged. The Background Paper explains the justification for the increase in terms of need, deliverability and economic viability.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent  81816  Mr P Sargeant
Representation  ACSPUB2_237

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant?  Sound?  Reason why Unsound?
No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?
Yes  Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The requirement of 85ha in paragraph 1 is contradicted by the additional requirement of an additional 70ha in paragraph 2. Wording changes suggested to clarify meaning and set maximum site limits;

Summary of changes being sought
Change the wording of the policy CAS 3.2, amendments to paragraphs 2 and 3 and set development site limits.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Background Paper explains the justification for expansion needs. The suggested wording changes are not considered necessary. The policy must be flexible to address future requirements, to be consistent with RSS.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent  81816  Mr P Sargeant
Representation  ACSPUB2_239
Legally Compliant? | Sound? | Reason why Unsound?  
---|---|---  
No | No | Justified?; Effective?; Consistent with National Policy?  
Have you raised this issue previously? | If yes, at what stage?  
Yes | Issues and Options; Preferred Options; Publication  
If no, why did you not comment earlier?  

If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
The alteration of 'site' to 'area' in paragraph 4 should be replaced with 'these areas'  
Summary of changes being sought  
Rewording of paragraph 4 substituting words 'site' and 'area' in favour of 'these areas'.  
Officer Recommendation  
No Change Recommended  
Justification for Recommendation  
Change not considered necessary.  
Recommended Change  
No change.  
Does the representor Support/Object/Comment..  
Object  
Does this representation withdraw or partially withdraw a representation made at publication stage?  

Which rep? - What is the reference number of the representation affected?  

Policy - CAS 3.2  
Respondent | 81816 | Mr P Sargeant  
Representation | ACSPUB2_240  
To which Part of the Core Strategy does this representation relate?  
Change Ref. CSRP_FC_09_01  
Legally Compliant? | Sound? | Reason why Unsound?  
---|---|---  
No | No | Justified?; Effective?; Consistent with National Policy?  
Have you raised this issue previously? | If yes, at what stage?  
Yes | Issues and Options; Preferred Options; Publication  
If no, why did you not comment earlier?  

If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
Paragraph 5 is unclear and whilst improvements are suggested it would be best deleted as Allocation DPD has no useful role to play.  
Summary of changes being sought  
Rewording of paragraph 5 to add clarity or complete removal of the sentence.  
Officer Recommendation  
No Change Recommended  
Justification for Recommendation  
The Council must identify how the proposed development will be progressed in future documents. The A&PM DPD is an appropriate vehicle to do this based on an approved scheme.  
Recommended Change  
No change.  
Does the representor Support/Object/Comment..  
Object  
Does this representation withdraw or partially withdraw a representation made at publication stage?  

Which rep? - What is the reference number of the representation affected?  

Policy - CAS 3.2  
Respondent | 81816 | Mr P Sargeant  
Representation | ACSPUB2_242  
To which Part of the Core Strategy does this representation relate?  
Change Ref. CSRP_FC_09_01  
Legally Compliant? | Sound? | Reason why Unsound?  
---|---|---  
No | No | Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No

Summary
IA is welcome and appropriate, subject to any overall rationalisation of expression: 'Land on the western side of the M6 is developed first'

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted.

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

### Paragraph - 9.32G

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To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? | Sound? | Reason why Unsound?
No | No | Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No

Summary
9.32G Suffers from poor punctuation and ambiguities, improvements suggested. It also places undue emphasis on the need for warehouses

Summary of changes being sought
Diminish the significance placed on the need for warehousing and improve the punctuation and wording of this paragraph.

Officer Recommendation
Comment Noted

Justification for Recommendation
No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

### Paragraph - 9.32H

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To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? | Sound? | Reason why Unsound?
No | No | Justified?; Effective?; Consistent with National Policy?
9.32H Another long and poorly expressed paragraph which would benefit from merging with 9.32G, improvements suggested.

Summary of changes being sought
Rewording of paragraph 9.32H and possible merger with previous policy 9.32G along with an enhancement in grammar and punctuation.

Officer Recommendation
Comment Noted

Justification for Recommendation
Disagree. No change considered necessary as does not harm policy.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 9.32K

Respondent 81816 Mr P Sargeant

Representation ACSPUB2_283

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? No
Sound? No

Reason why Unsound? Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes

If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32K The abbreviation GVA should be explained and the number of jobs should be expressed as net or gross, as appropriate. The estimate of 7,750 does not match the figure in the Employment Background Paper.

Summary of changes being sought
Asks for abbreviations to be explained and better presentation of figures.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Comment Noted. Include Gross Value added either in text or Glossary. Check figures in Employment Background Paper and correct as necessary.

Recommended Change
Include Gross Value added in the text or Glossary and review the figures in the Employment Background Paper.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Policy - CAS 3.2

Respondent 81816 Mr P Sargeant

Representation ACSPUB2_256

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? No
Sound? No

Reason why Unsound? Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The amendment to 4 is welcome if belated.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment Noted

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Point 7 The two phase approach puts into doubt adequate screening for phase 1.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Such issues would be considered as part of a planning application.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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No

Summary
9.17A Unnecessary reliance is placed on the Parkside Background Paper, unlike the remaining Background Papers about which little is written. Is such reliance appropriate? The Soundness & Legal Self-Assessment is dated 2009, rather than 2010 and is missing from the list at paragraph 1.21.

Summary of changes being sought
Redating of the Soundness and Legal Self-Assessment paper and addition to the list at paragraph 1.21. Delete or shorten the paragraph and correct punctuation.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
The Parkside Background Paper was commissioned to assess the viability of an SRFI at Newton-le-Willows and contains evidence to justify the policy. It would be inappropriate to include such an amount of detail in the Core Strategy, therefore reference to the Background Paper is justified.

The Soundness and Legal Self-Assessment Background Paper will be redated 2010.

Recommended Change
Redate the Soundness and Legal Self-Assessment Background Paper to 2010.

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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### Paragraph - 9.21

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Have you raised this issue previously?
If yes, at what stage?
Yes
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.21 blatantly misrepresents the extent of land that is previously-developed. The amended description fails to acknowledge that land within Warrington is required for the proposed junction. This is a further reason for deferring Green Belt review.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
54ha is the accurate amount of land classed as previously developed and is recorded as such in NLUD returns. We do not have control over land in Warrington and cannot therefore deal with it.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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### Paragraph - 9.23 A

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9.23A contains grammatical errors, a reference to recent government policy is unreferenced and should be more factually worded.

Summary of changes being sought
Correct punctuation, referencing and inclusion of more facts regarding freight movement in the region of paragraph 9.23A.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comments noted. A reference or footnote will be added to reference the citation. Disagree that North West should be hyphenated.

Recommended Change
Maybe a footnote should be added to reference the citation.

Does the representor Support/Object/Comment..?
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.25-9.27

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_264

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Reference to Regional documents should clarify their status. Reference to RSS support could be condensed.

Summary of changes being sought
The SRA should be described as ‘former’ and the paragraph 9.26A could be condensed.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..?
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.32A-9.32M

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_265

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Reference to Regional documents should clarify their status. Reference to RSS support could be condensed.

Summary of changes being sought
The SRA should be described as ‘former’ and the paragraph 9.26A could be condensed.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..?
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
9.32A-9.32M References to SRFIs should be substituted by references to ‘freight terminals’ and ‘freight interchanges’, consistent with the RSS. If this were the case, the emphasis on warehouse development in these paragraphs is open to doubt.

Summary of changes being sought
Needs to have more consistency with the RSS by avoiding references to SRFIs.

Officer Recommendation
No Change Recommended

Justification for Recommendation
RSS is inaccurate in its terminology. SRFI is the accurate definition for such a development.

Recommended Change
No change.

Summary of changes being sought
9.32A contains trendy words and could be reworded to add clarity.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Paragraph - 9.32A

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_266

Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Change the wording of paragraph 9.32A.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Paragraph - 9.32B

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_267

Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Change the wording of paragraph 9.32B.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.
Yes

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32B is obscure and could be reworded to add clarity.

Summary of changes being sought
Clearer wording and alterations to the structure of the paragraph.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32C refers to other SFRI contains insufficient detail and inaccuracies. Further information could be provided. Punctuation is deficient and abbreviations should be removed.

Summary of changes being sought
An improvement in the grammar and punctuation of the paragraph and a reduction in the use of abbreviations.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<td>If no, why did you not comment earlier?</td>
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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Punctuation is deficient and abbreviations should be removed.

Summary of changes being sought
An improvement in the grammar and punctuation of the paragraph and a reduction in the use of abbreviations.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32D Errors in grammar and punctuation, together with tendentious expressions require rewording. Alternative wording suggested.

Summary of changes being sought
Change to the wording of paragraph 9.32D or possible rewording of the whole paragraph as suggested.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..

Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Paragraph - 9.32E

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_270
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32E could be construed as misleading and references to current planning application may soon be redundant, the sensible approach would appear to be deletion.

Summary of changes being sought
Calls for the deletion of paragraph 9.32E.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment..

Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Paragraph - 9.32F

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_271
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
9.32F Suggested wording changes to add clarity.

Summary of changes being sought
Change in the wording and punctuation of paragraph 9.32F and suggestion the paragraph should be deleted.

Officer Recommendation
Comment Noted

Justification for Recommendation
No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Paragraph - 9.32I

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_275

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32I contains a misuse of the term 'Parkside'. Rewording suggested.

Summary of changes being sought
Rewording of the entire paragraph 9.32I.

Officer Recommendation
Comment Noted

Justification for Recommendation
Disagree. No change recommended

Recommended Change
No change.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Paragraph - 9.32J

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_276

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
9.32J is badly worded and self-contradictory. Alternative wording suggested.

Summary of changes being sought
Change to the wording of paragraph 9.32J, minor alterations to grammar and the complete restructuring of the
second sentence.

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted. No change recommended, but correction needed to misspelling of ‘whilst’.

**Recommended Change**
No change.

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Paragraph - 9.32L**

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**If no, why did you not comment earlier?**

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

9.32L repeats statements from earlier paragraphs, and should be deleted. The paragraph shows bias for development, when it should be for developers to prove exceptional circumstances.

**Summary of changes being sought**

Deletion of paragraph 9.32L.

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted. No change recommended.

**Recommended Change**
No change.

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Paragraph - 9.33 - 9.41**

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**If no, why did you not comment earlier?**

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

9.33-9.41 contain important information and should not be deleted.

**Summary of changes being sought**

Suggests paragraphs 9.33 - 9.41 should be reinstated.

**Officer Recommendation**
Comment Noted
Justification for Recommendation
No change recommended.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that there is a lack of evidence of the need for or economic viability of a SRFI at Parkside/ no justification or need to remove any land from the Green Belt/ Core Strategy takes no account of or references to the effects that a SRFI at Parkside would have on amenity, QOL, health of nearby residents and children

Summary of changes being sought
Respondent requesting that all references to the removal of Green Belt at Parkside should be removed from the Core Strategy.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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55
If you did comment previously, does the amendment address your previous concerns?
No
Summary
9.32M repetition and should be deleted.
Summary of changes being sought
Deletion or transfer of the second part of paragraph 9.32M slightly modified to 9.32K.
Officer Recommendation
Comment Noted
Justification for Recommendation
No change recommended.
Recommended Change
No change.

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.17 ii, iii, iv
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_352
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Summary
Respondent states that para. 9.17 criteria ii, iii, iv are irrelevant.
Summary of changes being sought
Respondent proposing to delete para. 9.17 criteria ii, iii, iv
Officer Recommendation
No Change Recommended
Justification for Recommendation
Objection noted. However, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this.
Recommended Change
No change recommended
Does the representor Support/Object/Comment..?
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.2
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_353
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Summary
Respondent concerned that there is no recognition of PPG 13 para. 45 which requires freight development to be
located away from congested central areas and residential areas/ site has reverted to nature/ SRFI may operate 24 hours so may not be acceptable close to residential areas

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan.

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that it will be several years before there is sufficient demand to run a single extra train into the North West let alone construct a new major rail freight terminal

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. However, the Parkside Background Paper prepared by Scott Wilson and Atkins explores the issue of need.

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that the effect on unemployment in the Borough from the Parkside SRFI is likely to be minimal as most "new" businesses will simply be relocations/ no apparent demand for warehouses at Earlestown
Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
Objections noted. However, the Parkside Background Paper prepared by Scott Wilson and Atkins explores the Council's estimate of job creation and the issue of need.
Recommended Change
No change recommended
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 9.28
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_356
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_P_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

---

Paragraph - 9.31
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_357
To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_P_FC_09_01
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

---
Summary
Respondent concerned that Parkside SRFI will not address unemployment in Wargrave

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objections noted. However, the Parkside Background Paper prepared by Scott Wilson and Atkins explores the Council's estimate of job creation

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that Parkside site is commercially disadvantaged/ rail network is near capacity

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes. The Background Paper prepared by Scott Wilson and Atkins looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability.

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that the Parkside SRFI conflicts with PPG2’s 5 purposes of including land in the Green Belt.

Summary of changes being sought

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD.

**Recommended Change**
No change recommended

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

---

**Paragraph - 9.32K**

| Respondent | 316762 | Mr Paul Taylor |
| Rep | ACSPUB2_360 |
| To which Part of the Core Strategy does this representation relate? | Change Ref. CSR_P_09_01 |
| Legally Compliant? | Sound? | Reason why Unsound? |
| Have you raised this issue previously? | If yes, at what stage? |
| Yes | Publication |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**
Respondent concerned that the estimate of 7,750 new jobs at Parkside SRFI is unjustified

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Objections noted. However, the Parkside Background Paper prepared by Scott Wilson and Atkins explores the Council’s estimate of job creation.

**Recommended Change**
No change recommended

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2; Parkside Background Paper**

| Respondent | 82121 | Mr Michael Coleman |
| Rep | ACSPUB2_364 |
| To which Part of the Core Strategy does this representation relate? | Change Ref. CSR_P_09_01 |
| Legally Compliant? | Sound? | Reason why Unsound? |
| Have you raised this issue previously? | If yes, at what stage? |
| Yes | Preferred Options; Publication |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**
This is an identical submission as made by Mr Taylor. See summaries to the following reps: ACSPUB2_328; ACSPUB2_330; ACSPUB2_332; ACSPUB2_333; ACSPUB2_335; ACSPUB2_336; ACSPUB2_339; ACSPUB2_347; ACSPUB2_348; ACSPUB2_349; ACSPUB2_350; ACSPUB2_351; ACSPUB2_352;
Summary of changes being sought
Respondent requesting that all references to the removal of Green Belt at Parkside should be removed from the Core Strategy/ proposing to delete para. 9.17 criteria ii, iii, iv

Officer Recommendation
No Change Recommended

Justification for Recommendation
See responses to the following reps: ACSPUB2_328; ACSPUB2_330; ACSPUB2_332; ACSPUB2_333; ACSPUB2_335; ACSPUB2_336; ACSPUB2_339; ACSPUB2_347; ACSPUB2_348; ACSPUB2_349; ACSPUB2_350; ACSPUB2_351; ACSPUB2_352; ACSPUB2_353; ACSPUB2_354; ACSPUB2_355; ACSPUB2_356; ACSPUB2_357; ACSPUB2_358; ACSPUB2_359; ACSPUB2_360; ACSPUB2_361; ACSPUB2_362; ACSPUB2_363

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - Policy CAS 3.2

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
PPS5 sets out a presumption of conservation and losses of Grade II buildings require convincing justification. CAS 3.2 should interpret PPS 5 policies within the local context. The supporting text should expand on mitigation measures to address the identified harm. What agreements with developers will be required to secure preservation and enhancement of nearby heritage assets and management of potential loss.

Summary of changes being sought
Expand the explanation of mitigation measures in the justifying text.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Minor changes to supporting text only

Recommended Change
Amend justifying text as follows

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

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<td>Justified?; Effective?; Consistent with National Policy?</td>
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<td>If yes, at what stage?</td>
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<tr>
<td>Yes</td>
<td>Issues and Options; Preferred Options; Publication</td>
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61
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Criterion 2 should be more comprehensive, wording suggested.

Summary of changes being sought
Change in the wording of paragraphs 2A and 2B.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The main entrance to the development would be by a new junction on the M6 motorway. It would be unfeasible to prohibit trips to the development using the local 'A' roads as they may be locally originating trips. The nature of these roads and their local strategic importance would mean it would not be viable to look at weight restriction as they would not meet appropriate criteria for this. By citing traffic sensitive routes these are defined in both the Network Management Plan and are listed on the Street Works Register. Any Transport Assessment produced to support an application for development would be required to show that there would be no adverse effects on the local highway network, and identify appropriate measures to mitigate against these. The Core Strategy is looking a broad principle and does not focus on such detail.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

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<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
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<tr>
<td>Representation</td>
<td>ACSPUB2_244</td>
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To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02

Legally Compliant? | Sound? | Reason why Unsound? |
-------------------|--------|---------------------|
No                 | No     | Justified?; Effective?; Consistent with National Policy? |

Have you raised this issue previously? | If yes, at what stage? |
-----------------------------------------|-----------------------|
Yes                                      | Issues and Options; Preferred Options; Publication |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The use of Network Management Plan in point 2 (erroneously referred to as 3 on page 8 of the Amendments Document) is unacceptable. Insufficient information is available

Summary of changes being sought
Correct numbering and more details relating to the Network Management Plan.

Officer Recommendation
No Change Recommended

Justification for Recommendation
CAS3.2 originally included reference to A49 & A573. Representations raised concerns that A572 & A579 had been omitted. It was considered that replacement of individually named routes with ‘traffic sensitive routes identified in the NMP’ would be more comprehensive and avoid omissions.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

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<tr>
<td>Representation</td>
<td>ACSPUB2_246</td>
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To which Part of the Core Strategy does this representation relate?
Summary

A further important element is the potential narrowing of the scope of the policy. Both the A49 and A573, together with other affected roads are partly under the jurisdiction of neighbouring authorities.

Summary of changes being sought

Specify all roads connected with the site.

Officer Recommendation

No Change Recommended

Justification for Recommendation

St. Helens Council as a highways authority has no statutory control over neighbouring authorities highways. As a matter of course any planning application, which is deemed to have an impact on a neighbouring authorities highways, will be consulted on with them.

Recommended Change

No change.

Does the representor Support/Object/Comment ...

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - CAS 3.2

81816

ACSPUB2_247

Change Ref. CSR_P_09_02

Legally Compliant? Sound? Reason why Unsound?

No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?

Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary

Use of the word ‘avoiding’ would be better substituted by ‘without’ in criteria 2.

Summary of changes being sought

Rewording of the paragraph and the word ‘avoiding’ substituted for ‘without’.

Officer Recommendation

No Change Recommended

Justification for Recommendation

There may be local traffic accessing the site, which may need to use traffic sensitive route.

Recommended Change

No change.

Does the representor Support/Object/Comment ...

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Legally Compliant? | Sound? | Reason why Unsound?  
--- | --- | ---  
No | No | Justified?; Effective?; Consistent with National Policy?  
Have you raised this issue previously? | If yes, at what stage?  
Yes | Issues and Options; Preferred Options; Publication  
If no, why did you not comment earlier?  
If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
If direct access from the M6 is to be a requirement, it should not be necessary to specify roads which might otherwise be used for indirect access  
Summary of changes being sought  
Remove reference to any or every road which may be used for indirect access.  
Officer Recommendation  
No Change Recommended  
Justification for Recommendation  
The highlighting of Traffic Sensitive Routes allows a proposed developer to address how they would mitigate impact on these with their development  
Recommended Change  
No change.  
Does the representor Support/Object/Comment..  
Object  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
Which rep? - What is the reference number of the representation affected?  
Policy - CAS 3.2  
Respondent | 81816 | Mr P Sargeant  
Representation | ACSPUB2_249  
To which Part of the Core Strategy does this representation relate?  
Change Ref. CSR_P_F09_02  
Legally Compliant? | Sound? | Reason why Unsound?  
--- | --- | ---  
No | No | Justified?; Effective?; Consistent with National Policy?  
Have you raised this issue previously? | If yes, at what stage?  
Yes | Issues and Options; Preferred Options; Publication  
If no, why did you not comment earlier?  
If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
The current application proposes use of part of the A573 as an access to the site. This wording not only contradicts itself but the current proposals. Requiring HGV access from M6 may force local HGVs to use local routes through Newton-le-Willows.  
Summary of changes being sought  
Change in the wording of the policy proposing the use of a section of the A573 as access.  
Officer Recommendation  
No Change Recommended  
Justification for Recommendation  
Access from the trunk road network would be from the M6, any impact on local roads will be required to be addressed within the Transport Assessment for a planning application.  
Recommended Change  
No change.  
Does the representor Support/Object/Comment..  
Object  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
Which rep? - What is the reference number of the representation affected?
Legally Compliant?  Sound?  Reason why Unsound?
No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?
Yes  Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
How would local traffic access the site e.g. Warrington. Routes along local roads would result in a loss of residential amenity, safety and health issues.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Access either via M6 or local roads. Traffic from Warrington could access onto the M62 J9 then north on M6 to J22

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent  81816  Mr P Sargeant
Representation  ACSPUB2_251

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02

Legally Compliant?  Sound?  Reason why Unsound?
No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?
Yes  Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Vehicles from Earlestown could be expected to find the M6 by using the A49 in similar ways, heading north to Junction 23 or, alternatively, south to Junction 22

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
The trip type referred to needs to be clarified i.e. Service vehicles, freight trip or staff trips? The Transport Assessment and Transport Plan would have to examine these potential impacts.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent  81816  Mr P Sargeant
Representation  ACSPUB2_252

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02

65
Legally Compliant? | Sound? | Reason why Unsound?
---|---|---
No | No | Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Whilst vehicles from the Leigh direction have the option of using the A580 to Junction 23 they may also choose to use local roads.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
The trip type referred is unclear i.e. Service vehicles, freight trip or staff trips? The Transport Assessment and Transport Plan would have to examine these potential impacts.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent | 81816 | Mr P Sargeant
---|---|---
Representation | ACSPUB2_253

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02

Legally Compliant? | Sound? | Reason why Unsound?
---|---|---
No | No | Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The NMP was not generally available until the third week of the consultation. How, therefore, could the Council's Executive conclude this was an appropriate vehicle for this LDF purpose?

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
The Network Management Plan is a developing document by St.Helens Council. A draft plan was available on request. The Traffic Sensitive Route within this plan are listed on the Streets Work Register.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent | 81816 | Mr P Sargeant
---|---|---
Representation | ACSPUB2_255

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02
Use of local roads by non-HGV traffic appears impossible to regulate. Management measures may be effective to some extent. However, acceptability in line with point 3 needs to be assessed.

Summary of changes being sought
Review and alteration of point 3.

Officer Recommendation
No Change Recommended

Justice for Recommendation
A travel plan and transport assessment are required elements of any major development. These documents would establish whether or not appropriate trip suppression and mitigation measure were to be put in place so as to not adversely effect the highway network.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS3.2

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objects to Parkside SFRI and has commented on examples used in the Parkside Background Paper

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justice for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No Change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2

Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_333

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_09_02

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that HGVs will impact upon routes not identified as Traffic Sensitive/ does not prevent LGVs and private cars using Traffic Sensitive Routes/ ineffective HGV routing arrangements

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The main entrance to the development would be by a new junction on the M6 motorway. It would be unfeasible to prohibit trips to the development using the local 'A' roads as they may be locally originating trips. The nature of these roads and their local strategic importance would mean it would not be viable to look at weight restriction as they would not meet appropriate criteria for this. By citing traffic sensitive routes these are defined in both the Network Management Plan and are listed on the Street Works Register. Any Transport Assessment produced to support an application for development would be required to show that there would be no adverse effects on the local highway network, and identify appropriate measures to mitigate against these. The Core Strategy is looking a broad principle and does not focus on such detail.

Recommended Change
No change recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy -

Respondent 422605 MRS JOANNE OAKLEY-MYLER
Representation ACSPUB2_31

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Parkside as outlined in CAS 3.2 is unsound policy is not legally compliant.

Summary of changes being sought
n/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special"
circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**

No change required

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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**Policy - I DISAGREE WITH THE APPORACH OF THE POLICY TO PREDETERMINE THE TERMS OF REMOVAL OF GREEN BELT. THE LDF SHOULD NOT MAKE ANY CHANGES TO GREEN BELT, THE POLICY FAILS TO ADEQUATELY DEMONSTRATE EXCEPTIONAL CIRCUMSTANCES.**

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<tr>
<th>Respondent</th>
<th>422714</th>
<th>Mrs Allyson Watt</th>
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<tr>
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To which Part of the Core Strategy does this representation relate?

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?

No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?

Yes  Other

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

Objects to Parkside and release of green belt land. Policy fails to demonstrate exceptional circumstances and bypasses PPG 2.

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**

No change required

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy -**

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<th>Mr Gary Duxbury</th>
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To which Part of the Core Strategy does this representation relate?

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?

No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?  If yes, at what stage?

No  Other

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Lack of evidence of need for SFRI at Parkside; no evidence to support development of east side Other alternative competing sites exist which do not use greenbelt land or are close to residential areas. No evidence of exceptional circumstances exists Site would become a road freight distribution centre rather than a road / rail interchange Detrimental effect on quality of life and health of local residents

Summary of changes being sought
Reference to East side site should be removed from CAS 3.2 various paras of the supporting text, relating to exceptional circumstances, commercial deliverability, benefits outweighing green belt purposes should be deleted Paras relating to brownfield/contaminated land at Parkside and job creation to be amended to avoid misrepresentation

Officer Recommendation
No Change Recommended

Justification for Recommendation
Parkside Background Paper demonstrates that there may be a need to develop land to the east of the M6. However CAS 3.2 requires a potential developer to demonstrate exceptional circumstances. The policy also safeguards the primary use of the site as a rail freight interchange. The regeneration and job creation benefits of the scheme are demonstrated in the Parkside Background Paper. The paper also clearly demonstrates that there is enough demand in the North West to require the development of all the identified schemes.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

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If you did comment previously, does the amendment address your previous concerns? No

Summary
Respondent is concerned about the loss of green belt land, health concerns due to reductions in air quality, impact of large job relocations from other sites, impact on future economic development of the region

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Land will remain in the Green Belt until Allocations and Proposals Map reviews this once a scheme that meets the requirements of CAS 3.2 has been developed. Newton High Street and the M6 corridor are identified in Policy CP 1.3.ii as an Air Quality Management Area. Therefore developments which will affect air quality will be given close scrutiny by Environmental Protection when a detailed scheme is considered. The Parkside SFRI Background Paper indicates that there is likely to be substantial job creation and takes account of displacement.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?
No  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
If yes, at what stage?
Yes  Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Object to Parkside SRFI and the release of green belt land because of impacts on bio-diversity, air quality, traffic generation and job creation. Plus PAG letter

Summary of changes being sought
N/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. Plus: The policy contains criteria to mitigate adverse affect on wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper).

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

| Policy - CAS 3.2 |
|------------------|-----------------|-----------------|
| Respondent       | 81588           | Mr G McCann     |
| Representation   | ACSPUB2_53      | Croft Parish Council |

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?
Have you raised this issue previously?
If yes, at what stage?
Yes  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objects to Parkside SRFI and the release of green belt land. Policy fails to demonstrate exceptional circumstances.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals.
Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**
No change required

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Summary**
The Core Strategy in its amended form is over-prescriptive; development site should be indicated symbolically with detailed examination deferred to allocations DPD, to allow full consideration of the relative planning merits

**Summary of changes being sought**
The boundary of the development site should be shown symbolically

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The identification of a boundary seeks to provide clarity. Any developer would need to demonstrate that the scale of a proposal could be justified. The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. Full consideration would be given to the future of Newton Park Farm through details required by criterion 10 of the policy.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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<th>Policy - CAS 3.2</th>
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<td><strong>Respondent</strong></td>
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**Summary**
The Core Strategy in its amended form is over-prescriptive; development site should be indicated symbolically with detailed examination deferred to allocations DPD, to allow full consideration of the relative planning merits

**Summary of changes being sought**
The boundary of the development site should be shown symbolically

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The identification of a boundary seeks to provide clarity. Any developer would need to demonstrate that the scale of a proposal could be justified. The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. Full consideration would be given to the future of Newton Park Farm through details required by criterion 10 of the policy.
If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that the Core Strategy removing land at Parkside SRFI from Green Belt when there is a planning application pending is prejudicial in favour of the application / increased traffic on local roads.

Summary of changes being sought
Delete Policy CAS 3.2 / restore paragraphs 9.33 to 9.36.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The objections are noted. However, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper).

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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<td>Dr Helena Pimlott-Wilson</td>
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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that the amendments adversely affect the Green Belt / does not constitute 'exceptional circumstances'. Please also see PAG letter.

Summary of changes being sought
No sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object
Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent  425260  Mr Michael Durrington
Representation  ACSPUB2_66

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?
No  No

Have you raised this issue previously?  If yes, at what stage?
No  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent is concerned about the loss of green belt land, health and air quality, noise pollution, traffic congestion, impact on wildlife.

Summary of changes being sought
No reference should be made to changes in the green belt boundary

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection.

Recommended Change
Removal from the Green Belt will only occur through the Allocations and Proposals Map DPD once a scheme that meets the requirements of CAS 3.2 has been developed.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent  425358  Mr & Mrs Claire & Jason Kerner
Representation  ACSPUB2_69

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?
No  No

Have you raised this issue previously?  If yes, at what stage?
No  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Objects to Parkside SFRI.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of
planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? | Sound? | Reason why Unsound?
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Have you raised this issue previously?
Yes

If yes, at what stage?
Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about removal of land from the Green Belt/ contrary to RSS/ disregarding previous consultation objections/ does not consider effect upon neighbouring authorities/ does not take account of Omega/ does not take account of other NW development/ detrimental effect on residents/ developers undermining policy

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Public opinion is being listened to and taken account of. However the Council must balance those issues with other material considerations. The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2

Respondent 425362 Mr Andy Gaskell Construction Partnership UK LTD

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?
Not answered

If you did comment previously, does the amendment address your previous concerns?

Summary
Objects to Parkside SFRI with concerns regarding light noise pollution caused by rail traffic. Could the rail intersection be taken south west away from Newton Le Willows?

Summary of changes being sought
Rail intersection be taken out to the South West away from Newton-le-Willows.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Parkside Background Paper states that the development will use existing access points to the site. The development of new access to the southwest may be unachieveable because of the line curviture required and a the change in levels between the site and the existing rail line to the Southwest.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy -

Respondent 82887 Mr Jonathan Miller

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objects to ParksideSRFI and release of green belt land. exceptional circumstances not demonstrated raises concerns about noise and air pollution, traffic and visual intrusion.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

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<td><strong>Mr Nick Clarke</strong></td>
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<td><strong>Summary</strong></td>
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Policy - CAS 3.2

| **Respondent** | 425428 |
| **K A Hart** | |
| **Representation** | ACSPUB2_78 |
| **To which Part of the Core Strategy does this representation relate?** | Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2 |
| **Legally Compliant?** | Sound? | Reason why Unsound? |
| No | No | Justified?; Effective?; Consistent with National Policy |
| **Have you raised this issue previously?** | If yes, at what stage? |
| No | |
| **If no, why did you not comment earlier?** | Not answered |
| **If you did comment previously, does the amendment address your previous concerns?** | |

**Summary**
Respondent is concerned about greenbelt loss, increased air,noise and light pollution, traffic congestion, loss of visual amenity, environmental habitat, high grade agricultural land and local heritage due to relocation of Grade II listed buildings, job relocation rather than job creation, adverse impact on drainage and water table. Also see PAG letter.

**Summary of changes being sought**
N/a

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The Parkside SRFI Background Paper sets out the the exceptional requirements warranting an amendment to the
Green Belt to permit an SFRI. It also indicates that the development will bring a significant number of additional jobs. The policy requires suitable mitigation to address loss of visual amenity and environmental issues. The policy aims to reduce traffic impact to local residents as much as possible and control of road use would be agreed through a planning approval legal agreement. It also seeks to safeguard the future of the Newton Park Farm buildings. Also the PAG response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

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**Policy - CAS 3.2**

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<th>Respondent</th>
<th>425426</th>
<th>Ms Victoria Tarbrooke</th>
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**To which Part of the Core Strategy does this representation relate?**
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?** Sound? Reason why Unsound?

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**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**

**Summary**
Respondent concerned about various issues relating to Parkside planning application, including: contrary to PPG2/ loss of GB/ pollution/ congestion/ traffic/ visual amenity/ local heritage/ agricultural land/ environmental habitat/ noise & disruption/ road freight/ job displacement/ consider other locations/ vibrations/ drainage/ QOL

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

**Recommended Change**
No change recommended.

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

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**Policy - CAS 3.2**

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<th>Respondent</th>
<th>422056</th>
<th>Mrs Jacqueline CPRE</th>
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Johnson

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?
Sound?
Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
No

If no, why did you not comment earlier?
Not answered

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about lack of clarity about whether 'exceptional circumstances' have been proved and if so, what amount of development is permitted / 'exceptional circumstances' should only be considered as part of a planning application/ policy pre-empts a future decision

Summary of changes being sought
Policy CAS 3.2 should be amended to keep land in the Green Belt

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent  425416    Irene Sargeant
Representation  ACSPUB2_85

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?
Sound?
Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
No

If no, why did you not comment earlier?
Impenetrable forms, lack of trust in the process and I thought you would give up on this crazy scheme before now.

If you did comment previously, does the amendment address your previous concerns?

Summary
Need for Parkside SRFI not clearly demonstrated, Benefits of scheme do not outweigh loss of open land, low confidence in estimate of job creation, policy as re-drafted may allow short-term interim uses, short term unsightliness from abandonment pending redevelopment, effective screening of early phases may not be possible, Policy is not clear what will trigger release of the site from Green Belt, CAS 3.2 does not explain how the Green Belt boundary will be determined by the DPDs land should be left in green belt for foreseeable future, Removal of green belt will reduce control over proposed development. Developer just has to get permission, undertake minor work and land will be removed from Green Belt, which could then be sold on for other uses, Requiring access from M6 may cause extra road miles for local firms, Text suggests the A49 and A533 are acceptable routes, restrictions on HGVs in St Helens alone is insufficient, HGV drivers may ignore restrictions, Hard to understand HGV access controls suggested by policy without Network Management Plan, Employees travelling to the site will harm local roads; travel plans may not be enforced, premature removal from green belt, The site has landscape, recreational and wildlife value
Summary of changes being sought
Policy should state which roads can and can't be used by HGVs

Officer Recommendation
No Change Recommended

Justification for Recommendation
Likely to be substantial job creation (the council's estimate of job creation is explained in the Parkside SFRI Background Paper; policy requires significant landscape and green infrastructure enhancements to mitigate impacts. Some short term unsightliness may occur during the development process but this is not a significant enough reason to prevent development on the site. The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. Network Management Plan allows flexibility. Traffic enforcement is not an issue for planning. No where does the policy state that the A49 and A 533 are acceptable routes. Neighbouring authorities will be consulted on any application and could take measures if necessary. The provision and implementation of a travel plan is a requirement.

Recommended Change
No change

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Summary
Site characteristics deleted in paragraphs 9.33-9.38 should be reintroduced

Summary of changes being sought
Site characteristics deleted in paragraphs 9.33-9.38 should be reintroduced

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Paragraph 9.17 explains that details have been removed to the background paper, this was in the interests of brevity, however, where deleted details have not transferred to the background paper they could be reintroduced.

Recommended Change
Ensure details previous contained in 9.33-9.38 are included in the background paper.

Does the representor Support/Object/Comment...
Object

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<td><strong>Sound?</strong></td>
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<td><strong>Reason why Unsound?</strong></td>
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</table>
Summary
Objects to Parkside and the release of green belt land. Policy CAS 3.2 fails to provide evidence of exceptional circumstances.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..?
Support

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent 316358 Mr and Mrs Eric and Beryl Lowe

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Objects to Parkside SFRI and the release of green belt land.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..?
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a
Which rep? - What is the reference number of the representation affected?

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<tr>
<td><strong>Summary of changes being sought</strong></td>
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<tr>
<td><strong>Officer Recommendation</strong></td>
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</table>
| **Justification for Recommendation** | Land will remain in the Green Belt until the Allocations and Proposals Map reviews this once a scheme that meets the requirements of CAS 3.2 has been built. The Parkside SRFI Background Paper indicates that the development
will provide a range of jobs and help raise skill levels of some residents. Policy 3.2 requires that any scheme will need to avoid traffic having an unacceptable impact on residential amenity and traffic flows.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2**

| Respondent | 82482 | Mr Peter Hayes |
| Representation | ACSPUB2_57 |
| To which Part of the Core Strategy does this representation relate? | Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2 |
| Legally Compliant? | Sound? | Reason why Unsound? |
| Have you raised this issue previously? | If yes, at what stage? | Reason why Unsound? |
| Yes | Publication |
| If no, why did you not comment earlier? | |

**Summary**
Respondent is concerned about greenbelt loss

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Land will remain in the Green Belt until the Allocations and Proposals Map reviews it once a scheme that meets the requirements of CAS 3.2 has been developed.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

---

**Policy - CAS 3.2**

| Respondent | 421933 | Mr Mark Hoyle |
| Representation | ACSPUB2_59 |
| To which Part of the Core Strategy does this representation relate? | Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2 |
| Legally Compliant? | Sound? | Reason why Unsound? |
| Have you raised this issue previously? | If yes, at what stage? | Reason why Unsound? |
| No | |
| If no, why did you not comment earlier? | |

**Summary**
Respondent is concerned that Policy CAS 3.2 predetermines the removal of Green Belt and bypasses PPG2 / fails to demonstrate the case for ‘exceptional circumstances’ / preempts the contents of a potential planning application

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be
delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been
developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores
the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins
makes this quite clear. The representation made confuses the issue of "exceptional" and "very special"
circumstances contained in PPG2. The policy makes no provision for other uses and is clearly worded to promote
the use as a rail freight facility.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
See PAG letter. Objects to CAS 3.2 due to effect on protection of Green Belt boundaries; impact on health due to air
pollution and noise.

Summary of changes being sought
N/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy
makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD.
The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria
on any scheme before it is deemed appropriate. The policy has been developed completely separately from the
recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability
and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation
made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The revised CAS
3.2 policy indicates that the site be removed from the Green Belt only where a scheme meets the requirement of the
policy, which will have to take account of such issues as air quality through an Environmental Impact Assessment
which would accompany a detailed submission. Newton High Street and the M6 corridor are identified in Policy
CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given
close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which
come forward on a case by case basis.

Recommended Change
No Change Recommended

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No
Yes Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objects to CAS 3.2 due to effect on protection of Green Belt boundaries; impact on highway network; and increased air pollution.

Summary of changes being sought
The LDF should not make changes to the existing Green belt boundaries.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. Part 6 of CAS 3.2 requires all uses within the site to have the prime purpose of facilitating the movement of freight by rail. The policy requires mitigation; amenity needs to be weighed against economic / employment / wider environmental benefits from road to rail transfer. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objects to Parkside SRFI and the release of green belt. Policy fails to demonstrate exceptional circumstances.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

N/a

Which rep? - What is the reference number of the representation affected?

### Policy - CAS 3.2

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82070</th>
<th>Mr L Higgins</th>
<th>Winwick Parish Council</th>
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<tr>
<td>Representation</td>
<td>ACSPUB2_62</td>
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**To which Part of the Core Strategy does this representation relate?**

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**

Sound?

Reason why Unsound?

Have you raised this issue previously?

If yes, at what stage?

No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**

Respondent is concerned about the loss of green belt land

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Land will remain in the green belt until Allocations and Proposals Map reviews this once a scheme that meets the requirements of CAS 3.2 has been developed.

**Recommended Change**

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Which rep? - What is the reference number of the representation affected?**

### Policy - CAS3.2

<table>
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<tr>
<th>Respondent</th>
<th>82573</th>
<th>Mrs Judith Mary Beveridge</th>
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<td>Representation</td>
<td>ACSPUB2_108</td>
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**To which Part of the Core Strategy does this representation relate?**

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**

Sound?

Reason why Unsound?

Have you raised this issue previously?

If yes, at what stage?

Yes Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**

Objects to CAS 3.2 due to: affect on character of NLW, scale of development; affect on environment; presence of similar facilities elsewhere; loss of Green Belt as exceptional circumstances have not been demonstrated; jobs will be relocated not new; and it would not lead to a reduction in CO2..

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The study undertaken explores the issues of scale, need, deliverability and viability. The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a
national and regional level and the Core Strategy must reflect this. The policy requires mitigation; environmental loss needs to be weighed against economic / employment / wider environmental benefits from road to rail transfer. The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes. There is likely to be substantial job creation (the Council’s estimate of job creation is explained in the Parkside SRFI Background Paper). Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward by case by case basis.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

### Policy - CAS 3.2

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<td>Mr Dave Tyas</td>
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**To which Part of the Core Strategy does this representation relate?**
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**
Sound?
Reason why Unsound?

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If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Respondent concerned about Policy CAS 3.2 removal of land west of M6 / removal of land east of M6 if exceptional circumstances demonstrated / Para. 9.32M states exceptional circumstances have been demonstrated

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2.

**Recommended Change**
No Change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

### Policy - CAS 3.2

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**Legally Compliant?**
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Reason why Unsound?

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If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about pre-empting the decision about Green Belt around Parkside / criticises information in Parkside Background Paper drawn from the planning application

Summary of changes being sought
Respondent proposing to remove the last two lines from Policy CAS 3.2 in relation to the removal of land to the west/ east of M6 from the Green Belt

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Core Strategy needs to consider the Parkside SRFI scheme. It is a key development in shaping the future of the Borough and can therefore not be deferred solely to a planning application.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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If no, why did you not comment earlier?
Not considered necessary.

If you did comment previously, does the amendment address your previous concerns?

Summary
Support policy but suggest reiteration of provision of rail access provision prior to occupation of site and further consideration of timing of removal ofalnd from Green Belt to ensure supporting infrastructure is solely for SRFI

Summary of changes being sought
Policy CAS 3.2 should ensure rail access provision prior to occupation of site, ensuring supporting infrastructure is solely for SRFI.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Support for the policy is noted. However with regard to concerns over the timing of removal of land from the Green Belt, the policy states that such removal will only occur once the site is developed in accordance with the criteria set out.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent is concerned about the loss of green belt land, health and air quality, noise pollution, traffic congestion, impact on wildlife.

Summary of changes being sought
The Core strategy should not change green belt boundaries

Officer Recommendation
No Change Recommended

Justification for Recommendation
Policy CAS 3.2 does not change the Green Belt boundaries Land will remain in the Green Belt until the Allocations and Proposals Map reviews the boundaries once a scheme that meets the requirements of CAS 3.2 has been developed.

Recommended Change
No change

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<td><strong>Officer Recommendation</strong></td>
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<tr>
<td>No Change Recommended</td>
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<tr>
<td><strong>Justification for Recommendation</strong></td>
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<tr>
<td>Land will remain in the Green Belt until Allocations and Proposals Map reviews the boundaries once a scheme that meets the requirements of CAS 3.2 has been developed. Newton High Street and the M6 corridor are identified in Policy CP 1.3.ii as an Air Quality Management Area. Therefore developments which will affect air quality will be given close scrutiny by Environmental Protection. This aspect together with issues of impact on wildlife will be considered as part of a detailed scheme. The policy requires that any scheme will need to avoid unacceptable impact on traffic flows on the local road network.</td>
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<tr>
<td><strong>Recommended Change</strong></td>
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<tr>
<td>No change</td>
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<td><strong>Does the representor Support/Object/Comment...</strong></td>
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<td>Object</td>
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Which rep? - What is the reference number of the representation affected?

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<tr>
<th>Policy - CAS 3.2</th>
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<td><strong>Respondent</strong></td>
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</tbody>
</table>
Have you raised this issue previously?  Yes
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  No

Summary
Respondent is concerned about the loss of green belt land

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Removal from the Green Belt will only occur through the Allocations and Proposals Map DPD once a scheme that meets the requirements of CAS 3.2 has been developed

Recommended Change
No change

Object
Does the representor Support/Object/Comment on this representation?

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent 425353 Mr & Mrs David & Honor Mottram
Representation ACSPUB2_68

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?
If yes, at what stage? Preferred Options

Have you raised this issue previously? If yes, at what stage? Preferred Options
Yes
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  No

Summary
Objects to Parkside SRFI and release of Green belt land. Policy fails of demonstrate exceptional circumstances and bypasses PPG2.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment on this representation?

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

90
Policy - CAS 3.2

Respondent 83398 Joint Chairs Golborne & Lowton Township Forum

Representation ACSPUB2_75
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary

Summary of changes being sought
Objects to Parkside SRFI and release of green belt land. Policy fails to demonstrate exceptional circumstances and bypasses PPG2.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Policy CAS 3.2 does not intend to bypass PPG2. The Policy and the Background Paper set what would be required before e release from the green belt can be considered. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Policy - CAS 3.2

Respondent 317697 Mrs Barbara Astles

Representation ACSPUB2_77
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about affect of Parkside upon the historic character of Newton

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The objection is noted. However, the policy contains a criterion (4) which states that any proposal for a SRFI will need to safeguard the character and amenity of the Newton High Street and Willow Park Conservation Areas.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2

Respondent 315595 Mrs Mary Charleston
Representation ACSPUB2_79
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2
Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about impact upon the historic character of Newton/ need to preserve Green Belt
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The objection is noted. However, the policy contains a criterion (4) which states that any proposal for a SRFI will need to safeguard the character and amenity of the Newton High Street and Willow Park Conservation Areas. The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

Policy - CAS 3.2

Respondent 317701 Mr Brian Astles
Representation ACSPUB2_80
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2
Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about impact upon historic character of Newton/ air pollution
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The objection is noted. However, the policy contains a criterion (4) which states that any proposal for a SRFI will need to safeguard the character and amenity of the Newton High Street and Willow Park Conservation Areas.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2

Respondent 83053 Mr David Tarbrooke

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about various issues relating to Parkside planning application, including: contrary to PPG2/loss of GB/pollution/congestion/traffic/visual amenity/local heritage/agricultural land/environmental habitat/noise & disruption/road freight/job displacement/consider other locations/vibrations/drainage/QOL

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent 82174 Mr Dave Tyas

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about how responses had been handled by the Council

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No comments to add.

Recommended Change
No Change
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

<table>
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<tr>
<th>Respondent</th>
<th>Ms Lynn Tarbrooke</th>
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To which Part of the Core Strategy does this representation relate?

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? | Sound? | Reason why Unsound?
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<td>Justified?; Consistent with National Policy?</td>
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Have you raised this issue previously? | If yes, at what stage?
| No                           | |

If you did comment previously, does the amendment address your previous concerns?

Summary

Respondent concerned about various issues relating to Parkside planning application, including: contrary to PPG2/ loss of GB/ pollution/ congestion/ traffic/ visual amenity/ local heritage/ agricultural land/ environmental habitat/ noise & disruption/ road freight/ job displacement/ consider other locations/ vibrations/ drainage/ QOL

Summary of changes being sought

Officer Recommendation

No Change Recommended

Justification for Recommendation

The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change

No change recommended.

Does the representor Support/Object/Comment..

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Mr Terry Redding</th>
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<tbody>
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<td>Representation</td>
<td>ACSPUB2_127</td>
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To which Part of the Core Strategy does this representation relate?

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? | Sound? | Reason why Unsound?
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</table>

Have you raised this issue previously? | If yes, at what stage?
| Yes                           | |

If you did comment previously, does the amendment address your previous concerns?

Summary

Objects to removal of land from Green Belt; the proposal fails to demonstrate exceptional circumstances; impact on residential amenity; traffic congestion; noise and air pollution; loss of green space; increase access by HGVs; and
lack of regard for public opinion.

**Summary of changes being sought**
Amend CAS 3.2 to protect and retain the green belt

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

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<tr>
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<tr>
<td>Respondent</td>
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<td>Representation</td>
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</table>

**To which Part of the Core Strategy does this representation relate?**
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**
Yes

**Sound?**
If yes, at what stage?
Preferred Options; Publication

**Reason why Unsound?**
If no, why did you not comment earlier?

**If you did comment previously, does the amendment address your previous concerns?**

**Summary**
See PAG letter, plus: removal of land from the Green Belt/ 'exceptional circumstances'/ views of local community not being given sufficient weight/ health impact and air quality issues

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. The policy contains a criterion to mitigate adverse affect on air quality. The concerns raised by people have led to the policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core
Strategy must reflect this. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper).

**Recommended Change**

No change recommended.

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2**

<table>
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<tr>
<th>Respondent</th>
<th>425710</th>
<th>Mr &amp; Mrs Richard &amp; Suzanne Holbrook</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_86</td>
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**To which Part of the Core Strategy does this representation relate?**

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**  Yes

**Sound?**  No

**Reason why Unsound?**  Justified?; Effective?

**Have you raised this issue previously?**  No

**If yes, at what stage?**

---

**Summary**

Objects to Parkside and the release of green belt land. Highlights inconsistencies between the Core Strategy Policy and information released by Prologis. Also raises concerns with the policy justification and traffic.

**Summary of changes being sought**

Consultee has asked for several points of clarification including plans for dealing with the additional traffic, how need has been demonstrated, why proposal outlined in the Core Strategy and by Prologis are different.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**

No change required

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2**

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<tr>
<th>Respondent</th>
<th>425668</th>
<th>Mr David Hull</th>
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<tr>
<td>Representation</td>
<td>ACSPUB2_92</td>
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</table>

**To which Part of the Core Strategy does this representation relate?**

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

**Legally Compliant?**  Yes

**Sound?**  Yes, with minor changes

**Reason why Unsound?**

**Have you raised this issue previously?**  No

**If yes, at what stage?**

---

**Summary**

It seemed mired and directionless

If you did comment previously, does the amendment address your previous concerns?
Respondent supports the principles of sustainable transport and the use of the Parkside site for a road-rail interchange, subject to mitigating measures.

**Summary of changes being sought**

Include mitigating measures with the policy.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Policy 3.2 requires that any development should implement appropriate mitigation measures.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

**Summary**

Concerned regarding traffic impact on local roads and concerns in PAG letter see standard letter.

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The provision and implementation of a Travel plan is a requirement. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

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<tr>
<td>Justified?; Effective?; Consistent with National Policy?</td>
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</table>
Yes Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary
Objects to CAS 3.2 due to effect on Green Belt boundaries. See PAG letter.

Summary of changes being sought
The LDF should make no changes to the existing Green Belt boundaries

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility

Recommended Change
No change recommended

Does this representation relate to a development that is currently being considered?

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Policy - CAS3.2

Respondent 82997 Mr Alan Beveridge

Representation ACSPUB2_103

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary
Objects to CAS 3.2 due to effect on Green Belt as exceptional circumstances have not been demonstrated; and affect on quality of life for resident.

Summary of changes being sought
LDF should make no changes to Green Belt boundaries

Officer Recommendation
No Change Recommended

Justification for Recommendation
Policy CAS 3.2 requires mitigation for the effects of development at the site. The land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2.

Recommended Change
No change

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
**Policy - CAS 3.2; CSS1**

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<th>Respondent</th>
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<th>Mr Dave Tyas</th>
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<td>Legally Compliant?</td>
<td>Sound?</td>
<td>Reason why Unsound?</td>
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<td>If no, why did you not comment earlier?</td>
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If you did comment previously, does the amendment address your previous concerns? No

**Summary**

Respondent concerned about Policy CAS 3.2 and CSS1 in relation to Parkside / concerns set out in a number of comments handled separately

**Summary of changes being sought**

Respondent requesting revision or removal of amendments

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

It is felt that the proposed policy wording and the Parkside Background Paper adequately deal with these issues.

**Recommended Change**

It is felt that the proposed policy wording and the Parkside Background Paper adequately deal with these issues.

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Which rep? - What is the reference number of the representation affected?**

---

**Policy - CAS 3.2**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82399</th>
<th>Mr Peter Franzen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_123</td>
<td>Wigan Council</td>
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<td>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2</td>
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<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
<td>Reason why Unsound?</td>
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<td>Justified?; Effective?; Consistent with National Policy?</td>
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<tr>
<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
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<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns? No

**Summary**

Objects to removal of land from Green Belt; impact on local wildlife; and affect on air quality. Proposals to upgrade NLW station should be implemented independently.

**Summary of changes being sought**

Protect all Green Belt Boundaries

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Object

Does the representor Support/Object/Comment..

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Which rep? - What is the reference number of the representation affected?**

---
Respondent 426510 Mrs K E Wright
Representation ACSPUB2_126
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2
Legally Compliant? Yes
Sound? Yes
Reason why Unsound?
Have you raised this issue previously? No
If yes, at what stage? Publication
If no, why did you not comment earlier?
Not answered
If you did comment previously, does the amendment address your previous concerns? No

Summary
Respondent concerned about various issues relating to Parkside planning application, including: contrary to PPG2/ loss of GB/ pollution/ congestion/ traffic/ visual amenity/ local heritage/ agricultural land/ environmental habitat/ noise & disruption/ road freight/ job displacement/ consider other locations/ vibrations/ drainage/ QOL

Summary of changes being sought
N/a

Officer Recommendation
No Change Recommended

Justification for Recommendation
The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy’s requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council’s estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent 82498 Mr Richard Ward
Representation ACSPUB2_215
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2
Legally Compliant? Yes
Sound? Yes
Reason why Unsound? Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? No
If yes, at what stage?
If no, why did you not comment earlier?
No Publication

If you did comment previously, does the amendment address your previous concerns? No

Summary
Policy CAS 3.2 does not comply with EU Directives. The policy by its content is in effect a planning application for a Strategic Rail Freight Interchange. It undermines green belt policy and does not demonstrate exceptional circumstances. A full EIA is required

Summary of changes being sought
Submit policy to the IPC for a decision or remove the policy from the Core Strategy

Officer Recommendation
No Change Recommended

Justification for Recommendation
CAS 3.2 is a strategic planning policy and not a planning application and therefore it is not an appropriate matter to be dealt with by the IPC. The Parkside site has been broadly identified in Policy RT 8 of the North West of England
Plan to 2021(RSS), as a suitable site for a inter-modal freight terminal. Policy CAS 3.2 is required to facilitate Parkside’s locational advantages, explain the need for the site release and identify an appropriate scale of development and appropriate phasing of land release, whilst ensuring that transport and environmental impacts are fully considered. There seems to have been a misrepresentation of the regulations. The assessment of the Core Strategy is only required to demonstrate compliance with the SEA Directive 2001/42/EC not the EIA Directive which applies to development planning applications at the project level. Annex I and II of EU 97/11/EC will be applicable at application stage. EIA will be undertaken as part of a planning application.

Recommended Change

Does the representor Support/Object/Comment.. 
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
<thead>
<tr>
<th>Policy - CAS 3.2</th>
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<tr>
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<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
On what legal basis is the public being asked to comment on policy CAS 3.2

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 require the Local Planning Authority to consult with the public on its draft planning policies

Recommended Change

Does the representor Support/Object/Comment.. 
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
<thead>
<tr>
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<tr>
<td>If no, why did you not comment earlier?</td>
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</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
The Core Strategy Parkside Plan is shown as a definitive plan, therefore any application deviating from this plan requires a fresh application.

Summary of changes being sought

Officer Recommendation
No Change Recommended

**Justification for Recommendation**

The diagram shown with policy CAS 3.2 is not a definitive plan. It is an indicative diagram of a potential scheme and its main purpose is to indicate the principles of development and the likely scale. CAS 3.2 is a strategic planning policy and is not concerned with the specifics of planning applications.

**Recommended Change**

Does the representor Support/Object/Comment...

Support

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

---

### Paragraph - CAS 3.2 paragraph 2

<table>
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<tr>
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<th>82550</th>
<th>Mr Steven Broomhead</th>
<th>Northwest Regional Development Agency</th>
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<td>If yes, at what stage?</td>
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If you did comment previously, does the amendment address your previous concerns?

**Summary**

Supports but recommends that either the word "approximately" or "no more than" is deleted.

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Council considers that its assessment of likely scale only explores the strategic principles and therefore the approximate scale of such a development. It would be unreasonably to strictly specify at this stage the exact site size.

**Recommended Change**

No change recommended

Does the representor Support/Object/Comment...

Support

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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### Diagram/Table - CAS 3.2 Diagram SFRI site

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82550</th>
<th>Mr Steven Broomhead</th>
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<td>If yes, at what stage?</td>
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</tbody>
</table>

If no, why did you not comment earlier?

Equivalent diagram in Publication Draft Core Strategy did not show extent of Parkside West and Parkside East

If you did comment previously, does the amendment address your previous concerns?

**Summary**

Supports but recommends that part of the development will be located in Warrington should be stated.

**Summary of changes being sought**

Identify that part of the site is within Warrington.

**Officer Recommendation**
No change recommended

**Justification for Recommendation**

The plan is intended to show the effect of the policy for land within St.Helens administrative boundary. A footnote is not considered necessary.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Paragraph - CAS 3.2 last two paragraphs**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82550 Mr Steven Broomhead</th>
<th>Northwest Regional Development Agency</th>
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<tbody>
<tr>
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<td>Policy wording to which this particular point relates did not appear earlier.</td>
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<tr>
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</table>

**Summary**

Supports but recommends that the last two paragraphs are deleted.

**Summary of changes being sought**

Recommends that the last two paragraphs are deleted.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Council considers important to specify the trigger points for Green Belt removal as these are not picked up with sufficient strength elsewhere in the Core Strategy. Due to other representations received the policy has been reworded in any event which supercedes these comments.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

---

**Policy - CAS 3.2**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82498 Mr Richard Ward</th>
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<tbody>
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<td>Representation</td>
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<td>Yes</td>
<td>Publication</td>
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<tr>
<td><strong>If no, why did you not comment earlier?</strong></td>
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</table>

If you did comment previously, does the amendment address your previous concerns?

No

**Summary**

CAS 3.2 does not take account of government policies to encourage the move towards zero carbon buildings through efficiency measures and renewable energy technology.

**Summary of changes being sought**

Officer Recommendation
No Change Recommended

Policy CAS 3.2 (8) make specific reference to the need to minimise environmental impacts and contribute to sustainable development. Including measures to encourage energy generation from renewable means and energy efficiency. Elsewhere in the Core Strategy, Policy CP1 (4) sets out targets for energy efficiency and renewable energy for new developments.

Recommended Change

Does the representor Support/Object/Comment...
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent: Mr Paul Taylor

Representation: ACSPUB2_328

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
Yes  Publication

If no, why did you not comment earlier?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent: Mr Paul Taylor

Representation: ACSPUB2_336

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2

Legally Compliant?  Sound?  Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
Yes  Publication

If no, why did you not comment earlier?

Summary
Respondent concerned that Policy CAS 3.2 predetermines the removal of Green Belt at Parkside/ bypasses PPG2/ fails to demonstrate 'exceptional circumstances'/ preempts the contents of a potential planning application/ no guarantee that the site will be used as a SRFI

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that the local road network is congested/ LGVs and cars would not be controlled so would harm local roads/ HGV routing agreements likely to continue to be mounted

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The main entrance to the development would be by a new junction on the M6 motorway. It would be unfeasible to prohibit trips to the development using the local ‘A’ roads as they may be locally originating trips. The nature of these roads and their local strategic importance would mean it would not be viable to look at weight restriction as they would not meet appropriate criteria for this. Any Transport Assessment produced to support an application for development would be required to show that there would be no adverse effects on the local highway network, and identify appropriate measures to mitigate against these. The Core Strategy is looking a broad principle and does not focus on such detail.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
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<tr>
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<td>Respondent</td>
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<tr>
<td>Mrs Olive Walkden</td>
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<td>Legally Compliant?</td>
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<td>Have you raised this issue previously?</td>
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<tr>
<td>Yes</td>
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<tr>
<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns?

Summary
Objects to Parkside SRFI on the basis of increased pollution and traffic congestion.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
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<tr>
<th>Policy - CAS3.2</th>
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<tr>
<td>Respondent</td>
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<tr>
<td>Mr Derek Walkden</td>
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Representation |  ACSPUB2_346        
To which Part of the Core Strategy does this representation relate? 
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2 
Legally Compliant? |  Sound? |  Reason why Unsound? 
Have you raised this issue previously? |  If yes, at what stage? |  Reason why Unsound? 
Yes |  Preferred Options; Publication 
If no, why did you not comment earlier? 
If you did comment previously, does the amendment address your previous concerns? 

Summary 
Objects to Parkside SRFI on the basis of increased pollution and traffic congestion. 

Summary of changes being sought 

Officer Recommendation 
No Change Recommended 

Justification for Recommendation 
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility. 

Recommended Change 
No change required 

Does the representor Support/Object/Comment.. 
Object 

Does this representation withdraw or partially withdraw a representation made at publication stage? 

Which rep? - What is the reference number of the representation affected? 

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Representation |  ACSPUB2_347        
To which Part of the Core Strategy does this representation relate? 
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2 
Legally Compliant? |  Sound? |  Reason why Unsound? 
Have you raised this issue previously? |  If yes, at what stage? |  Reason why Unsound? 
Yes |  Publication 
If no, why did you not comment earlier? 
If you did comment previously, does the amendment address your previous concerns? 

Summary 
Respondent concerned about the noise impact of vehicles 

Summary of changes being sought 

Officer Recommendation 
No Change Recommended 

Justification for Recommendation 
Objection noted. However, Policy CAS 3.2 criterion 5 aims to mitigate unacceptable noise impact on local residents. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. 

Recommended Change 
No change recommended. 

Does the representor Support/Object/Comment.. 
Object 

Does this representation withdraw or partially withdraw a representation made at publication stage? 

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_348
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that no guarantee that the prime purpose of the Parkside SRFI will be road to rail, rather than road-road

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. However, the policy makes no provision for other uses as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2
Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_351
To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery  Policy CAS 3.2
Legally Compliant? Sound? Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that it is unclear how environmental assets can be positively managed

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. However, Policy CAS 3.2 criterion 9 aims to mitigate adverse effect on environmental impact. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Policy - CAS 3.2; para. 9.23

Respondent 82576 Mr Sidney Keith Connah

Representation ACSPUB2_325

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that Policy CAS 3.2 predetermines the removal of Green Belt at Parkside/ bypasses PPG2/ fails to demonstrate ’exceptional circumstances’/ preempts the contents of a potential planning application/ no guarantee that the site will be used as a SRFI

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy makes no provision for other uses such as waste as mentioned in the response and is clearly worded to promote the use as a rail freight facility.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

Respondent 81816 Mr P Sargeant

Representation ACSPUB2_365

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
There are inconsistencies in the site areas used in the background paper and policy CAS3.2. This has administrative, jurisdictional and clarity implications. Modifications to correct errors should be subject to consultation.

Summary of changes being sought
Clarify the land take of the proposed development and make an agreement on the full extent of the operational area.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
The Core Strategy is intended to deal with principles and likely scale matters rather than precise boundaries. However, as indicated text at 10.3.3 and the diagrams at 12.2.1 and 12.2.3 are unclear and will be rectified at Submission.
Recommended Change
The text at 10.3.3 and diagrams at 12.2.1 and 12.2.3 are to be modified at Submission.

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
CAS 3.2 should be modified to provide for a buffer zone. Wording suggested.

Summary of changes being sought
Calls for more emphasis to be placed on the development of buffer zones, rewording of the first paragraph of CAS 3.2 and a more accurate description of the proposed development site.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Criteria in the policy require certain issues to be addressed e.g. 5, 7, 9 - buffers would assist to deliver these. However, given the importance of these, it is agreed that buffers be referred to directly and will be added into criteria.

Recommended Change
Make reference to buffers and add into criteria.

Does the representor Support/Object/Comment...
Object

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Traffic counts being undertaken may give misleading results as airport traffic is currently diminished. Employment creation figures are inflated and should more realistically be revised down to around 4,000 net. Additional wording should be added to clarify that business and retail park development is forbidden. Wording suggested.

Summary of changes being sought
Requests the projected number of jobs arising from the development is revised along with the volume of traffic on surrounding roads and the addition of a new paragraph forbidding the development of business and retail on the site.

Officer Recommendation
No Change Recommended

**Justification for Recommendation**
The employment generation ability of the SRFI can only be an estimate as it would be dependent on the final configuration of the development submitted for consideration and the end users. There is, therefore, no need to revise. It is not appropriate to highlight one unacceptable use amongst others that would also be considered unacceptable.

**Recommended Change**
No change.

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2**

| Respondent | 316762 | Mr Paul Taylor |
| Representation | ACSPUB2_335 |

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**
Respondent concerned that no evidence is presented that a viable (ie economically successful) facility is required and would not lead to an excess of capacity for warehousing in the North West/ Council should not judge viability or suitability of the site as it pre-judges a planning application

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Objection noted. However, the policy has been developed completely separately from the recent proposed scheme and looks at a "dummy" scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear.

**Recommended Change**
No change recommended.

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Policy - CAS 3.2**

| Respondent | 432539 | Mrs Jacqueline Lester |
| Representation | ACSPUB2_337 |

To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

**Summary**
Council is ignoring public opinion and objections from neighbouring Councils Existing traffic congestion would be exacerbated Extra traffic will lead to additional air pollution

**Summary of changes being sought**
Officer Recommendation
No Change Recommended

Justification for Recommendation
Newton High Street and the M6 corridor are identified in Policy CP 1.3.ii as an Air Quality Management Area. Therefore developments which affect air quality will be given close scrutiny by Environmental Protection. When a detailed scheme is considered, Public opinion is being listened to and taken account of. However the council must balance those issues with other material considerations. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about traffic impact on the character and amenity of the High Street Conservation Areas and on air quality impact and health

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. However, the policy aims to mitigate any adverse effects on the Newton High Street and Willow Park Conservation Areas and also air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
Summary
Respondent concerned about air quality and health

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Objection noted. However, this criterion aims to mitigate the adverse effect on air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

<table>
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<tr>
<th>Respondent</th>
<th>438579</th>
<th>Ms Andrea Winders</th>
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To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? | Sound? | Reason why Unsound?
---|---|---

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?
Not answered

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent is concerned about predetermining the release of Green Belt/ does not constitute 'exceptional circumstances'/ traffic issues/ impact upon local residents/ QOL/ disputes jobs figures/ environmental impact

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The representation confused the issue of "exceptional" and "very special" circumstances contained in PPG2. The policy contains criteria to mitigate adverse affect on residential amenity and environmental impact. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. Highway concerns are addressed by the policy's requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council's estimate of job creation is explained in the Parkside SRFI Background Paper). The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CAS 3.2

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<th>316762</th>
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Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that Parkside SRFI will result in the loss of productive agricultural land

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
It is accepted that only part of the site is brownfield. The Parkside Background Paper accepts that the site has elements of both brownfield and greenfield land and confirms that the brownfield element is the area of the former colliery.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that Policy CAS 3.2 and the Parkside SRFI Background Paper are contrary to Government's Green Book

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Government's Green Book does not apply to Local Planning Authorities.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

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To which Part of the Core Strategy does this representation relate?
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery Policy CAS 3.2
Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes

If no, why did you not comment earlier?
Preferred Options; Publication

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned about Policy CAS 3.2 and Parkside's impact upon jobs, traffic environmental damage/ does not demonstrate Green Belt exceptional circumstances/ predetermines a planning application/ adds to anxiety of local people/ out of sympathy with surrounding area/ purpose of Green Belt will be lost/ massive loss of precious countryside/ loss of grade 2 agricultural land/ not brownfield/ plant and animal life/ site in midst of established residential areas/ site should benefit local community/ noise, pollution, traffic/ area has sufficient development and jobs/ M6 and M62 congested/ disputes job figures/ how does it secure jobs for local people?/ alternative sites in NW/ impact on QOL and health.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The response is inaccurate as the land will not automatically be removed from the Green Belt on the granting of planning permission - the policy makes it quite clear that this can only be done through a change to the Proposals Map through the Allocations DPD. The policy clearly sets out the situations when and how a scheme could be delivered and places a range of criteria on any scheme before it is deemed appropriate. The policy has been developed completely separately from the recent proposed scheme and looks at a “dummy” scheme which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by Scott Wilson and Atkins makes this quite clear. The representation made confuses the issue of “exceptional” and “very special” circumstances contained in PPG2. The policy contains criteria to mitigate adverse affect on residential amenity, environmental impact, wildlife and air quality. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The objections are noted however, the scheme is given significant status at a national and regional level and the Core Strategy must reflect this. Highway concerns are addressed by the policy’s requirement for provision and implementation of a Travel plan. There is likely to be substantial job creation (the Council’s estimate of job creation is explained in the Parkside SRFI Background Paper). The Council are aware of the presence of alternative schemes, however there is enough demand in the North West to require the development of all identified schemes.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
The policy contains criteria to mitigate adverse effect on environmental impact. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible.

**Recommended Change**
No change recommended.

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

### Parkside Background Paper -

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<th>82174</th>
<th>Mr Dave Tyas</th>
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<td>Representation</td>
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**To which Part of the Core Strategy does this representation relate?**
Parkside Background Paper

**Legally Compliant?**
Sound?
Reason why Unsound?

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**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**
No

**Summary**
Respondent concerned the background paper is biased towards the developer / mixes bulk and non bulk data to confuse the reader / does not mention 'short sea' containers / Trans-Pennine routes are not gauge cleared / confused about electrification for the Liverpool-Manchester line / few environmental impacts discussed / does not prove that additional freight demand exists / does not consider potential of NW ports / subjectively justifies special circumstances for removal of GB / omits PPS7 and Grade 2 Agricultural land / no data on growth and uptake of West lead development

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The Background Paper has been prepared as core evidence to support the Councils position on the development of an SRFI at Parkside. It is not promoting a particular developer merely the principles of such a development.

**Recommended Change**
No Change

**Does the representor Support/Object/Comment..**
Object

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**Which rep? - What is the reference number of the representation affected?**

### Parkside Background Paper -

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Parkside Background Paper

**Legally Compliant?**
Sound?
Reason why Unsound?

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**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**
No

**Summary**
Respondent concerned about inconsistent job numbers - how does TP47 relate to the Background Paper or latest Prologis publication? / quoting aspects of the planning application is erroneous and reasoning is unsound
Summary of changes being sought
Respondent proposing that the background paper and Core Strategy should take a more generic approach

Officer Recommendation
No Change Recommended

Justification for Recommendation
The application for the site clearly contains a lot of information which is required to inform the Core Strategy. It is therefore appropriate to use such information. Scott Wilson/Atkins have discussed highways matters with Highways Agency.

Recommended Change
No Change

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Object

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that PPG2's 5 criteria cannot be assessed when the scale and nature of the development has not yet been determined / unsound to make a decision on special circumstances without all the information

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The potential scale and nature of the development are clearly identified in Policy CAS 3.2 and explored further in the Background Paper.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that the maximum scenario (east/west) is the only viable option, but in RailTrack in 2001
stated west was viable - therefore this argument is flawed and unsound / pre-empting the case as part of planning policy is unsound

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Previous scheme 9 years ago, therefore different economic and financial climate.

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

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**Summary**
Respondent doubting the case for rail freight over short distances

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The SRFI would have a much wider role and be in receive of goods from international sources.

**Recommended Change**
No Change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Summary**
Respondent concerned that a revised plan is to be put forward by Prologis / exceptional circumstances cannot be assessed until considered by planning committee or public inquiry

**Summary of changes being sought**
Officer Recommendation
No Change Recommended

Justification for Recommendation
The 2006 application has not been formally withdrawn and is therefore a material piece of information. PPG2 clearly outlines 'exceptional circumstances' is required to be demonstrated for changes to Green Belt in a development plan, whereas it is 'very special circumstances' for a planning application.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that SRFIs are not recommended to be sited adjacent to residential areas or congested central areas

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about wording in this statement

Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment..

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 4.1.8

Respondent 82174 Mr Dave Tyas

Representation ACSPUB2_155

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent claims statement is subjective

Summary of changes being sought

---

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation

The "Implementing DaSTS and the North West Regional Strategy" was published in January 2010. However, following the Coalition Government's announcement to abolish Regional Leaders Boards, work on the remaining studies (1-6), led by 4NW, has halted. Notwithstanding this, Phase 1 studies have been published and can be viewed on the 4NW archive website. The Parkside Background Paper will be updated to reflect this.

Recommended Change

The Parkside Background Paper will be updated to reflect that work on these studies by 4NW has halted.

Does the representor Support/Object/Comment..

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Parkside Background Paper -

Respondent 82174 Mr Dave Tyas

Representation ACSPUB2_130

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that the background paper uses data from previous Astral application / data does not match information from Prologis e.g. lower job numbers and warehouse footprints / using metrics from a planning application is erroneous

Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
The application for the site clearly contains a lot of information which is required to inform the Core Strategy. It is therefore appropriate to use such information. Scott Wilson/Atkins have discussed highways matters with Highways Agency.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that land west of M6 is not brownfield and has returned to its natural state / land east of M6 is Grade 2 Agricultural and is not brownfield

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No comment

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that land east of M6 is Grade 2 Agricultural land

Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
Taken account of in Sustainability Appraisal. Also the demonstrable need for the scheme outweighs agricultural land classification.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned the claim that special circumstances have been demonstrated is unsound because: scale, function, character is currently indeterminate / EIA has not been assessed and approved / approx. 50% of the land is Grade 2 Agricultural land

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Confusion between exceptional and very special circumstances, scale etc. clearly covered in Policy CAS 3.2, Background Paper and Sustainability Appraisal.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent doubts the need for the east when the east/west scheme would deliver 5x St.Helens' warehouse needs / questions why there is a need for more than double the requirement at Parkside in the maximum scale scenario

Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
This is a regional/subregional facility therefore not just St.Helens needs.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? | Sound? | Reason why Unsound? |
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Have you raised this issue previously?
If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that there is not a credible strategy for non-bulk rail freight in the NW / questions evidence that level of warehousing for Parkside is required and will be used for rail purposes

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Background Paper clearly identifies the regional need for such facilities and provides evidence of how Parkside fits into meeting the need.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? | Sound? | Reason why Unsound? |
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Have you raised this issue previously?
If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about Parkside’s simplistic designation as a strategic site without consideration of other factors

Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
Parkside is in a unique strategic location on 2 rail lines (WCML and Liverpool to Manchester), the M6 and in close proximity to M62. The Strategic Environmental Assessment/Sustainability Appraisal has assessed impacts of such an allocation and appropriate mitigation has been built into policy.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning whether figures include bulk freight

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The paragraph states the growth figures in this paragraph 4.3.4 relate to all freight volumes, this would include bulk freight.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned that carbon savings can only be assessed once site metrics are known and validated

Summary of changes being sought

Officer Recommendation
Officer Recommendation
Partly Agree Recommend Change

A summary of the changes to the rail freight market is included in chapter 4.3 of the Background Paper. This statement quotes from the SRA's Freight Strategy published in 2001. In reality, freight on rail has grown 60% in the 10 years between 1995 and 2005. Network Rail's recent commentary states that rail freight demand is expected to grow by at least 30% over the next decade and by as much as 140% over the next 30 years.

Recommended Change
Add footnote.

Officer Recommendation
Partly Agree Recommend Change

A summary of the changes to the rail freight market is included in chapter 4.3 of the Background Paper. This statement quotes from the SRA's Freight Strategy published in 2001. In reality, freight on rail has grown 60% in the 10 years between 1995 and 2005. Network Rail's recent commentary states that rail freight demand is expected to grow by at least 30% over the next decade and by as much as 140% over the next 30 years.

Recommended Change
Add footnote.

Officer Recommendation
Partly Agree Recommend Change

A summary of the changes to the rail freight market is included in chapter 4.3 of the Background Paper. This statement quotes from the SRA's Freight Strategy published in 2001. In reality, freight on rail has grown 60% in the 10 years between 1995 and 2005. Network Rail's recent commentary states that rail freight demand is expected to grow by at least 30% over the next decade and by as much as 140% over the next 30 years.

Recommended Change
Add footnote.

Officer Recommendation
Partly Agree Recommend Change

A summary of the changes to the rail freight market is included in chapter 4.3 of the Background Paper. This statement quotes from the SRA's Freight Strategy published in 2001. In reality, freight on rail has grown 60% in the 10 years between 1995 and 2005. Network Rail's recent commentary states that rail freight demand is expected to grow by at least 30% over the next decade and by as much as 140% over the next 30 years.

Recommended Change
Add footnote.
No Change Recommended

**Justification for Recommendation**

Background Paper comment remains valid. The SRA SRFI Policy took into account the number of known development proposals at the time in the North West, including the expansion of Ditton, Port Salford and Parkside (see Background Paper Section 4.4.5).

**Recommended Change**

No change recommended.

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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**Paragraph - 4.5.3**

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Have you raised this issue previously?

If yes, at what stage?

Yes | Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

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**Paragraph - 3.2.22**

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To which Part of the Core Strategy does this representation relate?

Parkside Background Paper

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Have you raised this issue previously?

If yes, at what stage?

Yes | Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

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**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Gross Valued Added (GVA) per head measures the contribution to the UK economy of each individual, and is therefore considered to be a relevant indicator to use to indicate the current economic output of St. Helens. The development of a SRFI at Parkside (including the maximum scale scenario) will make a substantial contribution to economic development and employment creation, delivering significant additional GVA to the regional economy. Table 3.1 on page 19 of the Background Paper is taken from the Liverpool SuperPort Economic Trends Study (2009) and indicates that a SRFI at Parkside could provide an estimated 10,702 additional jobs and generate £360m. Based on the figures in table 3.1 one could argue that if the maximum scale scenario was to generate 7,750 jobs (as calculated on page 52 of the Background Paper) this would be likely to have a significant positive impact on regional GVA, generating at least £150-£200m additional GVA.

**Recommended Change**

No change recommended.

**Does the representor Support/Object/Comment..**

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about suitability of Manchester-Liverpool line

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
It is understood that the upgrading of the Liverpool to Manchester line to W10 will occur through the recently announced electrification programme

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent seeking clarification on this statement

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Parkside Background Paper has been updated to reflect the situation with regards to other SRFI proposals in the North West.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

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If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent disagrees with this statement
Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
No Comments
Recommended Change
No Change

Does the representor Support/Object/Comment..?
Object

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Summary of changes being sought

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Standard international and domestic containers sizes are explained in containers sizes are explained in the section above relating to paragraph 9.32A. Commonly used Short sea containers are referred to as Palletwide. These containers are of 40’ or 45’ length and are 2.484m wide externally. All High Cube and Pallettwide containers can be carried by rail as previously explained. Some short sea containers may be too wide to be carried on W10 routes as identified earlier. No data is available to indicate the proportion of short sea containers which presently do not fit W10 routes but the majority and most commonly used short sea containers are suitable for rail in the UK. Port container statistics separate between deep and short sea traffic but do not differentiate between different sizes of short sea container. It is therefore not correct to claim that all short sea containers are too large to be carried by rail. Nevertheless, as Network Rail and the SRA have identified, it will be necessary to address the issue of wider containers in the future. Network Rail data in the Freight RUS does show that deep sea container traffic makes up 58% of containers at all UK ports and for the largest ports of Felixstowe and Southampton totals are 68% and 84% respectively. The total for Liverpool is 50%. The Rail modal share at Felixstowe and Southampton is 23% and 27% respectively. Figures quoted in the Background Paper are taken from a number of sources and are referenced in the Background Paper. They are derived from the GB Freight Model which is used by the Department for Transport, Network Rail, rail freight operators and the freight industry. Quoted sources are: Strategic Rail Freight Interchange Policy, SRA, March 2004 Network Rail Freight Utilisation Strategy March 2007 Rail Freight Forecasts to 2030. MDS Transmodal on behalf of Rail Freight Group and Freight Transport Association. 2008. Delivering a Sustainable Transport System: The Logistics Perspective. Department for Transport December 2008 Network Rail Route Utilisation Strategy. Scenarios and long Distance Forecasts. June 2009. Network Rail (Nuneaton North Chord) Order. Report to the Secretary of State for Transport. The Planning Inspectorate. 12 th April 2010. Value and Importance of Rail Freight. Network Rail July 2010 Britain’s Transport Infrastructure Strategic Rail Freight Network: The Longer Term Vision. Department for Transport September 2009.

Recommended Change
as an appendix to explain container sizes.

Does the representor Support/Object/Comment..?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

127
Which rep? - What is the reference number of the representation affected?

### Paragraph - 3.4.1

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To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

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Have you raised this issue previously?
Yes

If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning weight given to the Merseyside Green Belt study

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment..?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

### Paragraph - 3.5.4

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To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

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Have you raised this issue previously?
Yes

If yes, at what stage?
Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning jobs figure

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment..?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 3.5.6(i)

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If you did comment previously, does the amendment address your previous concerns? No

Summary
Respondent dismissing electrification issue

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Electrification is not essential for the establishment of an SRFI as most rail freight uses diesel traction. However, electrification does add operating flexibility and economic benefits for rail freight operators.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 5.3.7

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If you did comment previously, does the amendment address your previous concerns? No

Summary
Respondent disputes the claims of 18 trains per day

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Prologis’ proposal envisaged up to 18 trains in each direction per day by 2015. Of these, 8 would be deep sea traffic from Haven Ports, Southampton and Thames Ports, 1 European intermodal via The Channel Tunnel, 1 conventional via The Channel Tunnel and 8 for domestic traffic from other regions. W10 traffic from Haven ports is presently routed via London and the more direct route via Peterborough and Nuneaton is currently being cleared to W10 gauge. High Cube containers can be carried on low deck high wagons on routes not cleared for W10. Rail freight terminals in the North West, Midlands and other regions receive regular and timetable flows of intermodal traffic from Felixstowe, Southampton and deep sea ports. Up to 18 trains per day was a reasonable assessment of longer term requirements.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 4.1.3
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_153

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
Yes No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent claims that Peel Holdings are not aware of the Parkside proposal

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Parkside is a specific project in the Super Port concept as identified in 'Super Port June 2008' produced by TMP.

Recommended Change
No Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.1.4; 4.1.6
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_154

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
Yes No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent claims that Parkside will do little to reduce freight movement by road

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
It is not correct to claim that every freight movement will enter and leave the site by road. A large proportion of inwards freight will arrive by rail but it is correct that some traffic will reach the terminal by road and be delivered to final destinations by road. Freight terminals inevitably do increase the volume of road traffic in the immediate vicinity but overall the volume of road freight traffic in the region is reduced by the used of rail for bulk inwards movement.

Recommended Change
No change recommended. Background paper commentary remains valid.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 4.1.9

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_156
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound? No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage? Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary Respondent doubts that plans for Hard Shoulder running will address traffic issues
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Background Paper does not suggest that the hard shoulder running proposals for the M6 between Junction 21a and Junction 26 were initiated with Parkside as an objective. It states that the need to increase peak capacity on this stretch of the M6 has already been acknowledged and therefore this would correspond with an increase in M6 capacity required for Parkside. It is agreed that other traffic measures would be required to support the maximum scale scenario and this is already recognised on page 46 of the Background Paper.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.2.4

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_158
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound? No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage? Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary Respondent claims paragraph is misleading
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
### Paragraph - 6.3.5; 6.3.9

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**To which Part of the Core Strategy does this representation relate?**
- Parkside Background Paper

**Legally Compliant?** | **Sound?** | **Reason why Unsound?**
--- | --- | ---
No | [ ] | Justified?; Effective?; Consistent with National Policy?

**Have you raised this issue previously?** | **If yes, at what stage?**
--- | ---
Yes | Issues and Options; Preferred Options; Publication

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**
- No

**Summary**
- Respondent questions estimates of floor space

**Summary of changes being sought**

**Officer Recommendation**
- No Change Recommended

**Justification for Recommendation**
- We are looking at a model scheme not a detailed scheme.

**Recommended Change**
- No Change

**Does the representor Support/Object/Comment..**
- **Object**

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

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### Paragraph - 4.2.5; 4.2.9

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**To which Part of the Core Strategy does this representation relate?**
- Parkside Background Paper

**Legally Compliant?** | **Sound?** | **Reason why Unsound?**
--- | --- | ---
No | [ ] | Justified?; Effective?; Consistent with National Policy?

**Have you raised this issue previously?** | **If yes, at what stage?**
--- | ---
Yes | Issues and Options; Preferred Options; Publication

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**
- No

**Summary**
- Respondent claims that Parkside is not required to achieve modal shift away from road

**Summary of changes being sought**

**Officer Recommendation**
- No Change Recommended

**Justification for Recommendation**
- SRFIs primarily cater for container based and conventional wagon consumer goods. Such goods are time sensitive in a competitive freight market. Inland waterways are not suited to such business although there is sometimes a role for waterways in bulk materials which are less time sensitive. Rail already plays an important role in the movement of goods from ports.

**Recommended Change**
- No change recommended.

**Does the representor Support/Object/Comment..**
- **Object**

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

---

Which rep? - What is the reference number of the representation affected?
Paragraph - 4.2.10

Respondent  82174  Mr Dave Tyas
Representation  ACSPUB2_160

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant?  Sound?  Reason why Unsound?
Yes  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent concerned about capacity of surrounding rail network

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Network Rail have been consulted and identifies that there is capacity available.

Recommended Change
No Change

Does the representor Support/Object/Comment..?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.2.14

Respondent  82174  Mr Dave Tyas
Representation  ACSPUB2_161

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant?  Sound?  Reason why Unsound?
Yes  No  Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent claims that Freight RUS does not provide

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
It is not claimed that the RUS provides a comprehensive freight strategy for the region. Route Utilisation Strategies are produced by Network Rail to identify future network needs and the capacity of rail routes to cater for future demand. Paragraph 4.2.14 is clear in the explanation of rail planning and RUS.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..?
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 4.2.15; 4.2.20
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_162
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent requesting that reference be made to short sea containers which cannot be transport on the rail network
Summary of changes being sought
Officer Recommendation
No Change Recommended
Justification for Recommendation
Types of containers used for international and domestic traffic have been explained in the response to Paragraph 9.32A. Pallet wide containers commonly used for short sea can be carried by rail. Further explanation about short sea container sizes is given in response to the comments about paragraph 3.2.27. It should be noted that any issues about that capability of rail to carry some European short sea containers would affect not just aspirations for Parkside but all main rail freight routes and freight terminals in the country including others in the north west.
Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.2.16
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_163
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent providing clarification on the Liverpool to Manchester line
Summary of changes being sought
Officer Recommendation
Partly Agree Recommend Change
Justification for Recommendation
The Manchester to Liverpool Route is W9 except the section between Earlestown and Newton Le Willows Junction which is electrified and cleared to W10.
Recommended Change
Amend para 4.2.16 of the Background Paper to provide greater clarity in relation to the Liverpool to Manchester route.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 4.2.21
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_164
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? No
Sound? No
Reason why Unsound? Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?
If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent claims that this statement is misleading
Summary of changes being sought
Officer Recommendation
No Change Recommended
Justification for Recommendation
No further comment necessary in the Background Paper. Ro-Ro HGV lorries with fixed types of trailer are not intermodal and do not convey standard sized ISO containers. Many short sea ISO containers can be carried by rail. Volumes of deep sea containers entering the UK are more than twice those for short sea (DfT Maritime statistics 2008). Rail's principal container market from UK ports is in the movement of deep sea container traffic.
Recommended Change
No changes recommended.
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.2.23
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_165
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? No
Sound? No
Reason why Unsound? Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?
If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent criticising text
Summary of changes being sought
Officer Recommendation
No Change Recommended
Justification for Recommendation
No Comments
Recommended Change
No Change
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 4.3.1; 4.3.2

Respondent 82174 Mr Dave Tyas

Representation ACSPUB2_166

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
No Justified?: Effective?: Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent claims data is misleading

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Commentary and data is not misleading. It is clear these paragraphs refer to total volumes for freight by rail. They are included to explain and provide the context of rail freight activity.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.3.3

Respondent 82174 Mr Dave Tyas

Representation ACSPUB2_167

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
No Justified?: Effective?: Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning number of short sea containers

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Maritime statistics show that for 2008, 8.7 million TEU were handled in UK ports. Of this total, 33% were short sea, either EU or other short sea routes. As stated in the response to 3.2.27 no data is available to indicate the proportion of short sea containers which might not be carried by rail at present, until further gauge enhancement is undertaken.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

136
Paragraph - 4.3.5

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_169
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent criticising consultation of stakeholders
Summary of changes being sought
Officer Recommendation
No Change Recommended

Justification for Recommendation
In the course of this work, conversations were held with all the rail industry stakeholders listed. This builds on the author's extensive professional knowledge of the rail freight business and operations.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.4.2

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_170
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent criticising how freight is transported by sea
Summary of changes being sought
Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
There is a very substantial flow of intermodal consumer goods traffic from south and east coast ports to London and the SE, the East and West Midlands, the North West and Scotland. Shipping costs are the largest element of the international movement of goods from the production countries in Asia and the Far East. Ships carrying goods for the UK and Europe will travel via the English Channel and often call at Southampton, Thames ports or Felixstowe on their way to Rotterdam and Northern Europe. To divert to Liverpool or other northern UK ports would take considerably longer and be very costly in shipping time. It is therefore much more economically efficient to off-load at southern or eastern UK ports for containers to be carried to destination by rail or road. Asia and the Far East are the principal sources for consumer goods distributed in the UK and this is why deep sea port volumes are highest at these ports. Liverpool and other North West ports are more suited to traffic from North America and Ireland. Bulk containers by rail from Southampton, Thames and Haven ports will continue to grow, not just through Southampton and Felixstowe but also developing facilities at London Gateway and Bathside Bay.
Recommended Change
Provide further clarification in relation to the transportation of freight by sea in para 4.4.2 of the Background Paper.

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 4.5.1

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent requesting greater clarity on the graph

Summary of changes being sought

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Greater clarity in relation to figure 4.2 will ensure that this section of the report can be more easily understood.

Recommended Change
The Background Paper should be amended to ensure that the meaning and description of figure 4.2 is clear.

Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Paragraph - 4.5.12

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<th>82174</th>
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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning source of information

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Background Paper clearly states that the information presented in relation to employment opportunities likely to be generated through the development of a SRFI at Parkside is taken from the St. Helens Economic Land and Skills Study Review. This Review was prepared on behalf of the Council by Regeneris Consulting with Vernon & Co in 2009, to help inform the preparation of the St. Helens LDF. The Review offers an assessment of future skills requirements in St. Helens’ to provide the workforce to meet demand from employers. As indicated in the Review,
it is essential for employment land studies to consider how employment might change in future. Good practice
centres on the process of devising robust scenarios and testing them with the application of local intelligence. This
was an important feature of the Review. The Review used three steps to build a picture of how the provision of skills
in St. Helens needs to change in line with the projections for employment, premises and land: Assess skills
implications of employment growth; Assess the likely supply of skills; and Comparison of demand and supply. It is
therefore considered that a best practice approach has been applied to the development of employment figures and
skill requirements established in the Review and later presented in the Background Paper.

**Recommended Change**
No change recommended

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Paragraph - 4.5.14**
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_174
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Respondent claims that Parkside will only create 175 jobs for St.Helens residents

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The volume of jobs associated with multiplier effets, which St.Helens' residents could expect to fill, are those jobs
expected to be created off-site (see TP47 para. 7.49) and therefore in addition to jobs created on-site. The Council
expects the total number of jobs created (both on and off-site) for St.Helens' residents to be much higher than
quoted, but will be subject to the delivery of the final scheme..

**Recommended Change**
No Change

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Paragraph - 5.2.9**
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_176
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Respondent concerned that Parkside will become primarily a HGV based distribution centre
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The proportion of traffic which might be carried by rail is discussed in the answer to a representation made in relation to section 5.3.3. SRFIs are logistics distribution centres with direct rail access and the use of rail is determined by the market and freight users depending on the convenience, quality and cost of the rail service. Such distribution facilities will unavoidably attract and increase in HGV traffic but the availability of the rail option will mitigate against increasing road traffic and reduce total volume of HGV traffic in the region. In addition, the development of a SRFI at Parkside would be responding to a well established specific national planning and transport policy need to move freight from road to rail and to reduce CO2 emissions. It is likely that the Council would seek to establish a SEC 106 Agreement / Unilateral Undertaking which secures the appointment of a travel/freight management plan co-ordinator to promote rail freight at the site and potentially for the costs of maintaining the intermodal area and the fixed rail infrastructure on the site to be levied on each of the warehouse users, irrespective of the amount of use each occupier makes of the facilities It is also likely that the Council would seek to establish a Planning Obligation requiring the intermodal terminal and other fixed rail infrastructure to be provided on the site, prior to first occupation of any of the buildings. Prologis who submitted the 2006 application for a SRFI at Parkside are specialists in rail connected warehousing and it is unlikely that they would invest significantly in rail related infrastructure on the site if the aim was to develop a HGV based distribution centre.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..

Object

Which rep? - What is the reference number of the representation affected?

Paragraph - 5.3.3

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To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? | Sound? | Reason why Unsound? |
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If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent states that Parkside is not direct accessible from the WCML

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Parkside rail connections are not "on" the WCML but are directly accessible from the south WCML via Winwick Junction and Earlestown South and East Junctions, a distance by rail of less than 6.4 km (4 miles) and from the north via Golborne and Newton le Willows Junctions, a distance of less than 3.2 km (2 miles).

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..

Object

Which rep? - What is the reference number of the representation affected?

Paragraph - 5.3.3

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Evidence at Public Inquiries concerning SRFI at Howbury Park and Radlett in 2007 suggested that at the time, 5.8% of inwards traffic to DIRFT arrived by rail. Most rail traffic at DIRFT is unloaded at the intermodal terminal and delivered to warehouses either at the site or further away. DIRFT has been successful in attracting rail freight traffic and continues to expand with further phased development planning more rail facilities and direct rail warehouse access. Other SRFI proposals such as those at Slough suggest that 25% of traffic will arrive by rail. The Astral/Prologis submission for Parkside argued that rail would have 14% of the North West Freight Market. Kent International Gateway argued that 64% of goods despatched would be by rail. The proportion of freight traffic by rail is open to different analysis and interpretation and would form the basis of a developer's commercial submission to justify planning development. DIRFT continues to grow and the strength and integral part of rail is increasing all the time.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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Respondent questioning how excess capacity to meet future demand will be assessed

Summary
Respondent claims that little traffic would be moved from container to warehouses

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Paragraph 5.3.3 does not make any reference to capacity. I assume this comment refers to para. 5.3.5. The need and scope for expansion of terminal activity, i.e. capacity for growth will be a commercial judgement by a developer based on analysis of the strength and growth of the market for freight distribution in the region.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 5.3.7

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If you did comment previously, does the amendment address your previous concerns?  No

Summary
Respondent states that the success of new timetable has not been tested
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The WCML high frequency timetable has been in operation for nearly two years, since January 2009 and has proved to be workable and successful. Current freight requirements are catered for satisfactorily.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 5.3.9

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If you did comment previously, does the amendment address your previous concerns?  No

Summary
Respondent criticises Network Rail's support for the scheme
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The paragraph indicates Network Rail's support in principle for the scheme. Whilst NR, as custodians of the timetable, are confident line capacity will be available, they can never guarantee train paths at this stage in any such scheme as the timetable develops and changes year by year to accommodate operator need.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment...

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_183
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage? Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent claims that it is unlikely that the Earlestown curve will be modified
Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
The link via Winwick Junction and Earlestown South and East Junctions is used regularly for freight and other rail traffic. The link is also electrified for operating flexibility. There are no operating restrictions or limitations imposed by Network Rail or Freight operators the use of this link. There is no reason to suppose links to the WCML via Winwick, Earlestown or Golborne Junctions would be of any constraint for freight services or impose any extra operating costs.
Recommended Change
No change recommended.
Does the representor Support/Object/Comment..
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_184
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage? Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent questions the need for warehousing
Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
SRFIs are in principle, logistics distribution centres via rail access. The provision of warehouses on site is integral to the operation as would be the case for a road only distribution centre. Developers make their financial returns from the leasing of warehouse space to customers attracted by good road and rail links. Conventional rail terminals which do not have warehouses within the site are less attractive to some users because of added delivery costs. Planned warehouses and the scope to expand are essential to the commercial attraction of the development to balance the high fixed start up costs. The actual design of the terminal is for a developer to decide. However, many terminals, such as that proposed for Corby, do not provide direct rail access alongside warehouses but have a central intermodal terminal for containers which are then delivered to warehouses on the site by internal road tractors.
Direct rail sidings alongside warehouses will normally only be suited to conventional rail wagons rather than containers.

**Recommended Change**
No change recommended. The need for warehousing is already acknowledged in para 6.2.1.

**Does the representor Support/Object/Comment..**
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Paragraph - 4.2.1**

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**To which Part of the Core Strategy does this representation relate?**
Parkside Background Paper

**Legally Compliant?**

**Sound?**

**Reason why Unsound?**

- No
- Justified?; Effective?; Consistent with National Policy?

**Have you raised this issue previously?**

- Yes
- If yes, at what stage?
- Issues and Options; Preferred Options; Publication

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**

- No

**Summary**

Respondent seeking clarification on impact to air quality

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

CAS 3.2.8 covers this issue.

**Recommended Change**

No Change

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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**Paragraph - Executive Summary**

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**To which Part of the Core Strategy does this representation relate?**
Parkside Background Paper

**Legally Compliant?**

**Sound?**

**Reason why Unsound?**

- No

**Have you raised this issue previously?**

- Yes
- If yes, at what stage?
- Publication

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**

- No

**Summary**

The proposal needs to be considered in its entirety rather than as a phased development.

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The justification for the overall scheme on both sides of the motorway and the need to adopt a phased approach to development is set out in the Parkside SFRI Background Paper.

**Recommended Change**
Does the representor Support/Object/Comment.. 

Object 

Does this representation withdraw or partially withdraw a representation made at publication stage? 

Which rep? - What is the reference number of the representation affected? 

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**Paragraph - 6.3.5**

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To which Part of the Core Strategy does this representation relate? Parkside Background Paper

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Have you raised this issue previously? | If yes, at what stage? |
| Yes | Issues and Options; Preferred Options; Publication |

If no, why did you not comment earlier? |

If you did comment previously, does the amendment address your previous concerns? 
No

Summary 
Respondent questioning assumption for a new motorway junction

Summary of changes being sought

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The assumption that a new motorway junction will be required is based on a professional viewpoint that if Parkside east and west were to be developed there will need to be a new junction to meet capacity for future traffic growth generated by the SRFI. As indicated on page 55 of the Background Paper, the likely requirement for, and sequencing of, a new motorway junction would need to be determined through transport modelling and assessment at the planning application stage.

**Recommended Change**

No change recommended.

---

**Paragraph - 7.3**

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To which Part of the Core Strategy does this representation relate? Parkside Background Paper

Legally Compliant? | Sound? | Reason why Unsound? |
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Have you raised this issue previously? | If yes, at what stage? |
| Yes | Issues and Options; Preferred Options; Publication |

If no, why did you not comment earlier? |

If you did comment previously, does the amendment address your previous concerns? 
No

Summary 
Respondent questions where the old slag heap will be relocated to

Summary of changes being sought

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The kind of detail would be addressed in any planning application forthcoming. Criteria in CAS 3.2 would cover this.

**Recommended Change**

No change
Paragraph - 12.5.2

Respondent 82498 Mr Richard Ward
Representation ACSPUB2_220

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Decision on planning application for renovation of Newton Park Farm and House is being deferred because it conflicts with promotion of the SFRI.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Core Strategy is concerned with matters of overall policy and it is not within its remit to deal with individual planning applications

Recommended Change

Does the representor Support/Object/Comment..

Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph -

Respondent 82498 Mr Richard Ward
Representation ACSPUB2_221

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Government documents are of limited weight in supporting the SFRI

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The background paper provides evidence of a raft of National Government White Papers, Strategies, Planning Policy and Regional and sub regional policies which support the principle of SFRIs generally and specifically Parkside.

Recommended Change

Does the representor Support/Object/Comment..

Object
Paragraph -

Respondent  82498 Mr Richard Ward
Representation  ACSPUB2_222
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant?  Sound?  Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
Yes  Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
No need due to alternative existing or proposed facilities
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Parkside SFR Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to other schemes due to its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6.

Recommended Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph -

Respondent  82498 Mr Richard Ward
Representation  ACSPUB2_223
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant?  Sound?  Reason why Unsound?

Have you raised this issue previously?  If yes, at what stage?
Yes  Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Conflict with greenbelt purposes and insufficient justification to justify removal of land from greenbelt.
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Given the significance of the scheme at a national and regional level it is considered that 'exceptional circumstances' exist in line with PPG2 and this case is outlined in the Parkside Background Paper. The Background Paper acknowledges that there will be varying impacts on the five green belt purposes as defined in PPG2 but considers that a sufficiently robust case can be demonstrated to outweigh these impacts.

Recommended Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Which rep? - What is the reference number of the representation affected?

Paragraph - para 11.1.1

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<td>If no, why did you not comment earlier?</td>
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</tr>
</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Noise disturbance due to night time trains travelling through urban areas.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Parkside Background Paper indicates that the principle route access to Parkside will be via WCML. However it is acknowledged that some trains will necessitate movements through residential areas for which criteria 5 is aimed at mitigating.

Recommended Change

Does the representor Support/Object/Comment...
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.2.5

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82174</th>
<th>Mr Dave Tyas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_189</td>
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<tr>
<td>To which Part of the Core Strategy does this representation relate?</td>
<td>Parkside Background Paper</td>
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<td>Legally Compliant?</td>
<td>Sound?</td>
<td>Reason why Unsound?</td>
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<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
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<td>Yes</td>
<td>Publication</td>
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<tr>
<td>If no, why did you not comment earlier?</td>
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<td></td>
</tr>
</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent questioning this statement

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The respondent misinterprets paragraph 9.2.5. The paragraph is assessing purpose one of the five purposes of allocated land in the Green Belt established in PPG2 in the context of Parkside. The paragraph states that "in the absence of SRFI development proposals, both Parkside east and west could have functioned as a significant barrier restricting urban sprawl." The paragraph is thus indicating that without proposals for a SRFI, Parkside east and west would be fulfilling purpose one of the five purposes of allocating land in the Green Belt established in PPG2 - 'Check the unrestricted sprawl of St. Helens.' The paragraph is clearly not suggesting that a SRFI needs to be constructed at Parkside in order to protect the Green Belt.

Recommended Change
No change recommended
Paragraph - 9.2.9

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_190
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary Respondent concerned about impact upon Green Belt

Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
No Comments
Recommended Change
No Change

Does the representor Support/Object/Comment.. Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.2.10

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_191
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary Respondent concerned about loss of views if Parkside development goes ahead
Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation Loss of view is not a material planning consideration.
Recommended Change
No Change

Does the representor Support/Object/Comment.. Object
Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 9.2.11

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_192
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary
Respondent concerned about erosion of Green Belt which has historic value
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
This is covered in the Strategic Environmental Assessment/Sustainability Appraisal.

Recommended Change
No Change

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.3.1

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_193
To which Part of the Core Strategy does this representation relate? Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No
Summary
Respondent concerned that a decision on Green Belt without specific implementation criteria is unsound
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
No Comments

Recommended Change
No Change

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 9.3.1

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_194
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent claims that Trans-Pennine routes are not cost effective
Summary of changes being sought
Officer Recommendation
No Change Recommended
Justification for Recommendation
High cube containers can be carried on W8 routes on low deck wagons. Only heavy traffic routes such as the WCML and routes from Southampton and Felixstowe can justify the investment necessary to achieve W10 over the whole route. For the volumes of traffic and demand required and anticipated, use of low deck wagons is operationally and financially viable for Trans-Pennine routes.
Recommended Change
Para 9.3.1 does not make any reference to Trans-Pennine routes. Does this representation refer to 9.3.6? No alteration to either paragraph necessary.

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 9.3.10

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_195
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent concerned that the capacity of other NW RFI and Ports has not been investigated
Summary of changes being sought
Officer Recommendation
No Change Recommended
Justification for Recommendation
No Comments
Recommended Change
No Change
Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 9.3.15

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_196
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
Yes No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Respondent claims that the Secretary of State has been misquoted
Summary of changes being sought

Officer Recommendation
Agree Recommend Change

Justification for Recommendation
Agree that the Parkside Background Paper does not refer to all of the Secretary of State’s overall conclusions on the scheme.

Recommended Change
The Parkside Background Paper will be amended to reflect the Secretary of State’s overall conclusions on the Newton Park Farm scheme.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - Executive Summary

Respondent 82498 Mr Richard Ward
Representation ACSPUB2_216
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
Yes No Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Disputes the need for the facility and the total number and quality of jobs likely to be available and what proportion will go to the local workforce.
Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The Council’s opinion of need is set out clearly in the background paper. There is likely to be substantial job creation as explained in the background paper. The focus of the facility will be to transfer existing freight from road to rail rather than handling increases in the levels of freight per se. Policy 7 CAS 3.2 explains that training schemes will assist the local population to secure employment at the facility.

Recommended Change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Paragraph - 6.2.3; 6.2.4

Respondent 82174 Mr Dave Tyas
Representation ACSPUB2_185

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?
No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Respondent doubting justification for Hard Shoulder Running

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The information presented in paragraphs 6.2.3 and 6.2.4 of the Background Paper is based on a meeting between Scott Wilson and the Highways Agency (HA) on 03.11.09. The purpose of this meeting was to determine the HA's overall opinion on the development and deliverability of a SRFI at Parkside. The HA indicated that they anticipate that a developer would want a phased development and phased infrastructure plan for the site. The HA would also like to see a phased plan. This may permit some early phases coming forward in advance of implementing the new motorway junction and hard shoulder running (HSR) lanes. The HA indicated that HSR in both directions had been agreed in principle between the HA and the developer as suitable mitigation on the M6 between the new Junction 22A and Croft Interchange (M6/M62). The HA indicated that feasibility of HSR on this section of motorway has already been determined by URS. Two options would exist for the developer: a. to design and construct the scheme to the HA's satisfaction; or b. for the HA to do this and charge the developer. The HA indicated that although the provision of a new motorway junction to support development contravenes current HA policy, it has, however, gained ministerial (Dr Stephen Ladyman was Minister for Transport at that time) approval as it was original proposed a few years ago and the site is of regional significance. As indicated on page 55 of the Background Paper, the likely requirement for, and sequencing of, a new motorway junction and proposed HSR would need to be determined through transport modelling and assessment at the planning application stage. The meeting notes for the meeting between the HA and Scott Wilson are presented in Appendix 1 of the Evidence Base Background Paper - Update September 2010.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 3.2.29, 9.3.16

Respondent 82498 Mr Richard Ward
Representation ACSPUB2_219

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
raises doubt about likely CO2 savings and whether this is sufficient reason for removing the site from the Greenbelt

Summary of changes being sought

Officer Recommendation
No Change Recommended
Justification for Recommendation
Widespread accepted evidence that climange change is occurring, despite some limited flaws in the evidence. Energy transition refers to the move from reliance on fossil fuel based energy supplies to other forms including renewable energy. Such issues are addressed elsewhere in the Core Strategy and the forthcoming Climate Change DPD. The overall impact of the SFRI will be to reduce overall levels of road freight. The Council considered that reductions in CO2 forms part of the case for very special circumstances for removing the site from the Greenbelt.

Recommended Change

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<tr>
<td>No</td>
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<tr>
<td>Summary</td>
</tr>
<tr>
<td>concerns over extended period of noise, air and dirt pollution</td>
</tr>
<tr>
<td>Summary of changes being sought</td>
</tr>
<tr>
<td>Officer Recommendation</td>
</tr>
<tr>
<td>No Change Recommended</td>
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<tr>
<td>Justification for Recommendation</td>
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<tr>
<td>The Council acknowledges that there may be some periods of disruption during the construction phases, but this would not outweigh the benefits of a potential scheme.</td>
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</table>

Recommended Change

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<tr>
<td>Summary</td>
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<tr>
<td>concerns over loss of local businesses and companies operating at the site will only be branches not headquarters</td>
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<tr>
<td>Summary of changes being sought</td>
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<tr>
<td>Officer Recommendation</td>
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<tr>
<td>No Change Recommended</td>
<td></td>
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<tr>
<td>Justification for Recommendation</td>
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</tbody>
</table>
The Parkside Background Paper indicates that the SFRI would contribute to the regeneration of the Borough and would strengthen the local and wider sub-regional and regional economy.

**Recommended Change**

**Does the representor Support/Object/Comment..**

**Object**

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Which rep? - What is the reference number of the representation affected?**

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<td>If you did comment previously, does the amendment address your previous concerns?</td>
</tr>
</tbody>
</table>

**Summary**

objects to the removal of the Parkside Road to Golborne Road

**Summary of changes being sought**

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Such matters would be dealt with at such a time as when a detailed scheme is brought forward by way of a Transport Assessment. Any scheme would have to satisfy the criteria of CAS 3.2 and comply with Policy CP2.

**Recommended Change**

**Does the representor Support/Object/Comment..**

**Object**

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Which rep? - What is the reference number of the representation affected?**

<table>
<thead>
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</tr>
</tbody>
</table>

**Summary**

Astral must withdraw the 2006 application and submit a new one as legislation has changed since its submission.

**Summary of changes being sought**

Original application is now invalid due to change of ownership. LDF must remove all references to Astral. A new planning application is required because changes to the motorway junction will need referring to the IPC.

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The Core Strategy deals with matters of policy and not the specifics of individual planning applications. These matters are dealt with elsewhere under planning legislation.

**Recommended Change**
Paragraph - Executive Summary, and para 11.1.1

Respondent 82498 Mr Richard Ward
Representation ACSPUB2_218

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant?
Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Rail infrastructure may be economically unviable. Number of trains needs agreement with Network Rail

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Agreements on the number of trains utilising the facility would be outside the remit of planning legislation.

Recommended Change

Does the representor Support/Object/Comment.. Object

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.2.4 and 9.2.6.

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_327

To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

Legally Compliant?
Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Paragraphs 4.2.4 & 9.2.6 contain historical inaccuracies particularly regarding the designation of Green Belt. It is not clear what, if anything, is being implied in relation to the Green Belt designation. Unless it can be explained confusing statements should be removed.

Summary of changes being sought
Requests an improvement in the accuracy of paragraphs 4.2.4 and 9.2.6.

Officer Recommendation
Comment Noted

Justification for Recommendation
No change recommended.

Recommended Change
No change.

Does the representor Support/Object/Comment.. Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

**Paragraph - 6.5.3, 9.2.7, Table 9.1, 4.5.6, 7.2.3 and 7.3.2.**

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<thead>
<tr>
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<th>81816 Mr P Sargeant</th>
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<td>If no, why did you not comment earlier?</td>
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</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?

No

Summary

Little attention is paid to the effect of the proposed development beyond the administrative boundary of St.Helens.

Summary of changes being sought

Inclusion of all the neighbouring settlements within radius of the site including a more extensive list in Table 9.1 and removal of the term 'Parkside'.

Officer Recommendation

No Change Recommended

Justification for Recommendation

The Core Strategy is prepared for St.Helens and would therefore, concentrate on the impact development may have within its boundaries. Table 9.1 aims to display the reduction in Green Belt to the closest surrounding settlements.

Recommended Change

No change.

Does the representor Support/Object/Comment...

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

**Paragraph - 3.4.1, 6.2.4, 9.2.7 and 3.5.6**

<table>
<thead>
<tr>
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<th>81816 Mr P Sargeant</th>
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<td>No</td>
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<td>Yes</td>
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<tr>
<td>If no, why did you not comment earlier?</td>
<td></td>
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</table>

If you did comment previously, does the amendment address your previous concerns?

No

Summary

Documents are quoted selectively, out of context and without regard to their relevancy in order to support the SRFI.

Summary of changes being sought

Review of paragraphs 3.4.1, 6.2.4, 9.2.7 and 3.5.6.

Officer Recommendation

Comment Noted

Justification for Recommendation

Respondent does not explain exactly how this undermines policy or suggest alternatives. Important elements of documents that support the Core Strategy policy have been referenced accurately.

Recommended Change

No change.

Does the representor Support/Object/Comment...

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
Paragraph - 5.3.4, 6.1.2, 2.4.1, 9.1.1, 10.2.1, 11.1.1, 6.2.1, 9.3.13 and 9.3.1.

Respondent  81816 Mr P Sargeant  
Representation ACSPUB2_324

To which Part of the Core Strategy does this representation relate? Parkside Background Paper

Legally Compliant? No
Sound? No
Reason why Unsound? Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No

Summary
BP appears to have been created in haste and contains many grammatical inaccuracies.

Summary of changes being sought
The grammar and accuracy of the specified paragraphs need improvement and a more explanatory approach adopted in relation to paragraph 6.2.1.

Officer Recommendation
Comment Noted

Justification for Recommendation
No change recommended.

Recommended Change
No change.

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 4.1.9

Respondent  81816 Mr P Sargeant  
Representation ACSPUB2_326

To which Part of the Core Strategy does this representation relate? Parkside Background Paper

Legally Compliant? No
Sound? No
Reason why Unsound? Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? Yes
If yes, at what stage? Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No

Summary
4.1.9 Affect on both M6 and local road capacity remains to be seen.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
The Transport Assessment and Transport Plan accompanying a Planning Application would examine these potential impacts in detail.

Recommended Change
No change.

Does the representor Support/Object/Comment.. Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Parkside Background Paper -

Respondent 316762 Mr Paul Taylor
Representation ACSPUB2_363
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
Yes Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent concerned that the Parkside site has reverted back to nature/ Parkside Background Paper does not
detail economic viability, existing capacity, future requirements or the baseline from which figures are derived/ no
evaluation of national and regional demand/ effect on local amenity and environment/ criticises job figures/ conflicts
with PPG2's 5 purposes of including land in the Green Belt/ health issues/ fails to demonstrate special
circumstances

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The policy has been developed completely separately from the recent proposed scheme and looks at a hypothetical
scheme, which explores the issues of need, scale, deliverability and viability. The Background Paper prepared by
Scott Wilson and Atkins makes this quite clear.

Recommended Change
No Change Required

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Paragraph - 10.3.2

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_329
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper
Legally Compliant? Sound? Reason why Unsound?
No No Justified?; Effective?; Consistent with National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Paragraph 10.3.2 - 4 create confusion over the determining Authority of a future planning application, which shows a
lack of understanding on behalf of the consultants.

Summary of changes being sought
Suggests a review of paragraph 10.3.2.

Officer Recommendation
Comment Noted

Justification for Recommendation
Applications would be submitted to both Councils. The St.Helens Core Strategy can only look at the St.Helens
administrative area.

Recommended Change
No change.

Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

**Paragraph - 2.1.6, 12.6.4 and 9.3.16-9.3.19**

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<th>81816</th>
<th>Mr P Sargeant</th>
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If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
RSS is misinterpreted. Special justification will be required for SRFI which have not yet been demonstrated.

**Summary of changes being sought**

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
The background paper demonstrates exceptional circumstances to justify development of SRFI. RSS terminology is incorrect in the rail freight industry.

**Recommended Change**
No change.

**Does the representor Support/Object/Comment..?**
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

**Paragraph - 12.2.2 and diagram Parkside SRFI Maximum Scale Scenario - Parkside East and West Sites.**

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If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Figures used are unexplained and should be shown diagrammatically.

**Summary of changes being sought**
Figures should be integrated into the maps and diagrams to add clarity.

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
The Core Strategy is intended to deal with principles and likely scale matters rather than precise boundaries. Table 9.1 aims to display the reduction in Green Belt to the closest points in surrounding settlements. The scale we quote excludes Warrington, as we don’t control their area.

**Recommended Change**
No change.

**Does the representor Support/Object/Comment..?**
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
Which rep? - What is the reference number of the representation affected?

**Paragraph - 9.2.9 and 9.2.10**

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To which Part of the Core Strategy does this representation relate?

Parkside Background Paper

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Have you raised this issue previously?

Yes, at what stage?

Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

No

Summary

The conclusion drawn on what constitutes appropriate development in the Green Belt issues are unsound.

**Summary of changes being sought**

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

9.2.10 does not seek to justify development in the Green Belt due to the presence of urban features, it merely notes their existence.

**Recommended Change**

No change.

**Does the representor Support/Object/Comment...**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

**Summary of changes being sought**

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

The Council has a list of vacant sites within the Borough, however, given the potential scale and locational requirements of SRFI none would be suitable.

**Recommended Change**

No change.

**Summary**

References to alternative urban sites are unexplained and contradictory.

**Summary of changes being sought**

References made to alternative sites within paragraphs 9.3.12 and 9.3.18 need to be explained.

**Officer Recommendation**

Comment Noted

**Justification for Recommendation**

The Council has a list of vacant sites within the Borough, however, given the potential scale and locational requirements of SRFI none would be suitable.

**Recommended Change**

No change.

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?
Policy - SEA/SA and AA assessments

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_345
To which Part of the Core Strategy does this representation relate?
Parkside Background Paper

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Have you raised this issue previously?
Yes
If yes, at what stage?
Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Scott Wilson's involvement in the production of the Background Paper compromises their objectivity in production of SA/SEA

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Scott Wilson are a large and respected consultancy and were appointed through a competitive bidding process. Separate teams undertook each piece of work. Their ability to undertake two separate pieces of work is not considered to compromise the integrity of either. The work could have been undertaken by the Council, in house.

Recommended Change
No change.

Does the representer Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Chapter 10 – Haydock and Blackbrook

Policy - CAS4

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_18

To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_10_01

Legally Compliant? Yes Sound? Yes Reason why Unsound?

Have you raised this issue previously? Yes, at what stage? Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? Yes

Summary

The amendment meets previous concerns about clarification on the Clipsley Lane centre.

Summary of changes being sought

N/a

Officer Recommendation

Comment Noted

Justification for Recommendation

Comment Noted

Recommended Change

No change

Does the representor Support/Object/Comment..

Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected?

CSPUB387

Paragraph - 10.9

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_20

To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_10_02

Legally Compliant? Yes Sound? Yes Reason why Unsound?

Have you raised this issue previously? Yes, at what stage? Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? Yes

Summary

The amendment meets previous concerns regarding Clipsley Lane centre.

Summary of changes being sought

N/a

Officer Recommendation

Comment Noted

Justification for Recommendation

Comment Noted

Recommended Change

No change

Does the representor Support/Object/Comment..

Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected?

CSPUB387
Respondent concerned about inconsistency between the Infrastructure Background Paper and Policy CAS4 regarding Haydock Industrial Estate.

**Summary of changes being sought**
Respondent seeking clarification over proposals for Haydock Industrial Estate.

**Officer Recommendation**
No Change Recommended.

**Justification for Recommendation**
To clarify, the Council is no longer promoting the potential expansion of Haydock Industrial Estate as put forward by the Preferred Options Core Strategy. The focus of economic development on Haydock Industrial Estate, as put forward by Policy CAS4, does not imply that it will be expanded, rather that development of existing sites within the Industrial Estate will continue to be permitted.

**Recommended Change**
No Change.

**Does the representor Support/Object/Comment..**
Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

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**To which Part of the Core Strategy does this representation relate?**
- Change Ref. CSRP_11_01

**Legally Compliant?** | **Sound?** | **Reason why Unsound?**
--- | --- | ---
Yes | Yes |

**Have you raised this issue previously?** | **If yes, at what stage?**
--- | ---
Yes | Publication |

**If no, why did you not comment earlier?**

**If you did comment previously, does the amendment address your previous concerns?**
- Yes

**Summary**
The amendment meets GONW’s previous concerns about wording referring to the Allocations DPD.

**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comments noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
- Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
- Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB400
## Chapter 12 – Ensuring Quality Development in St. Helens

### Policy - CP1. 3. iii.

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<td>Respondent</td>
<td>81648 Dawn Hewitt Environment Agency (NW Regional Office)</td>
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**To which Part of the Core Strategy does this representation relate?**  
Change Ref. CSRP\_12\_02

**Legally Compliant?**  
Yes, with minor changes

**Sound?**  
Yes, with minor changes

**Have you raised this issue previously?**  
Yes

**If yes, at what stage?**  
Preferred Options

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  
Yes, in part

**Summary**  
Reference to flood defences should be removed from CP1 (3)iii

**Summary of changes being sought**  
Reference to flood defences should be removed from CP1 (3)iii

**Officer Recommendation**  
No Change Recommended

**Justification for Recommendation**  
The policy has been amended to ensure that development would only be permitted in a flood zone where there is an overriding need and a suitable alternative cannot be identified. In these circumstances it is considered that flood defences may be necessary to enable development.

**Recommended Change**  
No change

**Does the representor Support/Object/Comment..**  
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**  
Withdraw

**Which rep? - What is the reference number of the representation affected?**  
CSPUB722

### Policy - CP1 part 3 (iv)

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<td>316561 Miss Rachael Bust The Coal Authority</td>
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**To which Part of the Core Strategy does this representation relate?**  
Change Ref. CSRP\_12\_03

**Legally Compliant?**  
Yes

**Sound?**  
If yes, at what stage?  
Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  
Yes

**Summary**  
Additional wording in Policies CAS 3.2 and CP1 3(iv) addresses earlier concerns ensuring mining legacy is fully considered

**Summary of changes being sought**

**Officer Recommendation**  
Comment Noted

**Justification for Recommendation**  
Comment Noted

**Recommended Change**  
No change

**Does the representor Support/Object/Comment..**  
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**  
Withdraw
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Chapter 13 – Creating an Accessible St. Helens

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If you did comment previously, does the amendment address your previous concerns?  
No

**Summary**  
CP 2.3.V is not properly expressed. Insert ‘for’ after ‘than’.

**Summary of changes being sought**  
CP 2.3.V is not properly expressed. Insert ‘for’ after ‘than’.

**Officer Recommendation**  
Agree Recommend Change

**Justification for Recommendation**  
Agree.

**Recommended Change**  
Insert ‘for’ after ‘than’.

**Does the representor Support/Object/Comment..**  
Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**  
Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?  
No

**Summary**  
Errors in punctuation.

**Summary of changes being sought**  
Punctuation and grammatical corrections needed in paragraph 13.6.

**Officer Recommendation**  
Agree recommended change

**Justification for Recommendation**  
Comments noted, corrections to be made.

**Recommended Change**  
Minor changes to punctuation of paragraph 13.6.

**Does the representor Support/Object/Comment..**  
Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**  
Which rep? - What is the reference number of the representation affected?

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### Chapter 14 – Providing Quality Housing in St. Helens

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Policy - CH1

Respondent 82085 Ms Victoria Ridehaugh Highways Agency

Representation ACSPUB2_93

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_14_01

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent recommends to identify suitable and sustainable sites to address housing shortfall and identify supporting transport infrastructure on these sites to ensure housing sites are accessible

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
Potential sites are identified though an annual update to the Strategic Housing Land Availability Assessment. Accessibility to key services, jobs and public transport infrastructure is a key consideration when assessing these sites. Specific sites to be allocated for housing will be considered through the Allocations DPD.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CH1

Respondent 82085 Ms Victoria Ridehaugh Highways Agency

Representation ACSPUB2_94

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_FC_14_02

Legally Compliant? Sound? Reason why Unsound?

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent proposing that housing forecast is reconsidered in light of proposed densities / support proposed housing densities / support housing sites on PDL / support sustainable sites

Summary of changes being sought
Specific sites to be allocated for housing will be considered through the Allocations DPD.

Officer Recommendation
No Change Recommended

Justification for Recommendation
The SHLAA has followed the density approach proposed by Policy CH1 and its forecast therefore already takes this into account / support noted / Specific sites to be allocated for housing will be considered through the Allocations DPD.

Recommended Change
No change recommended.

Does the representor Support/Object/Comment..

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
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Yes

**Summary**
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**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comments noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261

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**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comments noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
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**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261; 264; 351

171
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**Summary**
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**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment...**
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Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261; 264; 351

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**Summary**
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment...**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261; 264; 351

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**Policy - CH1**
Respondent: 315762 Mrs Dianne Wheatley  Government Office for the North West

Policy - CH1

Respondent: 315762 Mrs Dianne Wheatley  Government Office for the North West

To which Part of the Core Strategy does this representation relate?
- Change Ref. CSR_P_14_04

Legally Compliant?  Sound?  Reason why Unsound?
- Yes  Yes  

Have you raised this issue previously?
- If yes, at what stage?
- Yes  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
- Yes

Summary
- The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
- N/a

Officer Recommendation
- Comment Noted

Justification for Recommendation
- Comment noted

Recommended Change
- No change

Does the representor Support/Object/Comment..
- Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
- Withdraw

Which rep? - What is the reference number of the representation affected?
- CSPUB 261; 264; 351

Policy - CH1

Respondent: 315762 Mrs Dianne Wheatley  Government Office for the North West

To which Part of the Core Strategy does this representation relate?
- Change Ref. CSR_P_14_05

Legally Compliant?  Sound?  Reason why Unsound?
- Yes  Yes  

Have you raised this issue previously?
- If yes, at what stage?
- Yes  Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
- Yes

Summary
- The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
- N/a

Officer Recommendation
- Comment Noted

Justification for Recommendation
- Comment noted

Recommended Change
- No change

Does the representor Support/Object/Comment..
- Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
- Withdraw

Which rep? - What is the reference number of the representation affected?
- CSPUB 261; 264; 351
**Policy - CH1**

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**If you did comment previously, does the amendment address your previous concerns?**
Yes

**Summary**
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261; 264; 351

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**Policy - CH1**

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Yes

**Summary**
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**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 261; 264; 351

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**Policy - CH1**

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Summary
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Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment?
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Paragraph - 14.2

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Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment?
Support

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Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Paragraph - 14.4

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If yes, at what stage? Publication
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If you did comment previously, does the amendment address your previous concerns? Yes
Summary
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Summary of changes being sought
N/a
Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted
Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw
Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Paragraph - 14.5

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Summary
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Summary of changes being sought
N/a
Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted
Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw
Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
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Summary
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Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
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Does this representation withdraw or partially withdraw a representation made at publication stage?
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CSPUB 261; 264; 351

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Summary
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Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Paragraph - 14.8

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_14_15

Legally Compliant? Yes
Sound? Yes
Reason why Unsound?

Have you raised this issue previously?
Yes
If yes, at what stage?
Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

Paragraph - 14.9

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_14_16

Legally Compliant? Yes
Sound? Yes
Reason why Unsound?

Have you raised this issue previously?
Yes
If yes, at what stage?
Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351
Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Paragraph - 14.11

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_293

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_14_17

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

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Diagram/Table - Housing Delivery Trajectory

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_294

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_14_18

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

Paragraph - 14.12

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_295

To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_14_19

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

Diagram/Table - Previously Developed land Trajectory

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_296

To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_14_20

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.
Summary of changes being sought
N/a
Officer Recommendation
Comment Noted
Justification for Recommendation
Comment noted
Recommended Change
No change
Does the representor Support/Object/Comment.. Support
Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw
Which rep? - What is the reference number of the representation affected? CSPUB 261; 264; 351

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Officer Recommendation  
Comment Noted  
Justification for Recommendation  
Comment noted  
Recommended Change  
No change  
Does the representor Support/Object/Comment..  
Support  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
Withdraw  
Which rep? - What is the reference number of the representation affected?  
CSPUB 261; 264; 351

Paragraph - 14.15

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If you did comment previously, does the amendment address your previous concerns?  
Yes  
Summary  
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.  
Summary of changes being sought  
N/a  
Officer Recommendation  
Comment Noted  
Justification for Recommendation  
Comment noted  
Recommended Change  
No change  
Does the representor Support/Object/Comment..  
Support  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
Withdraw  
Which rep? - What is the reference number of the representation affected?  
CSPUB 261; 264; 351

Paragraph - 14.16

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If you did comment previously, does the amendment address your previous concerns?  
Yes  
Summary  
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.  
Summary of changes being sought  
N/a  
Officer Recommendation  
Comment Noted
Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

### Paragraph - 14.16

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If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

### Paragraph - 14.16

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If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted
Paragraph - 14.17

Respondent 315762  Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_303

To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_14_27

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendments address previous concerns regarding CH1. Whilst a shortfall in housing land is identified this is not critical but should be monitored.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351

Paragraph - 14.24A

Respondent 315762  Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_23

To which Part of the Core Strategy does this representation relate?
Change Ref. CSR_14_28

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
Yes Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendment address previous concerns regarding housing mix.

Summary of changes being sought

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 261; 264; 351
Support
Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw
Which rep? - What is the reference number of the representation affected?
CSPUB 356
Chapter 15 – Ensuring a Strong and Sustainable St.Helens Economy

Policy - CE1

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<th>Respondent</th>
<th>82550</th>
<th>Mr Steven Broomhead</th>
<th>Northwest Regional Development Agency</th>
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Representation  | ACS PUB2_203 |
To which Part of the Core Strategy does this representation relate? | Chapter 15 - Ensuring a Strong and Sustainable St.Helens Economy |

Legally Compliant? | Sound? | Reason why Unsound? |
Yes | Yes | |

Have you raised this issue previously? | If yes, at what stage? |
No | |

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?

Summary
Express concern with the provision of employment land being proposed based on past take-up rates, the Boroughs shortage of suitable sites and premises, the need for the employment land supply to accommodate wider employment generating purposes, and the need for the Merseyside sub region to provide 494HA of additional employment land.

Summary of changes being sought

Officer Recommendation
No Change Recommended

Justification for Recommendation
The figure of 95.5 HA was used at the Preferred Options stage. This figure was replaced by the research carried out by Regeneris, which was used to give the figure of 60ha of land in May 2009. This was later revised to 30ha on the basis the NWDA have explained in there rep. This figure has now been revised further to 47ha to 2027 for the current publication draft. This is a result of the forecast model being re-run by Regeneris consulting using up dated housing assumption, forecast extended to 2027 and Parkside jobs being factored back into the forecast model.

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CE1

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Representation  | ACS PUB2_24 |
To which Part of the Core Strategy does this representation relate? | Chapter 15 - Ensuring a Strong and Sustainable St.Helens Economy |

Legally Compliant? | Sound? | Reason why Unsound? |
Yes | Yes | |

Have you raised this issue previously? | If yes, at what stage? |
No | |

If no, why did you not comment earlier?

New change

If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change
Does the representor Support/Object/Comment...  
Comment  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
N/a  
Which rep? - What is the reference number of the representation affected?  

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If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
Supports but highlights that RSS policy W3 is factually incorrect which should be reflected in this policy.  
Summary of changes being sought  
Add that table W3 includes SFRIs to supporting text paragraph 6.8  
Officer Recommendation  
Agree Recommend Change  
Justification for Recommendation  
Supporting text referring to Policy W3 that incorrectly states that SFRIs are not included in table 6.1 has been removed from paragraph 15.11  
Recommended Change  
Text deleted from paragraph 15.11. now reads as  
"The proposed SRFI at Parkside, Newton-le-Willows is a regionally significant development. Parkside scenarios are included in the review to provide a greater understanding of the impacts on demand and supply. If Parkside proceeds it could potentially provide jobs that could be accessed by St.Helens residents. The forecasts show that Parkside will contribute towards B8 demand but the deficit remains. This is because the specific nature of Parkside could be restrictive for potential local occupiers."  

Does the representor Support/Object/Comment...  
Support  
Does this representation withdraw or partially withdraw a representation made at publication stage?  
N/a  
Which rep? - What is the reference number of the representation affected?  

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If you did comment previously, does the amendment address your previous concerns?  
No  
Summary  
Supports but thinks it maybe better to include Parkside and Omega in the forecast to make it simpler. if they remain excluded then the reasons for this should be clearly stated in the supporting text.  
Summary of changes being sought  
Either include a greater explanation as to why Parkside and Omega have been left out of the forecast if this approach is maintained. Or include Parkside and Omega within the forecast to make it simpler.  
Officer Recommendation  
Partly Agree Recommend Change  
Justification for Recommendation
Parkside has now been factored back into the preferred forecast model. The forecast model has now been re-run by Regeneris Consulting to reflect changes that have occurred since the publication of the St Helens Employment Land & Skills Study in 2009. Changes include an extension of the plan period to 2027 changes the Boroughs annual housing target following the removal of the Growth Point Target and updated population growth figures. More weight has now been placed on the role of parkside in meeting the employment demands of the Borough. Whilst the RSS currently forms part of the St Helens Development plan it is the intention of the Coalition Government to revoke Regional Spatial Strategies

**Recommended Change**

Amend policy CE1 and justification as below Providing at least 47 hectares of land for B1, B2 or B8 purposes to 2027. This will primarily be for B8 uses and will be met through: A review of the existing and identified land supply to identify which B2 site

**Does the representor Support/Object/Comment..**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

N/a

**Which rep? - What is the reference number of the representation affected?**

**Paragraph - Point 2 CE1**

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<th>426180</th>
<th>Revelan Group</th>
<th>C/O Harris Lamb</th>
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To which Part of the Core Strategy does this representation relate?

Change Ref. CSRP_15_02

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Have you raised this issue previously?

If yes, at what stage?

No

If no, why did you not comment earlier?

We not instructed to.

If you did comment previously, does the amendment address your previous concerns?

**Summary**

Sets out a sequential series of land types that should be included in section 2 of CE1. Brownfield should be considered first, followed by Greenfield and then green belt.

**Summary of changes being sought**

Sets out a sequential series of land types that should be included in section 2 of CE1. Brownfield should be considered first, followed by Greenfield and then green belt. .

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

Policy CSS1, Overall Spatial Strategy point VI identifies that the re-use of previously developed land in sustainable locations will be prioritised. Point xi states that within the green belt area development will be restricted to within existing settlement boundaries or major developed sites in the green belt. Point vii highlights that the general extent of the green belt. These points set out the order in which the different types of sites should be considered.

**Recommended Change**

No change

**Does the representor Support/Object/Comment..**

Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

**Policy - CE1**

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Change Ref. CSRP_15_02

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Have you raised this issue previously?

If yes, at what stage?

No

If no, why did you not comment earlier?

New change

If you did comment previously, does the amendment address your previous concerns?
Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

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Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Punctuation and grammatical errors.
Summary of changes being sought
Punctuation and grammatical corrections needed to CE1 (2).

Officer Recommendation
Comment Noted
Justification for Recommendation
Comments noted MPPC.
Recommended Change
No change.

Does the representor Support/Object/Comment.. Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CE1

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_306
To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_15_04
Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier? New change

If you did comment previously, does the amendment address your previous concerns?

Summary Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.
Summary of changes being sought N/a

Officer Recommendation
Comment Noted
Justification for Recommendation
Comment noted
Recommended Change
No change

Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Policy - CE1

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_308
To which Part of the Core Strategy does this representation relate? Change Ref. CSRP_15_05
Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier? New change

If you did comment previously, does the amendment address your previous concerns?

Summary Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.
Summary of changes being sought N/a

Officer Recommendation
Comment Noted
Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..  
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?  
N/a

Which rep? - What is the reference number of the representation affected?

Policy - CE1

Respondent  315762  Mrs Dianne Wheatley  Government Office for the North West

Representation  ACSPUB2_309

To which Part of the Core Strategy does this representation relate?  
Change Ref. CSRP_15_06

Legally Compliant?  Sound?  Reason why Unsound?
Yes  Yes

Have you raised this issue previously?  If yes, at what stage?
No

If no, why did you not comment earlier?
New change

If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..  
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?  
N/a

Which rep? - What is the reference number of the representation affected?

Policy - CE1

Respondent  315762  Mrs Dianne Wheatley  Government Office for the North West

Representation  ACSPUB2_311

To which Part of the Core Strategy does this representation relate?  
Change Ref. CSRP_15_07

Legally Compliant?  Sound?  Reason why Unsound?
Yes  Yes

Have you raised this issue previously?  If yes, at what stage?
No

If no, why did you not comment earlier?
New change

If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..  
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?  
N/a

Which rep? - What is the reference number of the representation affected?
**Paragraph - 15.6**

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**Summary**
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

**Summary of changes being sought**
N/a

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
N/a

**Which rep? - What is the reference number of the representation affected?**
Paragraph - 15.6

Respondent 81816 Mr P Sargeant
Representation ACSPUB2_379
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRPR_15_09
Legally Compliant? Sound? Reason why Unsounb
No No Justified? Effective? Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No
Summary
Poorly expressed.
Summary of changes being sought
Grammatical corrections to paragraph 15.6.
Officer Recommendation
Comment Noted
Justification for Recommendation
Comments noted.
Recommended Change
No change.
Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Paragraph - 15.7

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West
Representation ACSPUB2_314
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRPR_15_10
Legally Compliant? Sound? Reason why Unsounb
Yes Yes Justified? Effective? Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?
New change
If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.
Summary of changes being sought
N/a
Officer Recommendation
Comment Noted
Justification for Recommendation
Comments noted.
Recommended Change
No change.
Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a
Which rep? - What is the reference number of the representation affected?

Paragraph - Paragraph 15.7, 15.8 and Table 15.7.
Summary
The method of presentation adopted fails to make it clear that the original table has been replaced, although the text suggests it has.

Summary of changes being sought
Make clear table 15.7 has been replaced.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Disagree only figures have been updated.

Recommended Change
No change.

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
Which rep? - What is the reference number of the representation affected?

Diagram/Table - 15.7

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_315

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_11

Legally Compliant? No

Sound? Yes

Reason why Unsound? Yes

Have you raised this issue previously? No

If yes, at what stage? No Change

If no, why did you not comment earlier? New change

If you did comment previously, does the amendment address your previous concerns? No Change

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Paragraph - 15.8

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_316
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_12

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?
New change

If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Paragraph - 15.8
Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_317

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_14

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?
New change

If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

Paragraph - 15.8
Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_318

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_13

Legally Compliant? Sound? Reason why Unsound?
Yes Yes

Have you raised this issue previously? If yes, at what stage?
No

If no, why did you not comment earlier?
New change

If you did comment previously, does the amendment address your previous concerns?
Have you raised this issue previously?  If yes, at what stage?
No
If no, why did you not comment earlier?
New change
If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

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Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

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Summary
Supports but thinks it maybe better to include Parkside and Omega in the forecast to make it simpler. if they remain excluded then the reasons for this should be clearly stated in the supporting text.

Summary of changes being sought
Either include a greater explanation as to why Parkside and Omega have been left out of the forecast if this approach is maintained. Or include Parkside and Omega within the forecast to make it simpler.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Parkside has now been factored back into the preferred forecast model. The forecast model has now been re-run by Regeneris Consulting to reflect changes that have occurred since the publication of the St Helens Employment Land & Skills Study in 2009. Changes include an extension of the plan period to 2027 changes the Boroughs annual housing target following the removal of the Growth Point Target and updated population growth figures. More weight has now been placed on the role of parkside in meeting the employment demands of the Borough. Whilst the RSS currently forms part of the St Helens Development plan it is the intention of the Coalition Government to revoke Regional Spatial Strategies

Recommended Change
Policy Justification Para 15.11 amended to: "The proposed SRFI at Parkside, Newton-le-Willows is a regionally significant development. Parkside scenarios are included in the review to provide a greater understanding of the impacts on demand and supply.

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?
National Policy?

Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Wording unsuitably informal, improvements suggested.

Summary of changes being sought
In paragraph 15.11 substitute both ‘Policy’ and ‘does not’. Use rounded figures.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comments noted.

Recommended Change
No change.

Does the representor Support/Object/Comment?

Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Supports but thinks it maybe better to include Parkside and Omega in the forecast to make it simpler. If they remain excluded then the reasons for this should be clearly stated in the supporting text.

Summary of changes being sought
Parkside has now been factored back into the preferred forecast model. The forecast model has now been re-run by Regeneris Consulting to reflect changes that have occurred since the publication of the St Helens Employment Land & Skills Study in 2009. Changes include an extension of the plan period to 2027 changes the Boroughs annual housing target following the removal of the Growth Point Target and updated population growth figures. More weight has now been placed on the role of parkside in meeting the employment demands of the Borough. Whilst the RSS currently forms part of the St Helens Development plan it is the intention of the Coalition Government to revoke Regional Spatial Strategies

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
The forecast was amended to reflect comments received by the NWDA at the Publication Stage. A meeting has been arranged with 4NW and NWDA to agree an approach which is acceptable to all parties

Recommended Change
Policy Justification Para 15.11 amended to: “The proposed SRFI at Parkside, Newton-le-Willows is a regionally significant development. Parkside scenarios are included in the review to provide a greater understanding of the impacts on demand and supply.

Does the representor Support/Object/Comment?
Support

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

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Representation ACSPUB2_321
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_17
Legally Compliant? Yes
Sound? Yes
Reason why Unsound?
Have you raised this issue previously? If yes, at what stage?
If no, why did you not comment earlier?
New change
If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Paragraph - 15.12
Respondent 81816 Mr P Sargeant
Representation ACSPUB2_385
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_17
Legally Compliant? No
Sound? No
Reason why Unsound?
Justified?; Effective?; Consistent with National Policy?
Have you raised this issue previously? If yes, at what stage?
Yes Issues and Options; Preferred Options; Publication
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Para 15.17 is not clear.

Officer Recommendation
Partly Agree Recommend Change

Justification for Recommendation
Disagree, however, punctuation will be picked up as MPPC.

Recommended Change
Punctuation updated as MPPC.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Paragraph - 15.13
Respondent 315762 Mrs Dianne Wheatley Government Office for the North West
Representation ACSPUB2_322
To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_15_18

Which rep? - What is the reference number of the representation affected?
Legally Compliant?  Sound?  Reason why Unsound?
Yes  Yes
Have you raised this issue previously?  If yes, at what stage?
No
If no, why did you not comment earlier?
New change
If you did comment previously, does the amendment address your previous concerns?

Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

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If you did comment previously, does the amendment address your previous concerns?
No

Summary
Paragraph 15.13 lacks Punctuation and consistency with earlier paragraphs.

Summary of changes being sought
Punctuation and grammatical changes needed to paragraph 15.13.

Officer Recommendation
Comment Noted

Justification for Recommendation
Any inconsistencies will be picked up as MPPC.

Recommended Change
Grammatical errors will be corrected.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?

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<td><strong>If no, why did you not comment earlier?</strong></td>
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</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Paragraph 15.13 lacks Punctuation and consistency with earlier paragraphs.

Summary of changes being sought
Punctuation and grammatical changes needed to paragraph 15.13.

Officer Recommendation
Comment Noted

Justification for Recommendation
Any inconsistencies will be picked up as MPPC.

Recommended Change
Grammatical errors will be corrected.

Does the representor Support/Object/Comment..
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?
Summary
Changes to employment land policy should be adequately evidenced and agreed with 4NW/NWDA.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment...
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?
N/a

Which rep? - What is the reference number of the representation affected?
### Chapter 16 – Safeguarding and Enhancing Quality of Life in St. Helens

#### Paragraph - 16.13A and 16.13B.

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If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Paragraphs added at 16.13A and B are not needed, over sentimental, and lack punctuation.

**Summary of changes being sought**
Paragraphs 16.13A and 16.13B should be removed.

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Disagree. The Council considers that trees and woodlands merit specific reference and have wide ranging benefits as demonstrated through the many initiatives currently proposed.

**Recommended Change**
No change.

Does the representor Support/Object/Comment..?
Object

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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### Policy - Policy CQL 3, part 4

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<th>82491 Miss Lesley Bye Merseyside Environmental Advisory Service</th>
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<tr>
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If you did comment previously, does the amendment address your previous concerns?
No

**Summary**
Requests for the deletion of a previous change, rewording of CQL3 (4) and addition of definitions to the glossary.

**Summary of changes being sought**
Delete change "identifying a network of natural habitats", reword CQL 3, part 4 to the following "Reducing habitat and species fragmentation by delivering the Ecological Framework for the Borough" and add Ecological Framework to the Glossary of Terms.

**Officer Recommendation**
Partly Agree Recommend Change

**Justification for Recommendation**
Slight wording change to that suggested. The aim is to give greater recognition to the importance of the developing ecological framework in safeguarding and promoting habitats and species

**Recommended Change**
reword policy CQL3 , part 4 as follows "Reducing habitat and species fragmentation by developing a functioning ecological framework for the Borough;” Definition of Ecological Framework added to glossary.

**Does the representor Support/Object/Comment..?**
Support
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Chapter 17 – Meeting St. Helens Resource and Infrastructure Needs

<table>
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<th>315762</th>
<th>Mrs Dianne Wheatley</th>
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</table>

If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
The amendment addresses previous concerns regarding the inclusion of the background study's conclusions.

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Justification for Recommendation
Comment noted

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected? CSPUB402

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If you did comment previously, does the amendment address your previous concerns?
Yes

Summary
Amended Policy CP1 part 3(iv) now requires consideration of issues of unstable land which addresses our concerns that the Core Strategy would not meet the requirements of PPG14.

Summary of changes being sought
N/A

Officer Recommendation
Comment Noted

Justification for Recommendation
Comments refer to inadmissible representation but withdraw objection

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Does this representation withdraw or partially withdraw a representation made at publication stage? Withdraw

Which rep? - What is the reference number of the representation affected? Inadmissible rep CSPUB 1852
Policy - CR1

Respondent 315762 Mrs Dianne Wheatley Government Office for the North West

Representation ACSPUB2_11

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_17_02

Legally Compliant? Yes
Sound? Yes

Have you raised this issue previously? Yes
If yes, at what stage? Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? Yes

Summary
Welcome the addition of date to diagram

Summary of changes being sought
N/a

Officer Recommendation
Comment Noted

Recommended Change
No change

Does the representor Support/Object/Comment.. Support

Diagram/Table -

Respondent 316561 Miss Rachael Bust The Coal Authority

Representation ACSPUB2_212

To which Part of the Core Strategy does this representation relate?
Chapter 17 - Meeting St.Helens' Resource and Infrastructure Needs

Legally Compliant? Yes
Sound? Yes

Have you raised this issue previously? Yes, at what stage? Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns? No

Summary
The Council's approach to mineral safeguarding in Policy CR1 is not in conformity with MPS1 or the BGS "Guide to Mineral Safeguarding in England" (Oct 2007), and has been informed by a fundamentally flawed piece of evidence in the "Mineral Planning on Merseyside 2008" report.

Summary of changes being sought
MSA be defined in accordance with MPS1

Officer Recommendation
No Change Recommended

Justification for Recommendation
Whilst MPS1 requires the designation of MSAs to ensure proven resources are not needlessly sterilised, the guidance for undertaking such designations includes refining resources in discussion with industry and deciding which minerals may become of economic importance in the foreseeable future. The study undertaken followed this processes to identify the two MSA proposed.

Recommended Change
No change

Does the representor Support/Object/Comment.. Object

Does this representation withdraw or partially withdraw a representation made at publication stage? Partially Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 371

Upholds rep CSPUB 862
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Chapter 18 – Appendix 1: Delivery & Monitoring Strategy

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<td><strong>If no, why did you not comment earlier?</strong></td>
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If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
The amendments, and updated background papers address previous concerns about the Delivery and Monitoring Strategy

**Summary of changes being sought**

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comments noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..?**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB374
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If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
Welcome the addition of the document "Mineral Planning on Merseyside 2008"

**Summary of changes being sought**

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
The addition of the document "Mineral Planning on Merseyside 2008" overcomes previous concerns

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB860
Chapter 20 – Appendix 3: Glossary of Terms

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**Summary**

In glossary definition of Local Nature Reserve, delete "Local Nature Reserve" at the end of the last sentence.

**Summary of changes being sought**

The words "Local Nature Reserve" appearing at the end of the last sentence, are not required and should be deleted.

**Officer Recommendation**

Agree Recommend Change

**Justification for Recommendation**

Agree minor wording change

**Recommended Change**

Delete "Local Nature Reserve" at the end of the Glossary definition for "Local Geological Site" (CSRP_App3_01)

**Does the representor Support/Object/Comment..**

Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**

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**Summary**

Minor change in the glossary - 'Sites of Community Wildlife Interest' are now called 'Local Wildlife Sites'.

**Summary of changes being sought**

The text of the Glossary should be updated from 'Sites of Community Wildlife Interest' to the new definition 'Local Wildlife Sites'.

**Officer Recommendation**

Agree Recommend Change

**Justification for Recommendation**

Agree minor wording change

**Recommended Change**

The Glossary definition of "Sites of Community Wildlife Interest" should be changed to "Local Wildlife Sites" (CSRP_App3_04 )

**Does the representor Support/Object/Comment..**

Comment

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

**Which rep? - What is the reference number of the representation affected?**
Chapter 21 – Appendix 4 Saved UDP policies to be replaced by the Core Strategy

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<th>Mrs Dianne Wheatley</th>
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**Representation**  ACSPUB2_9

To which Part of the Core Strategy does this representation relate?
Change Ref. CSRP_App4_01

Legally Compliant?  Yes

Sound?  Yes

Reason why Unsound?

Have you raised this issue previously?  Yes

If yes, at what stage?
Publication

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
Welcome the inclusion of Appendix 4, however, a number of minor amendments are needed to correct errors and add clarity.

**Summary of changes being sought**
Minor changes to Appendix 4 to add clarity and correct errors

**Officer Recommendation**
Partly Agree Recommend Change

**Justification for Recommendation**
A number of minor amendments to list of saved policies are needed for clarity.

**Recommended Change**
Update Appendix 4 in line with suggested changes.

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Partially Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB246
## Appendix 1: Inadmissible Representations

### Policy - 11

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**Have you raised this issue previously?**

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<td>If yes, at what stage?</td>
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**If no, why did you not comment earlier?**

Illness

**If you did comment previously, does the amendment address your previous concerns?**

No additional information provided

**Summary**

No/a

**Summary of changes being sought**

N/a

**Officer Recommendation**

No Change Recommended

**Justification for Recommendation**

The representation does not relate to a relevant amendment or policy.

**Recommended Change**

No change

**Does the representor Support/Object/Comment...**

Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**

Which rep? - What is the reference number of the representation affected?

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### Policy - CH1

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<td>Yes, with minor changes</td>
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**Have you raised this issue previously?**

If yes, at what stage?

No

**If no, why did you not comment earlier?**

Not considered before

**If you did comment previously, does the amendment address your previous concerns?**

Respondent concerned about windfall allowance (Inadmissible)

**Summary**

Respondent proposes to remove reference to windfall (Inadmissible)

**Summary of changes being sought**

Respondent's comments do not relate to amendments, they relate to May 2009 Publication Draft Core Strategy. In line with PPS3, the Council has not relied upon windfall sites when calculating its housing land supply in the first ten years of the plan to 2021. Policy CH1 is quite clear that there is an identified shortfall between 2021-2026 (i.e. the 11-15 year period) where it is expected that the Council will be in a position of undersupply. Consequently it was considered appropriate to include a windfall allowance for this period in line with PPS3. The inclusion of a windfall allowance on the housing delivery trajectory graph has merely been used to illustrate how much difference a windfall allowance in years 11-15 of the Core Strategy would make to the identified shortfall. In addition to a windfall allowance, para. 14.16 of the Core Strategy states that the shortfall could also be addressed through: increased densities; reconsideration of potentially suitable SHLAA sites; and Green Belt release. For the avoidance of doubt, this approach has been added to Policy CH1 in criterion 2A.

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Recommended Change

Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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**Summary**
Respondent concerned that 30% AH target is too high/ consider higher target on greenfield than brownfield

**Summary of changes being sought**
Respondent proposes a flexible 20% AH target/ consider higher target on greenfield than brownfield

**Officer Recommendation**
No Change Recommended

**Justification for Recommendation**
Respondent's comments do not relate to amendments, they relate to May 2009 Publication Draft Core Strategy. The respondent has not submitted any justification to demonstrate why a target of 20% Affordable Housing would more appropriately meet St.Helens' housing needs than the 30% target, as proposed by Policy CH2. Notwithstanding this, the Council's requirement for 30% Affordable Housing is balanced by undertaking an independent site-specific economic viability study, to see what is achievable on a site where the developer does not think it is possible, and in such cases the Council's requirement may be relaxed accordingly. In addition, there is no evidence submitted by the respondent to demonstrate that greenfield sites are any more viable than brownfield sites. Whilst it is appreciated that the viability of brownfield sites may be dependent upon higher abnormal costs, the viability of greenfield sites can also suffer, due to the increase in land value that the landowner expects to gain through a change of use of the land to residential.

**Recommended Change**

Does the representor Support/Object/Comment..
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

<table>
<thead>
<tr>
<th>Policy - CSS1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
</tr>
<tr>
<td><strong>Representation</strong></td>
</tr>
<tr>
<td><strong>To which Part of the Core Strategy does this representation relate?</strong></td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
</tr>
<tr>
<td>Yes</td>
</tr>
<tr>
<td><strong>Have you raised this issue previously?</strong></td>
</tr>
<tr>
<td>No</td>
</tr>
<tr>
<td><strong>If no, why did you not comment earlier?</strong></td>
</tr>
<tr>
<td>Not aware of changes</td>
</tr>
<tr>
<td><strong>If you did comment previously, does the amendment address your previous concerns?</strong></td>
</tr>
</tbody>
</table>

**Summary**
Respondent concerned about distribution of development

**Summary of changes being sought**
Respondent proposes to direct 50% of development towards the Town Centre
Officer Recommendation
No Change Recommended

Justification for Recommendation
Respondent's comments do not relate to amendments, they relate to May 2009 Publication Draft Core Strategy
These percentages are not intended to be prescriptive but instead indicative. However, the Core Strategy's Spatial vision includes the statement that "...the majority of new housing developed, including affordable housing, will be developed in the core settlement of St.Helens, with particular priority on creating sustainable communities in the deprived areas, including parts of Parr, Thatto heath, Four acre and St. Helens town centre." The core settlement area, in particular the areas named, have a significant need for housing-led regeneration. They also have a significant proportion of the available previously developed land identified by the SHLAA and which RSS requires the majority of development to be on. They are also more accessible locations in terms of jobs and services (and hence more sustainable) than the outlying areas classified as "rural" by policy CAS5. This combination of sustainable location with PDL supply and a need for regeneration support the approach in policy CSS1 to the indicative distribution of development.

Recommended Change

Does the representor Support/Object/Comment...
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

Policy - CSS1

<table>
<thead>
<tr>
<th>Respondent</th>
<th>316561 Miss Rachael Bust</th>
<th>The Coal Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>ACSPUB2_214</td>
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<tr>
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<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
<td>Reason why Unsound?</td>
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<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
<td>Effective?</td>
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<td>Publication</td>
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</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
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<td></td>
</tr>
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<td></td>
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<tr>
<td>If you did comment previously, does the amendment address your previous concerns?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Summary</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Whilst maintaining specific concerns The Coal Authority withdraw this over-arching objection</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Summary of changes being sought</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Officer Recommendation
Comment Noted
Justification for Recommendation
Comments Noted
Recommended Change
No change

Does the representor Support/Object/Comment...
Support
Does this representation withdraw or partially withdraw a representation made at publication stage?
Withdraw

Which rep? - What is the reference number of the representation affected?
CSPUB 851

Policy -

<table>
<thead>
<tr>
<th>Respondent</th>
<th>426180 Revelan Group</th>
<th>C/O Harris Lamb</th>
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<tr>
<td>Representation</td>
<td>ACSPUB2_243</td>
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<tr>
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<td></td>
<td></td>
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<tr>
<td>Chapter 6 - Overall Spatial Strategy</td>
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<td>Legally Compliant?</td>
<td>Sound?</td>
<td>Reason why Unsound?</td>
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<td>If yes, at what stage?</td>
<td>Effective?</td>
</tr>
<tr>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
<td></td>
<td></td>
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</table>
Summary
More development should be focused towards Haydock and Earlestown with Sankey Valley Industrial and Haydock Industrial Estates being the priority locations. Comments are Inadmissible because the Consultee has not commented on a change.  
Summary of changes being sought
Amend policy to show Sankey Valley Industrial and Haydock Industrial Estates as priority locations.

Officer Recommendation
No Change Recommended

Justification for Recommendation
Comments are inadmissible.

Recommended Change
No change required

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Policy - CAS 3.1

<table>
<thead>
<tr>
<th>Respondent</th>
<th>426180</th>
<th>Revelan Group</th>
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<td>Chapter 9 - Newton-le-Willows &amp; Earlestown</td>
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<tr>
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<tr>
<th>Have you raised this issue previously?</th>
<th>If yes, at what stage?</th>
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</thead>
<tbody>
<tr>
<td>No</td>
<td></td>
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</table>

If no, why did you not comment earlier?
Harris Lamb were not instructed at this stage.

If you did comment previously, does the amendment address your previous concerns?

Summary
Suggests re-wording subsection 2 of Policy CAS 3.1. Comments are inadmissible because the Consultee has not commented upon a change.

Summary of changes being sought
Policy CAS 3.1 subsection 2 should be amended to read: 'The main focus for industrial activity will continue to be the Sankey Valley Trading Estate. New employment development will be encouraged in and adjacent to the estate provided that it does not have an adverse impact on neighbouring land uses'

Officer Recommendation
No Change Recommended

Justification for Recommendation
Comments are inadmissible.

Recommended Change
No Change

Does the representor Support/Object/Comment...
Object
Does this representation withdraw or partially withdraw a representation made at publication stage?

Paragraph - 14.17

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82115</th>
<th>Mr Andrew Thompson</th>
<th>Morris Homes (North) Limited</th>
</tr>
</thead>
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<tr>
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<th>Sound?</th>
<th>Reason why Unsound?</th>
</tr>
</thead>
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<tr>
<td>Yes</td>
<td>Yes, with minor changes</td>
<td>Justified?; Consistent with National Policy?</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Have you raised this issue previously?</th>
<th>If yes, at what stage?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
No
If no, why did you not comment earlier?
Not aware of changes and no time to consider
If you did comment previously, does the amendment address your previous concerns?

Summary
Respondent supportive of general policies and Mid Mersey Growth Point/ reconsider SHLAA/ concerned about 80% PDL target due to prohibitive costs

Summary of changes being sought
Respondent proposes to reconsider SHLAA/ reduce PDL target to 65% (RSS)

Officer Recommendation
No Change Recommended

Justification for Recommendation
Respondent's comments do not relate to amendments, they relate to May 2009 Publication Draft Core Strategy. Support for general policies and Mid Mersey Growth Point is acknowledged. The SHLAA is updated on an annual basis. The Council is committed to regeneration and this is reflected by the local previously developed land target (PDL) of 80% for new residential development, which goes beyond the 65% RSS target (RSS Policy L4) for St.Helens and Halton. This is justified by 90% of completions being delivered on PDL between 2003/04 and 2007/08, and also that 87% of the supply identified in the SHLAA is on PDL.

Recommended Change

Does the representor Support/Object/Comment..?
Comment
Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?

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<thead>
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<td><strong>Legally Compliant?</strong></td>
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<tr>
<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns?
No

Summary
Objection to CR1 maintained as requirement for restoration is not included.

Summary of changes being sought
CR1 should include reference to restoration following mineral extraction

Officer Recommendation
No Change Recommended

Justification for Recommendation
No amendment has been made to CR1 which is a strategic policy that will be supplemented by detailed policies in a subsequent Development Management DPD as indicated in paragraph 17.11. Restoration is also covered by MPG7

Recommended Change
No change

Does the representor Support/Object/Comment..
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?

Which rep? - What is the reference number of the representation affected?
Upholds invalid rep CSPUB 1846

<p>| Paragraph - Within Chapter 17 |
|-----------------------------|----------------|----------------|
| <strong>Respondent</strong> | 316561 | Miss Rachael Bust | The Coal Authority |
| <strong>Representation</strong> | ACSPUB2_198 |
| <strong>To which Part of the Core Strategy does this representation relate?</strong> | | |</p>
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<th>Reason why Unsound?</th>
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<tr>
<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
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<tr>
<td>Yes</td>
<td></td>
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</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
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</table>

If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
Satisfied that points raised can be addressed through Development Management DPD

**Summary of changes being sought**

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment Noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 1853

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**Paragraph - Within Chapter 17**

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<tr>
<th>Respondent</th>
<th>316561</th>
<th>Miss Rachael Bust</th>
<th>The Coal Authority</th>
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To which Part of the Core Strategy does this representation relate?

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<th>Legally Compliant?</th>
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<th>Reason why Unsound?</th>
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<tr>
<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
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<tr>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
Satisfied that points previously raised can be omitted

**Summary of changes being sought**

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment Noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 1847

---

**Paragraph - Within Chapter 17**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>316561</th>
<th>Miss Rachael Bust</th>
<th>The Coal Authority</th>
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<tr>
<td>Representation</td>
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To which Part of the Core Strategy does this representation relate?

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<td>Have you raised this issue previously?</td>
<td>If yes, at what stage?</td>
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<tr>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If no, why did you not comment earlier?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If you did comment previously, does the amendment address your previous concerns?
Yes

**Summary**
Satisfied that points previously raised can be omitted

**Summary of changes being sought**

**Officer Recommendation**
Comment Noted

**Justification for Recommendation**
Comment Noted

**Recommended Change**
No change

**Does the representor Support/Object/Comment..**
Support

**Does this representation withdraw or partially withdraw a representation made at publication stage?**
Withdraw

**Which rep? - What is the reference number of the representation affected?**
CSPUB 1847
If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  
No

Summary  
Replace 'opencast' with 'surface mining' In order to ensure that the St Helens Core Strategy reflects current industry terminology

Summary of changes being sought  
Replace 'opencast' with 'surface mining'

Officer Recommendation  
No Change Recommended

Justification for Recommendation  
The public of St.Helens are familiar with the term opencast, any change in terminology could cause confusion.

Recommended Change  
No change

Does the representor Support/Object/Comment..  
Object

Does this representation withdraw or partially withdraw a representation made at publication stage?  
Invalid rep CSPUB 1850

Paragraph - 17.4

Respondent  Miss Rachael Bust  The Coal Authority
Representation ACSPUB2_209
To which Part of the Core Strategy does this representation relate?

Legally Compliant?  
No

Sound?  
If yes, at what stage?

Reason why Unsound?  
Consistent with National Policy?

Have you raised this issue previously?  
Yes

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  
No

Summary  
Para 17.4 should include link between prior extraction of minerals and issues of unstable land.

Summary of changes being sought  
Include link at 17.4 between prior extraction of minerals and issues of unstable land.

Officer Recommendation  
No Change Recommended

Justification for Recommendation  
In the interests of brevity such details have not been included. No amendment has been made to this section at this time. It is not considered that the absence of such details would affect the implementation of the policy.

Recommended Change  
No change

Does the representor Support/Object/Comment..  
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?  
Upholds inadmissible rep CSPUB 1851

Which rep? - What is the reference number of the representation affected?

Invalid rep CSPUB 1850

Paragraph - 17.4

Respondent  Miss Rachael Bust  The Coal Authority
Representation ACSPUB2_209
To which Part of the Core Strategy does this representation relate?

Legally Compliant?  
No

Sound?  
If yes, at what stage?

Reason why Unsound?  
Consistent with National Policy?

Have you raised this issue previously?  
Yes

If no, why did you not comment earlier?

If you did comment previously, does the amendment address your previous concerns?  
No

Summary  
Para 17.4 should include link between prior extraction of minerals and issues of unstable land.

Summary of changes being sought  
Include link at 17.4 between prior extraction of minerals and issues of unstable land.

Officer Recommendation  
No Change Recommended

Justification for Recommendation  
In the interests of brevity such details have not been included. No amendment has been made to this section at this time. It is not considered that the absence of such details would affect the implementation of the policy.

Recommended Change  
No change

Does the representor Support/Object/Comment..  
Comment

Does this representation withdraw or partially withdraw a representation made at publication stage?  
Upholds inadmissible rep CSPUB 1851

Which rep? - What is the reference number of the representation affected?
Appendix 2: List of those submitting a valid cyclostyled form with no additional comments

<table>
<thead>
<tr>
<th>Title</th>
<th>Given Name</th>
<th>Family Name</th>
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</thead>
<tbody>
<tr>
<td>Mr</td>
<td>Ian</td>
<td>Abbott</td>
</tr>
<tr>
<td>Miss</td>
<td>Ann</td>
<td>Adams</td>
</tr>
<tr>
<td>Mr</td>
<td>Chris</td>
<td>Addi</td>
</tr>
<tr>
<td>Mrs</td>
<td>Donna</td>
<td>Addi</td>
</tr>
<tr>
<td>Mrs</td>
<td>Lynette Maria</td>
<td>Alberta</td>
</tr>
<tr>
<td>Miss</td>
<td>Samantha</td>
<td>Allen</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret Alice</td>
<td>Almond</td>
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<tr>
<td>Mr</td>
<td>David</td>
<td>Appleton</td>
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<tr>
<td>Mrs</td>
<td>Elaine</td>
<td>Appleton</td>
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<tr>
<td>Mr &amp; Mrs</td>
<td>Steve and Ann</td>
<td>Armstrong</td>
</tr>
<tr>
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<td>Simon</td>
<td>Arnold</td>
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<tr>
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<td>Tina</td>
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<td>Ascott</td>
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<tr>
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<td>Bryan</td>
<td>Ashcroft</td>
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<tr>
<td>Mr &amp; Mrs</td>
<td>Clare and Carl</td>
<td>Ashton</td>
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<tr>
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<td>Linda</td>
<td>Ashworth</td>
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<tr>
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<td>Doli</td>
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Appendix 3: List of additional comments supplementing cyclostyled responses

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<td>Mr Norman Aldred</td>
<td>The local roads are not coping with present levels of traffic. Any further development is utter madness. This is not rocket science.</td>
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<td>Mr Eric Ambler</td>
<td>I strongly object to the latest draft of the LDF Core Strategy</td>
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<td>Mr Michael Anslow</td>
<td>Traffic is already a nightmare. I also suffer from asthma and don’t need anything else contributing to it. Newton is a nice place to live please don’t ruin it.</td>
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<td>Mr Harold Arnold</td>
<td>This is just a play to get around the Green Belt issue and will NOT offer real productive employment</td>
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<td>Mr &amp; Mrs Lee &amp; Linda Ash</td>
<td>We do not agree with proposed changes, as it will affect us with the traffic and it is too near our house, far too industrial for a residential dwelling.</td>
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<td>Mrs Winifred Ashcroft</td>
<td>I have lived in Newton-le-Willows for 91 years and do not wish to see it spoiled for future generations.</td>
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<td>Dr Michael M Ashley</td>
<td>An important issue. Has it not been raised few times at the House of Commons during Priminister Question Time. If not we need to do so.</td>
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<td>Miss Louise Baines</td>
<td>To get to work in a morning from Lowton to Newton Clinic (4 miles) can take up to 1 hour imagine the time it will take with all the extra traffic and lorries on the road</td>
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<td>Mr Robert Neill Ball</td>
<td>The whole foundation of the proposals for Parkside and the surrounding area is based on a false premise. The supposed Rail Interchange cannot operate efficiently with the limited capacity of the west coast line and feeder lines. This is being used as a cynical device to obtain planning authority for a road transport hub which will in effect create the complete opposite of its supposed raison d’etre i.e. the reduction of pollution and congestion. Indeed this area will within a very short time become one of the most congested and polluted (air, noise and water) areas in the whole UK.</td>
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<td>Mr Terence Barton</td>
<td>The whole proposals will be devastating for the area and people who live there. The existing roads are already being battered by the weight and volume of vehicles they were never intended to take. Stop this madness now!!!</td>
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<td>Mr Keith Basson</td>
<td>Are you insane? Or just corrupt? What is urban regeneration do you mean urban de regeneration?</td>
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<td>Mrs Elisabeth Basson</td>
<td>No matter, how many amendments you make to the wording trying to con people the result is just the same. You are ‘sabotaging’ the countryside, the country as a whole for what? Where is the economic sense in all this? When everything dies off? No I am not a green just a human being.</td>
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<td>Mr Irene Bate and Mrs Irene Bate</td>
<td>We need as much green as we can possibly keep. It’s time the residents had some peace and quiet. How about a lovely park it’s quite spacious and would be lovely.</td>
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<td>Mr James Beardsmore</td>
<td>St.Helens MBC should follow the precedent set by Maidstone MBC and reject any application for a SRFI (at Parkside) which in reality will be a road freight distribution centre.</td>
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<td>Miss Stephanie Beddard</td>
<td>I enjoy coming to this area to visit the local pubs and shops, but as the traffic is already bad enough, an increase in this would stop me visiting the area altogether.</td>
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<tr>
<td>Mr Alex Beddard</td>
<td>Why is land to the east of the M6 ‘protected’ by Green Belt status only to be suddenly removed whenever it pleases those in St.Helens.</td>
</tr>
<tr>
<td>Miss Rosalyn Beddard</td>
<td>Visit my father’s house in Newton and enjoy the surrounding Green Belt area which would be destroyed.</td>
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<tr>
<td>Mr Ronald Beddard</td>
<td>Over the past 15 years housing has been encouraged and increased and now for commercial greed and rateable revenue the Planners want to build a monster complex in the same area – Pollution is already an issue and traffic on the A49 a</td>
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problem at times. Section 9.32 demonstrated in the eyes of a minority!

In my experience the M6 at Haydock to Woolston is at a standstill from 7am onwards everyday so what is the point of creating more traffic. The roads around croft are already used as a rat run during rush hours.

Our town is too small to accommodate large lorries!

Please listen to us and keep our Green Belt green.

Leave the Green Belt green.

Pro Logis have shown their new outline proposal, same land grab, for smaller warehouses. The changes to LDF does not alleviate my environmental concerns.

We regret that Newton no longer has its former independent Urban District Council. St.Helens is a foreign influence in our life. We seem to have retained some of our town's history and generally pleasant surroundings. A journey through St.Helens is most depressing. Let Newtonians only decide on this new massive blot on our landscape.

It is sinister (to say the least) that the LDF seems to provide an easy “shoe-in” for astral/Prologis future developments. I live directly backing on the east/west main railway and already suffer questionable levels of rail traffic the M6 and M62 are already congested to an unacceptable level – which means that my daily commute to work will be intolerable if this plan goes ahead. Regeneration my foot!!

All the evidence presented to date demonstrates that there are "exceptional circumstances" for retaining the Green Belt in this area. To argue otherwise is pure sophistry.

I strongly object to the land adjacent to the M6 being removed from the green belt on the grounds of increased traffic, noise and pollution, which will arise as a direct consequence. Surely damage of our local environment but be given consideration above all else.

I object strongly and will always to the removal of greenbelt to allow for an environmental catastrophe it will blight the lives of bold St Helens Warrington, Leigh and Wigan it’s a disgraceful move.

I strongly oppose building on green belt land due to the impact this will have on local wildlife and the surrounding area.

We are totally against a combined review of whether an area is removed from Green Belt at the same time as a planning application. They should be separate considerations, with Green Belt being the first decision.

In my opinion the amendments make no difference to the overall plans to remove the land from the greenbelt status, thereby exposing the people of Newton to the same risks and poor quality of life.

The amendments proposed make no difference to the people of Newton. Will it in any way improve the quality of our health or lessen the impact of the heavy traffic which we are all worried about? I think not.

I think it will pollute the area around where the Green Belt is because of the lorries coming and going.

I believe that this proposal is seriously flawed. The intention is to create low level employment for rail traffic warehousing operations. Air pollution and traffic problems will result.

I oppose bulding on green belt.

Do not build on the green belt due to the wildlife which we are destroying.

I feel that there is enough traffic coming through the High Street and elsewhere in Newton without any increase being made.

A young man was tragically killed at the junction of Southworth
Rd and the A49. There is now a permanent memorial. Also St Helens Council have installed traffic lights at the junction. With the proposed increase in road traffic how many more deaths would St Helens Council be prepared to accept for Astral profits.

Mrs Susan M Bryce

The removal of the Green Belt and proposed development of the site will be disastrous for local residents. It will create massive traffic congestion and air, noise and light pollution.

Mr Frank Kenneth Bryce

St Helens Council are prepared to build anywhere but in St Helens.

Mr Michael Buckley

There is too much congestion already and we do not need any more Green Belt land to be used for commercial purposes. A49 already congested.

Mrs Ruth Buckley

You only have to experience the total gridlock and chaos on the M6 around J23 when there are major roadworks or a breakdown to appreciate what would happen with all the extra traffic that would be generated should this Rail Freight Terminal go ahead and it's simply not acceptable to people who live locally.

Mrs Barbara Bulmer

Green Belt is for the sustainable production of food, once under concrete, it cannot be used again, and we need as much food produced as possible. There is too much traffic on the surrounding roads already. Where will the barn owls roost, if the barns are demolished?

Mrs Joy Burman

At this point in time when we are facing an uncertain future for food supplies, fuel etc. We should not be removing any useable productive land from the pool. Surely there is enough brown sites in St Helens which could be developed even if at greater cost to the developer.

Mr Ken Burman

At this point in time when we are facing an uncertain future for food supplies, fuel, etc. we should not be removing any useable productive land from the pool. Surely there is enough brown sites in St Helens which could be developed even if at greater costs to the developer.

Mrs Julie Burman

Don’t you think there is enough traffic going through Newton as it is! Not enough parking, too much congestion – nightmare!

Mrs Ruth Burney

Any amendment that ProLogis may suggest will have no effect on the air pollution and traffic congestion that we will suffer if their plan goes ahead.

Mr Christopher Calderbank

There are no valid arguments for this project to succeed. All the data facts are in support of saving the Green Belt.

Mr Andrew Cameron

There are other commendable proposals for shipping and transporting freight in the northwest centring on Liverpool and Manchester. This is a white elephant we do not need another layer of road warehousing and distribution in this area.

Mr Colin Campbell

As I have stated in previous submissions, I feel that the removal of green belt land in an area that is already heading into one large conurbation is unacceptable. Open space and pockets of protected green belt are essential to stop urban sprawl continuing unchecked. The latest proposals will not reduce the deterioration of the already poor air quality in an area where high levels of airborne pollutants are already impacting from the motorway network. The impact of building Parkside will bring more vehicles into an area either loading or unloading goods and will increase the pressure on the local road network. Inevitably this will increase the levels of airborne particulates from car and truck exhausts. This will result in more respiratory problems in the local communities putting more pressure on local health resources.

Mr Roy Carter

This so called LDF is a farce. The Parkside footprint should not be exceeded. Green Belt should remain Green Belt.

Mr Christopher James Clark

I think the proposed development will remove the attraction of the area therefore be detrimental to local businesses.
will more than likely be increased wear and tear to the roads due to heavy goods vehicles.

Mr Ian Clayton
My feeling is that there is insufficient capacity in the region to support any significant road based activity. As this application has progressed, my belief is that the original portrayal of the work as primarily rail based is in fact untrue and the road element is the significant objective. Such additional traffic will bring misery to the local community and adversely impact pollution in the area to the detriment of all.

Mr Robert Clews
Since the initial application and proposed changes to the road infrastructure around Parkside. The traffic on these roads has already increased with most roads i.e. A49 Winwick and Ashton Road reaching saturation point at peak times. The entire development is not suitable for the area and in any case it is all based on previous assumptions and analysis that is now obsolete. Nothing in the proposed plans is accurate as all assessments have now changed.

Mr Jake Colbeck
Loss of Green Belt land combined with likely inappropriate usage of the site as a road-road interchange will have a massively negative impact on air quality, traffic levels and quality of life for residents of the area. I therefore strongly object to the proposals.

Mr Simon Cook
I very much object to the loss of massive areas of land from the Green Belt to the east of Newton-le-Willows to give the developers even easier access.

Mrs Dorothy Cook
I strongly object to the LDF developers gaining easier access to the countryside surrounding Newton-le-Willows, and the loss of even more Green Belt.

Mr Howard Cooper
1. Traffic congestion is already very bad around the whole area. If junction 22 is to be closed traffic will be grid locked around Haydock Island. 2. Air pollution already bad will be considerably worse.

Mrs marie Cooper
1. Traffic congestion will be worse and is already bad 2. Air Pollution 3. Warehousing does not create large numbers of new jobs

Mr Anthony Crane
When nothing was done to save Vulcan Works, Vickers and Suger Works, faith was lost in this Council. I believe this proposal only benefits others.

Miss Lucy Croft
This piece of land behind my house is used by both me and my family to walk our dogs. We DO NOT want this piece of land destroying not forgetting the amount of pollution that will come from these Governments Plans.

Mr Ronald Crye
This proposal to remove all of this land from the Green Belt is a disaster waiting to happen.

Mrs Helen Cunliffe
The inevitable road to road distribution centre operating 24 hours a day, 7 days per week would make life unbearable and this is unacceptable to remove land from the greenbelt and destroy the local area for only promised employment and evidence of little benefit.

Mr Peter K Cunliffe
Potential benefits at too high cost to environment

Mr Kenneth Dale
Stop building now.

Mrs Muriel Dale
I have grandchildren in this area what future for them. More air pollution, less and less green space.

Allan & Barbara Davies
No matter what I write you will ignore. Who do you people represent?

Mr Alfred Davis
Prior concern should be for people. My family and I along with lots of other families live near the A49 road in Winwick etc. We feel we are already affected by excessive traffic and should be strongly supported by local authorities and also Government departments.

Mr Reginald Frank Denning
Violating our green belt is not progress for our lives. There can be no circumstances under which our green belt can be changed.
Mrs Glynis Dickinson I am using this form as I wish to express my disagreement with the overall attitude of pre-determination of terms and policies as demonstrated above: furthermore, I object to the in-built difficulties for communicating this on your web site. This is to support my previous objections.

Mrs Gill Dickinson I disagree strongly that the area surrounding the former Parkside Colliery site should be removed from Green Belt. It is a further erosion of our countryside for commercial gain.

Mr Harold Dickinson I object to changing the terms and boundaries of this plan without proper consultation; above all, to the way in which the footprint of this plan increases with each draft; and to the way in which Green Belt land is being disregarded totally.

Dr Anil Dongre My wife and I strongly disagree with the latest LDF Core Strategy. We are both doctors. My wife is a Consultant Anaesthetist in Liverpool and I am a GP in Leigh. We are often on call for emergencies, and the current traffic congestion on roads - A579 and B5207 etc. means we have often to take detours to reach our destinations in time. If this development goes ahead, even these roads that we use for our detours will be gridlocked and will interfere with our ability to reach our patients in a timely fashion.

Mr and Mrs Brian Edge Recent delays experienced on the High Street, Winwick Road and throughout Newton-le-Willows by the replacement of gas mains etc have been unbearable and caused immense disruption to many services. If this ridiculous road freight interchange is allowed to happen –goodness knows what chaos it will bring with it!

Mr Kenneth Edwards If this project goes ahead with either a rail to road distribution centre or worse still a road to road centre I feel strongly that Newton-le-Willows is not the right place to have it as we already suffer air pollution, road congestion and noise. Should you decide to proceed with this project it would not be unreasonable to expect a considerable reduction in the Council and business tax in the effected area.

MRS GILLIAN EELS We object very strongly about these outrageous proposals of getting rid of very precious green belt land in order to build and develop on it. This land should remain strictly green belt and not be touched at all by industry or development of any kind. What is this ridiculous obsession with getting rid of beautiful countryside, nature in its natural habitat and trees. It should not be allowed, not to mention pollution, traffic congestion and many other things it will cause. Industry and development should remain in cities and built up areas only and not encroach on green belt or the countryside in any way. Why should thoroughly decent hard working people who live in this lovely rolling green belt residential area have to put up with their beautiful, nature rich, peaceful surroundings being destroyed by these preposterous proposals. I sincerely hope these and any future proposals/developments are halted in
their tracks. This land should always remain green belt and nothing should change that.

Mr Colin Eels

We object very strongly about these outrageous proposals of getting rid of very precious green belt land in order to build and develop on it. This land should remain strictly green belt and not be touched at all by industry or development of any kind. What is this ridiculous obsession with getting rid of beautiful countryside, nature in its natural habitat and trees. It should not be allowed, not to mention pollution, traffic congestion and many other things it will cause. Industry and development should remain in cities and built up areas only and not encroach on green belt or the countryside in any way. Why should thoroughly decent hard working people who live in this lovely rolling green belt residential area have to put up with their beautiful, nature rich, peaceful surroundings being destroyed by these preposterous proposals. I sincerely hope these and any future proposals/developments are halted in their tracks. This land should always remain green belt and nothing should change that.

Mr Mike Emerton

I pre-empting what future applications ‘maybe’ you are removing the right of local people to express their opinions on any changes to their local environment and their day to day lives – you have therefore are not considering the overall impact on a vast area surrounding this plan.

Mrs Joan Emerton

Our roads cannot cope with all the extra traffic there will be on them. We love our countryside that is why we chose to live here.

Mr Brandon Emmett

The development would be detrimental to the health and wellbeing of families living in the area. It would become our massive ‘blot on the landscape’ and have a negative impact on the area for decades to come. Leave the greenbelt alone.

Mr Keith Fairclough

Traffic volumes/congestion Public health concerns Wildlife Habitat Loss of visual amenity Road Safety

Mr Roy Fairhurst

Green Belt is a natural way of controlling air pollution, which is needed in this area.

Mrs Margaret Fairhurst

This should not even be a consideration in an already ‘overloaded’ area.

Mr Cyril Fairhurst

Asthma is bad enough in the North West. No more traffic and no more warehouses.

Mrs Anne Fairhurst

Air quality in this area very bad without any more traffic.

Mrs Anne Fairhurst

Green belt land should be sacrosanct I live on the A49 Newton-Le-Willows already heavy polluted with traffic. This is the only green belt left and is the lung for the people if this is removed and replaced with more noise, pollution Newton will no longer be a fit place to live.

Mr W Farquhar

Leave Parkside alone and do something useful rather than keep up this preposterous destruction of green belt.

Mr Lawrance Farrington

Enough is enough. We need all the Green Belt which is first class agricultural growing land which is needed for the ever increasing population in our country. Leave our Green Belt alone too much has already been done away with for private and industrial use.

Mrs Joyce Farrington

The amount of traffic, especially heavy vehicles is too much now. We cannot cope with more. For safety sake keep our roads free of any more traffic.

Mrs Alice Fedyk

The Council do nothing to stop railway commuters parking all along Mill Lane Newton - cars on pavements. Prams old people, and wheel chairs have to walk on the road to pass them. This will surely be further enhanced by the Parkside scheme which the Council seem determined to allow to go ahead.

Mrs Doris Fisher

I am 96 years old and have seen most of land around this area built on. Please leave the Green Belt alone
Barbara Flatley  
The development of Parkside as a road/rail freight terminal would have adverse effects upon the air quality. Putting the health of thousands of residents at risk cannot be justified under any circumstances.

Mr Peter Foley  
I am totally against removing any of the Green Belt land as stated above. Leave the land with the farmers, and any other Green Belt land with public access, leave for the local community to enjoy.

Mr Steven Ford  
I feel that consideration should also be given to the traffic chaos that will be created should this project and the proposed “Super School” at Hesketh Meadow Lane go ahead.

Mr Terence Forshaw  
The roads locally are choked with traffic making simple pleasures, like going for a walk, frustrating. Wagons start thundering past the bottom of my road at 3am and go on well into the evening – we do not need anymore. Parkside would make a great country park for thousands of local residents instead all our green land is being built on leaving none for leisure we soon will have nowhere to mentally breathe.

Mrs Maureen Foster  
The M6 motorway is already under tremendous strain, it is constantly bottlenecked over the Thelwall viaduct and this will only add to the pressure.

Mrs Irene Franzen  
I objected to the previous proposals and I am not satisfied that the current changes take into account the objections of myself and many others. The area referred to in the documents has a strategic importance as Green Belt and even that which has been used for industry should be included in the Green Belt rather than be removed. There is inadequate information to justify the removal of any land in the area from Green Belt. As such, the proposals should be heard before any planning applications for the land so an informed decision can be made now.

Mr Ian Franzen  
I objected to the previous proposals and I am not satisfied that the current changes take into account the objections of myself and many others. The area referred to in the documents has a strategic importance as Green Belt and even that which had been used for industry should be included in the Green belt rather than removed. There is inadequate information to justify the removal of any land in the area from Green Belt. As such, the proposals should be heard before any planning applications for the land so an informed decision can be made now.

Mrs Margaret Garceau  
The green belt should not be pre-determined.

Mrs Linda Gaskin  
What has happened to ‘Green Belt’ values and what they stand (or used to stand for?). Does this mean the developers and Planning Authorities no longer care about protecting natural environments? The ‘Green Belt’ policy came into effect for various reasons; please respect these and save our ‘Green Belt’ land.

Mr Alan Gauntlett  
Newton-le-Willows has expanded so much 25 years land has been swallowed up. We need more Green Belt not less. The vast scale of this development will also have a serious environmental impact as well. Air quality being one of several. Traffic congestion remains an issue irrespective of any amendments to development of Parkside and de-designation of green belt. Health and safety are critical issues in all walks of life, here, they remain ignored. When it suites, air and noise pollution are the concerns plus damage to homes and the infrastructure of a completely blighted large area.

MR AND MRS JOHN AND NORMA GILCHRIST  
Traffic congestion remains an issue irrespective of any amendments to development of Parkside and de-designation of green belt. Health and safety are critical issues in all walks of life, here, they remain ignored. When it suites, air and noise pollution are the concerns plus damage to homes and the infrastructure of a completely blighted large area.

Mrs Ethel Mary Goldsack  
How can anyone with any conscience agree to removal of Green Belt and replace it with a monstrosity of the largest warehousing complex in Europe? Quality of life of the residents of this area is being totally ignored and all for financial gains by Astral Developments and other interested
Mr John Gordon

The development of this site as a ‘Rail Freight Terminal’ can only be a ‘front’ for planning purposes. The road and rail networks cannot stand the proposed traffic even with improvements and several more suitable sites have already been identified. For pollution and environmental reasons alone this land should remain Green Belt.

Mrs Gwenyth Gordon

1) Among many others I feel very strongly that there must be no further incursions into the present Green Belt. We do not want to become part of the industrial sprawl. 2) Already then is great danger to villagers when our local lanes and roads are blocked because of incidents on the M6, M62 and A49 and any increase in traffic would exacerbate the situation.

Mrs Beryl Grady

I object to the draft LDF Core Strategy policy CAS 3.2 any removal of Green Belt.

Mr Chris Graham

The LDF should comply to the National Planning Policy and not agree to the plans just to gain rateable income.

Mr Robert Greaves

This is illegal! Once it has gone we can't get it back.

Mr Jack Greaves

This is illegal and wrong

Mrs Sue Greaves

I have written numerous times before against this proposal and strongly disagree with the removal of Green Belt in this area for the purpose of this development. We have lost so much already.

Ms Kathryn Green

I consider that your actions do not reflect the views of the local residents. Pre-empting a planning application is surely not consistent with the accepted planning process. Wigan Council rejected this whole proposal - why can't you?

Mr Frank Green

Don't do it. It will constantly jam the A49 and also the side roads.

Mr Paul Grenfell

Disgraceful

Mr Roy Griffiths

I totally disagree with the direction or our Green Belt.

Councillor James Grundy

I fully support the objections both of my electorate and also Wigan MBC.

Mrs Patricia Grundy

The implications of increased HGV movements is just not sustainable given the amount of traffic already gridlock in this area. The removal of greenbelt land by St Helens MBC is disgraceful and criminal.

Mrs Enid Hales

We do not want to loose the green belt or any part of this land.

Mrs Margaret Hamilton

There is not enough Green Belt in this country as it is, so do not take this land out of green land. Certainly not to build a road freight depot.

Miss Lisa Hanson

The roads and railways are already creaking at the seams. This is madness not to mention that this proposal goes against everything our government tells us we shouldn't be doing. I.e. clogging up the roads with more traffic.

Mr David Harris

I object against the Green Belt being changed on grounds of exceptional circumstances:- 1. Environmental impact – CO2 emission, pollution, health impacts on the community 2. No commercial justification – the jobs aren’t there! 3. Social impact: reduces the attractiveness of the area for further inward investment and quality of life 4. There are other more suitable development opportunities 5. Are the planners mad? Environmental - CO2 emissions up - Other pollutants up - Habitats destroyed - Health of population reduced Social - Reduces quality of life - Makes area unattractive for further investment - Noise up - Traffic congestion up - Encourages distant transportation rather than sourcing locally Commercial - Job density in warehouse parks is very low - Skill requirements are very low - Funding is no longer available for speculative commercial schemes - Better locations elsewhere in the region - Network Rail funding for rail will be reduced over the next 10 years - Motorway network already at peak capacity on this
stretch - Coal mine land can be used for power generation via methane extraction earning income for the land owner/local authority - Simply more jobs and companies rather than generates new fresh economic activity.

Mr Peter Harris
This project must NEVER be allowed to succeed it would be a crime against humanity and the residents of Newton, Earlestown and the surrounding district.

Mr David Harrison
I doubt if "such rule bending" would take place if this development was proposed for an area in the home counties. The air quality we have is below EU requirements and is unlikely to be improved by this development either during construction or operation. It is amazing that we can't find fresh air already with a huge green belt area next door.

Mr Richard Harrison
As a resident of Newton le Willows I have great concern regarding the impact the proposed development will have on the traffic within Newton and surrounding areas. Newton is already an over trafficked town, and with the scale of this development, can only escalate this problem.

Mr Frank Harrison
Green Belt must not be taken away!

Mr Roy Harrison
'Special circumstances' have not been proven, Green Belt should remain Green Belt! Councillors and Council Officers have totally ignored thousands of objections by local people!

Mrs Beryl Harrison
Environmental issues. Roads around my area are already busy and if accident on M6 they are blocked for hours. House prices will reduce.

Mrs Sheila Mary Harrison
Predetermination of approx. 660 acres of green belt land to suit Prologis plans is undemocratic

Mr & Mrs Ronald and Patricia Haslam
Blot on the landscape. Should never happen Green Belt should stay Green Belt.

Mrs & Mrs Raymond and Patricia Haslam
We already live between two motorways the M6 and M62. Traffic conditions in the morning are dreadful a 15 minute journey can take 45 minutes which makes for difficulty keeping appointments. I.e. doctors or hospital. The pollution from slowly moving or static vehicles is bad and if you have a chest complaint makes it difficult to breathe. Also property values will plummet.

Mr Peter Hatfield
1) The Green Belt is there to act as an important buffer zone between communities and townships and should be left undisturbed. 2) The Green Belt is paramount in peoples lives as a stress free environment and is vitally important for all to enjoy. 3) No Government or Local Authority doc should be set up in advance to remove the Green Belt in a predetermined effort for anyone to prove exceptional circumstances. 4) Hundreds of people have already objected from 3 Local Authorities together with organisations and your counterparts Cabinet Members and Planners both from Wigan and Warrington BC's have negatively commented to this massive SRFI that will adversely affect hundreds of people outside the St.Helens boundary by way of transport, environment and serious additional health issues to the immediate area and beyond. Cabinet Members of St.Helens why won't you listen!!! Are you saying that the professional Planning Officers of both neighbouring LA's don't understand either because they have objected with negative comments.

Mr Barry Hatton
I feel this proposal will have a detrimental effect across the board in relation to the amount of traffic already in the area Haydock Island is a nightmare.

Mrs Chantelle Hayes
This proposed change to the LDF is a breach of the Human Rights Act in that is causes substantial uncertainty about our family life. The Council should adopt a strategic for this land and not link it to a planning application.

Mr Raymond Healey
Green Belt land should be unchanged. The noise and traffic
from a development of this nature is unnecessary and is only a
means of St.Helens profiting at the expense of peoples lives
and well being.

Mrs Irene Healey I object to this proposal because: 1. This plan still takes away
large tracts of Green Belt land which is unacceptable. 2. The
lower profile of the building is simply a ploy, it is the thin end of
a wedge to get planning consent which will be followed by
further development.

Rev Alan Heaton I strongly object to the Parkside site being removed from the
green belt. The purpose of the green belt is to prevent urban
spread. The number of heavy lorries through Newton to and
from the Deacon Estate is enough without adding many more
to it.

Mr David Hemingway Given the very wide objection to the development of this
greenbelt I hear from almost all people I speak to I feel the
Council is not working in the interest of the local people it
represents on this issue but purely commercial interest.

Mr & Mrs G & E Higginson This would be a disastrous loss of Green Belt and devastate
the area for miles around. High time local and national
politicians put paid to this proposal in the interests of their
electorates

Mrs Carol Higham Major concerns of noise, traffic and problems development will
cause to nature.

Mrs Margaret Hill The traffic on our roads can be horrendous now and cannot
cope with a small increase never mind a proposal of this
magnitude.

Mr Peter Hill As a person who will be badly affected by this proposal, not
someone who comments from living miles away (our MP for
one). I know that should this proposal go ahead this area will
not be fit to live in and will be ruined for everyone.

Mr Michael Hilton We already have excessive traffic chaos/congestion in this
area can take 20 mins to travel a distance which should take
less than 5 minutes.

Mrs Sally Hitchmough There are extremely valid reasons why land is designated
Green Belt in the first place and these changes make 'Green
Belt' a pointless designation in the first place. Changes should
not be made prior to any approval of potential plans, otherwise
we will have no Green Belt left.

Mr Robert Hodgson This appalling blight on our countryside would force us to
consider moving from the area. So much for a well earned
quiet retirement!

Mr Martin Hodgson Through my work commitments I commute daily up and down
the M6 in the area in question. This is hard enough as things
currently stand. The potential disastrous impact of this
development is beyond belief. The fact that adjoining MBCs
have expressed such concern is telling.

Mr Jeffrey Hodkinson Dust pollution; light pollution; possible health reaction to dust.
Mr John Barry Holgate More pollution, more noise, more traffic, more light pollution.
Disgusted ex-Newtowner.

Mrs Annie Hopkins St.Helens Council is using a potential planning application to
justify removal of Green Belt land which will then be open to
other developers should the SRFI application not go ahead.
You seem to be intent on destroying acre upon acre of
Newton’s countryside.

Mrs Linda Horn We do not want more urban sprawl and green sites should be
protected. The narrow stretch separating Newton, Winwick
and Croft needs to be protected.

Ken Horn As with my previous objection Parkside should remain in the
green belt to preserve the small strip of green land between
the Newton, Winwick and Croft communities. We do not want
more urban sprawl

Mrs Caroline Horsfield We need to keep the Green Belt.

Miss Catherine Horton Disgraceful
Dr Valerie Horton
Disgraceful

Mr Matthew Horton
This will only bring future trouble in already desperate circumstances regarding global warming!

Cllr Edward Houlton
If we remove land from Green Belt status, you will set president and where will it stop. If you would, do your jobs and protect us, the little people. Or maybe we will remove you from your jobs. Do as you are told!!!

Mr Gerard Houlton
I object to Green Belt land being removed from public use, after all its ‘ours’ to enjoy. Also Newton Road is already a bottleneck, just what will Parkside do to that?

Mrs Kathleen Houlton
I thoroughly object to the total lack of regard for our green belt which is just becoming looked upon as yet another piece of ground to build on, instead of why it was legally set up to maintain.

Mr Brian Hughes
The traffic is already a problem in the local area. This development will only make the traffic much worse.

Mrs Mary Honora Hughes
I feel that the traffic situation would deteriorate vastly with the amount of heavy traffic this would generate.

Mr Glenn Hutton
Green belt land is vital for community welfare and identity and shouldn’t be removed when pressure is applied by developers. Lets celebrate 50 years of green belt protection.

Mr Lionel Jackson
I fully support the proposed development at Parkside. I cannot support the action group. This area, this country needs jobs!

Mrs Elsie Jones
How many of the Directors and Shareholders in the scheme will have the air and noise pollution that the people with properties in this area will be living with. My children and grandchildren deserve better than this from their “caring Council”!

Mrs Janette Jones
I believe that Newton already has a lot of traffic passing through the High Street + Winwick road. Anymore, especially on this scale would cause massive gridlock in the area as well as the surrounding area.

Mr David Jones
Green belt land is precious and a really important place for all local residents to enjoy walking, watching wildlife and relaxing. The case for destroying it has not been made to my satisfaction

Mrs Joyce Jones
Please keep our village safe.

Ms Irene Jones
Rail link should be placed in non residential area, such as docklands. Nothing has significantly improved since last submission. Noise pollution in residential areas - not good. Along with increased traffic, which incidentally is already at a standstill in peak periods, makes me object strongly. It will just set back the area, when it has attracted professionals to buy housing in Green Belt - now they will abandon the area which is not good as better schools follow parent support.

Mrs Jeanette Keegan
Parkside is Green Belt why does St.Helens think they can ride ruff shot over it. If St.Helens is so keen to have it put it in St.Helens and stop trying to ruin Newton and Earlestown

Mr Arthur Kemp
We disagree with the removal of any green belt.

Mrs Joan L Kennaugh
Will all of the development in Newton over recent years it is very important and valuable to keep existing green belt.

Miss Julie Kennaugh
In a time where we should be more not less aware of the impact to environment I believe that this doesn’t demonstrate a step in the right direction for all our futures.

Mr Iain Kerr
The North West Regional Framework Policy listed Parkside as one of four SRFI sites being considered, Runcorn being another. Now Runcorn SRFI exists, the need for Parkside to be considered no longer exists.

Mr John Kibbler
Concerned about increased heavy traffic on local roads.

Mr Roy Killcross
The LDF Core Strategy (Feb 2010) has been compiled in a very ambiguous manner. Obviously an attempt has been made to influence the consideration/ content of a future planning application and allow the state of exceptional
circumstances to apply if associated with the construction of a rail freight terminal. The splitting of the project in 2 phases east and west has added a great deal of uncertainty and masks detail which appear to be omitted from the original scheme.

Mr Philip Kirk

My children already suffer from asthma and cannot walk to school in safety from heavy traffic. This is not an industrial site, but a residential area. Protect the future generation from pollution!

Mrs Lee Kirk

I cannot believe we are fighting the same issues. It is time for new ideas, new government, new blood. Wake up and smell the air quality!

Mrs Janice Knowles

This development would be most detrimental to the environment, loss of ‘green belt’, increase in air pollution, loss of wild life, etc.

Dr Cyril Lambert

Building 600 houses on the site of the defunct Vulcan Works could put 600+ vehicles on local roads. What a village!

Ms Carol Lavelle

I am opposed to the loss of Green Belt and I object to this application.

Mr Will Lavelle

Totally unacceptable case there are no exceptional circumstances for the loss of this Green space.

Mrs Jacqueline Leather

Winwick Road is already busy and not wide enough to take its present volume. To add more would be dangerous for local residents and pollute an already polluted area more with fumes from vehicles and the buildings to be erected.

Mr William Leather

1. Air pollution, due to increase of traffic 2. Congestion, of extra vehicles on the High Street. As well as other roads in the vicinity of the development area.

Mr & Mrs Francis & Barbara Lee

The Green Belt area should be protected. The planning application does not demonstrate that exceptional circumstances have been proved. Far too much Green Belt land is being lost in our country to the detriment to the quality of life of residents.

Mr Christopher Lewis

Loss of wildlife; Green Belt; Traffic; air quality; job figures do not add up.

Miss Jenny Lewis

Green Belt lost forever, air quality, traffic, all concerns.

Mrs Gillian Lewis

Roads are already overloaded in the immediate area of the proposed development together with increased reduction in air quality is unacceptable.

Mrs Marie Little

I don’t agree with the building plans there is enough traffic on High Street Leave our Green Belt to nature.

Mrs Julie Llewellyn

Enough traffic on the roads around that area I do not feel any additional traffic could be managed appropriately.

Mr Jack Lloyd

I think it is disgraceful, in view of the very poor air quality, that this proposal is being put forward.

Mrs Norma Lloyd

Object strongly

Mr Alan Lloyd

I object strongly against any land being removed from Green Belt status

Mr Brian and Audrey Lobell

Such a plan will make life intolerable for residents in and around the proposed site and I object strongly to the revised plans.

Mrs Audrey Lobell

I strongly object because this proposed development will create more heavy traffic with resultant noise and environmental pollution and the destruction of the green belt land that is so much a part of this area. We need to retain all our farmland.

Mr David Lockyer

Land should only be removed from the Green Belt if the ‘exceptional circumstances’ have been considered at a public enquiry. It is not acceptable for a local authority to take this action since there are too many vested interests with local politicians for an honest appraisal of the serious consequences of this action to be taken.

Mrs Rita Longmuir

I support the above objections and at a loss to understand how National policy can be undermined by local strategy!
‘Exceptional’ circumstances should be adhered to in accordance the protection it seeks to provide.

Mrs Dee Lowe
Unbelievable that any sane person could even consider adding to the amount of traffic on the A49 and its approaches.

Mr Mark Lynam
The motorway network in this area is almost at saturation point and virtually grid locked. It's farcical to think the Council is actually considering this proposal. The landscape is going to be blighted forever and the quality of life in this area damaged for good.

Mrs Valerie Pauline Lythgoe
This development will be an ecological disaster for this beautiful part of St.Helens. I hope the Council is not too remote from the proposed site to realise this.

Dr Stanley Lythgoe
If this development goes ahead, it will ruin one of the few open countryside spaces in St.Helens and will create enormous traffic congestion on top of the existing flow problems at peak hours.

MRS SCOTT MABEL
I object to the LDF policy, due to the envisaged pollution to the environment, the proposed future changes will make to the surrounding areas.

Mr Ross MacMahon
I disagree with your plans to devastate the Green Belt in Newton-Le-Willows and the air pollution it will create.

Mrs Alice Mahon
Leave our Green Belt as it is.

Mrs Pauline Mahon
I strongly object to this latest draft or any other. Leave Green Belt alone and just around here.

Mr John Mahon
There must be no automatic removal of land from the green belt without democratic discussion of the scheme with all concerned parties.

Mrs Marian Maines
We have far too much congestion on the roads, particularly if there has been a problem on the M6.

Miss Nicola Maisey
The wildlife including birds of prey will suffer - land behind my home should remain greenbelt.

Mrs Wendy Maisey
Green Belt behind my home should stay Green Belt

Miss Lisa-Anne Maisey
Asthma sufferer already living in an air pollution count above EU standards.

Miss Sophie Maisey
I am asthmatic and don't need more HGVs and traffic on Newton Road (A574)

Mrs Janette Makin
I feel the traffic congestion that would cause in the area would be damaging to the area/environment

Mrs Johanna Marsh
There is far too much traffic using this road as it is.

Mr Colin Massey
A development the size of that proposed by ProLogis which requires the land to be removed from the green belt is on far too large a scale. The local road system cannot cope with the increase in traffic - the M6 is already stopped daily with existing volumes of traffic.

Mr Trevor McEwan
I feel that this area is already saturated with vehicles and this proposal would severely aggravate things further. We live adjacent to the Winwick link road and on days there is stationary traffic for long periods of time.

Dr Robert McLaughlan
What is the point of a green belt if areas can be removed from it at the will of the Council.

Anne Mercer
It only takes the motorways to come to a halt for a short time to make this area hell to live in.

Mr John Millington
This development site is located within the lightshaw water boreholes catchment area. This site is at risk of water pollution from the very water supply, which actually supplies Newton-le-Willows. With old coalmines there is radon gas, a cancer forming gas, which is odourless at present trapped within the mine.

Mr Gordon Mills
The A49 road network and M62/M6 are already too congested to accept any more transport in this region.

Mr Kenneth Moore
No attention appears to have been given to the effect on air quality which this development will cause. We are all ready suffering the highest bronchial related illness in the country.
Mrs Morris This area is far and away too congested already, without imposing additional millions of additional heavy lorries on already overflowing roads. The Manchester Ship Canal option is far preferable for moving freight around the area.

Mr Alan Morris The Manchester Ship Canal venture is far preferable to total loss of Green Belt in and around Newton-le-Willows. The NW is one of the most industrialised, heavily congested areas in the country. Parkside will assure that the road network grinds to a complete halt; we cannot sustain the level of road traffic projected by the sponsors. Go by sea/ canal is the answer.

Mrs Beryl Morris I feel that the noise and disruption, night and day, would be unacceptable and cause local residents much hastle. There is also the added fear that the predicted growth in rail freight, and the problems of accessing the West Coast Main Line would result in Parkside becoming a road freight terminal, rather than rail and this would be a disaster as far as I am concerned.

Mr William Moss To date I have seen no information on the pollution amounts evident due to road traffic, air contamination and noise increase and the resulting drop on the quality of life in the area.

Mr Alan Moss How many more time do local residents have to oppose this ridiculous scheme. The road network congestion in the area is already a joke. The M6/M62 cannot cope with the current volume of traffic so how will it cope with any extra volume, never mind the significant uplift associated.

Mr William Mullin I totally object to the ‘taking down’ of Green Belt status. The council need to listen to local people.

Ms Patricia Ann Murdock I strongly object to the latest draft of the LDF Core Strategy. It would seem to be much more ecologically sound to revitalise former industrial areas such as Ince via the ‘Ocean Gareway’ project than take over greenbelt area to the detriment of Winwick, Golborne, Croft, Newton-le-Willows

Mr Russell Nelson I totally agree with the above comments and vehemently oppose any loss of green belt status and the building of a SFRI of any form on this land.

Mr Alan Noons Stated grounds for objection and disagreement considered to be entirely adequate.

Mrs Marion Noons Stated grounds for objection and disagreement considered to be entirely adequate.

Mr Albert Norris I strongly object to any removal of Green Belt land.

Mrs Mary Norris I object strongly to the removal of Green Belt land.

Mr Denis O Neill We do not want it in Newton Le Willows or anywhere round here.

Ms Margaret Oakes We moved here in Lowton in the sixtys. The village has become a town. The traffic is a nightmare, from the M6. Now they want to put more on and do away with our Green Belt.

Mrs Louise OHara Save the Green Belt, already heavy traffic, this will increase, which is no good for anybody.

Mrs Linda OHara I feel there would be too much passing traffic. The roads are busy enough.

Mr Paul O'Hara Save the Green Belt! There is already too much passing traffic around the surrounding area and this will increase this in volume.

Mr Steven O'Hara Save the Green Belt!

Mr Melvyn Parker The imposition of this development will have a catastrophic environmental and ecological effect on all of the adjacent areas – for generations to come.

Mr John Parker Why use good open spaces. You could use the Sankey Valley Deacon Trading estate as it is by the railway and falling into ruin now. Abetter idea is the Ocean Gateway project using sea transport and linking it to the railway at various points on the route.

Mr Nick Parr This land should be saved as Green Belt. N-L-W can not cope
Miss Rebecca Parr
I disagree with the approach of the policy CAS 3.2 to predetermine the terms for the removal of Green Belt. No changes to the existing Green Belt should be made. This is a fictitious planning application and done in a way that is not understandable (i.e. English).

Mr Ian Parr
No.3 An inability of the local road network to accommodate traffic generated by the development i.e. the A49 would have excessive congestion caused by the closure to normal traffic of the A573 from Warrington to Lowton/Golborne.

Mr David Peake
The erosion of a large tract of arable land to the east of the motorway is reprehensible, especially when the purpose is for the erection and development of huge "carbuncle" warehouses.

Mr Brian Peters
Green Belts are essential to the physical and mental health of populations. Clearly exceptional circumstances cannot be demonstrated by non-existant developments.

MR PHILIP PINDER
Leave our Green Belt alone no more building.

Mrs Patricia Plant
The environment at risk. Air quality area already being managed due to low levels.

Mr Jon Purcell
I object to the latest draft LDF Core Strategy Policy CAS 3.2. This kind of action by St.Helens Council is underhand and typical of Councils wanting their way or no way. I thoroughly disagree!! Do not want Green Belt used for development!

Mr John Quormby
I object to the latest draft of LDF Core Strategy Policy CAS 3.2 because I do not want any changes to existing Green Belt or it be given up to any sort of development.

Mr Brian Rhodes
We live in a democracy - 90 plus per cent do not want this development, which would cause mayhem. Do the right thing and throw it out once and for all.

Mr Tom Rigby
Production farmland such as this is a national asset and needs protecting for the challenge of feeding the nation in a changing climate.

Mr John Roberts
The Core Strategy must not be swayed by fictitious assumptions!!

Mr Charles Robinson
It's taken a long time to make a decision.

Mrs Audrey Roe
What about air pollution.

Annie Rose
I disagree with the devastation of Green Belt area.

Mr Tim Rose
Already too many traffic movements.

Mr Stewart Ross
Prescott addressing Parliament 2003 "Today I give the house a guarantee to maintain or increase Green Belt land in every region of England". Ruth Kelly "Local Authorities should continue to contain urban sprawl. Green Belt policy has served us well and must continue to do so".

Mr Phil Round
It is unacceptable that large areas of the green belt are to be removed adjacent to an area where pollution from traffic means that Newton-Le-Willow already has air quality below EU recommended safe levels.

Mrs Lynn Rowlands
There are already huge traffic problems in this area and the impact on roads, the environment, the wildlife and residents in north Warrington will have a huge negative effect.

Mr Paul Rowley
Green Belt land is very very special – I do not agree it should be changed for any developments of industry.

Mr George Rowley
There is insufficient room on the roads to allow more heavy goods traffic into the system.

Mrs Maureen Rowley
There is insufficient Green Belt now for local requirements.

Mr Ernest Rozman
This site is close to population also the Motorway M6 M62. Any problems and these motorways would be closed for a long period. Also air pollution on all our local citizens. The workers go home at night, we live in Newton-le-Willows 24/7. We breathe all the time this pollution. Not good enough.

Mrs Carol Ann Rozman
We live here! Don’t want to lose any green belt also more
traffic on the roads leads to congestion and increase in air pollutions we should be protecting what's left not abusing it once again Council officials that are deaf.

Mr Richard Russell
Green Belt must be protected. If it is taken it is gone forever! Green Belt is vital.

Mrs Barbara Scholes
The huge loss of Green Belt land is totally unacceptable. In this day and age it is necessary to preserve this land for future generations. Taking this into account, together with the huge impact of air pollution and horrendous traffic increase, this project should not go ahead.

Mr Edward Scholes
It seems very clear to me that those individuals who are pushing for the adoption of this LDF Core Strategy have no idea of the horrendous impact their actions will have on the lives of all people in our community. Waken up before its too late!!!

Mr IAN HAMILTON SCOTT
I object to the above mentioned 'Draft LDF Policy CAS 3.2' This opens the way to remove the Green Belt on any pretext with future development of the ‘Parkside’ site whether it be the existing proposal for a freight terminal or any other proposals – giving rise to potential pollution, excessive traffic etc.

Mr Mark Seaborne
The LDF should affirm the status of this land as green belt and remove the continuing blight that is proposed or potential planning application is bringing.

Mr John Shimmin
Area cannot cope with new traffic plans proposed. Already heavily congested at peak times.

Mrs Edna Wendy Shimmin
Spoiling a Green Belt area of natural beauty. Traffic in area a major problem especially M6. Area cannot cope with HGVs.

Mr Raymond Shimmin
We must protect the Green Belt for future generations. Also the air quality must be improved.

Ms Jeannette Siddall
I strongly disagree with the Parkside development. It also must be noted that, last week, April, a car rear ended off the A49 link road and nearly ended up in my garden. The noise from the A49 link road to the motorway never ceases and even the furniture and radiators rattle when articulated lorries pass by. A speed restriction is needed on this road as a matter of urgency.

Mr Nick Sims
Leave the Green Belt alone.

Mr Paul Slee
Not only do I disagree with the approach of Policy CAS 3.2 to predetermine the terms for the removal of Green Belt I actually think it is a disgrace. In effect the developers are dictating planning policy, which smacks of potential underhand dealings and corruption. Losing the Green Belt to a "white elephant" development of largely empty warehouses, as in other parts of the country, should bring shame upon those who support and allow it - both local politicians and civil servants and national ones.

Mrs Shirley Smith
The roads at the moment from Newton-le-Willows are horrendous. I work in Warrington and 9 out of 10 days a week I am stuck in traffic to and from work!

Mr Geoffrey Smith
The road from Haydock roundabout through to Warrington at the moment is at its absolute maximum. It can not possibly take any more traffic. It would come to a stand still every day! Without a doubt.

Mr Leslie Smith
Since St Helens MBC assumed authority over the area there has been a gradual diminishment of open spaces. I suffer with Chronic Obstructive Pulmonary Disease. I live in close proximity to the proposed development. With the increase in HGVs and resulting air pollution can only exacerbate the condition. My family have lived in Newton-le-Willows since the mid 1800s. Loathe though I am to move I may have to
consider it!

We have enough noise, pollution and problems on A49 24hrs a day from the present traffic and do not need anymore. We believe Network Rail do not have any spare capacity on railway for new freight service so plans do not add up. Go elsewhere with your ideas and leave us and our green belt in peace.

Mr Maurice M Stafford
As we live on the main A49 we feel that we are inconvenienced enough by the amount of traffic we have to put up with at this moment in time without adding to this problem.

Mrs Audrey Staniforth
At Parkside I would like to see Newton Station improved with a large area for parking to encourage more passenger trains - thus taking more cars off the road, therefore less pollution. Also part of Parkside could be used for housing plus woodland for recreation and wildlife. We should keep the Green Belt land - you never know when we will need it for food production etc (when petrol and diesel is in short supply and the proposed freight lorries can not be used). When the Omega site is developed (planning has already been passed), which is only 5 mins from the proposed Parkside development there will be many more jobs and lots of extra traffic on our roads. An alternative - Peel Holdings 'Ocean Gateway' seems such a good idea - get more freight onto the canals - not on our already overcrowded roads.

Ms Julie Stockton
This proposal ignores the wishes of the majority of people in Newton-le-Willows and is detrimental to their welfare, safety and health. I believe it would alter the residential nature of the town forever.

Mr Geoffrey Stockton
If the Green Belt “protection” is removed, the area will be open to any developers to construct whatever they want. We want to preserve some rural quality in an area already given over to far too much industry and housing.

Mr and Mrs John and Edna Stroud
Why has there been no mention of the possibility of destruction to ‘hidden heritage’ under the land due for development. Don’t forget a bronze age light was destroyed on construction of Parkside colliery which was one ‘white elephant’ we don’t need a herd of ‘wild buffalo’ destroying over 1000 years of history.

Mr Gerald Tait
Should not be passed it shall be a death trap.

Mrs Edith Talbot
We need the Green Belt areas for the health and welfare of young and old, not a huge truck park belting out diesel petrol fumes 365 days a year.

Mr Paul Taylor
It is a disgrace that the proposal is to remove Green Belt areas within defined areas for developmental reasons. Green Belt land is precious and should be preserved.

Mr Ian Templeton
Green Belt should not be negotiable!

Mr Andrew Thomson
This tactical plan to keep asking the same question until you wear down all opposition clearly flies in the face of local opinion.

Mrs Gillian Tindall
Nothing has really changed with the LDF. Again I will take the opportunity to say how short sighted this proposed strategic road freight interchange is:- Road system is working to full capacity now, we need an alternative. Ocean Gateway may offer that. Destroying Green Belt huge costly mistake. Could it not be needed to feed a growing population in the future??

Mr Derek Todd
Also we don't want up to ten thousand lorries a day passing through our village.

Mr Joseph Tracey
I am asthmatic, and am worried about extra air pollution

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I am asthmatic, and am worried about extra air pollution

Mrs Julie Ruth Trumble
The road infrastructure is totally inadequate for the present volume of traffic and the proposals would completely overwhelm the area.
Mr George Ronald Turner  Green Belt land is scarce and should not be destroyed! An incinerator will smell for miles. The only work will be for usual foreign workers not ours.

Mrs Patricia Unsworth  Stop building on every green field there is.

Mr Stuart Van den Hoek  Air pollution already high and I suffer from asthma. Traffic already really busy on Motorways and in the general area. Concerned about problems commuting to work.

Mr Colin Waddington  Obviously the concerns of electorate are once again dismissed. Who knows what the future brings? We may well need to grow more of our own food again. And there is one thing for certain - it will be impossible to grow crops through concrete - and there is sure to be plenty of that.

Mrs Ann Waddington  I am dismayed at the proposal to remove such huge swathes of beautiful countryside from its 'Green Belt' status. These designated areas were initially created to prevent unrelenting urban sprawl and as a result, provide a pleasant environment for people to live their lives in relative peace. This complete turn-around is unacceptable, the Green Belt deserves the protection afforded to it in the past, more so today, in these uncertain times. What can possibly be the 'exceptional circumstances' warranted to remove that guarantee? This can only lead to ruination of the area. Numerous people have previously expressed their views on this matter to Council only to have them ignored. Democracy!!! The issue of the detrimental affect on health still remains.

Mr Leslie Walkden  There will be a problem with more HGV's on our already over congested local roads.

Mrs Christine Walkden  I am concerned about extra HGV’s on already over congested local roads.

Ms Geraldine Walker  In addition to the above; there is already too much traffic in this area on small and often poorly maintained roads. There is already poor air quality in the Winwick area and extra vehicles would aggravate this. Green Belt land should be sacrosant and not developed in any circumstances.

Mr Paul Walsh  I object to any development of this green belt area.

Mrs Joan Ward  The LDF CAS 3.2 is asking the public to comment on a planning application that has not been submitted to the appropriate authority - the Infrastructure Planning Commission. Future stages of the Core Strategy/ LDF process updated via post.

Mr Roy Weatherilt  The changes made since previous draft have little effect on our previous objections, (IE) traffic density HGVs, poor air quality (which is currently below E.U safe levels now!) and which will worsen public health concerns! Also, to remove such a vast area of land from existing Green Belt would make mockery of existing boundary laws.

Miss Becky Welsby  I am a student 18 years of age and have slowly watched the Green Belt in this area disappear and turn into warehousing, etc., since I was a child. Leave it alone.

Mr Ian Welsh  I am very disappointed that MP Dave Watts has shown no concern for the health and welfare for the people of Newton and Winwick, given the levels of pollution that would be created from the millions of HGV movements.

Mrs Margaret Whitfield  Green Belt is Green Belt. The extra traffic will be highly disruptive to N-L-W residents. There are plenty of other sites available within the ‘true’ St.Helens Borough to accommodate this development.

Mr Joseph Whittle  What's wrong with Sutton Manor colliery??

Mr John Alban Wilcock  We have very little open spaces and fresh air lets preserve what little we have left.

Mrs Beryl Wilcock  The green space is precious lets keep it that way.

Miss Lisa Wilcock  The largest warehousing complex in Europe should not be situated in a populated area full stop. Newton Le Willows,
Winwick, Lowton are all semi rural villages, the small local road networks are already swamped by commuters who work in Birchwood and Gemini. The land should be used for a different kind of development avoiding alteration to transport networks.

Mr & Mrs Shelagh & Roger Wilkinson

Ocean Gateway should be considered. It would surely benefit more of the Northwest than the proposed development.

Mrs Margaret Wilkinson

I have trouble now getting out of my close, onto the main road. It would be a nightmare if Parkside was to go ahead. Congestion would be awful. There will be extra traffic when the Vulcan Village is finished.

Mr Lester Williams

I am still concerned over excessive pollution and a disproportionate increase in HGV traffic adding to already local congested roads.

Ms Anne Williams

As well as being close to M6 and under the flight paths of Manchester and Liverpool Airports, the air quality of Newton-le-Willows is to endure extra pollution from this massive new proposed development. Will we be entitled to rates reduction to compensate?

Mrs Jean Williams

I worry about the increased amount of road traffic and it's consequences.

Mr Arthur Robert Williams

I was one of the objectors to the Parkside scheme going ahead and I still hold that view. I am still against the revised Planning Application being granted.

Mr Brian Williams

Strongly object to any further land being removed from the Green Belt

Mrs Deborah Wilson

Disappointed at the lack of concern regarding the work on a Green Belt site which I thought was valued plus disruption and impact to local residents

Claire & Geoffrey Winter

Once again what was our lovely town of Newton-Le-Willows is being ruined by St Helens Council. Play in your own backyard for a change. We don’t want this.

Mrs Anita Woodcock

Green Belt should be left as it is. No more pollution.

Mr George Woodward

No matter how it is reworded, redressed the issue is the same, we in Newton-le-Willows are to lose vast tracts of the Green Belt and nothing has changed. The message is clear, we don’t want it.

Mrs Irene Mary Wright

Too many Van’s Lorry’s Car’s on the road. Use waterways.

Mrs Joyce Wright

Why have a Green Belt if it is so easy to get round it. The whole thing is horrific and proving it exceptional circumstances reasons are fictitious the LDF should no way be allowed to change the Green Belt.

Mrs Anne Wynne

Very concerned with the traffic overload. N-Le-W is often blocked as it is. Also the air pollution is very worrying.

Mrs Karen Yates

Please stop this before our lives are ruined. Please support the Ocean Gateway, remove these monstrosities from our road and green belt land. We cannot be expected to live with such noise and pollution 24/7.

Mr Leslie Young

Keep up the good work. However do you have any documentation which gives owners on Winwick Road additional land?
Appendix 4 – List of those submitting a late cyclostyled representation

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