



Summary Proof of evidence of Sean Bashforth (for the Applicants) on Planning Policy Matters (CD 38.4A)

Call-in by the Secretary of State of an application made by
Omega St Helens Limited / TJ Morris Limited

Land To The West Of Omega South & South Of The M62,
Bold, St Helens

LPA REF: P/2020/0061/HYBR

PINS REF: APP/H4315/V/20/3265899

March 2021

Experience and Scope of Evidence

- 1.1 My name is Sean David Bashforth. I hold a First Class Bachelor of Arts Degree in Geography and a Master of Arts Degree in Town and Regional Planning from the University of Sheffield. I am a Member of the Royal Town Planning Institute.
- 1.2 I am a Board Director at Planning Consultants Quod, one of the largest independent planning consultancies in the UK, with offices in London and Leeds. I have 23 years' experience, principally acting as a planning consultant in the private sector.
- 1.3 My evidence considers the overall planning balance in assessing the case for the grant of planning permission for the development proposed at Omega West including whether, in the context of the Site being located in the Green Belt, very special circumstances exist.

The Planning Application

- 1.4 The Proposed Development is 'hybrid' with detailed and outline proposals to be considered in parallel as one planning application.
- 1.5 Detailed permission is sought for 'Unit 1' or the 'TJM Building' which is to be located in the northern part of the Application Site for a 81,570 sq.m warehouse building and related works. The proposed height and footprint of the building are essential for TJMs highly automated future operations. This element is 'oven ready' and, should permission be granted, works could get underway without delay.
- 1.6 The outline planning application component is for up to 123,930 sq.m of Class B2/B8 floorspace. Outline planning permission has been sought to provide essential future flexibility.
- 1.7 The Proposed Development forms a western extension to the existing Omega South site, which is at capacity, particularly for large-floorplate logistics development. Access to the Proposed Development is through the northern commercial parts of Omega South which provide direct access to junction 8 of the M62 without having to pass through residential or other sensitive areas.

Planning Policy and Guidance

- 1.8 The whole of the Application Site is located within the Green Belt and within the Bold Forest Park.
- 1.9 The National Planning Policy Framework (2019) is an important material consideration and includes requirements to achieve sustainable development (including economic, social and environmental objectives) and sets out Green Belt policies.
- 1.10 Regeneration and job creation are key objectives of the adopted St Helens Core Strategy. The adopted Core Strategy and Bold Forest Park Area Action Plan acknowledge that there may need to be changes to the Green Belt.
- 1.11 Pending the outcome of the local plan examination later in 2021, little material weight can be given to the draft Submission St Helens Local Plan. The emerging Local Plan identifies part of the Application Site as being removed from the Green Belt (31.22 ha) in order to meet the employment needs in Warrington.

- 1.12 St Helens Council published its draft Submission Local Plan over two years ago in January 2019, with the plan and evidence base prepared largely in 2018. At that point TJM's requirement for the Omega site was not apparent.
- 1.13 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.

Green Belt

- 1.14 Paragraph 145 of the NPPF states that the construction of new buildings is inappropriate in the Green Belt, with limited exceptions which are not relevant to these proposals. Paragraph 144 of the NPPF explains that substantial weight is to be given to any harm to the Green Belt, with very special circumstances not existing 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.
- 1.15 I conclude that there would be major harm to the openness of this part of the Green Belt. This needs to be considered in the context of the existence and prominence of the existing Omega development against which the development will be seen next to, the M62 motorway, the limited viewpoints available of this part of the countryside and the presence of existing and proposed trees and vegetation to the west. The Application Site represents less than one percent of St Helens Green Belt which has not been reviewed since 1983.
- 1.16 I consider that that there would be no impact on three of the five Green Belt purposes (preventing towns merging, preserving historic towns and assisting urban regeneration) and largely moderate impacts on the other two purposes (preventing sprawl and safeguarding the countryside).
- 1.17 In its draft Submission Local Plan, the Council has concluded that the eastern part of the site should be excluded from the Green Belt (site GBP_076_c) and indicated that its retention in the Green Belt would serve no Green Belt purpose. In my view, had the rest of the application site been specifically considered in the Council's Green Belt Review, it would have been identified as having a 'medium' overall score in respect of meeting the purposes of the Green Belt.
- 1.18 In terms of adopted Local Plan policy compliance, by virtue of proposing inappropriate development in the Green Belt, there would conflict with Saved UDP Policy GB1 unless very special circumstances apply.

Strong and Competitive Economy

- 1.19 In my opinion the benefits of the Proposed Development, particularly the TJM Building, directly responds to the imperatives in paragraphs 80 to 82 of the NPPF and should be given very significant weight.
- 1.20 St Helens is a very good location to provide new jobs with large parts of the borough comprising some of the most deprived places on the Governments' Indices of Multiple Deprivation. St Helens has been less successful than its neighbours in securing new employment opportunities for residents.

- 1.21 The creation of 3,886 jobs on site, and construction jobs, represents a very significant benefit of the Proposed Development and would help to reduce unemployment locally. Contributions towards bus services in St Helens will improve access to these opportunities.
- 1.22 These proposals will allow TJM to invest across the UK, help to arrest decline and provide affordable goods to a large number of communities and in turn provide jobs where they may otherwise be lost due to the contraction of the retail and hospitality sectors. Unit 1 could serve 325 new stores and help to facilitate approximately 22,750 new roles in retailing positions.
- 1.23 Levelling up is at the heart of the Government's economic policy agenda and St Helens is one of the highest priority areas for the Government. Not consenting the proposed development would result in a loss of jobs and economic activity and would not be aligned with this policy objective.

Conditions and Obligations

- 1.24 I consider that the proposed conditions will satisfactorily control the development and ensure that appropriate mitigation is secured and they accord with the requirements of the CIL Regulations and NPPF.
- 1.25 In my view, the draft S106 obligations are tailored to the impacts and mitigation required and meet the relevant tests in Regulation 122(2) of the CIL Regulations. Obligations will exceed £3.6 M, including £1.7 M for biodiversity offsetting and £1.65 M towards establishing and enhancing bus services to the site.

The Planning Balance

- 1.26 I recognise the importance the Government attaches to Green Belt policy and that Green Belt should be strongly protected. Substantial weight must be given to any harm on the Green Belt. I consider that these Application Proposals result of major harm to the openness of the Green Belt, largely moderate harm to two of its purposes and limited other harm including harm to the landscape. I nevertheless consider that very special circumstances do exist in respect of the Application Proposals when considered against the economic benefits (including jobs) and meeting the objectively assessed employment needs for St Helens, Warrington and the wider region.
- 1.27 In accordance with Section 38(6) of the Planning and Compulsory Act the application should be determined in accordance with the development plan unless material considerations indicate otherwise and a planning balance is required to weigh those aspects of development plan conformity against those of non-conformity.
- 1.28 In my view, the Proposed Development performs extremely well against the imperatives to support economic growth and productivity in the NPPF (paragraph 80) and the regeneration priorities in the St Helens Core Strategy and this should be given very significant weight.
- 1.29 The proposals do conflict with the current policies in the current Local Plan relating to the Green Belt. However these policies, which are the most important for determining the application, are out of date. Whilst it is not possible to attach weight to the new local plan, it does allocate approximately half of the Application Site for employment and remove it from the Green Belt. In my view, had the Council been aware of the TJM opportunity at the time of preparing its new local plan it would have expanded that draft allocation, given the substantial need for employment land and the benefits of the proposals.

1.30 I give substantial weight to the local plan evidence base for both St Helens and Warrington which clearly show that the demand for employment (particularly B8 logistics floorspace) is significant.

1.31 I also consider that the Proposed Development constitutes sustainable development, consistent with Section 2 of the NPPF:

- **Economic Objective** - the jobs and wealth created will contribute to building a strong, responsive and competitive economy and will directly meet the Government's objective of 'levelling up.'
- **Social Objective** - Commitments to local employment & training schemes will ensure that local people in deprived communities can gain significantly from the new job opportunities. There are also wider community benefits associated new and enhanced routes through the site and the provision of a nature conservation and woodland area in the north-west corner of the site which will be open to the public.
- **Environmental Objective** – Whilst the Proposed Development will give rise to environmental impacts these have been identified and mitigated for, and in certain circumstances, result in net benefits to environmental conditions including landscaping enhancements integrated with the ecological habitat design which will have a long term positive impact on local ecological conditions.

1.32 I consider that the Proposed Development largely conforms to the development plan, and that those elements as identified as not being conformity are outweighed by material considerations. I therefore conclude that in accordance with paragraph 11c of the NPPF, the Proposed Development accords with the development plan as a whole and that it should be granted planning permission.

Declaration

The evidence which I have prepared and provide for this called-in planning application (reference APP/H4315/V/20/3265899) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Dated: 29 March 2021



Sean David Bashforth

Director