

## ◆ Policy and Need

**INTRODUCTION**

1. This topic paper addresses the policy framework, site selection and the need for the provision of Strategic Freight Interchanges (SRFIs) at a national level; and identifies other relevant policy, including development plan policy, and need issues which underpin the merits of the Proposed Development.
2. This topic paper has been prepared with input from Frampton Town Planning, Baker Rose Consulting and Savills. The topic paper has specifically been prepared by:
  - Peter Frampton BA (Hons) MRICS MRTPI, Planning Director at Frampton Town Planning; and
  - David Baker FRICS FCILT MCI Arb, partner of Baker Rose Consulting LLP.
3. Whilst it provides an overview of the relevant policy framework, it should be read in conjunction with the other topic papers which contain a more detailed summary of legislation, policy and guidance as relevant to that topic.
4. Intermodal Logistics Park North Ltd. ('the Applicant') is promoting proposals for a new strategic rail freight interchange (SRFI) and associated development on land to the east of Newton-le-Willows, in the administrative areas of St Helens, Wigan and Warrington Councils. An SRFI is a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems. SRFIs reduce the cost of moving freight by rail and encourage the transfer of freight from road to rail, which saves fuel and reduces greenhouse gas emissions as well as reducing congestion on the highway network.
5. Under the Planning Act 2008, the proposals qualify as a Nationally Significant Infrastructure Project (NSIP). Accordingly, an application for a Development Consent Order (DCO) is to be made to the Planning Inspectorate (PINS), which will examine the DCO application on behalf of the Secretary of State (SoS) for Transport.
6. Before making a DCO application, an Environmental Impact Assessment (EIA) of the Proposed Development will be undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). EIA is a process that provides the decision maker with sufficient information about the likely environmental effects of a project and is used to improve the environmental design of a development proposal. The first stage of this process was the submission of a request for a formal scoping

opinion under Regulation 10 of the EIA Regulations. A scoping opinion was issued on 12 December 2024.

## SITE DESCRIPTION

### Site location

7. The DCO Site is located on the eastern extent of Newton-le-Willows in a flat, agricultural landscape. The DCO Site is located within the local authority areas of St Helens Borough Council, within the Liverpool City Region Combined Authority; Wigan Council, within the Greater Manchester Combined Authority; and Warrington Borough Council.
8. The DCO Site is split broadly in two sections:
  - the Main Site – land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane incorporating the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line;
  - the Western Rail Chord – land to the west of the M6 motorway, which bisects the DCO Site in a northwest southeast orientation, and to the east of the West Coast Mainline.
9. The majority of the land contained within the Main Site is bound to the north by the Chat Moss Line (Liverpool-Manchester railway line), to the west by the M6 motorway and to the southeast by Winwick Lane (A579). The Main Site south of the Chat Moss Line is approximately 198 hectares in size. The Highfield Moss Site of Special Scientific Interest (SSSI) is also adjacent to the north of the DCO Site, which is described in more detail below. A number of other uses exist at the Main Site currently, including:
  - Kenyon Hall Airfield, which is a small airfield used by the Lancashire Aero Club for recreational flying of small propeller planes;
  - Warrington Model Flying Club, which is a model club for radio controlled model aircraft; and
  - Highfield Farm, which is comprised of two agricultural/residential buildings set within a curtilage surrounded by agricultural fields.
10. The majority of the Main Site is comprised of agricultural fields used for arable crops, with some small patches of woodland in the east. There are also a number of residential properties, farmsteads and a commercial yard within the Main Site. Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.
11. The triangular parcel of land located to the north of the Chat Moss Line and to the east of Parkside Road also forms part of the Main Site.
12. The Western Rail Chord of the DCO Site is approximately 12 hectares in size and is bordered

to the west by the West Coast Mainline railway, to the north by the Chat Moss Line and to the east by the Parkside West Development.

13. The Western Rail Chord is comprised of scrub land and areas of woodland which are set within the context of an area of redevelopment with commercial uses proposed, which is known as Parkside West, and is currently being promoted through the Town and Country Planning Act process.

## DEVELOPMENT DESCRIPTION

14. The Proposed Development is an SRFI with associated development comprising:
- provision of a rail terminal serving up to 16 trains per day, including ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities;
  - a rail turn-back facility within the Western Rail Chord;
  - up to c.767,000 square metres (m<sup>2</sup>) (gross internal area) of warehousing and ancillary buildings with a total footprint of c.590,000m<sup>2</sup> and up to c.177,050m<sup>2</sup> of mezzanine floorspace, subject to ongoing design and market assessment, comprising a mixture of units with the potential to be rail-connected, rail served and additional units;
  - new road infrastructure and works to existing road infrastructure;
  - provision of an overnight lorry parking for users of the SRFI;
  - new energy centre and electricity substations, including central battery storage and potential provision of central Combined Heat and Power (CHP) units to augment the grid supply in the case of demand exceeding instantaneous firm and variable supplies;
  - provision of photovoltaics and battery storage on site;
  - strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas;
  - demolition of existing on-site structures (including existing residential dwellings / farmsteads and commercial premises);
  - potential relocation of the Huskisson Memorial; and
  - earthworks to regrade the DCO Site to provide appropriate access, connections to the railway, development plots and landscape zones.

## RELEVANT PLANNING POLICY

15. The DCO application will be determined pursuant to the Planning Act 2008 and relevant

regulations, the National Networks National Policy Statement ('NPSNN', adopted 2024) and the National Planning Policy Framework (NPPF). Relevant local planning policy are material considerations.

### National Networks National Policy Statement

16. The National Policy Statement for National Networks (NPSNN) was designated by Parliament in March 2024 and forms the primary basis for the Examining Authority to assess, and for the Secretary of State to make decisions, on DCO applications for national networks NSIPs in England.
17. The NPSNN sets out the need for, and the Government's policies to deliver, development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks and SRFI developments in England.
18. Importantly, the NPSNN sets out (para. 4.2) a presumption in favour of granting development consent for national networks NSIPs where they fall within the need for infrastructure established in the NPSNN and comply with its policies.
19. An SRFI is defined under the NPSNN (para. 4.89) as being capable of handling four trains per day and, where possible, capable of increasing the number of trains handled and capable of accommodating 775m trains with appropriately configured on-site infrastructure and layout.
20. The NPSNN (para. 2.15) defines the aim of an SRFI as
 

*'...optimising the use of rail in the freight journey by maximising the long-haul primary trunk journey by rail and minimising some elements of the secondary distribution (final delivery) leg by road, through co-location of other distribution and freight activities. SRFIs need to be supported at both ends by connections to rail infrastructure and logistics terminals. SRFIs are also typically associated with intermodal traffic'.*
21. The NPSNN (Chapter 2) details, amongst others, that national networks provide the opportunity to facilitate modal shift, prioritising decarbonisation and improving air quality outcomes whilst supporting the continuous improvement of the economic efficiency and reliability of end-to-end freight journeys, with greater resilience built into the system. In terms of environmental protection and enhancement, the NPSNN is informed by the overarching objectives set out in the Environment Act 2021 and the Environmental Principles Policy Statement.
22. Chapter 3 of the NPSNN sets out the drivers of need for SRFIs with four main areas identified:
  - In terms of network performance, rail freight is recognised as playing an important part in supply chain resilience, with intermodal freight a key growth market, underpinned by a Government-backed Rail Freight Growth target. There are cost benefits to users and reductions of the amount of freight movements on the national and local road networks, as well as facilitating trade links and enhancing port growth.

- The needs of users is a further driver of need for SRFIs. Increased emphasis on modal shift from freight and logistics operators requires new facilities well related to major rail routes. SRFIs are a key part of the modern role of the UK's network of warehouses. They can provide both storage processing facilities and onward connectivity to support the cross-modal transfer of goods, in order to deliver the full range of benefits that rail freight can provide.
  - SRFIs can also contribute to supporting local economies and growing capacity in the national network capacity and connectivity to support growth in ports, fuelled by predicted in imports and exports. SRFIs are vital in achieving these outcomes.
  - The effective development of SRFIs in the right locations will help realise the full range of environmental benefits that rail freight can offer. Promoters of SRFIs need to consider environmental impacts, avoiding harm where possible with mitigation or compensation where this is not possible.
23. The NPSNN goes on to set out Government's policy for addressing the need for SRFIs. Within this overarching context, the Government's policy for addressing need for SRFIs acknowledges that:
- Para. 3.100 - to facilitate modal shift, a network of SRFIs is needed across a broad range of regions, to serve regional, sub-regional and cross-regional markets. In all cases, it is essential that facilities have good connectivity with both the road and particularly the strategic rail freight network.
  - Para. 3.101 - to meet Government's ambitions for rail freight growth, there remains a need for appropriately located SRFI facilities across all regions where there is demand or potential demand, to enable further 'unlocking' of benefits.
  - Para. 3.102/103 - having regard to alternative options, such as relying on existing rail freight interchanges to manage demand, reliance on road-based logistics or reliance on a larger number of smaller rail freight interchanges, the policy concludes that there is a compelling need for an expanded network of SRFIs throughout the country.
  - Para. 3.103 (cont.) - it is important that SRFIs are located near the markets they will serve, such as major urban centres/groups of centres, and are linked to key supply chain routes.
  - Para. 3.103 (cont.) - given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which restrict the scope to identify viable alternative sites.
  - Para. 3.105 - SRFI capacity needs to be provided at a wide range of locations, both in regions where they are currently located, and more broadly, to provide the flexibility needed to match the changing demands of the market, possibly with traffic moving from existing rail freight interchanges to new larger facilities.

24. Consequently, the NPSNN details (para. 3.106) that:

*'Consideration should be given to ensuring existing SRFI locations are taken into account when making an application, to ensure that SRFIs are strategically located and thus enable a more extensive cross-country network which unlocks the full range of benefits that an expanded network of SRFIs can provide. Whilst there is likely to be a natural clustering of SRFI proposals in the distribution heartland of the nation (and further SRFI proposals in this area will continue to be important), consideration should be given to proposals for SRFIs in areas where there is currently lesser provision'.*

25. The NPSNN includes, at Section 4, general policies and considerations against which applications relating to national networks infrastructure are to be assessed. These comprise:

- General principles of assessment.
- Environmental Assessment, with a particular emphasis on the cumulative assessment.
- Habitat Regulations Assessment.
- Alternatives, requiring the main alternatives studied by the applicant to be set out.
- Biodiversity Net Gain, with a specific requirement for NSIPs to be published by the Government (yet to be published).
- Criteria for good design for national network infrastructure.
- Climate change adaptation.
- Pollution Control and other environmental regulatory regimes.
- Common law nuisance and statutory nuisance.
- Safety.
- Security considerations.
- Health.
- Accessibility.

26. Specific policy provision is provided for SRFIs under the subheadings of:

- Rail freight interchange function: recognising the need to plan for rail and non-rail activities.
- Transport links and location requirements: location-driven requirements and the adequacy of road and rail links and the availability of local workforce underlined.

- Scale and design: including expectations around rail infrastructure from the outset, though it is recognised that warehousing may need to be delivered and commissioned ahead of rail networks.
27. Section 5 of the NPSNN requires applicants to address generic impacts of an NSIP under the topic headings of:
- Air Quality.
  - Green House Gas Submissions.
  - Biodiversity and Nature Conservation.
  - Resource and Waste Management.
  - Civil and Military Aviation and Defence Interest.
  - Dust odour, artificial light, smoke, steam.
  - Flood Risk.
  - Land contamination and instability.
  - Landscape and visual impacts.
  - Land use, including Open Space, Green Infrastructure and Green Belt.
  - Historic Environment.
  - Noise and Vibration.
  - Social economic impacts.
  - Water Quality and Resources.
  - Impact on Transport Networks.

### **National Planning Policy Framework (NPPF)**

28. The NPPF is a material policy consideration in decisions on NSIPs. However, at the outset, the NPPF makes clear that it does not contain specific policies for NSIPs and that the NPSNN takes precedence in areas of overlap.
29. The following aspects of the NPPF are relevant:
- The three overarching objectives of the planning system (paragraph 8) comprise balancing of economic, social and environmental objectives. The economic objective seeks to ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

- The economic objective is supported by the need to create the conditions in which businesses can invest, expand and adapt (paragraph 85). The same paragraph confirms that significant weight should be placed on the need to support economic growth and productivity, and that each area should build on its strengths, counter any weaknesses and address the challenges of the future.
  - The specific locational requirements of different sectors should be recognised and addressed by both planning policies and decisions which includes making provision for “storage and distribution operations at a variety of scales and in suitably accessible locations” (paragraph 87).
30. The NPPF also contains policies on a range of economic, social and environmental matters to be considered in the determination of applications.

### ***Planning Practice Guidance (PPG)***

31. The NPPF is complemented by the Government’s Planning Practice Guidance (PPG) which provides guidance on a wide range of matters. There is no specific guidance on SRFIs.

### **Regional Planning Policy**

32. The LCRCA undertook consultation on a draft Spatial Development Strategy for the City Region in December 2023. The document 'Towards a Spatial Development Strategy for the Liverpool City Region up to 2024' (SDS) is at a relatively early stage of preparation has not yet been through Examination in Public and is expected to have unresolved objections. As such, and in accordance with the NPPF, it cannot currently be afforded any material weight. Its progress will be monitored throughout the DCO application preparation process.
33. Notwithstanding the above the SDS identifies, through Policy LCR SP4, "Parkside Strategic Rail Freight Interchange" as part of the city region's strategic infrastructure. The policy recognises that the identified strategic infrastructure is "necessary to meet identified needs" and "enable growth". Addressing deprivation is a key part of the SDS, with numerous references throughout (including Policies LCR SS1 - Liverpool City Region Spatial Strategy and LCR DP3 - Economic Prosperity). Parkside Strategic Rail Freight Interchange is the name given to the part of the DCO Site within St Helens’ administrative area which was allocated in the St Helens Local Plan in 2022, as explained further below.
34. Places for Everyone, the joint development plan document covering nine of the ten Greater Manchester authorities, including Wigan, was adopted in March 2024. It forms part of Wigan's adopted development plan and is considered further below.

### **Local Planning Policy**

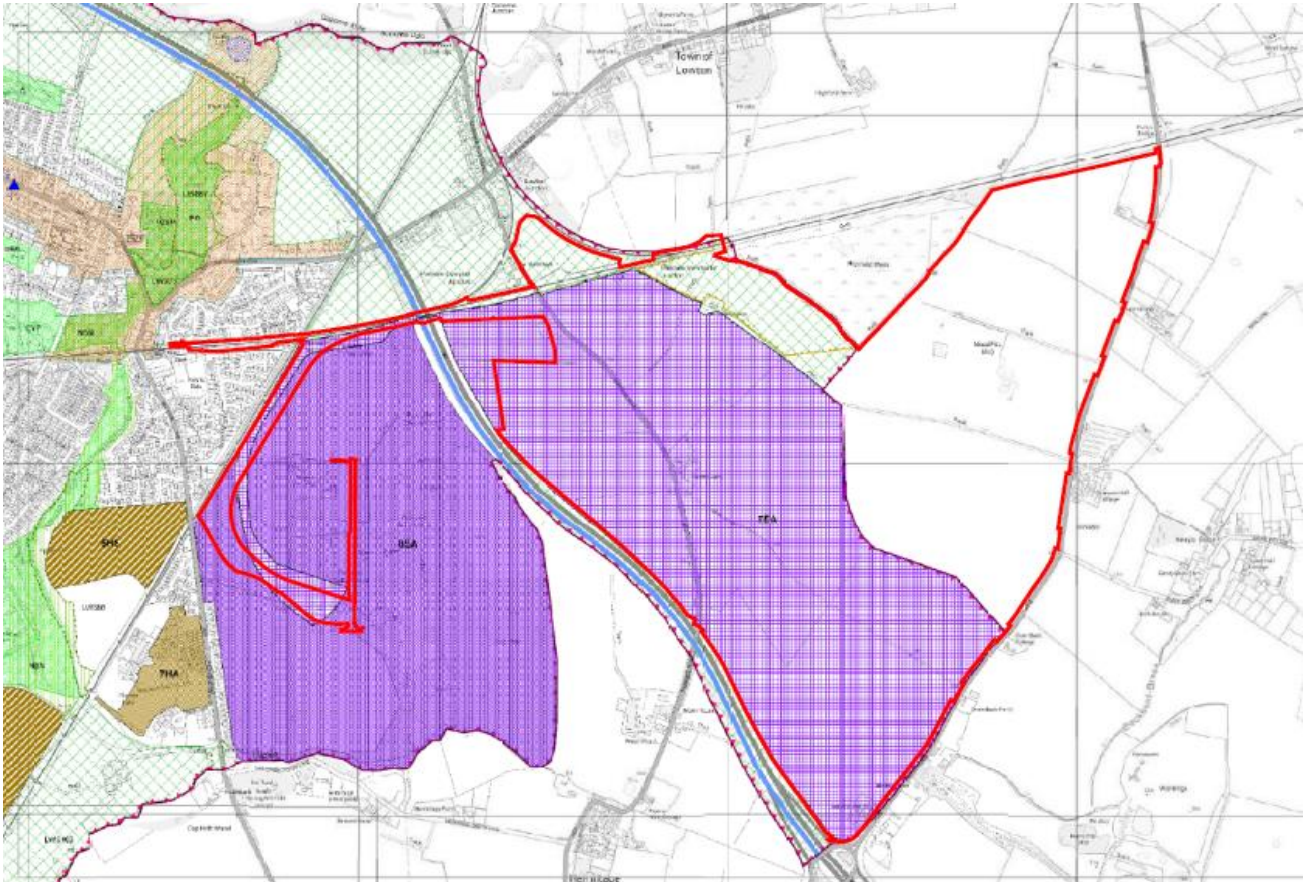
35. The DCO Site is located within the St Helens, Wigan and Warrington local authority areas. The majority of the DCO Site lies within the administrative area of St Helens. A summary of relevant policy considerations from each authority area is provided below.



## St Helens

36. The statutory development plan for the Borough comprises the following:
- Local Plan (adopted July 2022); for the plan period to 2037
  - Joint Merseyside and Halton Waste Plan (adopted 2013)
37. The overarching strategic aims/objectives of the Local Plan include supporting regeneration and balanced growth (Strategic Aim 1), including enabling sustainable economic growth and reducing deprivation by ensuring that development and investment benefits deprived communities. A further aim (Strategic Aim 5) is to ensure a strong and sustainable economy which maximises the contribution of St Helens to the economy of the Liverpool City Region and adjacent areas, and meeting local employment needs, by ensuring an adequate supply of employment land and premises. Strategic Aim 3 also promotes sustainable transport.
38. The strategic policies of the plan, including the allocations within the DCO Site (summarised below) reflect these aims, with Parkside West and Parkside East specifically recognised by Policy LPA01 as:
- 'transformational employment opportunity sites that will make a major contribution to the economic development of St Helens Borough, the Liverpool City Region and beyond.'*
39. The majority of the DCO Site is allocated for an SRFI in the adopted St Helens Local Plan. The relevant site-specific allocations and designations are summarised overleaf.

**Figure 1** Extract from St Helens Local Plan Policy Map (approximate DCO Site boundary edged red)



***Parkside East Allocation***

- 40. The land east of the M6 (and the spur that extends to the west which the Western Rail Chord broadly follows) identified in hatched purple colour is subject to Local Plan Policy LPA09, which confirms that the site (identified as Site 7EA in policy LPA03) is suitable for development as an SRFI; the primary purpose of which is to facilitate the movement of freight by rail, its on-site storage and transfer between rail and other transport modes. The policy sets out a range of criteria which development is expected to meet. The planning statement to be included as part of the DCO Application will address the performance of the proposals to these criteria requirements for future development.
- 41. The supporting text to the policy sets out the background and policy / evidence drivers that supported its allocations as a SRFI in the Local Plan. Together these formed a comprehensive policy basis and evidence base that represented the 'exceptional circumstances' required to remove the allocated sites from the Green Belt.

***Parkside West Allocation***

- 42. The land west of the M6 is subject to Local Plan Policy LPA10, which details that the site shall

be considered suitable for Class B2 and B8 employment uses. The policy sets out a range of requirements, including that part of the site is safeguarded from all forms of development, unless it can be shown that such development within it will not prejudice, or may provide, effective and deliverable future siding facilities in connection with the development of an SRFI or other rail-enabled development on the Parkside East site (land to the east of the M6).

### ***Strategic Employment Sites***

43. In accordance with Policy LPA03.1, both Parkside East and West are identified as Strategic Employment Sites. The policy sets out requirements for planning applications within these Strategic Employment Sites, comprising:
- Preparation of a comprehensive masterplan covering the whole site.
  - Inclusion of a comprehensive package of training schemes and/or measures to enable local residents to access employment opportunities.
  - Support the provision of expanded and /or enhanced transport infrastructure.
  - Address site-specific requirements set out in Appendix 5 of the Local Plan.

### ***Other Designations***

44. The DCO Site extends beyond the Policy LPA09 and LPA10 allocations and includes an area of land that is Green Belt (Policy LPA 01 (5) - green crosshatch in the plan above to the north and north-east of the Main DCO site) and a Nature Improvement Area (Policies LPC06 and LPC08 - yellow dashed line above to the north-east of the Main DCO site).
45. Green Belt policy in the Local Plan reflects that in the NPSNN and the NPPF with Very Special Circumstances (VSCs) to be demonstrated for inappropriate development in the Green Belt. The DCO application will set out the considerations which comprise the VSCs and justify the granting of the DCO.
46. The policies on Nature Improvement Areas require development to take a sequential approach to avoid harm, provide appropriate mitigation, replacement or other compensatory provision. These policy requirements will inform the next stage of design development.
47. The Local Plan contains other policies relating to environmental, social and economic matters.

### ***Wigan***

48. The statutory development plan for Wigan comprises:
- Saved Policies of the Wigan Replacement Unitary Development Plan (adopted 2006);
  - Local Plan Core Strategy (adopted September 2013; updated in March 2024 following the adoption of Places for Everyone);
  - Places for Everyone Joint Development Plan Document (adopted March 2024);

- The Greater Manchester Joint Minerals Plan (adopted April 2013); and
  - The Greater Manchester Joint Waste Plan (adopted April 2012).
49. A new Local Plan is being prepared by Wigan Council. It is at an early stage of preparation, with options and preferences having been published in December 2023, and is yet to reach Regulation 19 stage (i.e. a draft plan has not yet been published, this is expected by summer 2025). Its progress will be monitored throughout the DCO application preparation process. No material weight can be given to the emerging plan based on the stage it has reached, the fact that it has not yet been through Examination in Public and the likelihood of unresolved objections.
50. Both the Local Plan Core Strategy and Places for Everyone include strategic objectives around economic growth<sup>1</sup> and employment (with specific recognition of logistics in Places for Everyone<sup>2</sup> and the "important role" it can play in addressing the economic disparities across Greater Manchester<sup>3</sup>) and addressing inequalities by providing access to skills, training and employment opportunities and addressing deprivation (which the Local Plan Core Strategy states at paragraph 4.2 to be 'deep and widespread'). Places for Everyone also includes a strategic objective (Objective 6) around the sustainable movement of freight, with specific reference to opportunities for sustainable freight.
51. The part of the DCO Site within Wigan is currently designated as Green Belt. The Core Strategy policy on Green Belt has been superseded by Places for Everyone Policy JP-G9 which repeat the purpose of the Green Belt set out in national policy and supports the beneficial use of the Green Belt including improved public access, habitat restoration and delivering environmental and social benefits.

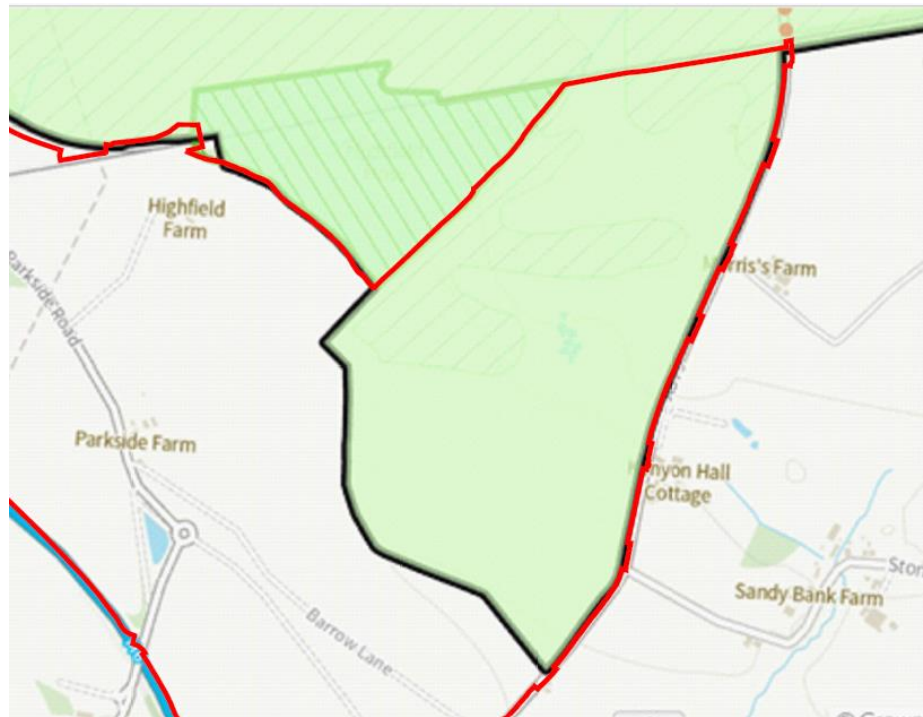
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<sup>1</sup> Objective EE

<sup>2</sup> Policy JP-J1

<sup>3</sup> Policy JP-J4, paragraph 6.36

**Figure 2** Extract from Wigan Local Plan Core Strategy Policy Map (approximate DCO boundary edged red)



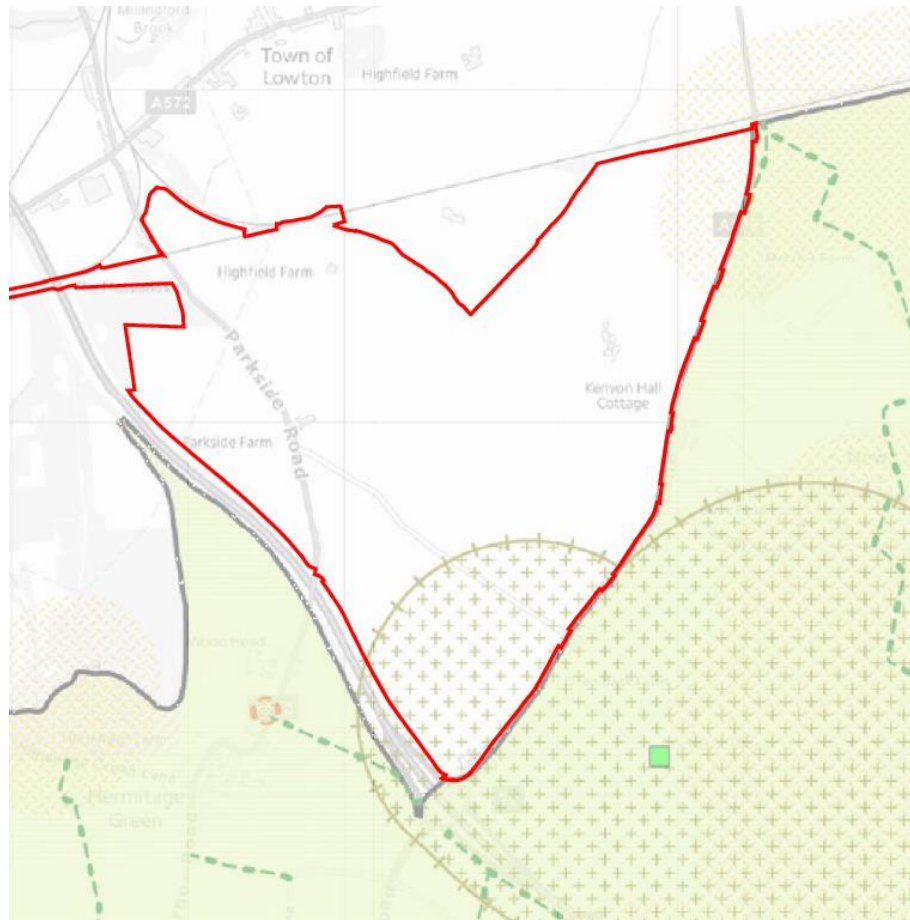
52. The Highfield Moss Site of Special Scientific Interest (SSSI) site is situated immediately adjacent but to the north-eastern boundary of the DCO Site, with a small area within the DCO Site. The SSSI is identified in Places for Everyone (PfE) as a Site of Biological Importance (SBI) and located within a 'Mosslands and Lowland Farmland' landscape character type/area. PfE Policy JP-G4 identifies that such areas will be protected, enhanced and restored with a strong emphasis on reconnecting local communities to the natural and historic environments. The Applicant is in active discussions with Natural England regarding the management of effects on Highfield Moss SSSI.
53. The DCO Site is located within a Mineral Safeguarding Area (MSA) for Sand and Gravel. Therefore, Greater Manchester Joint Minerals Plan Policy 8 - Prior Extraction of Mineral Resources Within Mineral Safeguarding Areas is relevant. The Policy details that all non-mineral development proposals within the Mineral Safeguarding Area should extract any viable mineral resources present in advance of construction. This policy provision will be considered in the Environmental Assessment.
54. The Wigan Core Strategy and UDP also contain topic-based policies which relate to the environmental matters set out in the NPSNN and the NPPF.

### **Warrington**

55. A small part of the DCO Site is within Warrington. The extent is presently limited to existing agricultural accesses along Winwick Lane. Very limited physical development is therefore proposed within Warrington Borough. For completeness, a brief summary of the Warrington development plan is provided below.

56. The development plan in Warrington comprises the Warrington Local Plan 2021/22 - 2038/39, adopted in December 2023.
57. At a strategic level the Warrington Local Plan recognises at Section 4.2 the strength of Warrington's economy and the potential to build on this, capitalising on Warrington's transport links and highly-skilled workforce. There is policy support (Policy DEV4) for supporting the local economy; the supporting text for the policy notes that there is a strong market for distribution development in locations linked to the main motorway junctions.
58. The part of the DCO Site within Warrington is Green Belt (Policy GB1 relates), but the nature of the works proposed within this part of the site are currently engineering works which are capable of comprising appropriate development in the Green Belt. Should the extent of works within the Green Belt change and comprise inappropriate development, the Planning Statement will set out the VSCs.
59. These areas are also subject to Mineral Safeguarding Area (MSA) designations. In accordance with Policy ENV3, these areas are to be protected from sterilisation by other development. There is a criteria-based policy for non-mineral development in MSAs.
60. The Warrington Local Plan contains a suite of policies dealing with the full range of environmental matters.

**Figure 3** Extract from Warrington Map Local Plan Policy Map (DCO Site boundary edged red)



## SITE SELECTION

61. This section considers the approach taken to site selection, noting in particular the importance placed on the delivery of SRFIs in appropriate locations in NPSNN, but also the long-standing aspiration regionally and locally to deliver an SRFI in this area.

### Site Options Key Criteria

62. The NPSNN details (para. 4.80) that rail freight interchanges are not only locations for freight access to the railway, but also locations for businesses, capable now or in the future, of supporting their commercial activities by rail.
63. Therefore, from the outset, the key criteria which informs a proportionate assessment of alternative locations, includes:
- Para. 4.80 (cont.) - the ability of a facility to be planned and developed in a form that can accommodate both rail and non-rail activities.
  - Para. 4.81 - that new/extended SRFIs are appropriately located relative to the markets they will serve, which will focus largely on major urban centres/groups of centres and key supply chain routes.

- Para. 4.81 (cont.) - as most freight movements by rail will end with transport by road to the final destination, proposed SRFI facilities should have good road access and provide appropriate parking and associated facilities for those using the interchange in order to effectively compete with, and work alongside, road freight to achieve a modal shift to rail. The NPSNN therefore acknowledges that, due to these requirements, it may be that countryside locations are required for SRFIs.
- Para. 4.82 - adequate links to the rail and road networks are essential. Rail access will vary between rail lines, both in the number of services that can be accommodated, and the physical characteristics such as the train length and, for intermodal services, the size of intermodal units that can be carried (the 'loading gauge').
- Para. 4.83 - SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). Additionally, given, by necessity, that such facilities involve large structures, buildings and the operation of heavy machinery, typically located away from residential areas and environmentally sensitive areas (though this does not preclude SRFIs from having such receptors in the vicinity as appropriate mitigation measures may be available to limit the impacts of visual intrusion, noise and light).
- Para. 4.84 - SRFIs and the on-site functions of major distribution operations are relatively labour intensive and therefore the existence of an available and economic local workforce is an important consideration.

64. Accordingly, these acknowledged locational characteristics and principles form the basis for the preparation of a 'proportionate' Site Selection exercise. The assessment will also follow the NPSNN guidance (para. 4.22) which details that where alternative schemes proposed are vague or have no real possibility of coming about, they are either irrelevant, or where relevant, should be given little or no weight.

### **Summary of Relevant Planning Policy and Application History**

65. At the outset, the locality of the former colliery site now known as Parkside West and surrounding land has long been identified as a suitable location for the provision of an SRFI. The part of the DCO Site within St Helens Borough is referred to as "Parkside East" and allocated for SRFI development in the adopted Local Plan (July 2022). This allocation has been a primary policy driver for the Applicant in bringing forward proposals for a SRFI at the DCO site.
66. Railtrack tried to progress a scheme (Ref. P/2001/0902) for a rail freight facility comprising some 168,000 sqm of warehouse distribution units on the former Parkside Colliery site (principally Parkside West and a small part extending into Parkside East). This proved ultimately unsuccessful but was followed by a much larger application (Ref. P/2006/1296) by Astral (subsequently taken over by Prologis) for an SRFI of up to 715,000 sqm of rail-served warehouse and distribution buildings, which was also heavily dependent on road logistics.



67. Allied to this planning application activity, the Parkside Colliery location and the surrounding land has also been identified as a potential location for the provision of an SRFI facility in previous planning policy / plan-making:
- The North West of England Regional Spatial Strategy ('RSS') to 2021 (adopted September 2008-now withdrawn from the development plan) identified under policy RT 8 (Inter-Modal Freight Terminals) that 'consideration should be given to the allocation of land for inter-modal freight terminals in broad locations including 'Newton-le-Willows (with access to the West Coast Main Line and Chat Moss rail route)';
  - St Helens Core Strategy (adopted 2012) policy CSS1 subsequently aligned with the RSS and formally allocated land at the former Parkside Colliery for a strategic location for an SRFI, subject to an appropriate scheme being delivered on the site.
68. Building on this long-standing identification of the Parkside locality as a prospective strategic location for an SRFI, a range of economic growth strategy papers and technical need assessments/reports were prepared by the Liverpool City Region (within which St Helens is one of the local authority areas).

### Design Options

69. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require projects with significant environmental effects to include a description of the main alternatives studied by the Applicant and an indication of the main reasons for the Applicant's choice, taking into account the environmental effects.
70. An underlying reason for the Applicant's decision to bring forward proposals for a SRFI on the DCO site is the allocation of what is referred to as Parkside East within the St Helen's Local Plan for the purposes for an SRFI. The DCO Application will examine the alternatives considered by the Applicant – including as to whether the area of land allocated in the St Helens Local Plan is adequate to suitably accommodate an SRFI which will meet technological requirements in the provision of infrastructure, including the Railport, and be of sufficient scale to meet market needs.
71. The DCO Application will explain the reasons for the Applicant selecting the DCO site for the purposes of an SRFI and the alternatives considered by the Applicant which have led to decision-taking in proposing an SRFI on the DCO site.
72. In evaluating environmental effects and the need to meet the locational requirements of an SRFI, the Applicant will set out in the DCO Application the alternatives considered in the evolutions of the Proposed Development informed by feedback through the Informal and Formal Consultation and pre-application engagement with stakeholders and consultees.

### NEED AND DEMAND FOR RAIL FREIGHT CAPACITY

73. This section of the Topic Paper outlines the background for the need and demand for an SRFI, having regard to relevant policy and evidence as well as market drivers. The evidence and assessment of the need for the Proposed Development will form a vital part of the DCO

application and will therefore continue to be developed through the pre-application stage.

### Drivers of Demand

74. Within the North-West, the movement of freight is of vital importance for imports and exports, mainly through the Liverpool2 deep-water freight terminal at the Port of Liverpool c. 30 km to the west of the DCO Site. Since its opening in 2016 and subsequent expansion (which became operational in 2021), it has been successful in attracting new container shipping lines and significantly increasing the movement of goods to and from the North-West and beyond. Other ports in the north of England have also been successful in attracting European trade, some of re-routed from the South-East and East of England.
75. As noted in the Rail Freight Topic Paper (paragraph 11), Ports operate more efficiently with rail than individual lorry movements and the growing volumes able to maximise the use of rail freight, as an alternative to long distance HGV movements, need the lifting capacity and efficiencies that SRFIs offer in order to provide an end-to-end distribution service.
76. In addition, there is a growing network of SRFIs across the UK as illustrated in the diagram overleaf, though there are none in the North of England (there are rail-freight interchanges such as iPort in Doncaster, which do not have the same capabilities as SRFIs).
77. The increased availability of regional SRFIs provides an opportunity for inter-regional movement of freight by rail and there are examples of this being implemented by Tesco and Coca-Cola amongst others in the retail and manufacturing sectors. The use of rail freight is also important to new and growing sectors including the automotive industry and the high-speed movement of parcels.

**Figure 4** Diagram illustrating the location of existing and planned SRFIs relative to Ports and other intermodal facilities (Source: Network Rail)

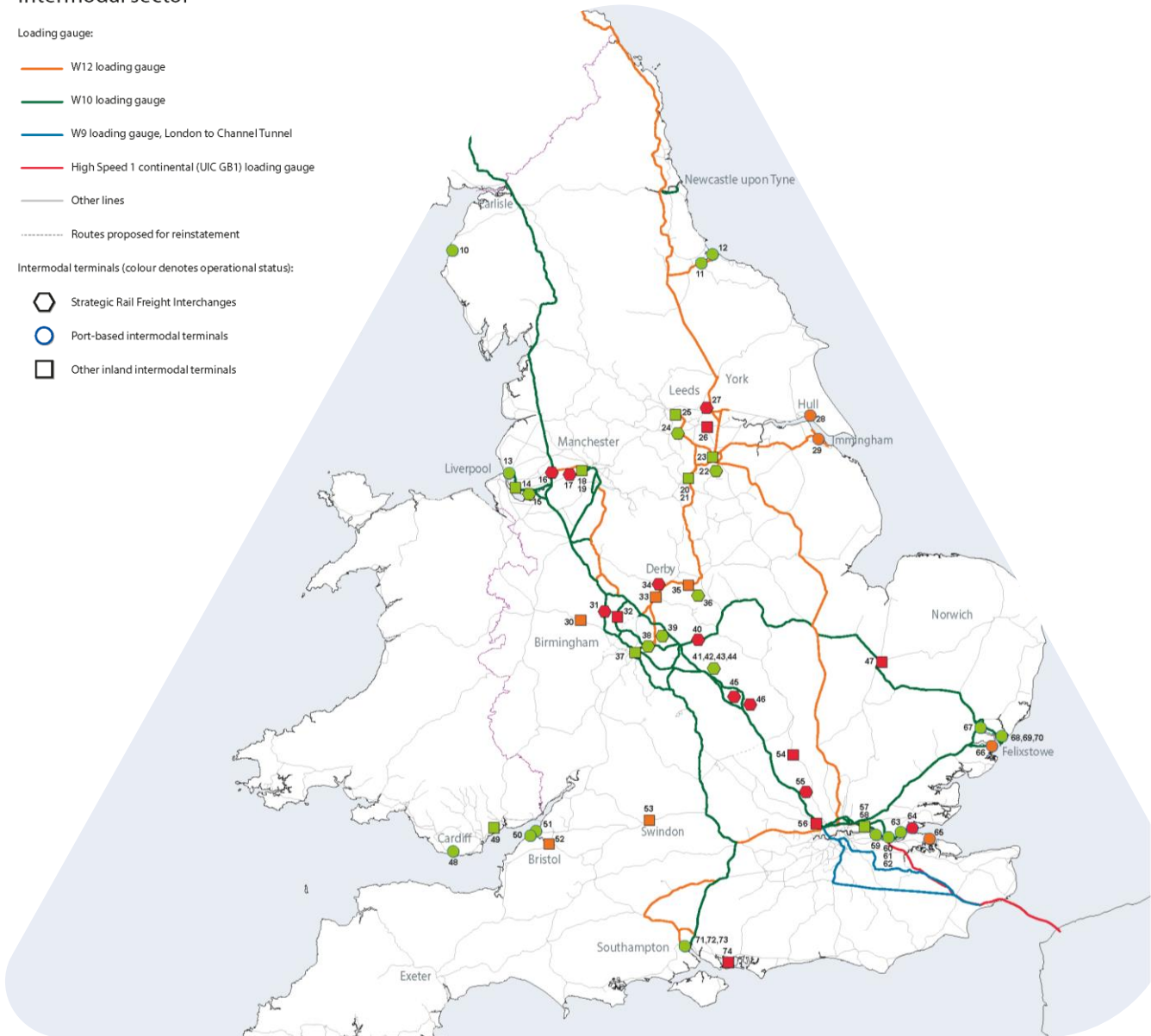
Intermodal sector

Loading gauge:

- W12 loading gauge
- W10 loading gauge
- W9 loading gauge, London to Channel Tunnel
- High Speed 1 continental (UIC GB1) loading gauge
- Other lines
- Routes proposed for reinstatement

Intermodal terminals (colour denotes operational status):

- ◻ Strategic Rail Freight Interchanges
- Port-based intermodal terminals
- ◻ Other inland intermodal terminals



78. The Proposed Development is exceptionally well placed to support the key ports in the north of England and Scotland and operate as a vital component of the network of regional SRFIs due to its ability to provide access to the North-South routes via the West Coast Main Line; and East-West via Chat Moss and Trans Pennine Lines. It is also very well placed to serve the Liverpool City Region, Greater Manchester Combined Authority areas and wider North.
79. The general growth of the logistics sector (considered further below) is a further source of demand that underlines the importance of providing the range of facilities and sites that the sector needs in order to meet customer demand and requirements.
80. These market drivers and the locational advantages of the DCO Site are important

considerations as to why the Proposed Development is needed and why it is proposed in this location.

81. Furthermore, a modal shift (i.e. moving more freight onto rail) is encouraged as a key measure in decarbonising the UK's transport system to meet the overall net zero objective underpinned by the Governments' ambition to grow rail freight by 75% by 2050, which forms part of the Rail Freight Growth Target (December 2023).
82. A key commitment of the DfT's 'Transport Decarbonisation Plan' is to support modal shift of freight from road to rail. 'The modal shift of freight from road to rail would not only lead to a reduction in GHG levels but also reduce congestion and noise pollution.' (Page 139). 'A shift to zero carbon modes of transporting goods and services including greater use of rail and maritime, will make our freight system net zero before 2050.' (Page 39)
83. Both this plan and the government's more detailed strategy published in 2022 (Future of Freight; a long term plan) contain specific measures to encourage modal shift including: grants for routes where road haulage has a financial advantage; working with industry on understanding opportunities / barriers to innovative freight modes (such as freight on light rail, high speed rail freight into cities); and publicity and communication campaigns to raise the profile of cross-modal freight and its benefits.
84. There are also important policy reasons; these are considered below.

### The National Policy

85. The NPSNN sets out the challenges that national networks face and the need to develop infrastructure in order to respond to those challenges. The details of these challenges for the development of SRFIs are set out under the following headings:
  - Network Performance and resilience
  - User needs
  - Connectivity and supporting economic growth environment
86. Paragraphs 3.98 -3.102 of the NPSNN set out the Government's policy for addressing the need for the SRFIs, including consideration of a range of alternative options to address need. Table 1 identifies these options as being:
  - Reliance on existing rail freight interchanges to manage demand.
  - Reliance on road-based logistics.
  - Reliance on a larger number of smaller rail freight interchanges.
87. The Government concludes these options are neither viable nor desirable ; hence the Government has concluded that there is (NPSNN paragraph 3.103)

*'..... a compelling need for an expanded network of SRFIs throughout the country. It is important that SRFIs are located near the markets they will serve - major urban centres, or groups of centres - and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites'*

88. A range of studies have been undertaken at the regional and local level as part of the evidence base for the St Helens Local Plan. This evidence was a crucial component in demonstrating that 'exceptional circumstances' existed to remove land from the Green Belt and allocate it for an SRFI and commercial development within the St Helens Local Plan. Some of the evidence also relates to the LCR SDS and therefore supports the approach taken in that document. The underlying justification has been evidence of need in the Region. Such need is consistent with Liverpool City Region Growth Plan and Strategic Economic Plan 2016.

These Local Level Studies include:

- Parkside Logistics and Rail Freight Interchange Study 2016.
- Parkside logistics and Rail Freight Study Addendum 2017.
- Transport for the North Freight and Logistics Report 2016
- Liverpool City Region Assessment of the Supply of large scale B8 sites 2018

The Planning Statement to be included with the DCO Application will refer to these studies in emphasising the need for the Proposed Development in this location.

89. Subsequent to the adoption of the St Helens Local Plan, the strategic need for a SRFI at the DCO Site has been emphasised in more recent LCR based reports, namely:
- LCR Plan for Property - setting out a long-term vision to 2035.
  - LCR Corporate Plan 2024 -28
  - LCR Spatial Development Strategy (up to 2040) (draft)

## ECONOMIC BENEFITS OF THE LOGISTICS SECTOR

### Logistics is the Fastest Growing Sector of the Economy

90. The logistics sector is the fastest growing segment of our economy, both in recent years and over the long term. Between 2015 Q1 and 2024 Q1, the number of jobs in the logistics sector grew by 27% compared to only 10% across the economy as a whole<sup>4</sup>.

<sup>4</sup> ONS (2024), Workforce Jobs by Industry JOBS02

### Logistics Jobs Pay More than Average

91. Notwithstanding its importance in terms of employment and GVA contributions, the logistics sector is subject to a number of misconceptions about average pay and skill levels.
92. Compared to the all-sector averages, the logistics sector's annual median wages in the North West are +£3,000 per annum higher<sup>5</sup>. In addition, entry-level jobs in logistics are relatively well paid, with the median annual pay being 47% higher than across jobs in the same occupational category<sup>6</sup>.

### High Skilled High Quality Jobs

93. The jobs offered within the sector are becoming higher skilled and more diverse. Within the Transportation and Storage industry, the highest skilled occupations (Groups 1-3) increased in the North West by 46% between 2011 and 2021<sup>7</sup>. These roles are associated with engineering and technological professions in response to automation and robotics and increased office collaboration.

### The Economic Contribution is Much Larger than On-Site Jobs

94. A common misconception about the logistics sector being a low density employer, fails to recognise the wider role it plays in supporting jobs which are not physically within a warehouse but are enabled by its operations. For every 10 new warehousing jobs created on-site, another 7-12 jobs are created off-site.
95. The indirect GVA of logistics in the UK is 2.0 times the direct GVA<sup>8</sup>, vastly greater than other sectors. This effectively measures the role it plays in supporting other business sectors and the economy more generally.

### Market Supply and Demand Indicators

96. The Proposed Development is well located for logistics operators to serve both the Liverpool City Region and the Greater Manchester conurbation, as well as Warrington and North Cheshire. These are all within the approximately 20 miles radius which terminal operators consider to be optimal. That is because the long-haul can be undertaken by rail and the local delivery by HGV, using local drivers who do not have to be away from home. The emerging use of electric HGV's work particularly well in this environment, as they are never far from base and can do a number of drops on a single charge.
97. Having warehousing on site means that the cartage costs between the terminal and the warehousing operation is considerably reduced and permits later cut-off times. The combination of warehousing and rail terminal distribution will be able to access the M6 at

<sup>5</sup> ONS (2024) Annual Survey of Hours and Earnings Workplace Analysis

<sup>6</sup> Frontier Economics (2023)

<sup>7</sup> ONS (2024) Annual Population Survey 2024

<sup>8</sup> ONS (2018) Input Output Tables

Junction 22, making for very efficient logistics operations.

98. The North West's logistics market for premises above 100k sq.ft is currently supply-constrained when considered against the strong demand. This can be evidenced by:
- The availability rate for premises over 100k sq.ft consistently being under the 8% equilibrium since 2014, with availability currently sitting at 5.4%<sup>9</sup>.
  - Rents have outpaced inflation for these premises, growing 90% over the last decade (versus 29% inflation)<sup>10</sup>.
  - Average net absorption<sup>11</sup> per annum (a measure of demand) over the last decade has exceeded average net deliveries per annum (a measure of supply) with demand being 36% higher than supply<sup>12</sup>.
99. Furthermore, the three key local authorities of St Helens, Wigan and Warrington, which benefit from access to the strategically significant M6 corridor, are even more supply-constrained when it comes to Logistics premises above 100k sq.ft:
- Availability currently sits at just 3.2%, and availability has consistently been below the 8% equilibrium since 2018<sup>13</sup>.
  - Rental growth has been even stronger than the regional average at 94%, which is more than 3 times that of inflation (29%) over the last decade<sup>14</sup>.
  - In line with the North West, demand has exceeded supply over the last decade, and there is only 1.2 years of currently available supply<sup>15</sup> of premises over 100k sqft.
100. These figures indicate a clear need for new logistics floorspace to meet the needs of strategic logistics operators along the M6 corridor and in the North West more generally.

## CONCLUSION AND NEXT STEPS

101. The Planning Statement which is to be prepared and submitted as part of the DCO application will examine the merits of the Proposed Development against the policy provisions of the policy framework summarised above.
102. The NPSNN is the primary basis for the determination of the application for a DCO. Considerations will also be given to relevant policies in the NPPF and development plans including the site-specific designations.
103. There is a policy presumption in favour of granting development consent for national

<sup>9</sup> CoStar (2024)

<sup>10</sup> Ibid

<sup>11</sup> Move ins versus move outs

<sup>12</sup> CoStar (2024)

<sup>13</sup> CoStar (2024)

<sup>14</sup> Ibid

<sup>15</sup> Currently existing available premises divided by average net absorption per annum 2014-2023

networks such as SRFIs with a compelling need established in the NPSNN.

104. The approach that will be taken to assessment of alternative sites is summarised; the assessment will be developed and provided as part the application.
105. Furthermore, the majority of the DCO Site is allocated for an SRFI, reflecting a long-standing ambition of St Helens and wider Liverpool City Region to capitalise on the unique opportunity presented by the Proposed Development (including the Parkside East allocation). Delivery of an SRFI is a vital component of delivering sustainable economic growth in St Helens, the city region and beyond (including the Greater Manchester city region), addressing deprivation across these areas and contributing to the sustainable movement of freight. These are fundamental objectives of the host local authorities (St Helens, Wigan and Warrington) as well as the Liverpool City Regional Combined Authority and the Greater Manchester Combined Authority.
106. The need for an SRFI is also underlined by local and regional evidence base documents.
107. The Planning Statement will also demonstrate the VSCs (very special circumstances) that justify development in the Green Belt, as well as assessing all aspects of the Proposed Development against all other relevant policy considerations.
108. The Secretary of State must decide the application is in accordance with the NPSNN, except to the extent that one or more of subsections 104 (4) to 104(8) of the Planning Act 2008 applies. Such an exception would arise if the Secretary of State is satisfied that the adverse impact of the Proposed Development would outweigh the benefits (S104(7)).
109. The residual impacts associated with the construction and operation of the Proposed Development will be weighed in a planning balance that is set out in the Planning Statement, to demonstrate that any such harms are outweighed by the package of benefits associated with the Proposed Development and that the granting of the DCO is in the overall public interest.
110. This topic paper forms part of the material available for the informal consultation that is taking place between 27 January 2025 and 21 March 2025. Should you wish to comment on this paper or any other matters related to the Proposed Development you can respond to the informal consultation via:
  - ILP North website – [www.tritaxbigbox.co.uk/our-spaces/intermodal-logistics-park-north](http://www.tritaxbigbox.co.uk/our-spaces/intermodal-logistics-park-north)
  - Email [ilpnorth@consultationonline.co.uk](mailto:ilpnorth@consultationonline.co.uk)
  - Freepost ILP North
  - 01744 802043