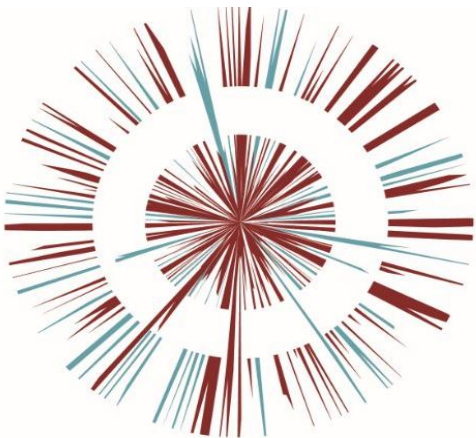




OMEGA ZONE 8, ST HELENS

Omega St Helens Ltd / T J Morris Ltd



Planning Statement Update
OPP DOC. 6a.

p r o g r e s s

p l a n n i n g c o n s u l t a n c y l t d



Planning Statement Update

Hybrid Planning Application
Omega Zone 8, St Helens

Omega St Helens Ltd
& T.J. Morris Limited

April 2020

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Executive Summary

This Planning Statement has been prepared by Progress Planning Ltd on behalf of Omega St Helens and T.J. Morris Limited, joint applicants of the hybrid planning application submitted for Omega Zone 8, St Helens.

The Site covers an area of approximately 75.3ha and is located wholly within the Green Belt. It is accepted that the proposed development at Omega Zone 8, by virtue of its proposed use (B2/B8), size and scale, can only be considered as 'inappropriate' development within the Green Belt.

It is considered that 'very special circumstances' exist that serve to justify the proposed development in the Green Belt, as required by the Framework, adopted Development Plan and emerging Local Plan policies. These circumstances are sufficient to clearly outweigh the harm to the Green Belt associated with the proposals (i.e. in relation to both 'inappropriateness' and 'other harm').

The proposed form of the development meets the requirements of the Development Plan and the associated investment and job creation will have significant benefits for both St Helens and Warrington Boroughs. The proposals also comply with guidance contained relevant policies in the Development Plan with regards to design and layout, highways, amenity and environmental assets.

As confirmed by the Council's own evidence base and the JLL Market Report appended to this Planning Statement, there is a clear and identified need for employment land to deliver large-scale logistics development in both St Helens and Warrington and an acceptance that this will need to be satisfied through the release of Green Belt land. The Application proposals will therefore help to meet the employment land supply needs of both St Helens and Warrington Borough Council's.

Further there is specific and immediate need for the detailed element of the scheme to meet a 'live' occupier led requirement for a bespoke, purpose-built development, which it has been demonstrated cannot be accommodated elsewhere within the Borough. Full details of the business case for this 'live' occupier need is provided in the Operator Statement appended to this Planning Statement.

The proposals represent sustainable development and will secure meaningful economic and social benefits whilst mitigating the potential adverse environmental impact associated with the scheme. As a consequence, the adverse impacts of permitting the development would not significantly and demonstrably outweigh the benefits of the development.

As a consequence, when assessed against the provisions of S.38(6) of the 2004 Act, the considered position is that the proposals present no conflict with the Framework or Development Plan policies (because 'very special circumstances' have been demonstrated) and material considerations also weigh in favour of the development.

On this basis it is considered that planning permission should be granted without delay for this sustainable and much needed development.

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Progress Planning Ltd on behalf of Omega St Helens and T.J. Morris Limited, joint applicants of the hybrid planning application submitted for Omega Zone 8, St Helens.
- 1.2 Omega St Helens Ltd (OSHL), has been set up by Miller Developments Ltd to bring forward the Omega Zone 8 proposals. Miller Developments are the developers behind the regeneration initiative known as Omega Warrington and have, over the course of the last 7 years, delivered in partnership with Homes England (the owners of the Omega site), over 6m sq.ft of manufacturing and logistics development at Omega, together with permission for up to 1100 residential units and a mixed-use zone, all set within a high quality environment underpinned by a strong landscape framework.
- 1.3 T.J. Morris Limited are the prospective occupiers of Zone 8 Unit 1, which is being brought forward in detail as outlined below. T.J. Morris Limited (TJM), trading as Home Bargains, is one of the UK's fastest growing discount retailers, having been established over 40 years ago. Since opening their first store in Liverpool, TJM has grown organically to become one of the biggest privately-owned companies in the UK. The company now boasts over 500 stores and employs more than 22,000 staff. It is the largest employer on Merseyside and is the largest independent grocer in the country. The company intends to continue its rapid growth with ambitious expansion plans to grow to 1,000 stores, employing over 40,000 staff. The proposed development of Unit 1 is central to these growth plans.
- 1.4 The proposed development forms a natural extension to the existing Omega site, which is nearing capacity particularly for large-floorplate logistics development and offers an opportunity to meet an identified need for logistics development and deliver meaningful economic and social benefits to both St Helens and Warrington Boroughs.
- 1.5 The proposed description of development is:
- 'Hybrid Planning Application for the following development (major development);*
- (i) Full Planning Permission for the erection of a B8 logistics warehouse, with ancillary offices, associated car parking, infrastructure and landscaping; and*
 - (ii) Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices and associated access infrastructure works (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval).'*
- 1.6 This Statement forms only one part of the application submission. The Statement makes cross reference to a series of other documents submitted as part of or alongside the application. Those other documents should be considered in full, albeit this document identifies the principal conclusions of each and provides a useful single point of reference. For clarity and

ease of reference a document register is submitted with this application identifying the relevant document and drawing references.

2. APPLICATION SITE AND SURROUNDING AREA

Site and Surroundings

- 2.1 The Site is located within St Helens Council authority boundary, albeit the Site adjoins the authority boundary of Warrington Borough Council to the east.
- 2.2 The Site covers an area of approximately 75.3ha and is under the ownership of Homes England (HE) and local farmer and landowner, Mr Bromilow. OSHL has a Development Agreement in place with HE and a signed option agreement with Mr Bromilow, ensuring the deliverability of the site is secured.
- 2.3 The Site is located approximately 4 miles to the south east of St Helens town centre and 3.3 miles to the north west of Warrington town centre. The Site is bound by Omega South to the east, a substantially developed strategic employment site within the Warrington area identified for a mix of uses including large-scale B2/B8 logistics development. Existing occupiers include ASDA Walmart, The HUT Group, Amazon and Plastic Omnium.
- 2.4 To the south east is the Lingley Mere Business Park occupied by United Utilities, North West Fire Control and Royal Mail, amongst others.
- 2.5 To the south and west of the Site is further Green Belt agricultural land, beyond which is an established residential area at Lingley Green, the Mersey Valley Golf & Country Club and large areas of deciduous woodlands and ponds.
- 2.6 The Site is bound by the M62 motorway to the north, beyond which is Omega North which includes existing occupiers such as Travis Perkins, Hermes and Brakes. Further north is Green Belt agricultural land.

The Application Site

- 2.7 The Site is located wholly within the Green Belt, although it is partly brownfield because, until 1994, the part of the Site under HE ownership was in use as a US/RAF Airbase ('RAF Burtonwood'). Since then, the Site has been used as agricultural land together with the rest of the application site. There are no existing buildings contained within the Site.
- 2.8 Within the Site boundary are a number of ponds, areas of woodland and established tree lines / hedgerows which define the existing agricultural fields. There are also a number of internal access tracks currently used for farm access. There are no public highways through the Site, however one public right of way does traverse the north-west corner of the site connecting to a pedestrian bridge that crosses the M62 and link to St Helens.
- 2.9 A Site Location Plan is enclosed at **Appendix 1**.

Access

- 2.10 The Site will be accessed via the existing highways infrastructure built to serve Omega South. As such the site has strong connections to the strategic highway network with Junction 8 of the M62 motorway, situated due east of the site. The construction of this junction was originally promoted and funded by Homes England (then English Partnerships), in order to facilitate the development of Omega.
- 2.11 As part of the redevelopment of Omega South, a series of financial contributions have been made to fund improvements to Junction 8, including the installation of an intelligent traffic light system known as MOVA and a major redesign of the junction itself brought forward by the Council as part of its Strategic Growth Fund allocation.
- 2.12 The capacity of Junction 8 to accommodate further development is discussed in later Sections of this document.
- 2.13 In terms of the local highway network, Omega has also delivered a new major infrastructure connection from Lingley Green Ave, via Omega Boulevard, to Junction 8, known as Skyline Drive. This road has recently been classed as an A-road and has been successful in drawing traffic (particularly HGVs) off the surrounding, more minor road network. Catalina Approach, the road that will provide access from Omega South to Omega Zone 8, is fed from Skyline Drive.
- 2.14 The Site also lies close to three major rail corridors. Within 4km of the site lie two Liverpool – Manchester and Trans-Pennine routes and the west coast main line. The nearest mainline stations are found in Warrington Town Centre, namely Warrington Central and Warrington Bank Quay and there remain proposals to create a third railway station at Chapelford (Warrington West), which would be within easy access of the site.

3. DEVELOPMENT PROPOSALS

Description of Development

- 3.1 The Proposed Development is subject to a Hybrid Planning application for both Full and Outline Planning Permission and is described as follows:

'Hybrid Planning Application for the following development (major development);

- (i) Full Planning Permission for the erection of a B8 logistics warehouse, with ancillary offices, associated car parking, infrastructure and landscaping; and*
- (ii) Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices and associated access infrastructure works (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval).'*

- 3.2 A hybrid (part detailed/part outline) planning application has been submitted to accommodate an immediate 'live' occupier-led logistics requirement (TJM) whilst establishing the principle of outline planning permission on the remainder of the site. In addition, detailed planning permission is sought for access and highways, landscaping and drainage proposals associated with the development of the TJ Morris site.

- 3.3 In terms of the remainder (outline) of the site, access has been brought forward as a reserved matter (given that the majority is shown within the full planning site), but all other matters such as landscaping, layout, appearance and scale have been reserved for future approval. Sufficient detail is provided to assess the likely impacts of the development.

- 3.4 Parameter Plan 2 (OPP DWG. 3.1) provides details of the split between detailed and outline parts of the site and is submitted with this application (**Appendix 2**).

Proposed Development

Detailed Proposals (Unit 1)

- 3.5 Unit 1 will be located in the northern part of the wider application site, immediately to the south of the M62 and west of the existing Omega South development.
- 3.6 Unit 1 will comprise a 81,570 sq.m (878,012 sq.ft) B8 logistics warehouse with of ancillary office development comprising of a 3-storey structure providing main reception / staff facilities / Goods In and Transport Office.
- 3.7 The development will be served by a private car park containing 576 parking spaces, including up to 35 disabled spaces, 48 motorcycle and 156 cycle spaces. Provision will also be made for up to 39 electric vehicle spaces. The warehouse will also incorporate a service yard with 383 HGV / trailer parking spaces.

- 3.8 The maximum building height for Unit 1 will be approximately 41m to the ridge, with the high-bay area located at the eastern end of the building, closest to the existing Omega site. This high-bay area will house a fully automated storage and racking system, which is a bespoke occupier requirement and is integral to the design and operation of the unit. The remainder of the Unit will be approximately 29.4m in height.
- 3.9 For Unit 1 the proposed building materials are as follows:
- Warehouse Walls - Horizontally laid trapezoidal profiled cladding in the following colours:
 - White - RAL 9003;
 - Ice Blue – RAL 230 80 10;
 - Adventure / Alsaka Grey – RAL 7000; and
 - Basalt / Slate Grey – RAL 7012.
 - Office Walls – Horizontal composite microrib panel in the following colours
 - White - RAL 9003;
 - Adventure / Alsaka Grey – RAL 7000; and
 - Basalt / Slate Grey – RAL 7012.
 - Roof – Profiled steel cladding (Goosewing Grey RAL 080 70 05) with translucent non-fragile GRP roof lights, PVC lined pre-galvanised steel gutters and projecting eaves with PPC profiled steel fascia (Higher Level – Ice Blue RAL 230 80 10; Lower Level – Basalt / Slate Grey RAL 7012)
 - Doors – as follows:
 - Free standing steel & glass entrance canopy with painted galvanised steel columns White - RAL 9003;
 - Metal Personnel Doors painted to match Basalt / Slate Grey – RAL 7012;
 - Electrically operated steel sectional Loading Doors with vision panels painted to match Basalt / Slate Grey – RAL 7012; and
 - Electrically operated steel sectional Dock Levellers Doors with vision panels painted to match Basalt / Slate Grey – RAL 7012.
 - Windows (offices only) – PPC Window frames and curtain walling with grey tinted anti-sun glazing and grey lookalike panel spandrels where required. External Frame - Basalt / Slate Grey RAL 7012 and Internal Frame White RAL 9003.
- 3.10 Surface water drainage and attenuation is provided in the form of a series of attenuation ponds to be situated within the wider landscape areas to the north and west of the proposed development. Full details of the drainage strategy and proposals for this plot have been submitted as part of site wide Drainage Strategy document submitted as part of this application.
- 3.11 The proposed unit has been designed to satisfy BREEAM 'Very Good' standards. The proposed site layout plan (UNIT 1 DWG. 1 - 6385 - 181 Rev. A) also shows the proposed location of the cage storage and pallet storage areas to be situated with the service yard. Whilst these areas

have been identified on the layout plan, both areas are allocated as informal storage areas only and do not involve any permanent or temporary physical structures that require approval.

Outline Proposals

- 3.12 The outline planning proposals, which will extend to the south of Unit 1, but also include an area of future expansion land for Unit 1 (to the east), are for up to 123,930 sq.m (1,333,9710 sq.ft) of employment development, spread across the Unit 1 expansion land and three separate warehouse buildings to the south (Units 2, 3 & 4). It is proposed that there will be a 30% B2/70% B8 split within this total floorspace.
- 3.14 The building dimensions and heights for Units 2 to 4 are not known given the outline nature of the proposals for this part of the site. However, for the purposes of the application and the Environmental Statement submitted with the application, it has been assumed that these buildings will be maximum of 19m to ridge height (see Parameter Plan 2 Maximum Building Heights Plan Dwg. Ref. OPP DWG 3.2), which reflects average building heights across the rest of the Omega site. Actual building heights for these units will be dictated by future occupiers, whose requirements will vary depending upon the use and nature of the operations involved.
- 3.15 It is important to note that for the purposes of the application, it has been assumed that there are no specific development proposals for the Unit 1 expansion land at this stage, which is included within the outline part of the site. The future land use for this part of the application site, will depend upon TJM's future business requirements, however for now it is assumed that this will come forward in a form pursuant to the outline planning proposals.
- 3.16 The proposed floorspace figures for Unit 1 and the Outline Planning area have been defined above already. At this stage, a breakdown of units and corresponding floorspace proposed within the outline planning area has not been finalised and will be guided by market demand requirements. However, the Indicative Masterplan (**Appendix 3**) shows the potential for three units on the outline planning area of the Site, with a potential combined floorspace of up to up to 123,930 sq.m. Importantly, the application proposes to restriction unit floorspace to a minimum of 27.870 sq.m / 300,000 sq.ft to reflect market demand for units of this size and greater, where suitable available sites are very limited within the Region and for which Omega Zone 8 is ideally suited to accommodate. It is considered that this minimum floorspace can be secured through a suitably worded planning condition.
- 3.17 A key part of the proposals is the creation of a sustainable transport connection between St Helens and the Omega development. The Proposed Development therefore incorporates a central pedestrian/cycle route that will link the existing pedestrian bridge that crosses the M62 in the north west corner of the application site, with the existing Omega development through a connection point on Catalina Approach.
- 3.18 The Proposed Development also includes the provision/creation of two landscape and ecology mitigation buffer areas within the site. The larger of these is referred to as the "Green Wedge"

and is situated in the north-west corner of the site immediately south of the M62 and west of Unit 1. This green infrastructure area, covering approximately 7 ha, offers opportunities for extensive habitat creation, specifically for BAP species. The second area will line the western boundary of the Site, adjacent to Units 2 and 4 for approximately 730m.

- 3.19 These areas will provide opportunities for replacement tree planting, pond creation and recreational open space. In addition to the 'Green Wedge', green spaces which provide landscape, ecological enhancements and attenuation are proposed along the boundaries of Zone 8 and along the main proposed access and circulation routes. across the Unit 1 expansion land and three separate warehouse buildings to the south (Units 2, 3 & 4). It is proposed that detailed matters of appearance, layout and scale and access for the expansion land and units will be reserved for subsequent approval through separate reserved matters.

4. PRE-APPLICATION CONSULTATION

- 4.1 Pre-application consultation has been undertaken with both St Helens and Warrington Borough Councils at various stages during the preparation of the application.
- 4.2 This consultation has been primarily held with the respective Planning Departments, but consultation has also been held with Highways, Environmental Protection and a range of advisory agencies and bodies including the LLFA, MEAS and Natural England.
- 4.3 The feedback received has been incorporated into the proposals and accompanying documents submitted with this application. It is anticipated that engagement with the key stakeholders will continue throughout the planning application determination period.
- 4.4 Unfortunately, because one of the landowners (Homes England), with whom OSHL have signed a development agreement for the site, is an executive non-departmental public body sponsored by the Government (Ministry of Housing, Communities & Local Government) it was not possible to undertake any public pre-application consultation in advance of the submission of the application.
- 4.5 Like all other Government organisations, Homes England have been subject to 'purdah' during the 6-week election period, which has restricted their activities and meant that they were duty bound not to enter into any form of publicity that may have a bearing on local or national politics. Publicity is defined as "any communication, in whatever form, addressed to the public at large or to a section of the public." Unfortunately, public / community consultation for the proposed development would have fallen into this definition and was therefore avoided.

5. PLANNING POLICY CONTEXT

Planning Policy Framework

- 5.1 This section reviews the national and local planning policy considered relevant to the application proposal. Section 38 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine any planning application in accordance with the development plan unless material considerations would indicate otherwise. Any application for this site will fall to be assessed against the following planning policy and guidance framework:

National

- National Planning Policy Framework (NPPF) 2019
- Planning Practice Guidance

Local

- Saved Policies of the St Helens Unitary Development Plan (1998) and Proposals Map
- Local Plan Core Strategy (adopted October 2012)
- Bold Forest Park Action Area Plan (adopted July 2017)
- Joint Waste Local Plan 2013

- 5.2 In addition, there are series of adopted Supplementary Planning Documents that provide additional guidance to the interpretation and application of policies contained in the adopted plans. Of most relevance to the application proposals would be:

- Local Economy SPD (2013) Design & Crime SPD (2009)
- Design Guidance SPD (2007)
- Ensuring a Choice of Travel SPD (2010)
- Biodiversity SPD (2011)
- Trees and Development SPD (2008)

- 5.3 St. Helens Council is also preparing a new Local Plan and whilst only limited weight can be afforded to this document given its limited status as a 'Submission Draft' document, brief reference is made to the most relevant policy proposals.

National Planning Policy Framework (2019)

- 5.4 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.
- 5.5 At the heart of the Framework is a presumption in favour of sustainable development, which it defines as development that meets *"the needs of the present without compromising the ability of future generations to meet their own needs"*.

- 5.6 The Framework identifies that to achieve sustainable development the planning system must adopt three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring 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; and by identifying and coordinating the provision of infrastructure;
 - b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.7 These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework, importantly it is stated they are not criteria against which every decision can or should be judged.
- 5.8 Paragraph 11 of the Framework sets out the how the presumption in favour of sustainable development should be applied. For decision-taking this means - approving development proposals that accord with the development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- I. the application of policies in this Framework that protect areas or assets of particular importance (including designated Green Belts) provides a clear reason for refusing the development proposed; or
 - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.9 When it comes to determining applications, the Framework confirms that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.10 The Framework also provides that Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

5.11 Within the Framework, Chapter 6 is focused on building a strong, competitive economy and establishes that decisions should *“help create the conditions in which businesses can invest, expand and adapt”* (Para. 80). Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Decisions should also *“recognise and address the specific locational requirements of different sectors...”* including making provision for *“storage and distribution operations at a variety of scales and in suitably accessible locations”* (Para 82).

5.12 Chapter 9 of the Framework seeks to promote sustainable transport and confirms that significant development proposals should be focused on *“locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”* (Para. 103). In assessing specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes are adopted, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be mitigated to an acceptable degree.

5.13 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, the Framework expects all applications for development to:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 5.14 The Framework seeks to secure high quality, well-designed development and states that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities” (Para 124).
- 5.15 The Framework respects the great importance that the Government places on the Green Belt and states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”* (Para. 133).
- 5.16 The Framework confirms that inappropriate development in the Green Belt is, by definition, harmful and should not be approved except in *“very special circumstances”* (Para. 143).
- 5.17 The Framework goes on to advise that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 5.18 Chapter 13 of the Framework indicates that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk by helping to contribute to reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure.
- 5.19 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 5.20 The Framework (Chapter 15) requires development to contribute to and enhance the natural and local environment.
- 5.21 In terms of biodiversity, planning permission should only be refused if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or compensated for. Opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 5.22 Development should also be located on sites that are suitable for the proposed use, taking account of ground conditions and any risks arising from land instability and contamination. Account should also be taken of the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of

the site or the wider area to impacts that could arise from the development. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

- 5.23 The Framework provides (Para. 189) that when assessing the impact of proposals on affected heritage assets, the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Any harm to, or loss of, the significance (including setting) of a designated heritage asset, will require clear and convincing justification. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

St Helens Unitary Development Plan (1998)

- 5.24 The St. Helens Unitary Development Plan (UDP) was originally adopted on 2 July 1998 and replaced all previous plans covered the Council area. The majority of policies in the UDP were saved indefinitely from 27 September 2007 by the Secretary of State, although several were replaced through the adoption of the St Helens Core Strategy (Oct 2012) and the Merseyside and Halton Joint Waste Local Plan (July 2013). A revised list of UDP saved policies was published in 2013 and these together with the Core Strategy Local Plan, the Merseyside and Halton Joint Waste Local Plan and Bold Forest Park Area Action Plan form the Development Plan for the Borough.

- 5.25 The relevant UDP policies are:

Policy S1 (Green Belt) maintains a Green Belt around the built- up parts of the Borough to achieve Green Belt purposes.

Policy GB1 (General Criteria for Development Control in the Green Belt) sets out a requirement for 'very special circumstances' to be met in order for new buildings to be permitted in the Green Belt.

Policy GB2 (General Criteria for Development Control in the Green Belt), sets out the criteria against which development will be judged, should the provisions of UDP Policies S1 & GB1 be met.

Policy ENV10 (The Mersey Forest) seeks to encourage woodland planting where it would contribute towards the creation of the Mersey Forest.

Policy ENV11 (Tree Surveys) requires tree surveys to enable the effect of development on trees to be assessed.

Policy ENV12 (Development Affecting Trees) indicates that development will not normally be permitted if it would result in a significant loss of trees and it does not incorporate adequate mitigation measures.

Policy ENV13 (New Trees Planting on Development Sites) states that Council will normally require the planting of trees on development sites adjacent to public frontages, the Green Belt and any environmental improvement corridor.

Policy ENV21 (Environmental Improvement of Transport Corridors) requires development to be of a high standard of design and suitably screened or landscaped along major transport corridors including the M62.

Policy ENV30 (Drainage) indicates that development will not be permitted in flood risk areas or where it would give rise to substantial changes in surface water run-off or have a detrimental impact on the water environment.

Local Plan Core Strategy (2012)

- 5.26 The Local Plan Core Strategy (LPCS) is the principal document in a framework of planning policy documents, that make up the St Helens Development Plan.

The Core Strategy contains strategic policies, which provides an overall plan of where development should be located, and the needs of the Borough will be met. The LPCS needs to be read as a whole and alongside the saved UDP policies, the Joint Merseyside Waste Local Plan and Bold Forest Park Area Action Plan.

- 5.27 The relevant LPCS policies for the application are:

Policy CSS1 (Overall Spatial Strategy) establishes that ‘exceptional circumstances’ exist for the release of land in the Green Belt. In particular, removal of land from the Green Belt will be required to meet the Borough’s longer-term development needs.

Policy CIN1 (Meeting St. Helens Infrastructure Needs) directs development towards locations already well-served by infrastructure and requires developers to provide the necessary infrastructure that their development will require, either through on or off-site provision of infrastructure or financial contributions.

Policy CSD1 (Presumption in Favour of Sustainable Development) reiterates the presumption in favour of sustainable development set out in the Framework (NPPF) and confirms that the Council will work proactively applicants jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Policy CAS5 (Rural St Helens) requires development outside of existing settlements to comply with Green Belt policy and sets out the aims and objectives of the Bold Forest Park, which include the creation of new economic opportunities through sustainable development.

Policy CP1 (Ensuring Quality Development in St. Helens) seeks to:

- protect the natural and historic environment and avoid unnecessary tree loss and safeguard landscape character;
- minimise and mitigate the effects of air, dust, light, noise and vibration caused by development;
- ensure development is located where it is compatible with the identified Flood Zone and includes satisfactory drainage arrangements;
- protect the biodiversity and geodiversity and bring these resources into positive management; and
- ensure developments maintain or enhance the overall character and appearance of the local environment including inter alia the siting, scale, massing and design of new buildings.

Policy CP2 (Creating an Accessible St. Helens) includes six policy strands, ensuring a choice in mode of travel, access to local facilities, safe and adequate access to and from the public highway, sustainable location for significant generators of journeys, a reduction in the adverse impacts of traffic on the community, support for local transport plan priorities.

Policy CE1 (A Strong and Sustainable Economy) complements Policy CSS1 in identifying a need for 37ha of employment land and setting out the need to identify employment sites through an Allocations DPD. The policy directs economic development to those sites that are either within, in close proximity to, or have easy public transport access to the most deprived areas of the Borough.

Policy CQL1 (Green Infrastructure) seeks to protect, manage, enhance and where appropriate expand the Green Infrastructure network and requires new development to contribute to the expansion and/or improvement of Green Infrastructure in accordance with local circumstances.

Policy CQL2 (Trees and Woodlands) requires the conservation, enhancement and management of existing trees and woodland and the absolute protect of all ancient woodland with the Borough. Seeks to ensure that development does not damage trees subjected to Tree Preservation Orders or other tree or hedgerow of value unless there is a clearly demonstrated public benefit, which outweighs the value of the tree(s) and/or hedgerow(s). Replacement of trees will be required on at least a 2 for 1 ratio.

Policy CQL3 (Biodiversity and Geological Conservation) seeks to protect and manage species and habitats, as well as enhancing and creating habitats and linkages between them and requires that where harm to protected species or habitats is unavoidable, that developers ensure suitable mitigation measures are implemented to enhance or recreate the features, either on or off-site.

Policy CQL4 (Heritage and Landscape) protects landscape character and the historic and built environment by all new development respects the significance and distinctive quality of the

built and historic environment and landscape character and is of a high standard of design, reinforcing St. Helens' local distinctiveness.

Bold Forest Park Action Area Plan (2017)

- 5.28 Area Action Plans are Development Plan Documents that provide a planning framework for specific areas of opportunity, change or conservation and give a geographic or spatial dimension and focus for the implementation of policies for such areas.
- 5.29 The Bold Forest Park Action Area Plan (AAP) aims, in partnership with The Mersey Forest and Bold Parish Council, to develop a Forest Park and encourage inward investment via rural entrepreneurship in the visitor economy, whilst providing leisure opportunities for the community. The AAP provides a framework for the development of the Bold Forest Park area, setting out the planning policies against which development proposals will be considered.
- 5.30 The aim of Bold Forest Park Area Action Plan is to provide an outdoor leisure destination in an attractive, wooded setting with the following objectives:
1. Create new economic opportunities through sustainable development within Bold Forest Park;
 2. Create opportunities for tourism and leisure related business, supported by the natural economy;
 3. Create an easily understood and accessible network of linked open spaces within Bold Forest Park and with surrounding areas;
 4. Promote the provision and positive use of green space for the benefit of the local community and visitors; and
 5. Enhance the natural environment through targeted delivery of green infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park area.
- 5.31 The relevant policies of the AAP for the application site are:
- Policy BFP1** (A Sustainable Forest Park) provides that the Council will work with its partners to seek an economic focus, balanced with environmental sustainability, in order to meet the needs of the community. It seeks to ensure that the Forest Park area contributes to meeting the Borough's needs for housing, employment, open space, sport and recreation and that new built development is appropriate in scale for its location and use. In addition, it seeks to enhance the landscape character of the area, including a 30% increase in tree cover, through additional and/or improved landscaping from new developments.
- Policy BFP ECON1** (Supporting Economic Growth) supports proposals that enhance the range and quality of economic opportunities or facilities, where it can demonstrate they help to deliver the objectives of the Forest Park, and they comply with national and local planning policies, particularly with regard to the Green Belt.

Policy BFP INF6 (Creating and Accessible Forest Park) seeks to ensure that journeys to and within the Forest Park can be made by a range of transport modes, partly through the protection and enhancement of key walking and cycling routes within the Forest Park.

Policy BFP SN1 (Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park) provides that development must make a positive contribution to the development of the Bold Forest, not result in the loss or prevent implementation of critical infrastructure elements and in the case of employment development include measures to enhance connectivity between the urban area and the Forest Park.

Policy BFP SN2 (Planning Obligations) expects development to contribute to the infrastructure of the Forest Park, including the provision of, maintenance or improvements to, footpaths, bridleways and cycleways and mitigation and enhancement for landscape conservation and biodiversity.

Policy BFP ENV1 (Enhancing Landscape Character) expects new development to contribute to increasing tree cover through on-site landscaping or where appropriate, by contributions towards off-site provision within the Forest Park area.

Policy BFP ENV3 (Heritage) seeks to ensure that all new developments respect the significance and, where possible, enhance the distinctiveness of the built and historic environment of the Forest Park area in their location, design and layout.

Merseyside Joint Waste Local Plan (2013)

- 5.36 The proposals will involve generation and management of a significant amount of waste materials during the excavation and construction works and also production of waste at the operational phase. As such, policies WM8 and WM9 of the Merseyside and Halton Joint Waste Local Plan apply.
- 5.37 **Policy WM8** (Waste Prevention and Resource Management) states that any development involving demolition and/or construction must implement measures to achieve the efficient use of resources, taking particular account of:
- Construction and demolition methods that minimise waste production and encourage re-use and recycling materials, as far as practicable on-site;
 - Designing out waste by using design principles and construction methods that prevent and minimise the use of resources and make provision for the use of high-quality building materials made from recycled and secondary sources;
 - Use of waste audits or site waste management plans (SWMP)G, where applicable, to monitor waste minimisation, recycling, management and disposal.
- 5.38 **Policy WM9** (Sustainable Waste Management Design and Layout for New Development) provides that the design and layout of new built developments and uses must, where relevant, provide measures as part of their design strategy to address the following:

1. Facilitation of collection and storage of waste, including separated recyclable materials;
2. Provide sufficient access to enable waste and recyclable materials to be easily collected and transported for treatment;
3. Accommodation of home composting in dwellings with individual gardens;
4. Facilitate small scale, low carbon combined heat and power in major new employment and residential schemes, where appropriate.

St Helen's Borough Local Plan (2020-2035)

- 5.32 Following adoption of the Core Strategy, the Council commenced work on a more detailed Site Allocations document. However, following a review of evidence to inform the emerging Local Plan, it became clear that the employment land requirement was substantially greater than the previous evidence identified (174-214 Ha), and as such the Council resolved in November 2015 to commence preparation of a new Local Plan for St Helens. This new Local Plan is now at the 'Local Plan Submission Draft' stage and, accordingly, can only be afforded very limited weight in the determination of the application.
- 5.33 The emerging Local Plan identifies part of the application site (31.22 ha) suitable site for B2 / B8 development under Employment Allocation 1EA (Omega South Western Extension) that will primarily help Warrington Council to meet their employment land needs.
- 5.34 **Policy LPA04.1** (Strategic Employment Sites) confirms that the land allocated under 1EA shall constitute a Strategic Employment Site, any planning application for which must be supported by a comprehensive masterplan. It also establishes that where detailed development proposals are brought forward, these must be supported by a comprehensive package of training schemes and / or other measures to enable local residents to access the employment opportunities of the development. Development will also be required, subject to compliance with Policy LPA08, to provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development.
- 5.35 Policy LPA04.1 also refers to Appendix 5 (Site Profiles – Allocated Housing and Employment Sites) of the Local Plan, which sets out the site-specific requirements for 1EA, which are as follows:
- Appropriate highway access via the existing Omega South development.
 - Implementation of any measures required to mitigate impacts on the M62 (Junction 8) or other parts of the highway network.
 - Measures to secure suitable access to the site by walking, cycling and public transport from residential areas in St Helens and Warrington.
- 5.36 The Submission Draft of the emerging Local Plan means that only very limited weight can be afforded to it. However, it is relevant to note that it identifies a need for a minimum of 215.4

ha of employment land between 2018 and 2035, which will meet a substantial proportion of the sub-regional need for large scale B8 uses identified to date in the Functional Economic Market Area (FEMA) as a whole. The emerging Local Plan proposes to allocate a total of 265.3ha (including the application site 1EA), which exceeds the identified employment land requirement but is justified in the Plan by:

- I. the need to reverse the suppression of employment land take-up the Borough has experienced since 2005, caused by an inadequate supply of market attractive sites; and
- II. the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above that identified in the ELNS Addendum Report and factored into the employment land requirement.

- 5.37 This evidence base is highly material to the application because it reflects other research and evidence being presented at the City Region and national levels and also includes both the economic land requirements and a Green Belt Review.

Local Plan Evidence Base & Other Material Information

- 5.38 The Local Plan evidence base is a material consideration in the determination of this application

Liverpool City Region Growth Strategy (2016)

- 5.39 The Liverpool City Region Local Enterprise Partnership (LCR LEP) has produced a Growth Strategy that seeks creation of over 100,000 additional jobs in the Liverpool City Region (LCR) by 2040, with a net increase of 20,000 businesses across the same period. It identifies a need to close the wealth gap as well as business and skills gaps. It highlights the importance of SuperPort and Liverpool2 as catalysts for growth.

Northern Powerhouse Strategy (2016)

- 5.40 The Northern Powerhouse strategy explains how the Government will work with local stakeholders to address key barriers to productivity in the region. The Strategy confirms that the Government will:

- invest in transport infrastructure to improve connections between and within the North's towns, cities and counties;
- work with local areas to raise education and skills levels across the North; ensure the North is an excellent place to start and grow a business; and
- ensure the Northern Powerhouse is recognised worldwide as an excellent opportunity for trade and investment.

- 5.41 The Proposed Development will make an important contribution to achieving the aspirations of the Northern Powerhouse by bringing about significant investment and job creation in the

local area. The logistics sector is seen as a key enabler of growth for the North's other sectors (particularly linked to port and airport activity) and, while historically logistics has been associated with relatively low level skill requirements, the sector is moving towards a higher skill business model, providing a routeway towards improved productivity on the back of greater levels of automation.

St Helens Economic Evidence Base Paper (EEBP) 2015

- 5.42 In September 2015, the Council published the Economic Evidence Base Paper (EEBP). The purpose of the paper was: to provide an update on the economic development situation since the adoption of the Core Strategy in 2012; to refresh the evidence supporting the Core Strategy which was mainly undertaken between 2008-2011; and to provide recommendations for change where needed for the remaining elements of the St Helens development plan.
- 5.43 The EEBP set the context for the demands of the employment land market and it noted that in 2015 there was an acute shortage of available, quality, industrial accommodation across all size parameters in the North West. The paper highlighted that the region had the lowest availability in the country of B8 logistics buildings in excess of 9,000 sq.m and less than 8 months of theoretical supply in September 2014.
- 5.44 The EEBP noted that occupier demand for large-scale logistics sites has remained strong over recent years. The total amount of floor space involved in transactions between 2011-13 in the North West was 723,741 sq.m with 353,031 sq.m of this taken up in 2013. A further review of the market between 2014 to June 2015 revealed that in the North West, transactions involved 506,321 sq.m of floor space, the largest take up of all UK regions in the first half of 2015. There is a significant demand for large scale logistics over 4,500 sq.m in the North West.
- 5.45 The EEBP stated that the strong demand is set to continue due to the North West Region's location, the strength of Manchester and Liverpool, infrastructure projects such as SuperPort and Airport City, the resurgence in manufacturing such as Jaguar Land Rover (part of whose supply chain is already located on Omega – Plastic Omnium), and the continued rise of Internet shopping whose retailers are purposefully developing logistics strategies to be near to customers.
- 5.46 Sub-regionally, the EEBP reflects on political change and investments in infrastructure in the LCR since 2012, including the LCR Growth Deal, signed in 2014. One of the five strategic projects at the heart of the Growth Deal is to create a freight and logistics hub to put the City Region in the best place to respond to changes in the UK and international logistics market. The Growth Plan for the LCR has a strong emphasis on logistics and freight as a means of supporting and enhancing the economic output of the region.
- 5.47 The EEBP notes the growing needs of the Liverpool SuperPort. It refers to the study 'Liverpool City Region SuperPort: An Analysis of the supply of, and demand for, distribution space within the Liverpool City Region (2014)'. The Study defines the SuperPort area as one hour's drive time from the Port of Liverpool and includes the Borough of St Helens. The Study examines

the factors that will drive demand for port related employment land and premises and states that there is an overall requirement of 783-808 ha in the SuperPort area over the next 20 years.

- 5.48 In this context of regional and sub-regional need, the EEBP identified the need for the Council to commission an Employment Land Needs Study (ELNS) to identify the objectively assessed need (OAN) for employment land within the Borough up to 2037, as discussed below.

Employment Land Need Study (ELNS) 2015

- 5.49 Following the publication of the EEBP, the Council published an Employment Land Needs Study (ELNS) in October 2015 to build on the context set out by the EEBP and inform the preparation of the Allocations Local Plan 2017-2033. The study analyses demand, supply and need up to 2037; identifying the Objectively Assessed Need (OAN) for employment land within the Borough. The ELNS follows the guidance for assessing economic development and town centre uses in the National Planning Practice Guidance (NPPG).
- 5.50 The ELNS states that the demand for warehousing space (which includes demands for manufacturing and logistics operations), has changed significantly since the development of the Core Strategy, with the commercial property market in the region being driven by an increasing demand for large scale logistics operations (greater than 10,000 sq.m). Consequently, the demand side factors which influence the calculated number of years' supply of land in the Core Strategy are now too low to provide a realistic projection of need.
- 5.51 The ELNS states that large flat sites with excellent motorway access and proximity to market/supply chains are highly sought after, and that St Helens' key location on the M6 and M62 motorways means that it is ideally positioned in the North West to perform a critical role in the logistics sector. However, the ELNS notes that the opportunities for larger operations, particularly large-scale logistics are very limited in the Borough. It states that opportunities in St Helens to take advantage of the large-scale logistics market would be dependent on new built stock in greenfield locations.
- 5.52 Taking this and other factors into account, the ELNS identifies an employment land OAN baseline of 147 - 174 ha up to 2037, based upon previous take up of floor space. However, it also considers the impact of SuperPort and the potential development of a Strategic Rail Freight Interchange at the former Parkside Colliery, and concludes that these developments would increase demand for large scale logistics employment in the Borough.
- 5.53 Due to its proximity to the motorway network and its land capacity, it was the report author's opinion that St Helens could accommodate approximately 50-70 ha of the secondary demand identified in the SuperPort study. After applying a discount for double counting of demand, this translates to an additional 30-40 ha. This would be additional growth on the baseline figures identified above, and the overall employment land OAN in the Borough is therefore identified as 177-214 ha.

- 5.54 Of this the ELNS states that the demand for B2/B8 logistics would indicatively be between 150 and 195 ha, and that large-scale B8 operators seeking buildings above 19,000 sq.m would account for approximately 60-70% of the B8 need (100-130 ha).
- 5.55 In summary, the OAN shows a clear and significant increase on the employment land need of 37 ha identified in the Core Strategy. It identifies that this need, particularly for large scale warehousing and distribution, is unlikely to be met on the Borough's existing employment land supply.
- 5.56 As the ELNS was published in October 2015, an Addendum Report to the ELNS (ARELNS) was published in January 2019 to update it and to support the Local Plan Submission Draft. The ARELNS reviews the ELNS's estimate of the OAN for employment to give the most up to date evidence and market conditions.

Addendum Report to the Employment Land Needs Study (ARELNS) 2019

- 5.57 The ARELNS notes that the logistics market continues to be the most in demand commercial market in the North West, with demand focussed on the motorway corridors. It reports that discussions with commercial agents in the region show a general opinion that there will be continuing and substantial demand for large logistics space in the coming years and that the logistics market is the most likely sector to drive growth in the Borough of St Helens and the broader North West Region for years to come. The Report identifies that the market is constrained by lack of space and that high quality, large (greater than 5 hectares), flat sites with excellent access to the motorway network and planning support are in short supply.
- 5.58 The ARELNS states that there has recently been strong developer interest in the Borough of St Helens (most notably at Haydock), which is consistent with the highlighted demand and the conclusions drawn in the ELNS. It also notes that with Omega built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62 (which is viewed as a key hub).
- 5.59 The ARELNS identifies that employment land take up has been suppressed in St Helens for a number of years because of an inadequate supply of market attractive sites. It notes that between 2005 and 2015, the adjacent Boroughs of Halton, Liverpool, Knowsley, Wirral and Warrington have all experienced a significantly greater take up of employment land than St Helens. Furthermore, it notes that the sustained strength of the market and the growing momentum around sites in St Helens suggests that the increased need for employment land may be more than anticipated in 2015.
- 5.60 As a result of these factors, the ARELNS identifies that the revised OAN for the Borough in the period 2012 to 2037 is between 190 – 239 hectares of employment land. It states that between 165 – 225 hectares of this land should be for logistics (B2 / B8).

Strategic Housing and Employment Land Market Assessment (SHELMA) & Assessment of the Supply of Large-Scale B8 sites (ASLCB8) 2018

- 5.61 Sub-regionally, the Liverpool City Region (LCR) published their Strategic Housing and Employment Land Market Assessment (SHELMA) in March 2018 and followed this with an Assessment of the Supply of Large-Scale B8 sites (ASLCB8) in June 2018. This which considered large-scale B8 uses in isolation. The purpose of the SHELMA is to provide an evidence base to inform the preparation of a City Region Spatial Framework and support the preparation of local plans by local planning authorities in the LCR & West Lancashire.
- 5.62 The Liverpool City Region SHELMA sets out the City Region's demand for large-scale B8 development to 2037. The SHELMA considered two scenarios:
- a 'Do Minimum' scenario which identifies a need for 308 ha of large-scale B8; and
 - a 'Do-something/ Transport for the North Strategy' scenario which identifies a need for 397 ha of large-scale B8.
- 5.63 Both demand scenarios include the new floorspace required for 'replacement build' which is like-for- like replacement for existing warehouse stock which is life expired; and 'Growth Build' which is the additional space required to support growth in freight through-put.
- 5.64 The purpose of the ASCLB8 is to identify how much of the existing supply is realistically marketable and likely to come forward for large-scale B8 uses by 2037 and therefore confirm whether the current supply is sufficient to meet forecast needs identified in the SHELMA or if there is a shortfall which will need to be met through the identification of additional sites.
- 5.63 The ASCLB8 provides assessments of current or potential sites within the FEMA, which could suitably accommodate large-scale B8 warehouse/ distribution development. It identifies the following four sites in St Helens
- Florida Farm North, Haydock (35.2ha);
 - Land North of Penny Lane, Haydock (11ha);
 - Parkside East (64.55ha); and
 - Parkside West (63.65ha).
- 5.64 In identifying the quantum of employment land that it is necessary to plan for, the Assessment has included a buffer of 105 on the SHELMA demand scenarios to account for churn, flexibility, normal market vacancy and choice. The Assessment therefore identifies the following need figures including a buffer:
- The 'Do Minimum' scenario + buffer: 339 ha
 - The 'Do-something/ Transport for the North Strategy' scenario + buffer: 437 ha

- 5.65 The ASCLB8 identifies a committed supply of 171.3 ha of employment land which is likely to come forward to meet the large-scale B8 demand, which is around half (51%) of the Do Minimum scenario and 39% of the Do Something scenario. This suggests there is a clear requirement to identify more sites across the City Region to meet the identified need.
- 5.66 The ASCLB8 also shows that if the supply of land likely to support strategic B8 development is extended to include sites which are currently within emerging Local Plans and/or are subject to current live planning applications then the total supply increases to 295.6 ha. However, this figure includes a number of sites which are currently under Green Belt designation and would need to be removed from the Green Belt before development could come forward, so may be subject to change as Local Plans are adopted.
- 5.67 Notwithstanding this, if it is assumed that the total supply of 295.6 ha does come forward, this falls short of the identified requirement in either of the demand scenarios (339-437 ha). This results in 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.

St Helens Local Plan 2020 – 2035 Green Belt Review (2018)

- 5.63 The Green Belt Review has been produced to inform the emerging Local Plan. The study is made in the context of the significant employment land need identified above. The report identifies that St Helens has the highest proportion of Green Belt of any of the authorities surrounding it. This is identified as 65% of the total land area or some 8,844 ha, enclosing each of the settlements in St Helens. The Green Belt has not been reviewed for some 30 years. It identifies a slow take up of employment land and the position in the EEBP that:

“none of the sites in the urban areas (brownfield land) of the Borough identified in the evidence base that supported the Core Strategy as suitable for large scale distribution and manufacturing uses, satisfy the criteria now suggested as being preferred by the market for large scale uses. Consequently, there is currently zero provision of suitable land for large scale distribution uses within the Borough’s identified employment land supply in the urban areas”.

- 5.64 It identifies the purposes of land in Green Belt and confirms that there are no reasonable alternatives to Green Belt release. The report assesses the Green Belt in St Helens against the purposes of Green Belt and then considers promoted sites. The Review concludes that only the first three of the five Green Belt purposes are relevant to St Helens.
- 5.65 It identifies what may be considered as strong and weak boundaries. Strong boundaries include natural features (watercourses and protected woodlands, bunds of greater than 5m in height) and man-made (Motorways and A-roads, railways, established ‘non-appropriate’ Green Belt buildings – agricultural or garden centres). Weak boundaries include hedgerows

or single lines of trees, fields, low-lying ditches, fencing, tracks/lanes or buildings with intermittent lines.

- 5.66 32 ha of the application site is identified within the Review as Omega South Western Extension (Land north of Finches Plantation, Bold). The assessment concludes that the site scores Medium against Purpose 1 (Check the unrestricted sprawl of large built-up areas), Purpose 2 (Prevent neighbouring towns merging into one another) and Purpose 3 (Assist in safeguarding the countryside from encroachment). The assessed site was scored as medium overall.
- 5.67 More specifically, in terms of Purpose 1 the assessment found that the assessed site as a whole is well contained to the north, east and in part the south and west. For Purpose 2, it was concluded that development of the site would lead to a reduction in the gap between these settlements, but a gap could still be maintained if the site were to be developed. With regard to Purpose 3 and the Overall Significance to Green Belt purposes, the assessment concluded that the site contains no inappropriate development and whilst there are open views across the site, it is bordered by large-scale built development at Omega South and the M62, and therefore only has a moderate countryside character.
- 5.68 As a result, in carrying the site forward for Stage 2 consideration, the assessment identified that the site made only a moderate contribution to the purposes of Green Belt land. Importantly, in the site pro-forma Summary Sheet, states that *“it would make sense to remove it from the Green Belt as its retention in the Green Belt would serve no Green Belt purpose”*.

Summary

- 5.69 Based upon this review of national and local planning guidance the proposed development of the land at Omega Zone 8 is required to accord with the following key principles:
1. The development of the site should satisfy the three themes of sustainable development which comprises economic, social and environmental gains.
 2. It will be necessary to show ‘very special circumstances’ to justify development in the Green Belt and these circumstances will not apply unless the potential harm to the Green Belt is clearly outweighed by other considerations.
 3. Significant weight should be placed on the need to support economic growth in both St Helens and Warrington Borough Council areas.
 4. High quality development should be located alongside the M62 gateway corridor and it is a key aspect of sustainable development.
 5. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
 6. Walking and cycling accessibility and permeability should be prioritised through the new and enhanced connections, and opportunities to encourage sustainable transport modes maximised through the implementation of a travel plan.
 7. Development should minimise impacts on environmental assets including protected species and habitats as well as important landscape features and, where possible,

include proposals for biodiversity enhancement and contributions towards the objectives of the Bold Forest Park AAP.

8. Development should ensure a good standard of amenity for all existing and future occupiers of land and buildings.
9. The development at both construction and operation stages should, where applicable satisfy the waste management principles set out in the Merseyside Joint Waste Local Plan.

5.70 Overall, there is a clear and compelling substantial need for new employment land in St Helens, including sites for large-scale logistics. It is also clear that the market for employment land has changed significantly since the adoption of the Core Strategy in 2012 and the more modest requirements of 37 hectares of land up until 2027. The extent of change outlined above effectively renders policies CSS1, and CE1 in the Core Strategy out of date (although it is important to note that they are not the most important for making a decision) and means that they should only be given limited weight when considering this application. By contrast the evidence outlined above is up-to-date and has been prepared in accordance with National Planning Practice Guidance (NPPG) which means that, particularly in the context of the NPPF, it should be given significant weight when assessing this application.

6. PLANNING MATTERS

- 6.1 The preceding chapters of this Statement have described the nature of the Hybrid planning proposals for Omega Zone 8 and reviewed the relevant national and Development Plan policies upon which a decision on the planning application should be made. Section 38(6) of the 2004 Act and Section 70(2) of the 1990 Act require that the applications be determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.
- 6.2 It is important therefore to note that it is the UDP which sets out the relevant policies relating to the Green Belt, however the UDP is now substantially out-of-date, with the plan period ending in 2001. The Core Strategy has superseded significant parts of the UDP and whilst it has not replaced the key Green Belt policies in the UDP, it does establish that there are 'exceptional circumstances' for the release of Green Belt land for development.
- 6.3 Nevertheless, the saved policies of UDP remain part of the adopted Development Plan and these set out what development is appropriate in the Green Belt and that 'very special circumstances' must exist for 'inappropriate' development to be granted permission. If such 'very special circumstances' (VSC) exist, the proposal will comply with the Green Belt policies in the development plan. In this regard there is broad conformity between the provisions of the Development Plan and the Framework.
- 6.4 Based on this policy analysis there are four planning issues raised by the proposed development; namely:
1. Would the proposed development cause harm to the Green Belt and to what extent?
 2. Are there very special circumstances that apply in this case?
 3. Does the proposed development comply with the Development Plan and relevant national planning guidance?
 4. Does the proposed scheme represent sustainable development?

7. IMPACT ON THE GREEN BELT

7.1 The Framework (Para. 133) attaches great importance to Green Belts and confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The Framework defines the essential characteristics of Green Belts as their “openness” and their “permanence”. The Framework (Para. 134) also identifies five purposes that Green Belts serve:

- check the unrestricted sprawl of large built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.2 The Framework (Para. 145) and UDP (Policy GB1) define those developments and uses that are considered ‘appropriate’ within the Green Belt. Beyond these exceptions the Framework instructs local planning authorities to regard the construction new buildings in the Green Belt as ‘inappropriate’. It is accepted that the proposed development at Omega Zone 8, does not fall into one of these exceptions and should therefore be considered as ‘inappropriate’ development within the Green Belt.

7.3 As a consequence, the Framework (Para. 143) and UDP [Policies GB1 & GB2] establish that inappropriate development, which is by definition harmful, should not be approved “except in very special circumstances”. In this context, the Framework (Para. 144) states that:

“...very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

7.4 To consider the VSC it is therefore firstly necessary to consider the extent of the harm to the Green Belt that results from the development through an appraisal of the characteristics of the proposed development against the impact on ‘permanence’, ‘openness’ and the five Green Belt purposes as set out below.

Harm to Permanence

7.5 When considering the issue of permanence, there is no doubt that the proposed development would remove the ability of the application site to remain permanently open as Green Belt. However, there is an identified need for significant Green Belt release within the Borough and therefore it is acknowledged that the current Green Belt boundaries within the Borough cannot now be treated as permanent. The principal focus must therefore be on the extent of harm which the proposed development would cause to the purposes of the Green Belt. The justification for amending the current Green Belt boundaries is overwhelming:

- The St Helens Core Strategy indicates that there will be a need to remove land from the Green Belt to meet the Borough's longer-term development needs. In addition, there have been changes in the economy since the Core Strategy adoption which has necessitated the re-visiting of the scale of the employment land requirement and its revision significantly upwards.
- The evidence base for the Allocations Local Plan demonstrates that there is an acute shortage of available, quality industrial accommodation across all size parameters in the North West.
- To support the preparation of the new Local Plan, St Helens commissioned the preparation of an Employment Land Needs Study (ELNS) in 2017, supplemented by a further ELNS Addendum Report (Jan 2019). This Addendum concluded there are very limited opportunities for larger industrial operations within the Borough, particularly large-scale logistics businesses. The ELNSAR forecasts an employment land requirement of 190-239ha for the Borough over the period 2012 and 2037. Of this requirement, between 55-70 ha is identified as being required for B2 General Industrial uses and between 110-155ha for B8 storage and distribution uses, giving a total logistics requirement of 165-225ha.
- The studies undertaken by the Council demonstrate that this scale of development cannot be accommodated without revising the Green Belt boundaries. This was a major factor in the Council abandoning the Allocations DPD and commencing the preparation of a new Local Plan so that significant releases from the Green Belt could be brought forward.

7.7 Reflecting this, the emerging Local Plan identifies part of the application site (31.22 ha) suitable site for B2 / B8 development under Employment Allocation 1EA (Omega South Western Extension). Whilst this only covers part of the application site, it is clear that the emerging Local Plan envisages that land for development could be removed from the Green Belt in this location and that the purposes of Green Belt policy in this locality would be maintained by the wider Green Belt land outside of this application site.

7.8 Accordingly on the basis of the above there is an incontrovertible need for the Council to remove land from the Green Belt to provide for large scale logistics developments, which cannot be accommodated in the existing settlement area and/or non-Green Belt land. Accordingly, we equate the nature of this impact to be MODERATE harm.

Harm to Openness

7.9 The Framework does not specify a precise definition of "openness" and this is not evident in any associated guidance.

7.10 With regards to the meaning of openness, the most recent case is the Supreme Court decision in R (Samuel Smith Old Brewery (Tadcaster) v North Yorkshire County Council [2020] UKSC 3 in which the Court had to consider whether the County Council had correctly understood the

meaning of “openness” in the NPPF. The Court, in finding that it had, reviewed the relevant history of Green Belt policy and concluded that it was clear that the visual quality of the landscape is not in itself an essential part of the “openness” for which the Green Belt is protected. The County Council had concluded that there would be no material harm to the character and openness of the Green Belt because the development proposed (an extension to an existing quarry) would be seen in the context of the existing quarry, was a temporary use of land and was not of a scale which would harm the purposes of the Green Belt.

7.11 The Supreme Court held that the NPPF does not refer to visual impact being a necessary part of the analysis of the effect of a proposal on openness of the Green Belt whether expressly or by implication. The matters relevant to openness in any particular case will be a matter of planning judgement, not law.

7.12 Lord Carnwath stated:

“The concept of “openness” in para 90 of the NPPF seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: “to prevent urban sprawl by keeping land permanently open ...”. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development. Paragraph 90 shows that some forms of development, including mineral extraction, may in principle be appropriate, and compatible with the concept of openness. A large quarry may not be visually attractive while it lasts, but the minerals can only be extracted where they are found, and the impact is temporary and subject to restoration. Further, as a barrier to urban sprawl a quarry may be regarded in Green Belt policy terms as no less effective than a stretch of agricultural land”.

7.13 Lord Carnwath also endorsed the judgment of Sales LJ in *Turner v SSCLG* [2017] 1 P&CR 1 in which he held:

“The concept of ‘openness of the Green Belt’ is not narrowly limited to the volumetric approach suggested by [counsel]. The word ‘openness’ is open-textured, and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs ... and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.”

7.11 A further case (*Euro Garages v SOSCLG* (2018)) has established that when considering impact on the Green Belt, it is important to consider the Green Belt as a whole and not just the specific site.

7.12 The application proposals would introduce large footplate buildings onto the site along with significant areas of hardstanding, car and lorry parking and roadways. It is accepted that the

introduction of these built elements will have an adverse impact upon the openness of the Green Belt.

- 7.13 The site is located on the edge of the Green Belt, immediately adjacent to the Borough boundary with Warrington, which in turn is defined by the western edge of the existing Omega site. The relationship with the developed areas of Warrington already reduces the openness of the Green Belt in this location and development of the site will be viewed in this context.
- 7.14 In addition due to the location of the site, remote from the main St Helens urban area, and its relatively flat topography, views of the site are mainly available from the M62 and some raised locations in the surrounding area. The scale and nature of the proposed development means that there will be a material loss of openness when viewed from a number of these vantage points. Nonetheless, in the majority of cases, the existence and prominence of the existing Omega development (both north and south of the M62) will offer a perspective and context against which the proposals will be viewed.
- 7.15 The proposals aim to minimise this impact as much as possible by locating the application site adjacent to the boundary with the existing Omega development, meaning it will, in time, appear as a continuation of the Omega site and will match the form of development already established in this location.
- 7.16 It is accepted that the first phase of development on the site will not be situated immediately adjacent to the boundary with the existing Omega site, however there are operational reasons for the layout of the proposed Unit 1 development as outlined in the TJM Operator Statement submitted with this Planning Statement (**Appendix 4**).
- 7.17 Equally, development of the application site requires the removal of the existing SPEN power line pylons and the rerouting of the power lines underground along the perimeter of the site. These works will be undertaken by SPEN under Section 37 of the Electricity Act 1989, however the timescales for consent under Section 37 and completion of the works to divert the power lines, mean that this part of the site will not be available as part of the first phase of development. As a consequence, this part of the site has been identified as future expansion land for TJM and details of how and when this is envisaged to come forward are included within the TJM Operator Statement. Once complete, the relationship between the application site and the existing Omega development will be established.
- 7.18 The establishment of new structural landscaping where views into the site may be most prevalent and the combination of careful consideration of the site layout, choice of materials and colours, control of light and noise emissions will serve to reduce the impact of the development. However, we accept that the scale of the new buildings and structures will have an impact upon the Green Belt openness due to their scale and height, but on the basis of the context provided by the existing Omega development, we equate the nature of this impact to be MODERATE harm.

Harm to the Green Belt Purposes

- 7.19 As detailed above the Framework outlines the five purposes of the Green Belt and as part of the assessment of harm to the Green Belt, these have been considered below to determine the impact that the site would have on the Green Belt purposes.
- 7.20 At this stage it is worth noting the findings of the St Helens Green Belt Review (Dec 2018) which assessed the relative contribution that different parts of St. Helens make to the purposes of Green Belt. The Review identified part of the application site (in line with the proposed 1EA allocation in the new Local Plan) as a site with the potential for development in a location that contributes least to the purposes of the Green Belt. The overall findings were that the site made only a “Medium” contribution to the purposes of the Green Belt and that it *“would make sense to remove it from the Green Belt as its retention in the Green Belt would serve no Green Belt purpose”* (Chapter 6 – GBP_076c Summary Sheet). Whilst these findings relate to only part of the application site it is not unreasonable to argue that, given the Green Belt in this location was found to not be high performing, that the same conclusion would have been reached for the application site as a whole.

Check the unrestricted sprawl of large built-up areas

- 7.21 It is accepted that the proposals involve development on land outside the defined urban area and would therefore lead to the expansion of a built-up area. However, the Site is contained by existing development of Omega to the east and M62 to the north and will provide new robust landscape features to its western boundary, ensuring that the development will not result in unrestricted sprawl. This conclusion is reflected in the Council’s Green Belt Review, which found that the site as a whole is *“well contained to the north, east and in part the south and west”*.
- 7.22 The proposals are predicated on a ‘transfer’ of trip generation figures from the current outline planning permissions affecting Omega South, which creates sufficient capacity for the development proposals in their current form, but which would not support further expansions in the future. This is reinforced by the masterplan layout which has been designed to deliver a self-contained development, with substantial landscaping along the western boundary that will define the extent the development and will represent a firm, clear and a defensible long-term Green Belt boundary in this location. The proposals do not therefore offer the potential for additional phases of development that could result in further sprawl in the vicinity of the site.
- 7.23 It is therefore accepted that the development of the application site would lead to the expansion of a built-up area but would not lead to unrestricted urban sprawl and would therefore have only a MODERATE impact on this purpose.

Prevent neighbouring towns merging into one another

- 7.24 It is considered that the development would have only a LOW impact on this purpose of preventing the merger of neighbouring towns.
- 7.25 As referred to previously, the Site is remote from the main St Helens settlement boundary, being located on the eastern edge of the existing Green Belt. The site is also physically separated from the settlement boundary by the physical barrier of the M62 motorway corridor and will be defined by new structural planting along its western boundary. As a consequence, the proposals do not pose a threat in terms of coalescence once developed.
- 7.26 Furthermore, the design and orientation of the development together with the proposed landscaping will create a visual and physical connection between the Site and the existing Omega development which will mean that the proposals are viewed as a natural extension to the Omega site.

Assist in safeguarding the countryside from encroachment

- 7.27 The proposals involve development within the countryside and therefore there is an obvious impact from development in this location. However, that will be the case with any development in the Borough required to meet the need for large-scale logistics development. The loss should be seen in context:
1. The Site can be characterised as relatively flat and featureless with fields currently being used for agriculture purposes;
 2. In terms of ecology and biodiversity, with the exception of areas of protected woodland, the value of the site is limited due to the agricultural nature of the site;
 3. The proposals, whilst involving development in the countryside, will open an area of previously private land to public access through new and improved pedestrian and cycle links between St Helens, the Site and into Warrington, significantly enhancing public access and enjoyment of the area. As such, the development proposals will have a community benefit; and,
 4. As outlined above, the prospect of further development into the adjacent areas of countryside is considered unlikely.

- 7.28 In regard to this purpose, the Green Belt Review concludes that whilst there are open views across the site, it is bounded by large-scale built development at Omega South and the M62, therefore only has a “moderate” countryside character. The proposals would therefore have only a MODERATE impact on this purpose.

Preserve the setting and special character of historic towns

- 7.29 Given the remote location of the site from any settlement and the fact that there are no historic towns or settlements within the Borough, the requirement to preserve the historic character of towns is not relevant in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 7.30 It is considered that the proposed development at Omega Zone 8 will have a positive impact on urban regeneration initiatives due to the economic development it proposes, which could not be accommodated elsewhere in the urban area. This conclusion is explained in the following paragraphs and accords with the Council's conclusions on this matter during the determination of the planning application for Florida Farm (P/2016/0608/HYBR) where impact on the Green Belt was a similar consideration.
- 7.31 The Green Belt is an urban regeneration mechanism designed to direct development and investment towards existing urban areas. In this instance, an Alternative Site Assessment Study has been undertaken to accompany the planning application. The purpose of this document is to establish whether the development could be located elsewhere.
- 7.32 The results of the Study have demonstrated that there are no alternative non-Green Belt sites within St Helens or Warrington (included due to the fact that part of the site could contribute towards WBC's employment land supply) that could accommodate a logistics development of this scale required to meet the identified need. As such, there is no alternative but to provide the development on a Green Belt site. In this instance, the Green Belt, if regarded as sacrosanct, would function as a mechanism through which to deflect investment and promote regeneration elsewhere, and to prevent regeneration and investment altogether. The proposals would therefore have only a MODERATE impact on this purpose.

Conclusions

- 7.33 In accordance with the Framework, the proposals will cause a defined harm to the Green Belt by reason of 'inappropriateness' and this must be given substantial weight. However, the 'other harm' to the Green Belt and the environment is limited.
- 7.34 It is considered that the harm to 'permanence' will be limited because of the need to release land for development of this type and scale and because the proposals will provide a firm, clear and a defensible long-term Green Belt boundary in this location. It is also noted that the Green Belt Review identified a large part of the site as being an acceptable release from the Green Belt because *"it's retention in the Green Belt would serve no Green Belt purpose"*.
- 7.35 It is accepted that development of this scale within the Green Belt will cause harm to 'openness' but, the existence and prominence of the existing Omega development (both north and south of the M62) will offer a perspective and context against which the proposals will be viewed. In addition, the proposals aim to reduce the impact on openness as much as possible by locating the application site adjacent to the boundary with the existing Omega development, meaning it will, in time, appear as a continuation of the Omega site and will match the form of development already established in this location.

7.36 Furthermore, for the reasons set out above the harm to Green Belt purposes will not be substantial because the proposals:

- a) Will not result in the unrestricted sprawl of a large built up area;
- b) Will not result in the merging of neighbouring towns;
- c) Whilst involving development in the countryside, it will not involve development at a site that has any current substantial agricultural, ecological or community value, and will deliver benefits in terms of community access to the countryside;
- d) Will have no impact in terms of the setting or character of historic towns; and,
- e) Will assist in urban regeneration, due to the economic development it proposes, which could not be accommodated elsewhere in the urban area.

7.37 Overall, therefore, whilst the proposals will result in a MODERATE degree of harm to the Green Belt, this harm is substantially mitigated as required by the Framework and UDP Policy GB2. The next section considers the 'Very Special Circumstances' that outweigh the harm to the Green Belt.

8. VERY SPECIAL CIRCUMSTANCES

- 8.1 As set out previously, the Framework and UDP (Policies GB1 & GB2) require ‘very special circumstances’ (VSC) to be present in order to justify inappropriate development within the Green Belt. Where it is possible to demonstrate VSC and compliance with the requirements of UDP Policy GB2, the presumption in favour of granting planning permission that complies with the development plan set out in s.38(6) of the 2004 Act will apply.
- 8.2 In *Wychavon District Council v SSCLG* [2008] EWCA the Court of Appeal held that the words “very special” are not the converse of commonplace but connoted a qualitative judgment as to the weight to be given to a particular factor for planning purposes and that a combination of factors, each of themselves commonplace, may in combination amount to very special circumstances justifying inappropriate development in the Green Belt depending on the particular context.
- 8.3 The very special circumstance case for Omega Zone 8 is based on the following:
- a) An over-riding quantitative need for large-scale logistics development at this location, to serve the identified employment land requirements of St Helens and Warrington based upon the Council’s own evidence base, the wider City Region strategic requirements and up to date review of market demand within the Region;
 - b) A clear qualitative need for large-scale logistics development at this location, based upon a lack of deliverable and attractive sites within the City Region that could accommodate development of this scale and the fact that disaggregation of the floorspace into numerous smaller buildings will not meet the needs of the market
 - c) An immediate and identified ‘live’ occupier-led need that is fully supported by the occupier’s business case supplied as part of this Planning Statement;
 - d) An absence of any suitable or available site on which the need can be met;
 - e) An assessment of the Planning Balance (or “Other Harm”); and
 - f) The significant benefits that the proposals will deliver to the economy and other local social and environmental benefits.
- 8.4 An Alternative Sites Assessment (OPP DOC. 6a) accompanies the planning application.

The Need Case

Quantitative Need

- 8.5 This application is made in the context of the considerable shift in the conclusions of the economic evidence, which is now informing the emerging Local Plan for St Helens, as outlined in Chapter 5, demonstrating that there is a significant need for new employment land in St Helens, including sites for large-scale logistics.
- 8.6 We provide a Market Report (JLL 2020) to support this Planning Statement (**Appendix 5**), which sets out the economic need and market demand for the proposed development. In summary, it states that:

- North West take up of Grade A space over the last ten years has varied reflecting the socio-political and economic conditions and averages c2.3m sq. ft per annum.
- St Helens has proven an attractive location with over 1,226,000 square feet of warehousing being taken up in three speculative and build to suit transactions in the last three years.
- Several large regional sites are built out – Omega, Warrington and Logistics North, Bolton.
- Sites of this size are developed out over a number of years which does often include periods of financial prosperity and recession. This results in a timescale that will vary depending on the size of the development site and the correlation between the stage in its development lifespan and the economic cycle.
- There are over 5 million sq. ft of requirements which would consider the site.
- The site adjoins Omega South, an established employment location of significant scale and will utilise its motorway access and infrastructure.
- Distribution and production units are becoming larger and require higher building heights to satisfy production, storage and automation.
- Automation delivers higher quality jobs in the maintenance of the automated handling systems whilst automation allows employees to undertake better quality roles.

8.7 The Report identifies that the retail / e-commerce sector makes up approximately 40% of the national industrial & logistics sector and that this sector is rapidly evolving due to changes in product handling and delivery strategies, which led to a demand for better specified buildings and more sophisticated handling systems. This in turn has led to higher building heights to allow companies to make more efficient use of land and buildings. The Report identifies several recent developments across the country where building heights similar to the proposed development have been utilised in response to the trend towards greater automation and efficiency, these include:

Table 8.1 – Examples of Logistics Warehouse Building Heights across UK

Company / Location	Floorspace (sq.ft)	Max Building Height (m)
Asda, Omega South, Warrington	630,000	30
Heinz, Wigan	96,000	30
Newcold, Wakefield Hub	417,000	42
Ikea, Westmoor Park, Doncaster	1.3m	35
Coca Cola, Wakefield	775,000	40
Aldi, Interlink South, Bardon	1.2m	30
Amazon, Magna Park, Milton Keynes	574,000	21

8.8 The above examples show the trend towards increased buildings heights in response to greater efficiency requirements through automation and minimised building footprints. The

majority of these developments have been built on a “built to suit” basis, however the Amazon building at Magna Park, whilst lower in height is significant and has been included in this table because this was, when completed in 2019, the largest and tallest speculative logistics warehouse in the UK. This also suggests a trend in the speculative market for higher buildings and is in-line with the 19m high ridge heights proposed as part of the outline element of the proposals.

- 8.9 The Report identifies that the total speculative build / build to suit take up in the North West is approximately 8.3m sq.ft, of which the retail / e-commerce sector has accounted for about 5.69m sq.ft. Over the five-year period 2015-2019 the supply of available Grade A floorspace has varied from circa 1m sq.ft to 3.5m sq.ft (in response to start on sites in specific years and lease expiries), with approximately 3m sq.ft Grade A stock available at the end of 2019. Of this, there is circa 1.74m sq.ft of available units in the North West, however only one is greater than 300,000 sq.ft (the minimum unit size anticipated for Omega Zone 8). A further five units (884,000 sq.ft) are under construction, but again only one is greater than 300,000 sq.ft (Unit 1 Mountpark Omega Phase 2), whilst existing Grade A supply is limited to 702,000 sq.ft and once again only one unit is greater than 300,000 sq.ft (Martland 350, Wigan). Most importantly, none of the sites / units identified in the Report are located within the Borough of St Helens.
- 8.10 In terms of take up within the North West, the Report confirms that the ten-year average is circa 2.3m sq. ft, with the most recent five-year average at circa 2.1m sq. ft. The lower five-year average is primarily due to the volatility of the market due to Brexit (2017) and more recently the General Election in 2019.
- 8.11 Take up in 2019 was 1,720,500 sq. ft focussed mainly on existing buildings. This slightly reduced take up was due to a number of short to medium term requirements related to stockpiling and the uncertainty created by Brexit related issues. The total immediately available Grade A supply is 2,441,000 sq.ft (speculative stock 1,739,000 and existing Grade A stock 702,000 sq.ft), which if based on the last years take up of 1,720,500 this would equate to 1.42 years supply. However, if the built units that are under offer are excluded this would reduce the supply to 2,185,000 sq.ft, equating to 1.27 years supply. This supply could be reduced further, given that take up in Quarter 1 2020 has already reached 681,500 sq.ft, which includes Kelloggs at Unit 2, 525 Haydock (Florida Farm), indicating a potential rise in take up.
- 8.12 The Report identifies that there is currently strong demand for units in excess of 100,000 sq. ft in the North West Region, with over 5 million sq ft of active requirements for Grade A or build to suit logistics development, split across a range of floorspace sizes and build to suit or existing building requirements. The identified market demand (need) can be seen to far outstrip the current supply within the North West. It is considered that the majority of the existing building requirements need to be satisfied in the next 6 – 12 months, whilst the build to suit requirements usually have a longer timescale of 18 – 24 months. It is these medium-term, build to suit requirements that the outline element of the Omega Zone 8 proposals will satisfy, continuing the trend across the majority of the Omega development.

8.13 The main criteria for any build to suit is certainty on the delivery of a fully serviced site where an implementable planning consent can or has been granted. Successful examples of this in the North West include: -

- Florida Farm, Haydock - now built out and fully let with units for Amazon (360,000 sq. ft) and Kellogg's (523,500 sq. ft). The scheme was part pre-let to Amazon and the speculative unit was let within 6 months of practical completion.
- Omega, Warrington - the last phase of Omega South is being built out.
- Logistics North, Bolton - there is one site available which can accommodate a single unit of over 100,000 sq. ft.
- Kingsway Business Park, Rochdale - there are several sites available, the maximum building size is 250,000 sq. ft.
- Matrix/Revolution Park, Chorley - the site is fully built out.
- Liverpool International Business Park - there are several sites remaining available.

8.14 Of the existing sites that would appeal to the build to suit market, there are few opportunities left and none within St Helens. It is considered that Omega Zone 8 will attract interest from a large number of occupiers because its flat topography allows the delivery large floorplate buildings; it has excellent motorway access and has access to a large labour supply within a 30-minute drive time. The Report places the application site in a regional context due to the limited availability of sites which can accommodate units in excess of 300,000 sq. ft. The target market is

- National and regional logistics/distribution companies
- Retailers and e-commerce companies
- Major regional and national companies already located in the area
- Port related companies - access to Liverpool 2/Atlantic Gateway

8.15 In summary, the Report concludes that the build to suit market has become more sophisticated with occupier requirements being more specific in terms of layout, size and building height but that there is still a need for speculatively institutionally built units for occupiers whose timescales will not allow build to suit. The application site is considered large enough to accommodate both. Equally, there are few sites in the North West that can offer plots in excess of 300,000 sq. ft, whereas the application is able to provide a number of plots capable of accommodating units in excess of this floor area. From the requirements that have been highlighted it is expected that there would be demand for the site on both a build to suit and speculative basis and subject to specific demand the application site could offer opportunities for various employment sectors other than warehousing including advanced manufacturing, automotive, food and engineering sectors.

8.16 More generally evidence indicates a need for the proposed floorspace. The Liverpool City Region Growth Plan 2014 & 2016 seeks the creation of over 100,000 additional jobs in the Liverpool City Region by 2040 with a net increase of 20,000 businesses across the same period.

It identifies a need to close the wealth gap as well as business and skills gaps. It highlights the importance of SuperPort and Liverpool2 as catalysts for growth.

- 8.17 In the January 2017 Committee Report for Florida Farm (P/2016/0608/HYBR) the Council identified that in the period 2012 – 2016, following adoption of the Core Strategy, take-up of employment land was slow (just 2.37ha), but this was indicative of a lack of quality sites to meet market demand. In fact, it is understood that in this period there was actually a net loss of 34.96 ha of employment land to higher value uses (e.g. residential and retail). The Council also identified that the Core Strategy requirements had not been met in St Helens.
- 8.18 As indicated in the Market Report, the North West has seen significant demand for and take up in large-scale logistics development and the supply of this is becoming increasingly limited. The SuperPort project and Liverpool2 have added to this requirement. It is noted that St Helens is starting to provide large-scale logistics floorspace to meet this demand at sites like Florida Farm and Parkside (subject to a Secretary of State decision on call-in). This represents an important step forward for St Helens, but the demand for floorspace remains greater than available supply (as identified in the Market Report).
- 8.19 The EEBP (2015) identifies the growing needs of the Port of Liverpool in their study 'Liverpool City Region SuperPort: An Analysis of the Supply of, and Demand for, Distribution Space within the Liverpool City Region'. It examines the factors that will drive demand for Port related employment land and premises. It examines the current and planned supply of sites in the current economic area of the Port that could meet this demand up to 2024. This Study defined SuperPort as one hours' drive time from the Port of Liverpool covering the following authorities: Cheshire West and Chester, Halton, Knowsley, Liverpool, Sefton, St Helens, Warrington, West Lancashire and Wirral. It assessed sites based on criteria as follows:
- Sites of 5+ha capable of accommodating more than one unit of 50,000m²;
 - Ready access to the Port and other key hubs/ transport infrastructure, with a drive time no more than 60 minutes from the Port (and within 20 minutes of the motorway network);
 - A population centre in close proximity (but not within 200m or beyond 1km); and
 - Certain availability, location suitability and unconstrained by issues such as site shape, access, ground conditions, utility constraints, conflict with neighbouring land uses
- 8.20 The EEBP identifies some 851.54 ha of land across 69 sites of greater than 5 ha each. Whilst the current application site was not specifically identified, Omega South was identified as a key site within this total and as the second largest immediately available, high-quality site making it one of 12 sites are considered to form the short-term supply (initial 5-year period) covering 233 ha of land.
- 8.21 In terms of the long-term supply the study found that there was an estimated demand of 634 ha (net) over the 20-year period, but that of the 851 ha of total supply, 618 ha were

constrained through availability or physical factors. The Study concluded that in order to be competitive in the logistics market, the City Region would need a good, available supply of large, high quality sites suitable for logistics clusters, or demand would go elsewhere. It found therefore that a further 400 ha (500 ha to provide 25% headroom) of high-quality sites would be required to enable the City Region to maximise the opportunity presented by SuperPort.

- 8.22 The ELNS (2015) states that the demand for B2/B8 logistics would indicatively be between 150 and 195 ha, and that large-scale B8 operators seeking buildings above 19,000 sq.m would account for approximately 60-70% of the B8 need (100-130 ha).
- 8.23 The ARELNS (2019) identifies that employment land take up has been suppressed in St Helens for a number of years because of an inadequate supply of market attractive sites. It notes that between 2005 and 2015, the adjacent Boroughs of Halton, Liverpool, Knowsley, Wirral and Warrington have all experienced a significantly greater take up of employment land than St Helens. Furthermore, it notes that the sustained strength of the market and the growing momentum around sites in St Helens suggests that the increased need for employment land may be more than anticipated in 2015.
- 8.24 As a result of these factors, the ARELNS identifies that the revised OAN for the Borough in the period 2012 to 2037 is between 190 – 239 hectares of employment land. It states that between 165 – 225 hectares of this land should be for logistics (B2 / B8).
- 8.25 The ASCLB8 (2018) prepared in support of the SHELMA (2018) also shows a total strategic employment land supply of 295.6 ha. This falls short of the identified requirement in either of the SHELMA demand scenarios (339-437 ha) and results in 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.
- 8.26 It is considered therefore that there is a significant need for new employment floorspace particularly for logistics in the UK and that this remains a significant growth sector. More specifically there is also a significant need for logistics floorspace to serve the North West and Liverpool City Region, which represents a marked change from the context in which the Core Strategy was adopted.
- 8.27 It has been established that there is a need for significant economic growth in St Helens to address demand in the City Region and also address the economic disadvantages of the Borough. It has been established that to achieve this, given the significant proportion of the Borough being in Green Belt, and lack of available and suitable sites to deliver this, there is a need to release land in Green Belt.
- 8.28 The existing Omega site has been performing a regional and national role as a large-scale logistics location but is now substantially built out. It is considered that the application site, if approved, has the ability to become one for the next key sites for the Region and would represent an immediately available, high-quality site that could satisfy the short to medium-

term demand identified in the JLL Market Report and through the Council's evidence base and the City Region SHELMA.

- 8.29 As noted already, the Policy context for economic development has changed with the significant uplift in employment land requirement to benefit St Helens. The Core Strategy minimum need of c. 37 ha of employment land is therefore considered to be out of date and now superseded by the latest evidence base prepared in support of the new Local Plan. It is considered that the need for employment sites is a significant material planning consideration in favour of the proposals and that SIGNIFICANT weight should be put to it.

Policy Need

St Helens

- 8.30 The Core Strategy and the evidence base for the emerging Local Plan clearly demonstrate a need for logistics development and the M62 is identified as a preferred location for such development.
- 8.31 The Core Strategy provides the vision, aims and objectives for the future economic development of the Borough with a focus on land needs and supply and under Policy CE1 identifies a need for 37 hectares of employment land to be developed between 2012 and 2027.
- 8.32 Of this requirement 32 hectares was identified as being for B8 Warehouse and Distribution floorspace. The reasoned justification for the policy stated that in 2012 there was enough land, and indeed a surplus, to meet those needs.
- 8.33 Notwithstanding this, at the time of publication, the Core Strategy indicated a need to remove land from the Green Belt to meet the Borough's longer-term development needs, although it did not identify the scale or location of any such removal. Since then the national economy has evolved, most notably with the rise of online retailing, and there has been a change in the Liverpool City Region approach where the importance of SuperPort and Liverpool2 has identified a significant economic multiplier that has formed the basis of the LCR Growth Strategy (within which Omega is identified as a key strategic site).
- 8.34 The current adopted approach does seek to promote economic development, but the new evidence base provides the justification and impetus to take this further forward and at a much greater rate. This is considered consistent with the requirements of the NPPF, as previously identified, which in its economic objective seeks to build *"a strong, responsive and competitive economy"* (Para 8). It confirms at Paragraph 80 that *"significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"* and *"The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future"*.

- 8.35 Of particular relevance in this case is Paragraph 82, which requires planning decisions to *“recognise and address the specific locational requirements of different sectors. This includes making provision for... storage and distribution operations at a variety of scales and in suitably accessible locations”*. This is clear statement from Government that planning policies and decisions need to take account of the specific locational requirements of the storage and distribution market. The Alternative Sites Assessment submitted with this application sets out what those locational requirements are and why the application site is sequentially the best site to meet these requirements within St Helens.
- 8.36 In this context, it is important to note that the problems of deprivation and joblessness remain in St Helens. The opportunities provided by sites such as Omega Zone 8, which lies within 1km of an area within the 20% most deprived population in the UK, are economic multipliers as they are strategically located to be attractive to regional and national employment/logistics operators.
- 8.37 As has been noted, neighbouring authorities have supported very large logistics buildings along the M62 corridor, with Warrington and Omega the prime example. However due to the lack of suitable brownfield sites and a restrictive approach to Green Belt change in St Helens, these opportunities have not been forthcoming in St Helens. Whilst other sites within the urban area could provide employment development, unless they are located in the appropriate location with high levels of accessibility, the interest will remain local. SME's are a key component in any local economy, but they do not have the ability to expand to meet exponential economic growth requirements. Sites, such as the application site, that are capable of accommodating larger units close to the motorway are therefore vital to achieve this vision in accordance with paragraph 82 of the NPPF (18).
- 8.38 As a result of the work carried out in support of the emerging Local Plan, St Helens now recognise the need to positively plan for economic growth for the benefit of the borough and to capture the economic benefits of the logistics industry. There is an established economic policy requirement which has now grown significantly.
- 8.39 This requirement is reflected in the emerging St Helens Local Plan and although only very limited weight can be attached to the document at this stage, the identified need for 215.4ha of employment land and the proposed allocation of up to 265.3ha (including part of the application site – Allocation 1EA) cannot be ignored. The Local Plan confirms that the over-provision of employment land can be justified by:
- i) the need to reverse the suppression of employment land take-up the Borough has experienced since 2005, caused by an inadequate supply of market attractive sites; and
 - ii) the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above that identified in the ELNS Addendum Report and factored into the employment land requirement.

- 8.40 The Local Plan's proposed over-provision of employment land allocations therefore specifically targets the large-scale (strategic) logistics market where, as concluded in the Council's evidence base, take up in St Helens has fallen behind other local authorities within the Functional Economic Market Area (FEMA). This despite St Helens ideal strategic location at the meeting point of the M6 / M62 motorway corridors.
- 8.41 The emerging Local Plan aims to address this through the identification of the Strategic Employment Sites under Policy LPA04.1. In addition to part of the application site (Allocation 1EA), this policy identifies the following strategic sites:
- 2EA: Land at Florida Farm North, Slag Lane, Haydock (36.37ha);
 - 6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (20.58ha);
 - 7EA: Parkside East, Newton-le-Willows (64.55ha); and
 - 8EA: Parkside West, Newton-le-Willows (79.57ha).
- 8.42 Of these, Site 2EA (Florida Farm) secured hybrid planning permission (P/2016/0608/HYBR) for logistics development in April 2017 and following the granted of two subsequent reserved matters approvals (P/2018/0478/RES & P/2018/0479/RES) in September 2018, has now been fully built out and let. Meanwhile, Parkside West (the former Parkside Colliery site) is currently subject to a planning application (P/2018/0048/OUP) for the construction of up to 92,900 sq.m of employment (B8) floorspace, which represents Phase 1 (circa 47.9ha) of this site. This application has been recommended for approval by the Council and is currently with the Secretary of State for a decision on whether the application will be called-in or not.
- 8.43 In addition to these strategic sites, planning permission (P/2015/0571/HYBR) was granted (September 2016) at the site known as Haydock Green (Penny Lane 11.05ha) for the erection of two B8 warehouses: one 373,000 sq.ft and one 125,000 sq.ft. The larger unit was subject to a pre-let agreement to healthcare services firm Movianto and is now complete, with the smaller unit proposed on a speculative basis.
- 8.44 These sites have been brought forward on the basis of the Council's evidence base, which the identified need for strategic employment sites within the Borough and the Council's acceptance that this could only be met through the development of Green Belt land. The fact that Florida Farm is now fully let and that the Haydock Green site was in part pre-let demonstrate the attractiveness of St Helens as a logistics location and reinforces the evidence base conclusions that strategic logistics demand in the Borough has been restricted by the lack of available, market attractive sites.
- 8.45 However, the take-up of these sites in advance of the Local Plan being adopted does mean that the number of sites capable of accommodating large-scale / strategic logistics development has been reduced. Of the total of 201.07ha of strategic land identified in the emerging Local Plan, the above development and planning permissions have reduced this figure by 84.27ha to 116.8ha. Whilst, this would appear to be a reasonable level supply, the

remaining sites are subject to development constraints that it is considered may affect their deliverability in the short-term and their attractiveness to the market by virtue of their size / shape and infrastructure requirements. This is covered in more detail in the Qualitative Need section below.

- 8.46 It is considered therefore that despite the Council's intention to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, the rapid take up of the most deliverable and market attractive sites, means that the Borough could ultimately end up with the same issues of an inadequate employment land supply to meet the intended sub-regional market demands.
- 8.47 This is backed up by the fact that of the four St Helens sites identified in the SHELMA's Assessment of the Supply of Large-Scale B8 Sites, only Phase 2 Parkside West and Parkside East remain either undeveloped or without a planning permission (minded to grant in the case of Parkside West Phs 1). As outlined in Chapter 5, the SHELMA Assessment identified a shortfall of between 43.4 ha and 141.4 ha across the City Region. In order for St Helens to respond to this shortfall, it is considered that there is a need for further Green Belt release for large-scale logistics development and it is considered that the application site is the most appropriate location to satisfy this need.
- 8.48 The application proposals are submitted in this context of a national, regional and local requirement and are consistent with this. It is considered that this policy support for employment development is a significant material planning consideration in favour of the proposals for which significant weight can be attached.

Warrington

- 8.49 Due to the site's proximity to the Warrington Borough Council authority boundary and the relationship with the existing Omega site, there is also an opportunity for the site to contribute towards Warrington's employment land supply as well (as identified in the emerging St Helens Local Plan). It is therefore also important to consider the employment land needs of Warrington Borough.
- 8.50 BE Group published the most recent update to the Warrington Economic Development Needs Assessment (EDNA) in Feb 2019, that will inform the preparation of the merging Warrington Local Plan. This was an update of the 2016 EDNA, which identified a realistic employment land supply comprising local supply of 34.85 ha and a strategic supply of 69.68 ha at Omega and a need for a further of 276.37 ha of employment land, to 2037.
- 8.51 The 2019 EDNA provides a review of the current property market relative to logistics, which confirms that rents for prime industrial and logistics locations of more than 10,000 sqm in Warrington had increased by almost a third in five years, from £51/sqm in 2013 to £67/sqm today. The current high was achieved in a pre-let of 32,000 sqm at Mountpark, Omega to Royal Mail in July 2018. This is set against a North West average of £64/sqm, rising to a regional maximum of £70/sqm in Manchester. It is estimated that headline rents of £73/sqm

will be achieved at prime industrial and logistics sites in Warrington by the end of 2018. The high rents achieved in Warrington reflect the Borough's position at the centre of the region's communications network and ongoing declines in supply, with the availability of big sheds in the North West having declined by two thirds since 2010.

- 8.52 The EDNA confirms that the North West remains the logistics market leader in the UK, with the highest amount of supply overall, but, just 1.5 years' worth of supply for Grade A units, the lowest of any region outside of the M25. In addition, it confirms that demand from the logistics sector is sustainable, if a pipeline of modern serviced space and units can be maintained, to compete with other locations in the North West and that developers remain interested in the provision of land for further schemes at the Omega site.
- 8.53 The 2019 EDNA identifies a realistic supply, as of June/July 2018 of 83.91 ha in 10 sites, comprising:
- Local supply: 23.94 ha (28.5 percent), eight sites
 - Strategic (Omega): 59.97 ha (71.5 percent), two sites
- 8.54 The EDNA also identifies that take up over 2016-18 has been focused at Omega a trend that is considered will continue for the next few years. Take Up at Omega, to 2018, is 121.50 ha, with up to 33.70 ha likely to be taken up over the next few years as part of the Mountpark scheme.
- 8.55 Using a strategic/local projection take-up rate, inclusive of Omega, and applying it to the Local Plan period 2017-2037 (20 years), the 2019 EDNA identifies that Warrington requires 277.60 ha of land to 2037. With a 5-year buffer (to reflect a choice of sites by size, quality and location and to provide a continuum of supply beyond the end of the 2037 period) applied, this rises to 347 ha. Based upon the realistic supply, this results in a combined further need of 277.80 ha to 2037.
- 8.56 St. Helens and Warrington Councils have identified, under the duty to cooperate, that the emerging Warrington Local Plan is unlikely to be able to accommodate all of Warrington's employment land needs for 2017-2037 within its administrative boundary. St. Helens Council has therefore agreed to allocate part of the application site (31.22ha) as an employment land allocation in their own emerging Local Plan (Allocation site 1EA), which will help Warrington Council to meet these needs. The Proposed Development therefore responds to this identified need.

Conclusions on Quantitative Need

- 8.57 In this context, the commercial property market in the region is being driven by an increasing demand for large-scale logistics operations. Large, flat sites with excellent motorway access and proximity to markets/supply chains are highly sought after, as evidenced by the success to date at Omega and other sites within the North West. St Helens and Warrington benefit

from being in a key location on the M6 (north-south) and M62 (east- west) motorway network meaning that they are ideally positioned to provide a critical role in the large-scale logistics sector and Omega Zone 8 is considered to be key to realising this potential.

- 8.58 As indicated in the JLL Market Report, the North West has seen significant demand for and take up in large-scale logistics development and the land supply for this sector is becoming increasingly limited. The SuperPort project and Liverpool2 have added to this requirement. It is noted that St Helens is starting to provide large-scale logistics floorspace to meet this demand at sites like Florida Farm and Parkside (subject to Secretary of State review). This represents an important step forward for St Helens, but the demand for floorspace remains greater than available supply (as identified in the Market Report).
- 8.59 It is considered therefore that there is a significant need for new employment floorspace particularly for logistics in the UK and that this remains a significant growth sector. More specifically there is also a significant need for large-scale logistics floorspace to serve the North West and Liverpool City Region, which represents a marked change from the context in which the Core Strategy was adopted.
- 8.60 It has been established that there is a need for significant economic growth in St Helens to address demand in the City Region and also address the economic disadvantages of the Borough. It has been established that to achieve this, given the significant proportion of the Borough being in Green Belt, and lack of available and suitable sites to deliver this, there is a need to release land in Green Belt.
- 8.61 The emerging St Helens Local Plan proposed 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 of the application would meet the identified need for large-scale logistics floorspace to serve the North West and Liverpool City Region and facilitate economic growth in St Helens.
- 8.62 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.
- 8.63 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.

Qualitative Need

- 8.64 A clear quantitative need for the proposals has therefore been established and the Omega Zone 8 site is considered to be the most appropriate and deliverable location to meet this need for large-scale logistics floorspace.
- 8.65 However, in recognition of the status of the application site as Green Belt, there is a need to demonstrate that not only is the application site the most suitable location for the proposed development, but that the form of development proposed also represents the only way in which the identified need for logistics floorspace of the scale and type proposed could be delivered (i.e. that there are no other options).
- 8.66 This hybrid application has two main elements; the detailed proposals for Unit 1 and the outline proposals, nominally identified as Units 2-4. The Unit 1 proposals, for 81,570 sq.m (878,012 sq.ft) B8 logistics warehouse, reflect a 'live' occupier led requirement for development of this scale and design. This requirement and the business case that supports it is discussed in more detail in the "Occupier Led Need" section below, however for the purposes of identifying the qualitative need for this element of the Proposed Development we can confirm that:
- the size and scale of the proposed Unit 1 development is a product of TJM's retail operation requirements and is similar to their other existing distribution centres;
 - the footprint of the building has been optimised through the incorporation of a "high-bay" racking system which reflects a growing shift within the logistics sector (retail / e-commerce in particular) for higher levels of automation to enable operators to respond consumer demand;
 - a reduction in the height or floorspace of the unit would not deliver the operational efficiencies that would satisfy TJM's business requirements;
 - application was chosen by TJM as the most appropriate location from which to tie into their existing distribution network, to serve their existing retail stores and enable delivery of their planned future growth; and
 - a series of small distribution centres spread across a variety of sites in different locations would not meet these existing and future business requirements.
- 8.67 As a consequence, it is considered that to meet the occupier led need for the Unit 1 proposals there is no opportunity to reduce the size or scale of the proposals or disaggregate the floorspace across a series of smaller buildings or sites.
- 8.68 It is therefore only considered relevant to consider whether there is an opportunity to disaggregate the outline element of the proposals (Units 2 to 4), which comprises 123,930 sq.m (1,333,9710 sq.ft) of logistics development. It is proposed that, in response to market demand and the unique characteristics of the application site, Units 2 to 4 will provide logistics development with a minimum floorspace size of 300,000 sq.ft. There therefore are two parts to the disaggregation assessment, namely:

1. Is there a need for single buildings of 300,000 sq.ft or could the need be satisfied by a number of smaller developments?
2. Could the proposed development be provided on separate sites and still meet the needs of the market?

8.69 The JLL Market Report demonstrates that there is demand for large-scale logistics buildings and the distribution of the proposed floorspace would not achieve the results required:

- There is over 5 million sq.ft of active requirements for Grade A or “build to suit” logistics development in the North West, of which a large percentage is for larger facilities in the order of between 300,000 sq.ft and 800,000 sq.ft;
- These larger facilities, which are primarily within the “build to suit” market require certainty on delivery and therefore target fully serviced sites, with excellent motorway access and access to a large labour supply within a 30-minute drive time that are capable of delivering large floorplate buildings;
- Sites of this type sit within a regional context and of those that have recently accommodated development on this scale few remain available or capable of accommodating development on the scale proposed;
- The disaggregation of the floorspace into numerous smaller buildings will not meet the needs of the market for large scale logistics facilities.

8.70 It is not suggested that only large-scale logistics buildings will meet the needs of the City Region. There are numerous examples of smaller facilities making a valuable contribution to the economy of the City Region. However, as the Market Report identifies there is a particular need for buildings of the proposed scale, which cannot be satisfactorily disaggregated if the efficiency of operations, the attractiveness to the distribution market and financial viability are not to be prejudiced. This conclusion reinforces the findings of the review of policy context, that identifies a clear need for large-scale logistics buildings, rather than smaller, less efficient alternatives.

8.71 Fundamentally, as the TJM business case explains, disaggregation would not be the preferred option for any major occupier looking to locate a large-scale logistics operation in the area, due to the increased costs associated with constructing and running multiple sites and the loss of efficiency in the operational processes required by that occupier. As well as losing many economies of scale benefits, splitting a larger facility into two or more smaller facilities would increase operational costs. For example, each facility would require its own transport / distribution manager, security, additional plant and machinery and would also incur greater overall costs in relation to rent and rates. In addition, the relative lack of space in smaller facilities is not consistent with the floorspace requirements associated with the growing reliance on higher levels of automation that, as the Unit 1 proposals illustrate, involve highly complex and expensive racking systems, which require either large floorplates or higher buildings to be accommodated.

- 8.72 Ultimately, in the context of the particular need for large-scale logistics buildings, and the risk of disaggregation prejudicing the attractiveness to the distribution market and financial viability of the proposals, providing 123,930 sq.m across several smaller buildings is not a reasonable or realistic alternative in market terms and would not meet the specific needs of major occupiers for whom the choice of attractive sites is already limited.
- 8.73 Notwithstanding this, to ensure a robust assessment it is also worth reviewing any existing premises or recent planning permissions for large-scale logistics development in St Helens and Warrington to see if these could accommodate a large-scale logistics building similar to the Proposed Development. The following sites have been identified:

St Helens

- Land at Haydock Cross – brownfield site with planning permission for 131,320 (12,200 sq.m) of B8 logistics floorspace;
- Unit 1, Haydock Green (Penny Lane) – Green Belt site with planning permission for 124,862 sq.ft (11,600 sq.m) of B8 logistics floorspace;
- Eurolink 110 – existing logistics building of 110,869 sq.ft (10,300 sq.m); and
- Former Palmer & Harvey site, Millfield Lane – brownfield site with existing logistics building of 144,991sq.ft (13,470 sq.m).

Warrington

- Omega South (Mountpark 1) Unit 4 – brownfield site with planning permission for 188,854 sq.ft (17,545 sq.m);
 - Omega South (Mountpark 2) Unit 1 - brownfield site with planning permission for 307,807 sq.ft (28,596 sq.m);
 - Omega South (Mountpark 2) Unit 2 - brownfield site with planning permission for 203,180 sq.ft (18,876 sq.m); and
 - Omega South (Mountpark 2) Unit 3 - brownfield site with planning permission for 225,312 sq.ft (20,932 sq.m).
- 8.74 From this list of existing premises and recent large-scale logistics permissions, it is clear that the vast majority of existing buildings or sites with permission are too small to accommodate the minimum unit size of 300,000 sq.ft (27,871 sq.m) proposed by this application. In fact, only one site is capable of accommodating this scale of floorspace, that being Omega South (Mountpark 2) Unit 1.
- 8.75 The illustrative masterplan submitted with this application shows the proposed outline floorspace being split across three development plots, which would range from 300,000 sq.ft upwards. The Mountpark 2 unit would not be capable of accommodating a building even modestly greater in size than 300,000 sq.ft and therefore does not offer the same flexibility as the proposed development site.

- 8.76 Similarly, the Mountpark 2 site is subject to reserved matters approval that is predicated on a layout and building design that ensures appropriate levels of residential amenity to the Omega land to the south and the existing residential areas to the east of the site. As such none of the approved units offer the cross-dock facilities that the majority of large-scale occupiers would seek and there is no realistic opportunity to amend the approved design to accommodate this requirement, which limits the flexibility and attractiveness of these sites to the market. It is also the case that construction works have started on site for these units, further emphasising the lack of flexibility that these offer in comparison to the Proposed Development.
- 8.77 It is also worth considering whether any of the proposed employment allocation sites identified in the emerging St Helens Local Plan are capable of accommodating some or all of the Proposed Development.
- 8.78 As mentioned previous the site at Parkside Colliery Phs 1 (Parkside West 8EA) has recently been the subject of an outline planning application, which was recommended for approval at committee in December 2019. Whilst planning permission is still subject to decision from the Secretary of State about whether the application should be called-in, it is relevant to consider it against the Proposed Development. The outline application was for up to 92,900 sq.m (999,976 sq.ft) of B8 employment floorspace and was supported by an indicative masterplan that showed the smallest unit to be approximately 18,000 sq.m (although a minimum unit size of 150,000 sq.ft (13,935 sqm) is conditioned). Whilst the Parkside application is in outline only and the masterplan is referred to as indicative, the application is supported by a series of parameter / constraint plans which illustrate that there is only one viable layout option for the site, which means that within the site there is only one development plot capable of accommodating a unit in excess of circa 20,000 sq.m, that being plot A/B, which is shown as having capacity for a building of circa 52,000 sq.m. However, there is no certainty that a unit of this size will be delivered on the site, as the application seeks the flexibility to deliver two smaller buildings subject to market demand, both of which would be smaller than the minimum size identified in this application. The potential availability of this site is not therefore considered to be directly comparable to the application proposals.
- 8.79 It is also the case that the Parkside application seeks permission for B8 uses only, presumably due to the proximity of sensitive receptors to the site, whereas the outline element of the Proposed Development seeks permission for a 70% / 305 split of B8 / B2 logistics floorspace. The Parkside proposals are therefore not directly comparable and do not offer the flexibility in land use terms that are sought by the Proposed Development.
- 8.80 Of the remaining sites, Phase 2 of Parkside West is yet to come forward, however the emerging Local Plan confirms that this phase should be served by a new link road from the east (linking to Junction 22 of the M6) and that the amount of development achievable will be determined through comprehensive transport assessment work. There is therefore no certainty over the timescales for delivery of the link road required to serve this phase and similarly no certainty over the scale of development that could be accommodated. In terms

of the certainty over deliverability and scale that the market requires, the site is not therefore considered to be comparable with the application site.

- 8.81 Similarly, whilst Parkside East (7EA) is allocated for employment land this is predicated on the delivery of the Strategic Rail Freight Interchange. Whilst the site is uniquely placed to satisfy a significant market demand for an SFRI at this location (Parkside Logistics and Rail Freight Interchange Study -AECOM and Cushman & Wakefield 2016) the infrastructure investment needed to bring this site to the market make it a medium to long-term prospect and at present there is no timeframes or certainty over when this could be delivered. As such, the site is not therefore considered to be comparable with the application site.
- 8.82 Site 6AE (Land west of Millfield Lane) is not currently the subject of any planning application proposals and therefore remains available as a strategic employment site. However, the irregular shape of the site and the need to accommodate effective flood management will have an impact on the scale of development that can be achieved on the site and will limit the layout options. Equally, the emerging Local Plan sets out an expectation that the design and layout of any forthcoming development must integrate well within any existing or approved development within adjacent allocated sites, further limiting the flexibility of the site and reducing its ability to cater for development of a similar scale to the Proposed Development. In light of these development constraints the site is not considered to be directly comparable to the application site on the basis that it will not be capable of accommodating single buildings in excess of 300,000 sq.ft and therefore will not be attractive to the same sector of the logistics market.
- 8.83 It is acknowledged that, as part of the justification for this application, it is the applicant's intention to forsake consented B1 employment floorspace on the existing Omega South site, to create capacity within the highway network for the proposed development. An outline planning application is currently pending determination with Warrington Borough Council for residential development on this land. Whilst this would result in the loss of employment land within the Borough, the residential outline application is supported by a Market Report that demonstrates the lack of demand for B1 office development in this location.
- 8.84 Theoretically, this B1 land could offer an opportunity for alternative employment uses such as B2 / B8 logistics, however the site is not considered to be a viable alternative because it remains consented for B1 floorspace at this stage and because the site is not considered a suitable site for further B2 / B8 development. The site, whilst brownfield, would fail to satisfy the Stage 1 criteria set out in the Alternative Site Assessment (OPP DOC. 7) submitted with this application, in so far as the site is located close to sensitive receptors in the form of existing and proposed residential development, which could not be adequately mitigated for without reducing the developable area of the site and compromising the design and layout of any potential development. Equally, access to the site could only be taken off Burtonwood Road, causing direct conflicts between HGV and private vehicle traffic. These constraints combined with the limited size of the site would render the site undesirable to market and incapable of meeting the market requirements discussed above.

Conclusions on Qualitative Need

- 8.85 it is considered that to meet the occupier led need for the Unit 1 proposals there is no opportunity to reduce the size or scale of the proposals or disaggregate the floorspace across a series of smaller buildings or sites. It is proposed that, in response to market demand and the unique characteristics of the application site, Units 2 to 4 will provide logistics development with a minimum floorspace size of 300,000 sq.ft.
- 8.86 The qualitative need case for the outline element of the Proposed Development can be summarised as follows:
1. There is a significant market requirement from major occupiers of logistics warehousing for larger facilities in the order of in the order of between 300,000 sq.ft and 800,000 sq.ft;
 2. There is a lack of deliverable and attractive sites within the City Region that could accommodate development of this scale;
 3. There are no sites available within the existing urban areas that are suitable for logistics development on the scale proposed by this development;
 4. The disaggregation of the floorspace into numerous smaller buildings will not meet the needs of the market for large scale logistics facilities and there are no more suitable sites that meet the disaggregated parameters for the proposed scale of development.
- 8.87 Together these factors combine to present a strong qualitative 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.

Occupier-led Need

- 8.88 A clear quantitative and qualitative need for the Proposed Development has been demonstrated in the preceding sections, which justifies the development of this entire Green Belt site for employment (B2 / B8) uses. However, the proposals are submitted in the form of a hybrid planning application which seeks both detailed and outline planning permission and it is considered that there is also an established occupier-led need for the detailed element of the Proposed Development.
- 8.89 The B8 warehouse subject to the detailed element of this application, referred to as Omega Zone 8 Unit 1, is proposed in response to a specific 'live' occupier-led requirement from locally based company TJ Morris / Home Bargains who have identified the need a new distribution centre to service their existing and future business requirements. This new distribution facility will comprise a bespoke, purpose-built unit that has been designed to meet the specific operational requirements of the occupier and to take advantage of the specific locational advantages provide by the application site.

- 8.90 In support of this application, TJM have provided a full business case in the form of an Operator Statement to explain the need for the proposed development in terms of its scale & design, location and layout. A copy of the Operator Statement is provided in **Appendix 4**.
- 8.91 The TJM business currently has two existing distribution centres in the UK, one in Liverpool (Axis) and one in Amesbury, Wiltshire (Solstice), which supply over 500 Homes Bargains retail stores across the UK. These sites currently operate at 100% and 50% capacity respectively, however as part of TJM's planned growth a third distribution centre is required to enable the company to grow to approximately 800 stores and double its annual turnover by 2024. The existing capacity at Amesbury and the proposed site at Omega Zone 8 will enable TJM to achieve these growth plans.
- 8.92 The Operator Statement confirms TJM's rationale for selecting the application site as its preferred location for a new distribution centre. In summary, TJM collate data that allows them to forecast planned growth in store numbers, analysing population density per existing and possible store location and likely availability of suitable stores. This analysis led to the conclusion that the best location for their third distribution centre was in the North, in a corridor running from Liverpool across to Hull. The proposals would represent their second logistics facility in the Merseyside Region, but the Operator Statement illustrates that when considered in the context of their existing store network (Operator Statement Figure 1) and their planned growth (Operator Statement Figure 3) the rationale for the selection of the location of Omega Zone 8 is obvious. It will remove pressure from their Axis site, and it will enable them to service their existing and proposed network more efficiently.
- 8.93 Freehold site opportunities were then assessed and evaluated across the target area, however few sites are capable of accommodating circa 1m square feet of floorspace including a "High Bay" warehouse in a location that is strategically well linked to the motorway network and without constraints that would hamper 24/7 logistics use. Omega Zone 8 is one of those few sites and the specific advantages of the site, from TJM's business perspective, are set out below.
- Proximity to a large source of skilled, engineering, technical labour.
 - Excellent motorway and road connections allowing an efficient link to the wider store network.
 - Relatively unconstrained and a significant distance from the closest noise sensitive receptors, meaning the proposed 24/7 operation would not be fettered.
 - Proximity to the Axis site which also contains the TJM head office; this assists with construction, ramp-up, management and operation of the site.
 - Relieves pressure on the Axis site which operating at 100% capacity with Omega Zone 8's proximity offering logistics efficiencies that would not otherwise be secured.
- 8.94 The proposed development is of a similar size and design to TJM's existing centres and is expected to handle similar volumes and will have similar stock holding capacity. The Axis site

was TJM's first distribution centre. It was opened in the early 2000s and now provides over 1m square feet across two linked buildings with a capacity to serve approximately 350 stores. The facility has been more recently expanded through the creation of an enlarged training centre and buyer's office in 2016/17. It is currently operating at 100% capacity and it includes a High-Bay warehouse.

- 8.95 In 2013, TJM completed the freehold purchase of 64 acres of land with planning permission at Solstice Park, Wiltshire for a southern regional distribution centre. The approved development was amended to suit TJM with planning permission secured for a distribution centre extending to 1,013,150 square feet. Work commenced on site in August 2013 and the facility was completed in the autumn of 2015 and has been operational since. TJM's second distribution has been a vital addition to the business, supporting store growth in the south of the country. And currently serving around 150 stores and operating at 50% capacity.
- 8.96 These existing centres are already highly automated; however, the Omega Zone 8 proposals represent a significant increase in automation in-line with emerging trends in the logistics sector. This greater automation means that total investment in the site will be significantly higher than at either of TJM's existing sites (£300m as opposed to £150m) and will involve the creation of a greater number of high-skilled and machine operator jobs. A full breakdown of the anticipated job creation figures is provided in the TJM Operator Statement.
- 8.97 The proposals are for a 81.570 sq.m cross-docked warehouse which can accommodate a "High Bay" racking system that means that part of the building must be in excess of 41m to ridge height at its highest point and on average 29m to ridge height across the rest of the unit. Similar "High-Bay" solutions have already been deployed at both of TJM's existing sites and are crucial to the operation of the centre and particularly their stock handling process.
- 8.98 "High Bay" storage is now widely used for bulk storage within the retail industry because it offers a highly efficient solution, both in terms of labour and space, as well as safety. Each point is explained below:
- Labour – all movements within the "High Bay" are carried out automatically by robotic cranes avoiding the need for Forklift Truck (FLT) drivers.
 - Space – being "High" and densely packed, the required volume of pallets can be stored in an area three or four times smaller than would be required for a system with manual FLT storage.
 - Safety – because no manually operated FLTs are used, the risk of dropping pallets and hitting racking is greatly reduced. Also, being operator free, if a pallet does fall accidentally, it will also only result in damage to equipment, not personnel.
- 8.99 Of these factors, space efficiency is the most important benefit of the "High Bay" system. If this solution was not used, practically the entire floorspace of the proposed distribution centre at Omega Zone 8 would be required to achieve the same levels of stock storage. Accordingly, to accommodate the other elements of the proposed development (inc. chilled and frozen

storage areas, tote pick and cage areas) would mean that the development would have to double in footprint, resulting a significantly greater land-take (contrary to NPPF?).

- 8.100 As a result, without a “High bay” of the size proposed, a new distribution centre would not be a viable option for TJM because it would not provide the efficiencies required to meet their operational requirements and would require a such a large site that it would be unfeasible. Full details of the “High Bay” system and its operation are provided in the submitted Operator Statement.
- 8.101 The overall height of the building is dictated by what happens inside it and the automation that is required to achieve the required commercial efficiencies that make the operation viable. Equally, the size and shape of the building is a direct product of the requirements of the automation layout and the number of stores that it is intended to serve.
- 8.102 The building essentially acts as an envelope to the automation layout and the yards as a means to service (this function is explained in detail below). The building is designed to critical minimum dimensions to allow the automation to function efficiently within the smallest possible footprint.
- 8.103 The orientation of the building reflects TJM’s operational requirements with the inbound yard closest to the entrance and the offices addressing the approach from the Omega West estate road. The location of the offices allows for the early segregation of HGV and staff / visitor vehicle movements and provision of a safe and secure dedicated parking area, which could not be achieved if this element of the development was located elsewhere within the building.
- 8.104 There is no other practical alternative in terms of either the location or orientation of the building, without either comprising the operational needs of the business – both in terms of the proposed operation and future operational requirements as a result of ongoing, rapid business growth – or sterilising large parts of the wider site. There are also constraints which have required the siting of the building further west as opposed to be located on the site’s frontage directly addressing the estate road. The primary constraints in this case include:
- overhead pylons, requiring diversion; and
 - a major watercourse, requiring diversion.
- 8.105 These are shown on the constraints drawing prepared by Fairhurst which appears as Appendix 1 of the TJM Operator Statement. Positioning the building away from these constraints reduces the programme risk as it means that the warehouse and most notably the High Bay area and racking, which has a significant lead in period, can be constructed ahead of the diversions being in place. Each constraint poses a risk to the programme, which as mentioned, has been one of the key criteria driving the site search that will enable TJM to deliver a fully operational distribution centre by Autumn 2023.

- 8.106 The sting of the building also fundamentally allows for the provision of land required for future expansion of the proposed distribution centre operation. As part of the business strategy, it is very important that an investment of this scale is supported by sufficient surplus land that will enable future business requirements to be met. For example, both the Amesbury and Axis sites are supported by Vehicle Maintenance Units (VMU) and training centres. Those are both anticipated future requirements at Omega Zone 8 and land needs to be available for those to be delivered. The land also provides potential for additional warehousing (you will note that the Axis site has two warehouse buildings connected by a bridge link) and lorry parking, both which would arise from ongoing business expansion.
- 8.107 As mentioned above, the existing Axis site has successfully expanded over the years and now, due to rapid growth, occupies significantly more land than it did originally. That growth has been possible due to the presence of readily available and viable expansion land immediately adjacent to the original site. TJM has learnt from this and are therefore determined to ensure that the capacity to accommodate future growth at Omega Zone 8 is established as early as possible, in order to provide as much business certainty as possible. That means securing additional land to support the future expansion of the proposed distribution centre and associated uses and without this the viability of the overall project would be jeopardised.
- 8.108 The need for the expansion land identified as part of this application reflects the combination of constraints, the size and orientation of the distribution centre (which as explained is a consequence of the automation within it), and TJM's need for further land to enable other associated development to be constructed in due course.
- 8.109 The Alternative Site Assessment that accompanies this application demonstrates that there are no alternative existing premises, brownfield or greenfield sites that would be capable of accommodating these specific requirements.
- 8.110 Consequently, in addition to the Quantitative and Qualitative Need identified above, there is a clear and defined occupier-led need for the detailed element of the proposed development in this location, which will deliver significant benefits for the Borough in terms of economic regeneration & investment and employment opportunities. We attach SIGNIFICANT weight to it.

Alternative Sites Case

- 8.111 An Alternative Sites Assessment Study accompanies the planning application. The Study seeks to establish whether there are any alternative sites to Omega Zone 8 that could meet the need for large-scale logistics buildings (in excess of 27,870 sq.m / 300,000 sq.ft) to serve St Helens and / or Warrington.
- 8.112 The Study establishes that there are no non-Green Belt sites that could potentially meet the operational and policy need for the Proposed Development. It also evaluates the availability of other Green Belt sites, to establish whether the locations could accommodate the facility with less of an impact upon the Green Belt and the wider environment.

- 8.113 This predominantly desk-based exercise having regard to the technical aspects of logistics developments. Sites were assessed against seven key criteria (loosely informed by the EEBP):
1. Site Size: minimum area of 5 ha (to allow for a minimum unit size of 27,870 sq.m / 300,000 sq.ft).
 2. Topography: relatively level and should be above flood plain;
 3. Strategic road access: direct access to the trunk road network, distance to a motorway junction and no direct residential frontages between the site and nearest main road network;
 4. Public Transport accessibility: to provide sustainable travel choices.
 5. Proximity to labour: an accessible workforce, including a ready supply of local labour.
 6. Relationship to other land uses: comparability with surrounding land uses.
 7. Environmental constraints: limitations on the development of the land due to heritage, ecological of other environmental factors.
- 8.114 A comprehensive review of the supply of potential sites has been undertaken, with information obtained from all relevant and accessible sources within both St Helens and Warrington.
- 8.115 For St Helens this evidence based comprised the Economic Evidence Base Paper 2015 (EEBP), prepared on behalf of the Council as part of the Allocations Local Plan, whilst for Warrington the most up-to-date evidence base is the Economic Developments Need Assessment 2019 (EDNA)
- 8.116 A total of 36 sites, including the application site, were identified as meeting the minimum size requirement. Of these, six sites were brownfield and the remaining 30 were Green Belt sites.
- 8.117 These sites were assessed against the minimum site requirements criteria set out in Stage 2 of the methodology. These criteria, taken from the EEBP, relate to access to the strategic road network, availability of public transport and proximity to sensitive uses. Nineteen of the identified sites did not meet with the defined minimum criteria and were discounted from further assessment.
- 8.118 The remaining 17 sites were assessed against the site suitability requirements set out in Stage 3 of the methodology. Four sites were excluded from further analysis because they did not represent realistically suitable alternative sites for large scale logistics distribution development, due to their irregular shape or potential development constraints associated with flood risk.
- 8.119 Eleven of the remaining 13 sites were then assessed against their impact on Green Belt purposes as set out in Stage 4 of the methodology (the other two being excluded from this stage given their brownfield status). All sites robustly served at least one Green Belt purpose however, the assessment fails to identify any site that could be released from the Green Belt without causing some harm to the Green Belt purposes.

- 8.120 However, four sites were found to fail three of the Green Belt Purposes meaning that those sites would potentially have greater harm to the Green Belt purposes and were therefore discounted from any further assessment. Furthermore, on the basis that there are no historic towns or villages within the Borough, Purpose 4 was also discounted at this stage, as every site had equal impact (none) on this purpose.
- 8.121 Of the remaining sites, Florida Farm (St Helens Site 2) was discounted because the development is now fully occupied. The remaining Warrington sites were also discounted on the basis that they all form part of the existing or emerging Employment Land Supply for the Borough and therefore redirection of the proposed development to these sites would not negate the need for Green Belt release to satisfy the identified demand. In addition, the two brownfield sites located at Omega South (Warrington Sites 1 & 2) were discounted on the basis that three of the four available units are too small to satisfy the minimum floorspace requirement established by this application. Only Unit 1 on Warrington Site 2 is capable of accommodating this scale of floorspace, however would not be capable of accommodating a building even modestly greater in size than 300,000 sq.ft and therefore does not offer the same flexibility as the proposed development site.
- 8.122 The Warrington 2 site is also subject to reserved matters approval that is predicated on a layout and building design that ensures appropriate levels of residential amenity to the Omega land to the south and the existing residential areas to the east of the site. As such none of the approved units offer the cross-dock facilities that the majority of large-scale occupiers would seek and there is no realistic opportunity to amend the approved design to accommodate this requirement, which limits the flexibility and attractiveness of these sites to the market. It is also the case that construction works have started on site for these units, further emphasising the lack of flexibility that these offer in comparison to the Proposed Development.
- 8.123 As a consequence, it has been established that the application site, Omega Zone 8, is the only site realistically capable of delivering the 'live' occupier-led requirement for Unit 1 and separately the outline B2/B8 floorspace proposals on the basis of a minimum floorspace requirement of 27,870 sq.m / 300,000 sq.ft, in the short-term. We therefore consider that the lack of other alternative, available sites to meet the need for employment is a significant material planning consideration in favour of the proposals. We attach SIGNIFICANT weight to it.

Economic Benefits

- 8.124 The VSC case to justify development at Omega Zone 8 also relies on the economic benefits of the proposed development, in terms of the direct local regional and national benefits. As referred to above, to accompany this application an assessment of the economic impact has been prepared within the ES (OPP Doc. 11.15 Chapter 15: Population & Health), to quantify the economic implications arising from the development proposals.

- 8.125 The proposed logistics development will have a significant positive economic benefit for St Helens and will assist in improving the profile of the area, particularly through the provision of sustainable transport links between the site and the southern areas of the St Helens urban area.
- 8.126 Furthermore, the proposals represent a significant investment in the local area and will contribute towards existing economic initiatives. The proposed development is expected to generate a wide range of direct and indirect economic impacts, both during the construction and in the longer term. These impacts will be spread over a wide area and should benefit the Borough as a whole. Table 7.1 below provides a summary of the likely economic impacts that the development will have:

Table 8.2 – Summary of Economic Impacts

Direct Impacts	Indirect Impacts	Wider Economy and Catalytic Effects
Capital Expenditure	"Spin-off" from construction supplier and wages expenditure	Meeting the need for new residential accommodation
Construction Jobs	Additional Council Tax receipts	Supporting mixed communities by providing affordable housing
Gross Value Added to local economy from construction jobs	New community services and infrastructure	Support existing and new communities through the provision of new services and infrastructure
Jobs creation within mixed-use zone	S106 Planning Contributions	Provision of jobs in those sectors that would benefit most from additional opportunities
Additional retail expenditure to town and district centres	Greater access to affordable housing in Warrington	Promotion of Warrington as a more sustainable and attractive place to live

- 8.127 This range of economic effects aligns well with national, regional and local policy objectives, in particular the creation of enhanced economic prosperity through creating employment opportunities for local people and providing suitable accommodation for business growth and contributing towards a more attractive and accessible public realm.
- 8.128 The Population & Health chapter of the ES (OPP Doc. 11.15) provides a detailed assessment of the likely positive impacts of the development in this regard. The conclusions can be summarised as follows:

- it is estimated that on average there will likely be approximately 845 gross construction workers on-site per year, totalling approximately 1,267 net construction phase jobs;
- by applying an average benchmark of £80,444 GVA per construction employee, it is anticipated that the estimated 1,267 net construction jobs generated by the proposed development represent a net additional £76,421,800 GVA to the St. Helens economy, and a net additional £25,500,748 GVA to the North West economy.
- there will be an estimated 980 average annual Full Time Equivalent (FTE) employment opportunities and 1,103 total net employment FTE jobs associated with the detailed application site, of which approximately 827 FTE jobs will likely be taken up by residents within St. Helens, and 276 FTE jobs will be taken by residents within the North West.
- by applying an average benchmark of £45,846 GVA per warehouse employee, it is anticipated that the likely generation of approximately 1,103 net warehouse FTE jobs by the proposed development would represent an additional £37,914,642 GVA to the economy within St. Helens and £12,653,496 GVA to the economy within the North West.
- there will be an estimated 2,679 gross employment opportunities and an estimated 3,014 total net employment jobs associated with the outline application site, of which approximately 2,260 will likely be taken up by residents within St. Helens, and 753 will be taken by residents within the North West.
- by applying an average benchmark of £45,846 GVA per industrial employee, the likely generation of approximately 3,014 net warehouse and industrial jobs by the Proposed Development would represent an additional net £103,611,960 GVA to the economy within St. Helens and net £34,522,038 GVA to the economy within the North West
- overall it is anticipated that an estimated £141,526,602 GVA to the economy within St. Helens and £47,175,534 GVA to the economy within the North West would be contributed by the proposed development during operation.

8.129 This emphasises the importance and benefits of the Proposed Development of generating jobs opportunities within St. Helens and the wider area (assumption of one FTE equates to one employment job generated has been applied). More generally the wider economic benefits are also considered to include:

- Maintaining and enhancing the profile and image of Omega as a major focus for the distribution sector, and send a strong signal of investment confidence in the both St Helens and Warrington Boroughs;
- It would build on the competitive advantages of the area for the distribution sector, including investment in the SuperPort, helping build a critical mass of such activities and encouraging further distribution investment so that the City Region remains competitive against other areas with similar facilities

- It would contribute towards a diversified local economy in an area where the traditional sectors of mining and manufacturing have declined or stagnated and where revitalised economic growth is a key driver for the area; and
- It would help to grow an efficient, sustainable logistics sector in the Liverpool City Region that is necessary to maintain and support the growth of other sectors such as manufacturing and higher technology activities and building upon on the investment in the SuperPort.

8.130 Significantly, as is reflected by the hybrid nature of this application that there is an urgent demand for a bespoke, purpose built B8 warehouse to serve a defined occupier demand for TJ Morris/Home Bargains, which cannot be accommodated elsewhere within the Borough. There is also a need for employment development now to stimulate economic activity in an efficient and sustainable manner and in response to the market demand and the Council's identified need for between 55-70ha B2 industrial and 110-155ha for B8 logistics land.

8.131 The location of the development within the M62 corridor, will provide an appropriate form of development in a sustainable location that will provide much needed investment and job creation will not only provide jobs of an appropriate type to meet the needs of a large number of unemployed people in this part of St Helens MBC. As such, the proposals will assist the strategic objectives of the City Region, LEP and Council to an extent that other Green Belt alternatives will not.

8.132 The economic benefits of the proposal development are considered to be a significant material planning consideration in favour of the proposals, for which SIGNIFICANT weight should be attached.

Social / Community Benefits

8.133 The social and community benefits associated with the proposals also contribute towards the VSC case.

8.134 St Helens has a number of areas that are ranked poorly in the national indices of multiple deprivation, with some of the most deprived within 1km of the site.

8.135 The application is supported by a proposed Local Employment Scheme for construction activities associated with the detailed element of the Proposed Development, focused on the most deprived Super Output Areas in the Borough and shall include the following:

- Details of how the initial staff/employment opportunities at the Development will be advertised and how liaison with the Council and other bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;

- Details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;
- A procedure setting out criteria for employment, and for matching of candidates to the vacancies;
- Measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;
- Details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;
- A procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Council including details of the origins qualifications numbers and other details of candidates; and,
- A timetable for the implementation of the Local Employment Scheme.

8.136 Given the proximity to neighbouring boroughs, it is considered that there will also be tangible benefits to those populations.

8.137 In addition to jobs and training the Proposed Development will also deliver improved public access to areas of greenspace and onward connections to both St Helens and Warrington. This direct public access will allow the public and future employees opportunities for recreation with resultant health impacts benefits. These improvements take the form of the following physical works:

- The introduction of new and enhanced pedestrian and cycle routes through the site that will provide links with the southern areas of the St Helens urban area, via an upgraded link bridge across the M62 and multiple connection points into the existing Omega site and wider Warrington network;
- The provision of a nature conservation and woodland area ('the Green Wedge'), extending to c. 4 ha in the north-west corner of the site which will be open to the public.

8.138 It is considered that the social and community benefits of the proposal are a significant material planning consideration in favour of the proposals and that SIGNIFICANT weight should be attached to them.

Environmental Benefits

8.139 It is acknowledged that the proposed development will have an environmental impact, and a full assessment of the environmental impact of the development is provided within the ES (OPP Doc. 11.9 Chapter 9: Biodiversity) submitted to accompany the application.

- 8.140 However, whilst the erection of a logistics buildings on the site will not be without environmental concerns, through proposed mitigation measures, the environmental impacts are reduced, and in certain circumstances, result in net benefits to environmental conditions.
- 8.141 In particular, through implementation of an ecological mitigation scheme, involving landscaping enhancements integrated with the ecological habitat design, good practice construction methodologies, and the implementation of a sustainable urban drainage system, the proposed development will have a long-term positive impact on local ecological conditions. Through the provision and approval of Landscape Management & Maintenance Strategies and Landscape & Environmental Management Plans the applicant will commit to a long-term management of these areas to the benefit of both site users and the local area.
- 8.142 The environmental benefits of the proposal are considered to be a significant material planning consideration in favour of the proposals and consequently SIGNIFICANT weight should be afforded to them.

Planning Balance

- 8.143 Paragraph 144 of the NPPF (18) requires that “substantial weight is given to any harm to the Green Belt”. It confirms that “very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any “other harm” resulting from the proposal, is clearly outweighed by other considerations”.
- 8.144 The assessment of VSC therefore requires an assessment of the harm to Green Belt; any other harm; any other planning considerations and an overall conclusion on whether the above results in very special circumstances in favour of the development proposals.
- 8.145 In respect of potential Green Belt harm, the above assessment shows that in line with paragraph 143 of the Framework, the application proposals are “by definition, harmful to the Green Belt” and as set out in paragraph 144 of The Framework “substantial weight is given to any harm to the Green Belt”.
- 8.146 In terms of harm to the “permanence” of the Green Belt, there is no doubt that the proposed development would remove the ability of the application site to remain permanently open as Green Belt. However, there is an identified need for significant Green Belt release within the Borough and therefore it is considered that the current Green Belt boundaries within the Borough cannot now be treated as permanent. The extent of this harm is therefore considered to be MODERATE.
- 8.147 There is harm to the “openness” of the Green Belt from the proposals but given both the existing context provided by the Omega development, as well as the proposed mitigation, the extent of this harm is MODERATE.

8.148 In terms of the “purposes” of including land within the Green Belt, as set out in Chapter 7, the application proposals are considered to have no more than moderate harm to the Green Belt Purposes and indeed the application proposals are considered beneficial for Purpose 5.

8.149 It is necessary therefore to consider whether there is any “other harm” from the development, which is taken to be non-Green Belt harm. We therefore now consider whether there is any potential environmental or technical (non-Green Belt) harm that could arise from the Proposed Development.

Ground / Contaminated Land

8.150 A Ground Investigation Report (GIR) & Remediation Strategy has been prepared and submitted as part of the application (OPP DOC. 2). The overall objective of this assessment was to identify potential geotechnical and environmental constraints and opportunities associated with the planned development of the site for the proposed commercial end use. Overall the environmental conclusions were as follows:

- the potential health risk associated with chemical contamination is low and acceptable based on a proposed commercial development at the site.
- no asbestos or asbestos containing material was identified.
- areas of localised Made Ground may be present onsite, therefore precautions to minimise dust generation during the ground disturbance works are recommended
- elevated exceedances of metals, sulphate, TPH and PAHs were recorded from groundwater in samples when compared with WQS protective of groundwater and surface waters, however samples collected from the Till are considered to represent perched bodies of water present within granular pockets are considered unlikely to be in connectivity with the underlying sandstone (Principal Aquifer) or surface water features.
- based on the surface water and groundwater assessments, there is a low risk posed to controlled waters.
- the preliminary ground gas risk assessment classifies the site as Characteristic Situation 1, based on the assessment of ground gas monitoring data and the preliminary conclusion is that no ground gas protective measures are required.

8.151 In response to the investigation findings a Remediation Strategy has been prepared and included with the GIR submission for approval. It recommends that a watching brief should be maintained during earthworks to identify and deal with any localised contamination, if encountered and that the management of the reuse of site won materials should be undertaken under a Materials Management Plan (MMP) in accordance with the Definition of Waste: Development Industry Code of Practice’ (DoW CoP). A Validation Report will also be completed at the end of works to demonstrate appropriate remediation works have been completed for the proposed commercial development.

- 8.152 Accordingly, the presence of contaminated land and associated risk from development of the site is considered to be low, however where localised contamination is encountered, the application proposals will facilitate the remediation of the issues, addressing any existing localised harm and result in beneficial elements relating to ground conditions. LIMITED BENEFICIAL weight should therefore be ascribed to this matter in the planning balance.

Traffic & Transport

- 8.153 Consideration of highways relates to potential impacts arising from movements of vehicles and people within the site and on the external highway network. The application proposals will generate HGV, LGV, public transport and private car movements as well as pedestrian and cycle movements.
- 8.154 The Proposed Development will be accessed from the east via Catalina Way, from the M62 Junction 8, north east of the development, and from the Omega Boulevard / Orion Boulevard roundabout to the south. All HGV traffic to/from Omega Zone 8 will be via Skyline Drive, which connects to the M62 Junction 8. No HGV traffic will be routed via Lingley Green Avenue to the south. The formation of multiple vehicle accesses for normal traffic into the wider Omega development is intended to result in a legible development which will enable traffic to disperse onto the external road network.
- 8.155 The Transport Assessment (TA) that accompanies this application indicates that the application site is accessible by sustainable modes of transport. The proposed development will facilitate connection to a comprehensive network of pedestrian and cycle facilities which are provided throughout the wider Omega development and beyond. This should encourage local trips to be made on foot or by cycle. A number of pedestrian / cycle accesses will be formed to ensure that the internal transport network is comprehensively connected to the external network as well as being connected to other sustainable transport links.
- 8.156 It is proposed to divert the existing services into Omega Zone 8, as well as provide a bus stop within the site, resulting in less than a 5-minute walking distance to access public transport. It is considered that the range of proposed accesses will ensure that the development is legible by all modes of transport and that it will provide good opportunity for employees to access the site by sustainable modes of travel.
- 8.157 The TA includes a Workplace Travel Plan Framework, which considers how the public transport and non-vehicle measures may be implemented in respect of the site to reduce reliance on the private car. It is expected that this will form the basis of any future Travel Plan's prepared by individual occupiers on the site.
- 8.158 The scope of the TA was discussed with St Helens Council, Warrington Borough Council and Highways England, through a scoping exercise and subsequent scoping note submissions. It was agreed that the following junctions should be considered as part of the TA:

- Burtonwood Road / Lockheed Road roundabout

- M62 Junction 8 signalised gyratory
- Burtonwood Road / Charon Way signalised junction
- Burtonwood Road / Kingswood Road signalised junction
- Burtonwood Road / Westbrook Way roundabout
- Skyline Drive / Fairchild Road priority junction; and
- Omega Boulevard / Catalina Way roundabout.

- 8.159 In addition, an assessment of the M62 Junction 8 merge and diverge slip roads has been undertaken with reference to the Design Manual for Roads and Bridges (DMRB).
- 8.160 The impact of the development has been identified at each of the junctions on the local study network. The TA findings show that the majority of the junctions assessed are operating within capacity following the addition of traffic generated by the Omega Zone 8 development, as well as other committed development and development associated with the wider Omega development.
- 8.161 Mitigation measures have been developed for implementation at the M62 Junction 8 (Westbound Off-Slip and Circulatory Carriageway) to diminish the identified impact of the proposed development. The proposed mitigation measures at this junction can be delivered within the existing highway boundary, within land under the control of the Highway Authority and only requires changes to road markings and lane allocation.
- 8.162 It is concluded that *“in transport terms, that the proposed development site is considered suitable for the development proposals”*, and therefore it is considered that there are no transport reasons why the proposals should not be granted.
- 8.163 We consider that highway impact is an important consideration in this application owing to the nature of the proposals for Use Classes B2/B8. Due to the fact that the TA identifies that only minor mitigation measures are required and that the conclusion is that the proposals can be accommodated on the highway network and it is considered that there is LIMITED HARM to the highway network.

Landscape Character and Visual Amenity

- 8.164 We have considered the impact of the proposals against Green Belt purposes and on its permanence and openness above.
- 8.165 Chapter 10 of the ES (OPP DOC. 11.10) comprises an LVIA. The LVIA considers 12 viewpoints as agreed with the Local Authority Officers. Views of the site and associated potential effects will vary depending on the viewpoint and the receptor (some are permanent whilst others are fleeting).
- 8.166 The ES concludes that during construction, *“significant adverse”* effects would arise due to the permeant, direct and indirect effects upon the landscape character, landscape features (including woodland, hedgerows, ponds and agricultural land) and permeant loss of key

features of the existing agricultural landscape. Mitigation measures would re-create some elements of landscape character and would replace some key landscape features but would take time to mature and would not contribute to landscape character over the period of construction and would permanently alter the structure and pattern of the existing landscape.

- 8.167 A “*significant adverse*” effect would also arise due to the permeant effects upon the view for residential receptors, public rights of way, public open space and recreational area, commercial property and highway receptors during construction of the Proposed Development.
- 8.168 Operation of the Proposed Development would result in the permeant loss of landscape and characteristic features, including mature woodland, hedgerow, open fields and historic field pattern and ditches. In addition, the introduction of uncharacteristic build form, including scale, would be permanent. Mitigation measures provide limited opportunities for the replacement of these landscape features which would make a limited contribution to the landscape character, resulting in a “*significant adverse*” effect.
- 8.169 A “*significant adverse*” effect would also arise due to the permeant effects upon the view for residential receptors, public rights of way, public open space and recreational area, commercial property and highway receptors during operation of the Proposed Development.
- 8.170 In this regard, we ascribe SIGNIFICANT HARM to this element of the application in the planning balance.

Biodiversity

- 8.171 A full assessment of likely significant effects arising from the Proposed Development upon biodiversity has been undertaken and is submitted as part of the ES (OPP DOC. 11.9 ES Vol. 1 Chapter 9). This has included a range of species-specific survey work in addition to an ecological appraisal. The proposals will have impacts including habitat loss, habitat fragmentation, pollution and disturbance of important species.
- 8.172 Construction of the Proposed Development would result in the permanent loss of woodland and tree cover and damage to trees covered by Tree Preservation Orders, however mitigation measures include mitigation planting and tree protection, to be included within the Construction Environmental Management Plan. The newly planted woodland would not immediately be of the same value / quality in the short-term, it would however progress to be of at least equivalent, or enhanced, quality in the long-term providing a 2:1 coverage of wooded area. In addition, construction of the Proposed Development would result in a permanent loss of poor-quality pond habitat and loss / damage to fish populations within ponds. Mitigation measures include additional pond and attenuation feature creation, a net gain to the existing pond habitat.
- 8.173 The ES concludes that there would be “*no significant adverse*” effects on the hedgerow, Booth’s Wood, Whittle Brook or Purple Ramping-Fumitory, brown hare or breeding birds.

Mitigation measures would be outlined within the Construction Environmental Management Plan and replacement hedgerow mitigation planting is proposed. The loss of bat roosts and habitat and noise and vibration on bats is expected during construction of the Proposed Development, however mitigation is proposed in the form of bat boxes and improved / newly created habitat, resulting in a '*significant beneficial*' effects.

- 8.174 The Proposed Development would result in "*no significant adverse*" effects on biodiversity during the operation phase as there would be a negligible effect on the woodland and trees, ponds, Whittle Brook and Booth's Wood. Mitigation measures proposed include a landscape strategy, lighting strategy, sustainable drainage systems integrated into the design of the Proposed Development.
- 8.175 It is accepted that overall the Proposed Development will have a negative impact on biodiversity, however substantial mitigation is also proposed, and the harm is therefore considered moderate and the weight is also MODERATE in the planning balance.

Cultural Heritage

- 8.176 The site has been assessed in detail in respect of Heritage matters. The ES submitted with the application includes a chapter on Cultural Heritage (ES Chapter 8) and is supported by a Historic Environment Desk-based Assessment (HEBDA).
- 8.177 The HEBDA confirms that there are no designated assets present within the application site, with the nearest being the site of Old Bold Hall moated site (Scheduled Monument 1010703), located c.300m west of the Proposed Development. There are also five non-designated heritage assets in the area, of which four lie within the development boundary and comprise the site of the medieval and Post-Medieval park at Old Bold Hall and Bold Hall (MME8654), Booth's Wood (possible ancient woodland; WSP001), the site of "Big Dam" (WSP002), shown on the 1850 and successive Ordnance Survey maps and an area of former ridge and furrow identified from the National Mapping Programme (NHL1605040).
- 8.178 The HEBDA has identified the possibility of both temporary and permanent adverse impacts during both construction and operational phases, however it is recognised that any temporary impacts can be mitigated through the implementation of a CEMP.
- 8.179 In terms of the physical impacts to below and above ground non-designated assets it was recommended, in consultation with Merseyside Environmental Advisory Service (MEAS), that further investigation, in the form of enhanced field survey should be undertaken to identify any surviving boundary features of the Medieval park and Booth's Wood, and to investigate whether any archaeological features survive within the part of Booth's Wood affected by the Proposed Development.
- 8.180 To avoid the need for a pre-commencement condition, this additional survey work has already been undertaken and in conclusion, there was no clear evidence of human activity within the application site prior to post- medieval enclosure and the development of Bold Park. As a

result, MEAS have confirmed that the survey work has sufficiently established the archaeological potential of the site (low) and as such further mitigation is not warranted.

- 8.181 As the overall conclusion is that the archaeological potential of the site is low, the harm is therefore limited, and the weight is also LIMITED in the planning balance.

Noise and Vibration

- 8.182 Chapter 7 of the ES (OPP. DOC 11.7) assesses the potential impact of the development from Noise and Vibrations. The application site is remote from residential properties and therefore there were no sensitive receptors identified within the typical 300m assessment zone, the zone was therefore extended to cover the nearest receptors approx. 350m away.
- 8.183 The ES concludes that “*no significant adverse*” effects on noise and vibration are anticipated during the construction phase of the Proposed Development, as the temporary increase in noise and ground-borne vibration levels associated with the construction programme is considered minor or negligible. Mitigation measures have been identified to reduce the effect of noise and vibration from construction activities. And are included in the Construction Environmental Management Plan.
- 8.184 The ES also confirms “*no significant adverse*” effects on noise and vibration are anticipated during the operation phase of the Proposed Development, as the permanent industrial / commercial noise once operational is considered minor.
- 8.185 It is considered that through implementation of appropriate measures, there will be limited harm and LIMITED weight may be given to this matter.

Air Quality

- 8.186 An assessment of the impacts on Air Quality has been undertaken in respect of the proposals and is provided in ES Chapter 6 (OPP DOC. 11.6) which confirms that the site is not located in or adjacent to any AQMAs in St Helens but borders the motorway AQMA for Warrington.
- 8.187 The ES determines that “*no significant adverse*” effects on air quality are anticipated during the construction phase of the Proposed Development. The effect of temporary earthworks, construction and track-out activities on dust and particulate matter concentrations on sensitive receptors within 350 metres of the application site, within 50 metres of the construction route and up to 500 metres from the application site boundary is considered negligible.
- 8.188 Mitigation measures have been identified to reduce the effect of dust and particulate matter from construction activities, including wheel wash facilities to prevent dust and dirt that can be spread by construction vehicles onto public highways. These measures would be implemented through the Construction Environmental Management Plan.

- 8.189 Equally “*no significant adverse*” effects on air quality are anticipated during the operational phase of the Proposed Development. The permanent development-led traffic effect on nitrogen dioxide and particulate matter concentrations from the Proposed Development on nearby residential dwellings and other highly sensitive receptors is considered “*negligible*”.
- 8.190 It is considered that through implementation of appropriate measures, there will be limited harm and LIMITED weight may be given to this matter.

Water

- 8.191 ES Chapter 11 (OPP DOC. 11.11) reports the outcome of the assessment of likely significant effects arising from the Proposed Development upon the hydrology, flood risk, water resources and Water Framework Directive (WFD) from the construction and operation of the Proposed Development.
- 8.192 During the construction of the Proposed Development, there would be “*no significant adverse*” effects on flood risk, groundwater sources or Whittle Brook. The ES identifies the potential for changes to the existing water environment of the Whittle Brook (Mersey Estuary) due to the proposed diversion of Whittle Brook, which could affect the aquatic ecology and sediment regime. However, diversion of the watercourse will be done under EA licence and any adverse impacts will be short-term, until the new habitats have established.
- 8.193 There is also the potential for runoff and infiltration contributing to an increase in flood risk until the sustainable drainage systems have been constructed, but this is considered to be short-term and limited.
- 8.194 The implementation of the Construction Environmental Management Plan, including identified mitigation measures, will serve to avoid the risk of pollution to watercourses during construction of the Proposed Development.
- 8.195 During the operation of the Proposed Development, the effect on flooding and the diversion of Whittle Brook has been assessed to have “*no significant adverse*” effects. The implementation of mitigation measures including sustainable drainage systems would control the potential impact from runoff entering the water environment and the channel design of Whittle Brook would reduce the operational affects to the aquatic ecology and the sediment regime.
- 8.196 It is considered that through implementation of appropriate measures, there will be limited harm and LIMITED weight may be given to this matter.

Land and Soils

- 8.197 As a result of the Proposed Development, there would be a permanent loss of 67.5 hectares of land, of which 17.2 hectares is best and most versatile agricultural land in Subgrade 3a (good quality land). Chapter 14 of the ES (OPP DOC. 11.14) establishes that due to the nature

of the Proposed Development, no additional mitigation is available, but there would be “*no significant adverse*” effects.

8.198 The ES concludes that the Proposed Development has the potential to damage to soil structure and top as result of construction activates, however the is mitigated by the inclusion of material / soil resource management proposals contained within the Construction Environmental Management Plan.

8.199 It is considered that through implementation of appropriate measures, there will be limited harm and LIMITED weight may be given to this matter.

Climate, Population and Health

8.200 Matters of Climate, Population and Heath are considered in ES Chapters 16 and 15 respectively. Each chapter identifies that there will be certain effects, but that these are not significant and therefore in terms of harm would be considered as NEUTRAL or even have POSITIVE benefits. These matters are considered to be of LIMITED weight in the planning balance.

Conclusion on ‘Very Special Circumstances’

8.201 Having established the extent of harm to the Green Belt and ‘other harm’ in relation to the planning balance, it is important to consider whether there are “any other considerations” that could outweigh this harm.

- The policy support for employment development is a significant material planning consideration in favour of the proposals. SIGNIFICANT weight is attached to it.
- The need for employment sites is a significant material planning consideration in favour of the proposals. SIGNIFICANT weight is attached to it.
- There is a significant need for the proposed development as confirmed by the JLL Market Report appended to this Planning Statement that will serve St Helens, Warrington and the City Region. SIGNIFICANT weight is attached to it.
- The site is a suitable and deliverable development site that will form an important part of the St Helens and Warrington employment land requirements. It is considered that the suitability and deliverability of the site is a significant material planning consideration in favour of the proposals and SIGNIFICANT weight is attached to it.
- There are no alternative sites on brownfield land or on land in Green Belt that performs better the application site in regeneration or deliverability terms. It is considered that the lack of other alternative, available sites to meet the need for employment is a significant material planning consideration in favour of the proposals. SIGNIFICANT weight is attached to it.
- The proposals will provide a range of significant Economic, Social and Environmental benefits for the local areas of St Helens, Warrington and the wider City Region. The economic and social benefits of the proposal are considered to be a significant

material planning consideration in favour of the proposals and SIGNIFICANT weight is attached to them.

- We consider that the environmental benefits of the proposal are a material planning consideration in favour of the Proposed Development and MODERATE weight is attached to these benefits.

8.202 We acknowledge and accept that there is substantial “definitional” harm to the Green Belt but the harm to the “permanence” and the “openness” of the Green Belt is moderate and there is no more than moderate harm to the “purposes” of the Green Belt.

8.203 The assessment of “other harm” has identified some environmental issues that need to be addressed and mitigated for as part of the development, some of which are minor adverse effects which need to be balanced against the significant benefits that the scheme will deliver.

8.204 There is moderate to significant harm to landscape, visual amenity and biodiversity, however it is considered that this harm can be mitigated through the detailed landscape proposals and associated management plans submitted as part of this application and also through future reserved matters for the rest of the site. Where adequate mitigation cannot be provided on site it is considered that appropriate off-site mitigation or contributions can be secured through a Section 106 Agreement.

8.205 In light of the above, we conclude that the harm to Green Belt and “other harm” arising from the Proposed Development would be “clearly outweighed by other considerations” and hence in line with paragraph 144 of the NPPF (18), “very special circumstances” have been shown to support the application proposals. In light of the above, Green Belt policy does not provide a “clear reason for refusing the development proposed”.

9. COMPLIANCE WITH PLANNING POLICY

9.1 Having assessed the proposals against their impact on the Green Belt and demonstrated that VSC exist at Omega Zone 8, to justify the development proposals, this section of the Statement considers the compliance of the proposals with other relevant policies of the statutory development plan and emerging policy, together with the relevant supplementary planning guidance, as previously identified. It demonstrates that the proposals broadly accord with the relevant policies and, in accordance with s38(6) of the 2004 Act, should be granted planning permission.

9.2 As identified in Section 5 above, the Development Plan for the application comprises of the Saved Policies from the St Helens UDP 1998 (including The Proposals Map), the St Helens Core Strategy 2012 and the Joint Waste Local Plan for Merseyside and Halton 2013.

Principle of Development

Green Belt

9.3 The Application Site is located outside the defined urban area of St Helens and lies within the designated Green Belt (see **UDP Policies S1, GB1 and Core Strategy Policy CAS5**).

9.4 It is recognised that the scale of the works and the nature of the proposed use mean that the proposals can only be considered as ‘inappropriate development’ within the Green Belt.

9.5 The Framework and UDP (**Policies GB1 & GB2**) require VSC to be demonstrated in order to justify development within the Green Belt. If it can be shown that VSC apply, the proposal will comply with the development plan.

9.6 The requisite VSC have been demonstrated to justify the scheme. The proposals are therefore considered to comply with the provisions of UDP **Policies S1, GB1 and GB2** and Core Strategy **Policy CAS5** which requires development outside the existing settlements to comply with Green Belt policies retained from the UDP.

9.7 The Bold Forest AAP **Policy BFP1** seeks to ensure that the Forest Park area contributes to meeting the Borough’s needs for employment and that new built development is appropriate in scale for its location and use. It has been demonstrated that there is a clear need for the proposed development, including a “live” occupier-led requirement, and this is supported by the Council’s own evidence base and a review of market demand and supply. As set out in the Operator Statement submitted with this application, the scale and nature of the detailed element of the application is a direct response to their business needs, which in turn reflect the requirements of the retail / e-commerce logistics sector. The height of the “High Bay” part of the proposed development reflects the increased automation requirements of the sector and allows for more efficient use of land to deliver the same operational benefits. Similarly, in terms of proposed building height, the outline proposals at 19m are in-line with recent the speculative market developments, ensuring the proposals are appropriate for the

use and attractive to the market. The proposals are therefore considered to comply with the provisions of **Policy BFP1**.

Economic Development

- 9.8 The need for the proposed development and the role it will play in supporting the economic objectives for the City Region have already been set out in Chapter 8. It has been demonstrated that the development will support the planning policy objectives of St Helens Council to create a strong and stable economy in the borough (**Core Strategy Policy CE1**). In these circumstances, and in accordance with the Framework, significant weight should be placed on the economic growth and jobs that will be created by the proposed development.
- 9.9 **Policy CE1** seeks to focus economic development to sites within, in close proximity to, or have easy public transport access to the most deprived areas of the Borough and where this is not possible developments are expected to contribute towards improving such links. As referred to above, to accompany this application an assessment of economic impacts has been provided within the ES (OPP Doc. 11.15), to quantify the economic implications arising from the development proposals.
- 9.10 The proposed logistics development will have a significant positive economic benefit for St Helens and will assist in improving the profile of the area, particularly through the provision of sustainable transport links between the site and the southern areas of the St Helens urban area, which rank among some of the most deprived areas of the Country.
- 9.11 There will be provision of 845 (gross) / 1,267 (net) jobs during construction and up to 3,659 (gross) / 4,117 (net) additional jobs during operation. There will also be significant opportunities for skills and training through working with the Council, Chamber and College to target areas of joblessness. Overall the development will create an estimated additional GVA of £141,526,602 for the Borough at the operational stage.
- 9.12 The development will have a beneficial economic effect on the locality in terms of additional expenditure in the Borough and the potential 'multiplier effect' with opportunities for SME's and other smaller operations to become part of a supply chain for future occupiers.
- 9.13 We consider that the proposals are therefore in accordance with the Core Strategy's primary approach of regeneration and growth and will contribute to a strong and sustainable economy as set out in **Policies CSS1 and CE1**.

Conclusion on Principle of Development

- 9.14 As 'very special circumstances' have been demonstrated to justify the scheme, the development proposals comply with the requirements of the Framework UDP **Polices GB1 & GB2** and Core Strategy **Policy CAS5**. In addition, the proposed investment will have significant benefits for the Haydock Industrial Estate and thereby accord with the objectives and locational policies of the Core Strategy **Polices CSS1 & CE1**.

Design & Layout

- 9.15 The development proposals have been developed following a comprehensive process of site survey, LVIA, feasibility study, design development and consultation. The Application is accompanied by two Design and Access Statements, (one for the detailed proposals and one covering the rest of the site), which explain the design principles that have been followed in arriving at the proposed scheme.
- 9.16 The design principles for Unit 1 can be summarised as follows:
- Provide a layout of the site that proactively responds to both by the immediate context of the site and operational requirements of the occupier;
 - Provide a building of appropriate scale, shape and size to successfully achieve the required amount of internal designated storage areas with associated automated goods handling equipment and racking, with as efficient interconnection as possible, all to suit the particular needs of the occupier.
 - Provide a landscaping treatment that ensures that the building form is carefully detailed and articulated, so as to provide interesting and attractive views from both the immediate and more distant surroundings.
 - Provide a design appearance and palette of materials and colours that are consistent with the established employment areas adjacent to the site to provide harmony between the sites and a visual context for the development.
 - Provide an access solution that will ensure safe and efficient access and egress to the new development for all forms of vehicles.
- 9.17 The design principles for the outline proposals can be summarised as follows:
- Flexibility is sought in order to allow for the development to be marked and 'tailored' to suit the requirements of the potential occupiers.
 - Creation of a successful, leading edge commercial development which is attractive to large-floorplate occupiers, accords with the Sustainability Agenda and Secured by Design standards, demonstrates environmental best practice and satisfies the identified need for this type and scale of development in the area.
 - The proposed units will be a maximum of 19m in height and will be designed and sited to reduce the visual and noise impact on the surrounding areas.
 - Appropriate urban design principles will be adopted to provide a consistent character and form to ensure that the development will be appropriate to its context, create a sense of place and encourage sustainable forms of travel through an appropriate access strategy.
 - The development proposals will be designed and operated in a sustainable manner that will include objectives to minimise energy consumption, reduce carbon emissions and enhance the biodiversity of the site wherever possible.

- It is intended that the design and layout of the development will create a shared character identity, with buildings designed to create a strong visual focus on the office component and to use materials and colours selected from a palette used previously across the adjacent Omega site.

- 9.18 UDP **Policy ENV21** requires development along the M62 transport corridor to be of a high standard of design and suitably screened or landscaped. The design of the detailed proposals, in terms of materials and colours represents a high-quality, Grade A logistics development that is appropriate for this major transport corridor and will be seen in the context of the existing Omega development, adjacent to the application site. The proposals also include new and improved structural landscaping, which given the scale of development will not screen the development but will provide a landscape framework that will help to provide a context for the development, particularly in relation to the adjacent Omega development.
- 9.19 Core Strategy **Policy CP1** requires assessment of the development against the standards set out for the Quality of the Built Environment, Protection of Natural and Historic Environment, Environmental Quality and Resource Management. It is considered that the development has had regard to the requirements of **Policy CP1** through the detailed proposals and the establishment of basic parameters for the outline proposals that will ensure the development is of high quality to meet both Policy requirements for social and environmental impacts as well as to ensure that it is viable and attractive to the market. The proposals consider impacts in terms of air and noise. It is accepted that the proposals will have an adverse impact on the character and appearance of the local environment, however it has been demonstrated that there is a compelling need for the development and there are no suitable alternative sites that could accommodate the development. Whilst there will be a loss of trees, these will be replaced as part of the structured landscaping and a new pedestrian / cycle link will be provided through the site providing sustainable travel opportunities between the site and the surrounding area. The drainage strategy will seek to manage water (clean and foul) on site through SuDS and other appropriate infrastructure. The ES identifies how the approach to development seeks to minimize the impact in resource terms including retention of displaced materials within the site. The proposals therefore do not conflict with the requirements of **Policy CP1**.
- 9.20 Bold Forest AAP **Policy BFP SN1** requires development to contribute positively to the development of the Bold Forest Park, avoid the loss of critical infrastructure and include measures to enhance connectivity between the urban area and the Park. As discussed, the proposals include a new pedestrian / cycle link that will be run through the site providing sustainable travel opportunities between the site and the surrounding area. This will connect to the existing public right of way which crosses the north-west corner of the site and the applicant will work with the Council to identify suitable onward connections through the Park and into St Helens.

- 9.21 The St Helens Design & Crime SPD sets out the design principles that the Council wish to see demonstrated in developments for the prevention of crime. This guidance is most relevant in relation to the proposed pedestrian / cycleway, which is designed to be relatively straight and wide, reasonably well overlooked and adjacent to areas of activity. It is intended that the footpath will be lit to adoptable standards, however further discussion is required with the Council in this regard to understand their adoptable standards and how this relates to matters of ecological protection.
- 9.22 The St Helen Design Guidance SPD requires large scale development to give consideration to their position, orientation, scale and massing. These matters are discussed in the Design & Access Statements and in the case of the detailed proposals have been justified through the Operator Statement submitted with the application.
- 9.23 The proposed development therefore accords with the relevant provisions of the development plan (**UDP Policy ENV21, Core Strategy Policy CP1, Bold Forest AAP Policy BFP SN1**) and the guidance contained within the Design & Crime SPD and Design Guidance SPD and the Framework.

Highways & Transport

- 9.24 The development proposals have been designed to be as sustainable as possible from transport perspective. A Transport Assessment has been prepared to support the application proposals which has considered the following key aspects in regard to highways and transport matters.

Access

- 9.25 The proposed development will facilitate connection to a comprehensive network of pedestrian and cycle facilities which are provided throughout the wider Omega development and beyond. This should encourage local trips to be made on foot or by cycle. A number of pedestrian / cycle accesses will be formed to ensure that the internal transport network is comprehensively connected to the external network as well as being connected to other sustainable transport links.
- 9.26 It is proposed to divert the existing B52 service into Omega Zone 8 as part of its route, as well as provide a bus stop within the site, resulting in less than a 5-minute walking distance from all four units to access public transport.
- 9.27 It is considered that the range of proposed accesses will ensure that the development is legible by all modes of transport and that it will provide good opportunity for employees to access the site by sustainable modes of travel.

Workplace Travel Plan Framework

- 9.28 It is intended that the proposed Workplace Travel Plan Framework form the basis for an initial Workplace Travel Plan which will support the proposed development. It sets out a range of

measures and incentives which would be adopted at the development to promote access by sustainable travel modes. The framework is flexible enough to be implemented within a site wide travel plan covering all employers within the site if required.

9.29 Development of the site will provide good opportunities to promote sustainable travel patterns from the outset. The proposed development will provide the opportunity for comprehensive transport links for bus, rail, walking and cycling facilities.

9.30 The measures proposed for inclusion as part of the proposed development are described in detail in the following sections and are listed below;

- Creation of a TP Co-ordinator role;
- Public transport initiatives;
- Cycling initiatives;
- Pedestrian initiatives;
- A formal car sharing scheme; and
- Miscellaneous measures.

9.31 The measures proposed in the framework are intended to be flexible enough that they could form part of a wider TP for the whole of the Omega South site, or measures that could be adopted for use by the final occupiers of individual employment land uses.

Development Impact (Traffic)

9.32 The impact of the development has been identified at each of the junctions on the local study network. It can be seen that the majority of the junctions assessed are operating within capacity following the addition of traffic generated by the proposed development, as well as other committed development and development associated with the wider Omega development.

9.33 Mitigation measures have been developed for implementation at the following junction to diminish the identified impact of the proposed development:

- M62 Junction 8 – Westbound Off-Slip and Circulatory Carriageway

9.34 The proposed mitigation measures at this junction can be delivered within the existing highway boundary, within land under the control of the Highway Authority and only require changes to road markings and lane allocation.

9.35 Furthermore, the modelling results cannot demonstrate the current operational efficiencies achieved through MOVA control, which is expected to improve journey time reliability as well as aid in queue management. Therefore, the expectation is that the junction results will be better than is being shown within the modelling as part of this assessment.

Summary

- 9.36 A thorough assessment has been undertaken of the proposed development and its potential impact upon the local road network. Where necessary, the requirement for improvements to the existing road and transportation conditions has been highlighted within the report.
- 9.37 In accordance with Core Strategy **Policies CIN1 & CP2**, the Transport Assessment has shown that the development site is well located in relation to the local transport network and that no significant off-site infrastructure improvements are required to facilitate development. The site also currently enjoys a good level of accessibility by sustainable modes of transport through measures already implemented as part of the wider Omega site.
- 9.38 The proposals will create a new pedestrian / cycleway that will provide a link to the existing Omega development, existing walking and cycling routes within the Bold Forest Park and connections into St Helens offering a range of sustainable transport options to the site in accordance with Bold Forest AAP **Policy BFP INF6**.
- 9.39 As required by the Council's Ensuring a Choice of Travel SPD a Transport Assessment and Travel Plan have been submitted with this application, as summarised above. In terms of satisfying the Council's parking standards, the detailed element of the proposals provides 576 parking spaces, including up to 35 disabled spaces, 48 motorcycle, 156 cycle spaces and provision for up to 39 electric vehicle spaces, which accord with the standards for B8 Storage & Distribution (Logistics) proposals.
- 9.40 It is concluded, in transport terms, that the proposed development site is considered suitable for the development proposals and therefore accords with the relevant provisions of the Development Plan, Core Strategy **Policies CIN1 & CP2** and Bold Forest AAP **Policy BFP INF6**, as well as the guidance contained within the Ensuring a Choice of Travel SPD and the Framework.

Environmental Assets

Biodiversity

- 9.41 A full assessment of likely significant effects arising from the Proposed Development upon biodiversity has been undertaken and is submitted as part of the ES (OPP DOC. 11.9 ES Vol. 1 Chapter 9). As part of this the following sensitive receptors have been identified on site:

Habitat

- Woodland and trees (including those covered by TPO's);
- Hedgerows;
- Ponds;
- Booth's Wood (LWS); and
- Whittle Brook.

Species

- Bats;
- Breeding birds;
- Brown hare; and
- Purple ramping-fumitory.

9.42 The assessment of biodiversity has established that the following additional mitigation measures are required and will be implemented as part of the development proposals:

- On-site habitat creation targeted for notable and protected species noted on or near to the Site, to include;
 - Native woodland/tree planting (80,639m²); pond habitat (15,742m²), species diverse, native hedgerow (9621 linear m), high-quality grassland (wetland and meadow – 91,534m²) and native aquatic planting (2,133m²).
- Off-site compensation for woodland and trees provided to meet 2:1 planting requirement or biodiversity compensation payment (subject to agreement);
- Provision of bat boxes and suitable bat habitat;
- Provision of bird boxes and suitable bird habitat;
- Provision of a CEMP: Biodiversity for detailed area of the Proposed Scheme to include (among other items);
 - Tree Protective Fencing and Root Protection Areas (RPA's);
 - Agreed Method Statements for any works required within RPA's or sensitive areas;
 - Protective fencing of sensitive receptors (where necessary);
 - Fish rescue methodology when draining ponds;
 - Allocated compounds/areas for temporary storage of materials (hazardous and non-hazardous);
 - Advise for habitat removal in relation to sensitive species and habitats on and near to the Site (such as Tree Protection Order's, roosting bats, breeding birds and brown hare);
 - Provision of buffer to protect purple ramping-fumitory); and
 - The requirement for an Ecological Clerk of Works and/or Arboriculturalist or any necessary works.
- Provision of a CEMP: Biodiversity for all outline areas of the Proposed Scheme as details emerge;
- Provision of a detailed Lighting Strategy for all areas of the Proposed Scheme as details emerge;
- Provision of a detailed Landscape Scheme for all areas of the Proposed Scheme as details emerge.

9.43 The assessment also identifies the following enhancement opportunities that will realised as part of the development proposals:

- Improve the quality of retained ponds by reducing shading, dredging, and introducing aquatic planting);
- Bat and bird box provision within outline planning are of the Proposed Scheme;
- Enhancement of Whittle Brook via planting with native tree species and high-quality grassland. Potential to reduce siltation by introducing reed beds / coir rolls;
- Control of Himalayan balsam throughout site.

Landscape & Trees (LVIA)

- 9.44 The Landscape Strategy is reflected in the indicative masterplan for the site and strives to balance commercial viability and development flexibility with habitat creation in equal measure.
- 9.45 In this regard, Zone 8 provides the opportunity to introduce significant new areas of woodland and wetland (mitigating the loss through development) as part of an overall strategy for the wider Omega, by creating a strong western boundary landscape, built upon the retained woodland blocks of Plain Plantation, Booths Wood and Duck Wood (part) and introducing a matrix of varied habitat linking all three elements around a new an accessible mini country park, which serves not only an important ecological function but at the same time establishing a significant area of accessible open space that links with Clock Face to the north west and to Ladies walk and the wider network of footpaths toward Mersey Valley Golf Club. A new combined footpath and cycleway also offers a strategic car free link into the established employment zone of Omega South and longer commuter routes into Warrington as a result.
- 9.46 The landscape focus within the current application boundary is the western “Green Wedge”, which captures much of the mitigation proposed across the wider masterplan and creates a landscape that provides a variety of habitat including woodland, ponds, hedgerow and grassland and is a focus in a substantial north south corridor that forms the western buffer to the development. Embracing Booths Wood and Local Nature Reserve as a key hub in this buffer zone.
- 9.47 A series of east west corridors, the most northern of which forms part of the current detailed application link the east and west landscape and habitat corridors and then further beyond into the wider Omega South landscape and ecological infrastructure. It is an express intention of this proposal to add to the significant works already completed on Omega south to encourage the spread of Great Crested Newt into the Zone 8 landscape, and in this, the east west linkages provide corridors through which these animals can pass.
- 9.48 A landscape corridor, linking Zone 8 with Omega south, provides a vehicle free cycle and footpath route that will form part of a wider network of footpath/ cycleways throughout the wider Omega masterplan area, however this corridor also establishes a new physical component in ecological and engineering terms in that it will incorporate new native species hedgerow, and wild flora grass areas, at the same time as introducing swales and attenuation

ponds (as part of the TJM development) that will; serve both drainage and habitat enhancement roles.

- 9.49 The Landscape Strategy also identifies those established trees and landscape features that are intended to be protected and retained as part of the wider strategy, these are identified on the attached drawings, and will be retained and protected during construction works in accordance with current British Standard guidance, BS 5837 2012. Trees in relation to design, demolition and construction-Recommendations.
- 9.50 In line with UDP **Policy ENV11**, a tree survey has been undertaken in respect of the site. The proposals will result in loss of trees, but new habitat creation and tree planting will be undertaken, together with improvements to existing / retained woodland to compensate for this. This is consistent with UDP **Policies ENV12 and ENV13**.
- 9.51 Core Strategy **Policy CQL1** Green Infrastructure seeks to promote open space within new development and accessibility of open space within walking distance of housing, health, employment, and education facilities. The proposals provide new landscaped areas to address visual impact and provide other mitigation, including the new cycle and footpath route that will form part of a wider network of footpath/ cycleways and provide onwards sustainable travel connections to the main conurbations of St Helens and Warrington. The proposals do not conflict with the requirements of **Policy CQL1**.
- 9.52 **Policy CQL2** indicates that developers should be encouraged to plant new trees and woodland and conserve, enhance and manage existing woodland. Trees subject to a TPO should not be damaged or destroyed unless there is clearly demonstrated public benefit. As set out in the Arboricultural Impact Assessment and Landscape chapter within the ES that accompanies this application, the proposals will result in the loss of trees including trees affected by TPOs. However, there will be significant areas of new tree planting including the provision of a nature conservation and woodland area ('the Green Wedge'), extending to c. 4 ha in the north-west corner of the site which will be open to the public.
- 9.53 As summarised above, the development proposals have been subject to ecological survey work that considers the presence or absence of a range of species. The ES indicates that there will be loss of habitat as a result of the development, but that the enhancement and protection of certain existing areas and the provision of new biodiversity opportunities within the site alongside recommendations to address the need to mitigate impact on certain specific species is in accordance with **Policy CQL3**.
- 9.54 It is accepted that the proposals will lead to the loss of trees, woodland and hedgerows across the site, however the proposal development includes a strategy of landscape mitigation that will create approximately 80,639 sq.m of new woodland & tree planting and 770 linear metres of new hedgerows. The applicant will also engage with the Council to identify opportunities to contribute towards off-site provision elsewhere within the Forest Park, in accordance with Bold Forest AAP **Policy BFP ENV1**.

- 9.55 In accordance with the Council's Trees and Development SPD a tree survey has been undertaken in respect of the site. The scale and nature of the proposals mean that there will be significant areas of trees & woodland lost on the site, however, as referred to above there will be significant areas of new tree planting and it has been demonstrated VSC exist that outweigh this harm. The proposals are accompanied by a tree protection plan and a Arboricultural Supervision Method Statement has been prepared as for approval as part of the application (contained with the Construction Environmental Management Plans) which outlines the protection and monitoring proposals for retained landscape features.
- 9.56 The proposed development is therefore considered to accord with the relevant provisions of the Development Plan, UDP Policies **ENV12 & ENV13**, Core Strategy Policies **CQL1, CQL2 & CQL3** and Bold Forest AAP **Policy BFP ENV1**, as well as the guidance contained within the Trees and Development SPD and the Framework.

Heritage

- 9.57 The ES submitted with the application includes a chapter on Cultural Heritage (ES Chapter 8) and is supported by a Historic Environment Desk-based Assessment (HEBDA). The HEBDA confirms that there are no designated assets present within the application site, with the nearest being the site of Old Bold Hall moated site (Scheduled Monument 1010703), located c.300m west of the Proposed Development. There are also five non-designated heritage assets in the area, of which four lie within the development boundary and comprise the site of the medieval and Post-Medieval park at Old Bold Hall and Bold Hall (MME8654), Booth's Wood (possible ancient woodland; WSP001), the site of "Big Dam" (WSP002), shown on the 1850 and successive Ordnance Survey maps and an area of former ridge and furrow identified from the National Mapping Programme (NHL1605040).
- 9.58 Core Strategy **Policy CQL4** and Bold Forest AAP **Policy BFP ENV3** both seeks to protect landscape character and the historic and built environment by ensuring that all new development respects the significance and distinctive quality of the built and historic environment and landscape character.
- 9.59 The HEBDA has identified the possibility of both temporary and permanent adverse impacts during both construction and operational phases, however it is recognised that any temporary impacts can be mitigated through the implementation of a CEMP. In terms of the physical impacts to below and above ground non-designated assets it has been recommended, in consultation with Merseyside Environmental Advisory Service, that further investigation, in the form of enhanced field survey is undertaken to identify any surviving boundary features of the Medieval park and Booth's Wood, and to investigate whether any archaeological features survive within the part of Booth's Wood affected by the Proposed Development. If appropriate an Archaeological Watching Brief, will also be undertaken during the development of the site.

- 9.60 It is concluded that whilst there is potential harm caused by the development proposals, this is less than substantial harm. It is considered that the mitigation measures outlined in the ES and accompanying HEBDA are appropriate and commensurate with the potential impact that the proposals could have on existing designated and non-designated assets in the area and as a consequence the proposals are considered to accord with the provisions of **Policy CQL4** and **Policy BFP ENV3**.

Flood Risk & Drainage

- 9.61 The Application Site covers an area of approximately 75.3 ha and is classified as a greenfield site. The application Site is currently used as agricultural land.
- 9.62 As a result of the development proposals the proportion of the application site that is impermeable will increase to 42.1 ha.
- 9.63 According to the Environment Agency's flood map for planning, the Proposed Development is located within Flood Zone 1 and where the Whittle Brook currently flows through the proposed development site, there are bands of land which lie within Flood Zone 2.

Surface Water Drainage

- 9.64 The available ground investigation data indicates that the site is underlain glacial deposits which will preclude the use of infiltration as a means of surface water disposal.
- 9.65 Where practical the proposed surface water drainage will reflect the existing drainage regime. It is therefore proposed that surface water flows from the development will drain to the watercourses which pass through the Site as the primary means of surface water disposal.
- 9.66 In accordance with the lead local flood authority's design and technical guidance, it is proposed that peak flows leaving the site are restricted to the existing greenfield run-off rate by means of a series of SUDS features around the proposed development.
- 9.67 It is proposed to restrict the development surface water run-off to the Mean Annual Peak Flow Rate, Qbar. The figure for Qbar has been calculated using the Institute of Hydrology Report 124 and has been calculated as 5.8 l/s/ha.
- 9.68 In order to limit the rate of surface water runoff, the drainage system to each unit will incorporate various SUDS features such as swales and attenuation ponds to restrict and treat surface water run-off. These features will be used to treat, convey and store surface water runoff from impermeable areas for storm events up to and including a 1 in 100-year event plus 40% climate change.
- 9.69 The combination of the cascading conveyance swales, storage swales and attenuation ponds will provide a multi-stage treatment train for surface water run off to enhance the quality of surface water leaving the development site.

- 9.70 The SUDS features will be privately maintained by an appointed management company.

Foul Water Drainage

- 9.71 It is proposed to install a new foul water sewer system to serve the development site.
- 9.72 United Utilities has confirmed that foul will be allowed to drain to the public foul sewer network at an unrestricted rate.
- 9.73 A foul water pumping station is proposed to service the Proposed Development and full details are provided as part of the application.
- 9.74 The foul water pumping station and sewerage proposed in public areas will be designed and constructed in accordance with Sewers for Adoption for adoption and maintenance by United Utilities and form part of the public sewer network.
- 9.75 The below ground foul water drainage network within the site boundary will remain in private ownership and will be operated and maintained privately.

Summary

- 9.76 UDP **Policy ENV30** indicates that development will not be permitted in flood risk areas or where it would give rise to substantial changes in surface water run-off or have a detrimental impact on the water environment.
- 9.77 Core Strategy **Policy CP1** (Ensuring Quality Development in St. Helens) seeks to ensure development is located where it is compatible with the identified Flood Zone and include satisfactory drainage arrangements.
- 9.78 A Drainage Strategy Report has been prepared and submitted in support of this application which provides full details of how the proposals address the requirements of Flood Risk & Drainage. In summary however:
- The majority of the site is located within Flood Risk Zone 1, where the annual probability of river and sea flooding is less than 1:1000 (0.1%). The site is therefore sequentially preferable in terms of the Framework and employment uses are considered appropriate in this zone.
 - Some areas of the site are affected by bands of Flood Zone 2 associated with Whittle Brook, however these areas will be removed from the site, as part of the watercourse diversion works that will be required to facilitate the outline planning proposals.
 - The potential for the development to increase surface water flood risk elsewhere is mitigated through the surface water drainage strategy proposed for the site.
 - In order to limit the rate of surface water runoff, the drainage system to each unit will incorporate various SUDS features such as swales and attenuation ponds to restrict and treat surface water run-off. It is proposed that the discharge rate from the

development is limited for all storm events up to and including the 100-year return period.

- United Utilities has confirmed that foul will be allowed to drain to the public foul sewer network at an unrestricted rate.

9.79 It is therefore considered that the proposed development complies with the UDP **Policy ENV30** and Core Strategy **Policy CP1** and the Framework.

Waste

9.80 Separate Construction Environmental Management Plans (CEMP) for the on-plot Unit 1 development and the off-plot infrastructure that combine to form the detailed element of the proposals have been prepared and will be submitted for approval as part of the application. In accordance with Joint Waste Plan **Policy WM8** these CEMPs detail the measures that will be put in place to achieve the efficient use of resources, including details of construction methods that will minimise waste production and encourage re-use and recycling materials, as far as practicable on-site and the use of waste audits or site waste management plans (SWMP)G, where applicable, to monitor waste minimisation, recycling, management and disposal.

9.81 Whilst the detailed proposals for Unit 1, in accordance with **Policy WM9**, indicate on the submitted layout plans proposed measures, which included dedicated areas within the service yard, to facilitate the collection and storage of waste, including separated recyclable materials together with sufficient access for collection and transportation.

Conclusion

9.82 With regards to compliance with the Development Plan, it is considered that whilst there is a need to assess compliance with individual policies, as set out at the start of this section, case law identifies that the test of compliance should be in the context of whether the application proposals are or are not in accordance with the development plan “*as a whole*”.

9.83 Whilst the site is in Green Belt, the relevant policies recognise that if very special circumstances are demonstrated then a proposal will comply with the Policy. It is considered that there are VSC to justify the proposed development in the Green Belt, as required by the Framework, UDP Policy GB1 and Core Strategy Policy CAS5. Consequently, these circumstances are sufficient to outweigh the harm to the Green Belt and other harm associated with the proposals.

9.84 The proposed form of the development meets the requirements of UDP Policy GB 2, Core Strategy Policies CIN1 & CP2 and ‘Submission Draft’ Policies LP03 & LP07. The proposed investment will also have significant benefits for the wider area.

9.85 The proposed development also accords with the principles of the Bold Forest Park AAP and in particular of AAP policies BFP1, BFP SN1 and BFP ENV1.

- 9.86 The proposed development complies with guidance contained relevant policies in the Development Plan and emerging Local Plan and adopted SPG with regards to design and layout, highways, amenity and other environmental assets.
- 9.87 As indicated above, when taken as a whole, the proposals will deliver important economic development in line with the principle tenet that underpins both the UDP and Core Strategy. The application proposals are therefore considered to comply with the Development Plan “as a whole” and hence there is a Section 38(6) presumption in their favour and also, they benefit from support from the Framework paragraph 11(c) relating to approving development proposals that accord with the Development Plan without delay.

10. SUSTAINABLE DEVELOPMENT

- 10.1 This Chapter considers the compliance of the proposed development with the principles of sustainable development as set out in the Framework. It demonstrates that the proposals perform a positive economic, social and environmental role and whilst the development cannot claim the presumption in favour of sustainable development set out in the Framework, due to its Green Belt location, it should be given significant weight in the planning balance.

Economic Role

- 10.2 The proposed development will contribute to building a strong, responsive and competitive economy. In particular, the proposals will bring a number of economic benefits in terms of job creation and increased expenditure in the local economy.
- 10.3 The economic benefits associated with the development have already been outlined above and it is considered that these align well with national, regional and local policy objectives, in particular the creation of enhanced economic prosperity through creating employment opportunities for local people and providing suitable accommodation for business growth, and contributing towards a more attractive and accessible public realm.
- 10.4 The Population & Health chapter of the ES (OPP Doc. 11.15) provides a detailed assessment of the likely positive impacts of the development in this regard. More generally the wider economic benefits are also considered to include:
- Maintaining and enhancing the profile and image of Omega as a major focus for the distribution sector, and send a strong signal of investment confidence in the both St Helens and Warrington Boroughs;
 - It would build on the competitive advantages of the area for the distribution sector, including investment in the SuperPort, helping build a critical mass of such activities and encouraging further distribution investment so that the City Region remains competitive against other areas with similar facilities
 - It would contribute towards a diversified local economy in an area where the traditional sectors of mining and manufacturing have declined or stagnated and where revitalised economic growth is a key driver for the area; and,
 - It would help to grow an efficient, sustainable logistics sector in the Liverpool City Region that is necessary to maintain and support the growth of other sectors such as manufacturing and higher technology activities and building upon on the investment in the SuperPort.

Social Role

- 10.5 The proposed development will support the creation of a strong, vibrant and healthy community by increasing the supply of local employment thereby helping to reduce unemployment rates in St Helens.

Deprivation

- 10.6 St Helens is ranked as the 26th most relatively deprived authority out of 317 across England and the 12th most relatively deprived authority out of 39 within the North West Region (Index of Multiple Deprivation 2019). Its relative position has deteriorated since the 2010 Index of Deprivation (51st) and 2015 Index of Deprivation (35th) most deprived area. Across all summary measures St Helens has fallen within the most relatively deprived 13% of all 317 authorities across England, meaning St Helens is relatively more deprived in 2019 than it was in 2015.
- 10.7 Overall, deprivation within St Helens remains both relatively extensive and concentrated and deprivation levels in some parts of the Borough have also worsened relative to others. The proportion of children in low income families is higher than those in England and the North West as a whole. St Helens still has levels of dependency on benefits that are above regional and national averages (Department for Work and Pensions).
- 10.8 As set out below in Table 10.1, the unemployment rate in St Helens is lower than regional and national averages. However, the economic activity and employment rates in the Borough remain relatively consistent with national averages. Economic inactivity (e.g., due to sickness) is slightly higher than the national average and pay levels in the Borough (Full Time - Gross Weekly) are also lower than elsewhere.

Table 10.1: St Helens Labour Market Indicators

Labour Market Indicators	St. Helens Borough (%)	North West (%)	England (%)
Economically active	78.7	77.1	78.9
Employment	75.6	73.9	75.6
Self-employed	6.9	9.4	10.7
Unemployment	3.5	4.0	4.1
Economic inactivity	21.3	22.9	21.1

Source: NOMIS (ONS) – rate as % of population aged 16-64 years. Period: Jul 18 – Jun 19

- 10.9 Despite relative consistency with the national statistics outlined above, the proportion of residents without any qualifications is also higher than the regional and national levels (NOMIS Jul 18 – Jun 18) at 11.6% compared to 9.1% and 7.8% respectively.
- 10.10 Some of the areas of greatest deprivation are situated within 2-3km of the Application Site. As a consequence, the employment generated by the proposed development, when combined with the new and improved pedestrian and cycle links between these areas and the site, will have a significant and positive impact on reducing deprivation in St Helens. This is

particularly the case as the lead contractor and future occupiers will be required to prepare, and implement, Local Employment & Training Schemes to ensure local people gain the most from, the new job opportunities. This is seen as a significant and important social benefit of the proposed development.

Physical Works

10.11 The proposals include a series of physical works and wider community benefits associated with the operation of the development, namely:

- The introduction of new and enhanced pedestrian and cycle routes through the site that will provide links with the southern areas of the St Helens urban area, via an upgraded link bridge across the M62 and multiple connection points into the existing Omega site and wider Warrington network;
- The provision of a nature conservation and woodland area ('the Green Triangle'), extending to c.4 ha in the north-west corner of the site which will be open to the public.

10.12 On this basis, the proposals will deliver substantial social benefits, which should be given significant weight in the planning balance.

Environmental Role

10.13 Evidently, the proposed development will give rise to environmental impacts, however, those impacts have been identified and mitigated for, and in certain circumstances, result in net benefits to environmental conditions.

10.14 In particular, through implementation of an ecological mitigation scheme, involving landscaping enhancements integrated with the ecological habitat design, good practice construction methodologies, and the implementation of a sustainable urban drainage system, the proposed development will have a long-term positive impact on local ecological conditions.

10.15 The ES (OPP Doc 11.1 – 17) submitted with the planning application provides a full assessment of the environmental impact of the development.

Conclusion

10.16 The proposed development will secure benefits to the economic and social roles with a neutral or limited adverse impact on the environmental role. As a consequence, the adverse impacts of permitting the development would not significantly and demonstrably outweigh the benefits, which should be given significant weight in the planning balance.

11. SUMMARY AND CONCLUSIONS

Planning Summary

- 11.1 The starting point for the consideration of the Application must be whether the proposed development complies with the Development Plan “*as a whole*”. In this case the relevant policies are contained within the UDP and Core Strategy and the ‘Submission Draft’ Local Plan, although the latter document has no formal status at present and therefore only limited weight can be afforded to it.
- 11.2 Whilst the site is in Green Belt, the relevant policies recognise that if very special circumstances are demonstrated then a proposal will comply with the Policy. It is considered that ‘very special circumstances’ exist that serve to justify the proposed development in the Green Belt, as required by the Framework, UDP Policy GB1 and Core Strategy Policy CAS5. These circumstances are considered sufficient to outweigh the harm to the Green Belt associated with the proposals and the other harms which the development would cause.
- 11.3 The proposed form of the development meets the requirements of the UDP [Policy GB2] and the associated investment and job creation will have significant benefits for both St Helens and Warrington Boroughs. It would accord with the objectives and locational policies of Core Strategy Policies CSS1 and CAS5.
- 11.4 The proposed development complies with guidance contained relevant policies in the UDP and Core Strategy with regards to design and layout, highways, amenity and other environmental assets.
- 11.5 As indicated above, when taken as a whole, the proposals will deliver important economic development in line with the principle tenet that underpins both the UDP and Core Strategy. The application proposals are therefore considered to comply with the Development Plan “*as a whole*” and hence in accordance with the provisions of s38(6) of the 2004 Act planning permission should be granted for the proposed development.
- 11.6 The development plan compliance is supported by other material considerations.

Material Considerations

- 11.7 St Helens Council’s evidence base for the emerging Local Plan also clearly identifies need for a substantial amount of logistics development (165 – 225ha) within St Helens. This land is needed to meet the needs of the Borough and support the economic objectives of the wider City Region. In addition, the emerging Local Plan identifies part of the application site (circa 32ha) as an employment allocation (1EA) that will contribute towards Warrington’s employment land supply. The Application proposals will therefore help to meet the needs of both St Helens and Warrington Borough Council’s.
- 11.8 This Statement is supported by a Market Report prepared by JLL, which demonstrates that current market demand for large-scale logistics out strips available land supply within the

Region and in particular in St Helens, where no available site have been identified. The application site is well suited to meet medium to long-term demand, particularly for build to suit units over 27,870 sq.m / 300,000 sq.ft, of which there are few available and deliverable sites within the Region.

- 11.9 There is specific need for the development, in so far as the proposals seek detailed approval for part of the site to meet a 'live' occupier led requirement for a bespoke, purpose-built development which it has been demonstrated cannot be accommodated elsewhere within the Borough
- 11.10 The proposed development will deliver substantial employment opportunities in an area of high unemployment where economic growth and investment is greatly needed. Given the severe deprivation issues suffered by St Helens, it is considered the job creation associated with the development should be given substantial weight.

Conclusion

- 11.11 As a consequence, when assessed against the provisions of S.38(6) of the 2004 Act, the considered position is that the proposals present no conflict with the Framework or Development Plan policies "as a whole" because 'very special circumstances' have been demonstrated and material considerations also weigh in favour of the development.
- 11.12 On this basis it is considered that planning permission should be granted without delay for this sustainable and much needed development.
- 11.13 For the above reasons, the Council is urged to grant planning permission for the proposed development.