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# Planning Addendum

Hybrid Planning Application  
Omega Zone 8, St Helens

Omega St Helens Ltd  
& T.J. Morris Limited

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## 1. INTRODUCTION

1.1 This Planning Addendum document has been prepared in response to comments received from St Helens Council Planning Department on 21<sup>st</sup> May 2020.

1.2 These comments identified the following areas where addition information was required:

- Additional commentary on the Liverpool City Region Areas of Search Assessment 2019 as part of the Quantitative Need case;
- Additional information regarding the height of the detailed element (Unit 1) of the Proposed Development; and
- Additional information regarding the siting and orientation of the detailed element (Unit 1) of the Proposed Development.

1.3 These matters are discussed in more detail in the following sections.

## 2. LIVERPOOL CITY REGION AREAS OF SEARCH ASSESSMENT 2019

2.1 Following on from the publication of the LCR Strategic Housing and Employment Land Market Assessment (SHELMA) in March 2018 and the Assessment of the Supply of Large-Scale B8 sites (ACLCB8) in June 2018, the LCR published their Areas of Search Assessment (ASA) document in August 2019 which was intended to build on the work previously undertaken in the ACLCB8, by assessing a further number of areas that were considered to provide further development potential for strategic B8 warehousing and distribution requirements. This document was updated by the ASA Addendum Sheet (November 2019), which provided a corrected set of tables (Tables 3, 5 & 6) relating to Strategic B2 / B8 development within the City Region.

2.2 With reference to the 'Do Minimum' and 'Do-something/ Transport for the North Strategy' need figures identified in the ACLCB8, the ASA identifies a committed supply of 182.75ha which is likely to come forward to meet the large-scale B8 demand. The ASA then goes on to show that if the supply of land likely to support strategic B8 development is extended to include sites as set out in the Table 3 (as corrected by the Addendum Sheet), then the total supply increases to 342.68ha (previously 295.6ha in the ACLCB8), including Green Belt sites.

2.3 Overall therefore the ASA established that there is a residual over supply of 3.68ha for the 'Do Minimum' scenario and a residual requirement of 89.97 ha for the 'Do Something' scenario.

2.4 In terms of potential strategic B8 Areas of Search within the City Region, the ASA identifies two such 'Areas' within St Helens for consideration, those being:

- Omega South Western Extension, land north of Finches Plantation, Bold (part of the application site); and
- Land to the west of Haydock Industrial Estate and land west of Millfield Lane.

2.5 It is worth noting that the Haydock site has been considered as part of the Alternative Site Assessment, submitted with this application (site ref. *St Helens 23*). The Alternative Site Assessment discounted the site at the Site Suitability stage (Stage 3) due to the irregular shape of the site and the potential for localised flooding associated with the adjacent Clipsley Brook. Consequently, whilst the site may be an appropriate site for employment development

(despite the recent refusal of planning permission for logistics on smaller part of the site), it is not considered to be a viable alternative to the application site.

- 2.5 When considering the Omega South Western Extension as potential strategic B8 location, the ASA establishes that the site benefits from a central location within the Region, with strong strategic highway accessibility which in combination with the size of the site will appeal to large-scale strategic employment requirements. The ASA also identifies that the site is available in the short-term and that development of the site will form a natural extension to the neighbouring established industrial estate (Omega South).
- 2.6 Importantly however, the ASA does state that if the site is included in the forthcoming approved version of the St Helens Borough Local Plan as meeting the employment needs of Warrington (as is proposed), it may not be eligible for inclusion in the Liverpool City Region provision.
- 2.7 In conclusion, the ASA process has identified 281.0ha of B8 developable land, which is in excess of that required to achieve the 'Do Something' strategic B8 requirement and thus fulfils future growth requirements.

### Conclusions

- 2.8 The Planning Statement Update (April 2020) confirms that the SHELMA and ACLCB8 produces in 2018 identified a shortfall in land supply creating a residual requirement for sites to support strategic B8 development which totals between 43.4 ha and 141.4 ha across the City Region by 2037. The ASA has established that there is now a reduction in the shortfall to the point that there is a small surplus for the 'Do Minimum' scenario. However, a residual requirement of 89.97 ha still remains for the 'Do Something' scenario.
- 2.9 The ASA has therefore identified a number of sites in a variety of locations across the Region that will address this shortfall and satisfy the future growth requirements of the City Region. The application site, the part affected by the proposed employment allocation in the St Helens Local Plan (Submission Draft) 2020-2035, is included in this future land supply and should therefore be considered to be a key site in the City Region's employment growth strategy for the future.
- 2.10 However, as acknowledged by the ASA, the intention of the proposed St Helens Local Plan allocation is to satisfy the employment land needs of Warrington Borough Council and therefore if the site is included in the forthcoming approved version of the Local Plan it is unlikely to be eligible for inclusion in the City Region's employment land provision. This means that the ASA's 281.0ha of B8 developable land would be reduced by 31.22ha (the extent of the proposed allocation) to 249.78ha, which would have an adverse effect on the City Region's ability to sustain future growth requirements.
- 2.11 The application site measures approximately 75.3ha in total, although once the proposed landscape area referred to as the "Green Wedge" has been discounted this leaves a total developable area of 68.3ha. If the proposed Local Plan employment allocation (31.22ha) is also discounted, this leaves approximately 37.08ha of proposed employment, which would address the reduction in developable B8 land that would result from the allocation of the land and would maintain the City Region's employment land provision, therefore ensuring future growth requirements remain fully satisfied.

- 2.12 It is considered therefore that the Areas of Search Assessment Report provides further evidence of the quantitative need for the Proposed Development. The emerging St Helens Local Plan proposes an employment land allocation on 31.2ha to address a shortfall in employment land provision within the adjacent Borough of Warrington, which the proposed development would address. The remaining 44.1ha (37.08 developable) of the application site would meet the identified need for large-scale logistics floorspace to serve the North West and Liverpool City Region and facilitate future economic growth in both St Helens and the City Region.
- 2.13 As defined in the Planning Statement Update, the quantitative need case for the Proposed Development can be summarised as follows:
1. The need to cater for the identified market demands of the logistics sector, particularly in relation to large-scale floorspace (in excess of 300,000 sq.ft), where a current shortfall in available supply exists both within St Helens and the City Region;
  2. The need, under the duty to cooperate, to provide land within St Helens to cater for the shortfall in Warrington Borough Council's employment land supply; and
  3. The overwhelming policy support for the principle of the further logistics development in the Liverpool City Region (and St Helens in particular) to benefit from the investment through the Northern Powerhouse, the SuperPort and Liverpool2.
- 2.14 Together they combine to present a strong quantitative need case for the development and represent a key contributor towards the VSC required to justify development of this Green Belt site. We attach SIGNIFICANT weight to it.

### **3. UNIT 1 BUILDING HEIGHT**

- 3.1 It has been highlighted that the proposed high-bay at circa 41m to ridge is greater in height when compared to TJM's existing Axis and Amesbury distribution centres. As clearly set out in the Operator Statement, the building envelope is driven by what is contained within it, meaning it is the particular automation that derives the building height.
- 3.2 TJM has established a new automation supplier, WITRON, and this will be one of the most advanced systems of its type. The equipment is bespoke to TJM and meets the needs of its supply chain which in turn reflects a growing network of retail stores with larger floorplates.
- 3.3 Whilst TJM's existing and proposed distribution centres are all going to serve a similar number of stores (c. 350), newer stores tend to be larger and therefore more pallets per store are required for each replenishment. For example, the Axis facility does not cope particularly well with the number of pallet locations to support the existing store profile. The assumption that is now being made, based on TJM experience and input from the automation supplier is that ratio of pallets stored per store served needs to be higher. As you will note from the technical details below, this means Omega Zone 8 will be capable of storing 91,300 pallets which is substantially greater when compared to Amesbury (74,624 pallets) and Axis (69,400 pallets). More pallet storage capacity means a larger volume is needed in the high-bay which is the central storage system within the distribution facility. This increased volume has to be achieved as efficiently and economically as possible, which means increasing the building height rather than the building footprint.

- 3.4 The speed and evolving nature of TJM's store rollout has meant that during a relatively short space of time, both the number of stores and the format of those stores has rapidly increased. This growth is evidenced in the submitted Operator Statement. With regard to store size, we have already identified that Home Bargains' first store opened in Old Swan in Liverpool. This traditional high street format has, over a period of 40 years and most notably over the last 10 years, morphed into a predominately large-format out of town offer, mainly in response to demand and competition. That has seen store sizes grow significantly as can be evidenced by stores local to St Helens. For example, there is a first-generation shopping centre store in the Hardshaw Centre in St Helens which extends to 2,787 sq.ft which contrasts with a new generation store at Linkway West at 17,700 sq.ft, being over six times larger than the in centre store. This stark contrast of new and old stores is reflected across the portfolio.
- 3.5 The increased size of Home Bargains stores continues to grow and even over the last 8-10 years their store size requirement has more than doubled. For example, in 2012 when the Amesbury site was being planned, Home Bargains' store requirement was for a ground floor slab 10,000 - 20,000 sq.ft, but in 2020 the requirement is Ground floor slab 20-25,000 sq.ft. This is evidenced on the attached Store Requirement flyers dated 2012 and 2020. This growth in store format has driven the high-bay volume storage capacity. In a business which has expanded so rapidly both in terms of number of outlets and the business model, it is essential that the investment at Omega Zone 8 is fit for purpose.
- 3.6 In summary, larger stores means there is a greater need for more volume storage capacity in a TJM distribution centre. As a result, the distribution centre at Omega Zone 8, whilst capable of serving the same number of stores as Axis and Amesbury, can serve 350 new generation stores which is the future of the retail business. This means the size of the proposed high-bay does not directly correlate to TJM existing facilities.

#### Axis

- 1<sup>st</sup> level of automation automatically replenishing pallets to a limited number (1350) of manual pallet pick positions with remainder of range approx. 9,500 products picked from manual rack
- Multi deep rack 3 pallets deep both sides of crane aisle with pick tunnels on GF within the rack
- 42,700 pallet reserve locations
- 1,350 pick positions
- 45,400 pallet positions total (+24,000 pallets in Axis and G park low bays)
- 11 pallet cranes
- 250 p/hr in and out

Notes: at the time this building was constructed the height was approaching the limits for standard portal frame buildings; together with this there were only a limited number of automation manufacturers with pallet cranes >34m.

#### Amesbury

- 2<sup>nd</sup> level of automation with auto pallet replenishment to higher number (5700) of manual pallet pick positions with remainder of range approx. 4,300 products picked from manual rack

- Multi deep rack 3.5 pallets deep both side (7 between cranes) with pick tunnels on 1<sup>st</sup> and 2<sup>nd</sup> floor
- 58,804 pallet reserve locations
- 5,660 pick positions
- 70,124 pallet positions total (+4,500 pallets in low bay)
- 21 pallet cranes
- 450 p/hr in and out

Notes: site had an existing planning height constraint when purchased. Automation suppliers recommended configuration at 41m would have been a more efficient automation design.

### Omega Zone 8

- 3<sup>rd</sup> level of automation with large percentage of range stored as single case and streamed to automatic picking machines with reserve stock being stored as cases on pallets.
- Auto pallet replenishment to low number (690) of manual pallet pick positions
- Multi deep rack 2 pallets deep both sides
- 91,300 pallet positions total
- 690 pick slots
- 20 pallet cranes
- 6 pick aisles supplied by 5 of the 20 pallet cranes
- 280 p/hr in and out

Notes: storage of pallets double deep enables standard proven design concept to be used. In general the performance, pallets/hr in and out, determines how many automated pallet cranes are required. These are high cost items. Knowing how long the crane aisle is then sets how high we need to go to store the required number of pallets. Reducing the height would lead to significant inefficiencies including more automated pallet cranes and associated infeed/outfeed systems together with an increase in the high-bay footprint.

## 4. UNIT 1 SITING AND ORIENTATION

### Watercourses

- 4.1 The current Unit 1 layout has been designed to avoid the existing watercourse (the **Barrow Brook**) in the north east corner of the plot. This watercourse, which was present before the M62 was constructed, runs west to east, and enters the site via a culvert under the M62. It then proceeds in a south-easterly direction before returning due north at the site's eastern boundary and exiting via another culvert under the M62. As is explained in the Operator Statement, the proposed TJM unit must be rectangular in form, which then dictates a largely rectangular plot to accommodate it.
- 4.2 As can be seen from the Fairhursts' Site Constraints Plan (Drawing No. 131504/9100) the TJM plot boundary (excluding the Future Expansion Land) almost touches the north-west tip of the Barrow Brook (including a mandatory 8m 'no working' zone that runs from the top of the bank of both sides).
- 4.3 So that the land marked 'Future Expansion Land' can be fully utilised, it is TJM's intention to divert the Barrow Brook as close to the boundary with the M62 as Highways England will

permit but before it can be moved, the Lead Local Flood Authority (LLFA) will have to grant an Ordinary Watercourse Land Drainage Consent for the proposed diversion. The permitting process is broken down into 3 stages, the first of which is consultation with the LLFA and the EA. Barrow Brook is classed as an 'Ordinary Watercourse' with the supervisory duty sitting within the LLFA. However, best practice dictates that the EA also be consulted to confirm that a Flood Risk Environmental Permit is not required. This ensures that any potential delays are avoided, as the application for Land Drainage Consent is only considered to be 'duly made' once all the relevant forms, supporting information and the correct application fees have been submitted and any questions raised at consultation stage answered by the Applicant.

- 4.4 Stage 1 is almost complete. A Technical Note has been issued to the LLFA and EA, and a joint stakeholder meeting held on the 5th May 2020 to understand each party's requirements & concerns. This has enabled us to identify the information already available and where further environmental assessments or surveys will be required. However, to now progress the diversion requires a drainage assessment, hydraulic modelling, channel diversion work and further consultation with various external bodies (including Highways England) before a detailed design for a demonstrably functioning channel system (both from a flood risk & drainage perspective, and an ecological & geomorphological perspective) can be prepared & submitted for approval.
- 4.5 The site is complex hydraulically with a number of water features across the site with currently unknown interconnectivity and in order to successfully resolve the Barrow Brook diversion it is necessary to further assess these. There are thus four main tasks:
1. Site Wide Drainage/Groundwater Assessment, to set the context for the drainage design;
  2. Hydraulic modelling, outline design, consultation with stakeholders, detailed design, to develop a safe, sustainable and cost-effective solution for the diversion within the context of the site wide water system;
  3. Geomorphological assessment of the baseline conditions to inform the design parameters for the channel diversion, including input to the detailed design process and stakeholder consultation to update the preliminary Water Framework Directive assessment into a detailed assessment report to support the Flood Risk Activity Permit, including feeding into the modelling, consultation and design of the diversion; and
  4. Development of ecological survey input by third party and co-ordination with third party to ensure ecological information is robustly included in the above assessments.
- 4.6 The outline programme for the completion of the surveys, hydraulic modelling, detailed design and preparation of the consenting forms and applications is 32 weeks. This is subject to timely responses from the Statutory Consultees, which neither TJM nor OWL are in control of. The Statutory Consenting period is an additional 8 weeks from the date that the application is considered to be duly made to the consenting bodies but this is dependent on the speed of response of the consenting bodies and as such, the programme is likely to be affected by factors not within the control of the applicant. In practice it could take at least a year for the consenting bodies to make a decision and, clearly, there is no guarantee that an Ordinary Watercourse Consent will be forthcoming in any case.
- 4.7 For these reasons, TJM cannot design its current layout around an expectation that the Ordinary Watercourse Consent will be forthcoming by a certain date.

### National Grid Overhead Cables

- 4.8 The Omega Zone 8 site, and the Unit 1 plot in particular, is currently bisected by 2 sets of 132kV overhead cables that form part of the National Grid. Both power lines enter the site via the M62 to the north, where there are steel pylons on either side of the motorway. Once they are within the Omega West site, the lines split and change to wooden pylons. One power line heads almost directly south; the other heads south-west on a diagonal alignment. Both can be seen on the Fairhursts Constraints Plan and both come with restrictions on what can be located within the associated easement corridors (and this is further complicated by different regulations governing the construction process, where there is a greater risk of plant or materials either striking the cables or causing arcing).
- 4.9 Construction of the TJM unit in the location currently proposed (with the unit to the west and the future expansion land to the east) could not proceed without the diversion of the existing line heading south-west. However, OWL has secured an agreement with SPEN to divert this line further east within Omega West (still via overhead wooden pylons) during August. This will ensure that both lines are completely outwith TJM's operational area (the western-most line still crosses the access roads to the TJM service yard and car park but this can be accommodated) but they will still blight a significant portion of the Future Expansion Land.
- 4.10 To deal with this, OWL and SPEN have reached agreement whereby both lines will be diverted around the eastern/southern boundaries of the TJM plot via new underground cables. This is subject to an outage of both lines within the National Grid which has provisionally been arranged for Summer 2022 (grid outages can only take place during summer months because of the additional demand experienced during the winter months). Notwithstanding that a 2+ year delay cannot be accommodated within the TJM programme, neither OWL nor TJM are in control of National Grid outages and SPEN has made it clear that it reserves the right to cancel/delay/move the 2022 outages should there be situations elsewhere within the grid that necessitates these lines remaining energised. Such situations can include greater-than-expected demand or technical issues elsewhere on the network. Because of the lead-in time required for a major outage such as this, and the prohibition on outages during the winter months, the consequential delay that would occur should the outage be moved could be substantial. TJM can accommodate this risk of delay within the Future Expansion Land but not within the operational plot.
- 4.11 Even a partial move to the east once the temporary diversion is in place is not feasible. This would bring it into conflict with the Barrow Brook to the north, it would then mean that live cables were above the car park and service yard areas and – critically – it would significantly reduce the size of the Future Expansion Land by splitting it into two sections, east & west of the TJM operational plot. Not only does this reduce the Future Expansion Land's flexibility, future access into 'expansion land' to the west is unlikely to be feasible given the TJM layout.

### Orientation

- 4.12 As identified in the LCR Areas of Search Assessment above, the development of the application site for employment uses would be viewed as a natural extension to the neighbouring established industrial estate (Omega South). All of the Omega South warehouse units (HUT, ASDA & Dominos) fronting onto the M62 motorway corridor are orientated to run parallel with the motorway. It is considered therefore that the design and orientation of Unit 1, which is also parallel with the M62, provides an important visual and physical connection between



the Site and the existing Omega development that will ensure that the proposed development is viewed as a natural extension to the Omega site.

- 4.13 Whilst it is accepted that this connection would be even stronger if the proposed Unit 1 development was located further east, we have outlined above why this is not possible as part of the initial development of Unit 1. By allocating the land for the future expansion of the TJM operations, the opportunity to strengthen this connection in the future has been safeguarded.
- 4.14 An alternative orientation for the Unit 1 Plot has been considered, with the unit sited perpendicular to the motorway however this was discounted for the following reasons.
- 4.15 Irrespective of the orientation of the building the development constraints associated with removal of the motorway bridge ramp and the diversion of Barrow Brook and overhead powerlines and the risk to the construction programme as outlined above would still apply. This would push the development further west to avoid these affected areas and once the car park and cross-docked service yard facilities have been accommodated would mean that the western edge of the plot would have a more significant impact on Booth Wood, with development situated within the direct loss of trees and adverse impacts associated with a service yard direct adjacent to this sensitive habitat – these impacts would be significantly greater than the impacts of the current proposals.
- 4.16 A north-south orientation would also extend the plot into the outline planning area and impact directly upon the existing Whittle Brook watercourse, requiring its diversion – as with Barrow Brook, albeit to an even greater extent, the process of securing the necessary consents to allow for these diversion works would not be within the control of the applicant placing further unacceptable risk on the construction programme. The proposed development layout has been specifically chosen to allow the main watercourse diversion to take place in isolation of the Unit 1 works and only when the layout of these outline plots has been confirmed.
- 4.17 As explained in the Operator Statement, the expansion land is a key element of the TJM business model for this site and therefore this needs to be accounted for in any alternative layouts. Whilst the end uses for the expansion land are as yet unclear, it is considered that development on this land will most likely have a direct relationship with the high-bay element of the unit and therefore needs to be located in close proximity to this part of the unit. Given the height of the high-bay element, this must be situated away from the closest sensitive receptors (which lie primarily to the south of the site) and therefore would remain adjacent to the motorway. This would mean that the expansion land would have to lie to the west of the unit and north of Booth Wood, equating to the same area of developed land as is currently proposed.
- 4.18 The re-orientation of the plot to run north-south would also effectively seal off the ‘Green Triangle’ and access to the public rights of way that exist in the western corner of the site. The east-west pedestrian / cycle link that currently forms part of the proposals has always been seen as a key element of the development, providing a potential link between St Helens and the site. Any re-orientation of the unit would prevent this from being delivered and effectively force the development to turn its back on the Bold Forest and to a lesser extent St Helens as a whole.

4.19 In summary, the re-orientation of the TJM plot is not viable because it would:

- fail to address the development constraints and risk to the programme associated with the diversion of the Barrow Brook and overhead powerline;
- have a greater impact on Booth Wood in terms of both the loss of trees and loss of habitat amenity;
- require the early diversion of the Whittle Brook watercourse, which would introduce a further risk to the programme and prejudice the development of the outline element of the proposed development;
- require the same scale of land take within the Green Belt due to the business requirement for the expansion land and its need to be located close to the high-bay element of the unit; and
- prevent the delivery of an important sustainable transport connection between the site and St Helens.

4.20 It is considered therefore that the proposed orientation of Unit 1 is the optimum layout option which minimises, where possible, the impact on the Green Belt and sensitive habitats and takes account of the visual context provided by the existing development at Omega South whilst balancing the timescales associated with resolving the development constraints that affect the site, with the occupiers construction programme requirements.