



NW

TAR

Transport Activists' Roundtable North West

The North West TAR CORE GROUP contact details

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Mr. Scott Bracken,
St. Helens Borough Council,
Planning Department,
Town Hall, Victoria Square,
St. Helens, WA10 1HP.

Monday, March 31st, 2008

Dear Mr. Bracken,

PLANNING APP. P/08/0095 & P/08/0096 PARKSIDE FREIGHT INTERCHANGE

The North West Transport Activists Roundtable (NW TAR) would like to re-confirm its objection to Astral's proposals for a multi-modal freight interchange at Parkside as envisaged in their latest planning application and refer St. Helens Borough Council to our previous letter of objection of November 15th 2006 to the earlier planning application (P/2006/1296) by the same promoters.

In our previous submission we expressed our concern that the scale of the development proposed, which included extensive additional highway infrastructure, and the amount of warehousing associated with it was not indicative of a business whose primary purpose was rail freight. We also pointed to the Highways Agency's expressed concerns regarding stress on their networks, the likely effects on the local road network and the fact that there is insufficient spare 'path' capacity to support a thriving rail freight interchange at this location. Consequently, we did not believe a credible exceptional case had been made for building over and destroying such a vast area of Green Belt.

None of the fears we expressed in that earlier submission have been allayed with this latest application. In fact this one raises additional concerns because it includes a proposal to provide extra northbound capacity on the M6 motorway in the vicinity of the site, despite the fact that even the promoters themselves acknowledge this measure would generate extra traffic movements. This is an extraordinary proposal and admission at a time when the government has recognised the need to reduce harmful emissions, combat the causes of climate change and encourage more sustainable lifestyles. And the Highways Agency, at the government's behest, is currently re-evaluating its plans for road-building and future working in the light of the Eddington and Stern reports.

Sir Nicholas Stern's report: *'The Economics of Climate Change'* describes climate change as *"the greatest and widest-ranging market failure ever seen"* and argues that planning regulations have a potentially important role to play in moving towards a less energy-intensive society. It says efficiency can be promoted by *"reducing long-run transport demand through integrated land-use planning and infrastructure development"* (p. 381, full report). And it goes on: *"Spatial and strategic planning can affect patterns of energy consumption"* (p. 384). At this point it is apposite to point out that whilst the Panel who sat in judgement at the Regional Spatial Strategy Examination in Public gave the nod in principle to the concept of a freight terminal in the Parkside area, the current planning application was not a part of their deliberations.

The Executive Summary of the Stern Report states: *"over-investment in long-lived, high carbon infrastructure ... will make emission cuts much more expensive and difficult"* (p.19); *"land-use planning and performance standards should encourage both private and public investment in buildings and other long-lived infrastructure to take account of climate change"* (p. 21) and *"investments made in the next 10 - 20 years could lock in very high emissions"* (p. 22). The NW TAR contends that this planning application runs completely contrary to all of Stern's advice. It is unsustainable and should be refused.

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Yours Sincerely,

LILLIAN BURNS, Convenor