



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

EMPLOYMENT LAND NEED AND SUPPLY BACKGROUND PAPER

October 2020

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1. Introduction

- 1.1 This Background Paper is one of several that have been prepared by the Council. It will provide evidence for the forthcoming Examination in Public of the St Helens Borough Local Plan 2020-2035 (the SHBLP).
- 1.2 The purpose of this paper on employment land is twofold. Firstly, it is to set out the background and approach taken to the employment policies in the SHBLP; and secondly to provide an update on the Council's employment land supply position.
- 1.3 It is not the purpose of this paper to repeat all the evidence that the Council has relied upon when preparing the SHBLP. This evidence has been separately published and is available on the Council's website. However, where appropriate this document refers to the source of evidence and provides a brief summary or explanation of how the evidence has been considered. Similarly, options which are referred to in the paper are explained further in Developing the Spatial Strategy Background Paper (SD026), and the Local Plan Sustainability Appraisal reports.
- 1.4 This paper briefly summarises:
 - the policy context relevant to employment land need and supply (see Section 2);
 - how the Borough's employment land needs have been established (see Section 3);
 - the SHBLP employment land requirement (see Section 3); and
 - how the SHBLP employment land requirement will be delivered (see Section 4).
- 1.5 This paper should be read in conjunction with other evidence base documents. These include:
 - St Helens Employment Land Needs Study Addendum Report (2019);
 - St Helens Employment Land Needs Study (2015);
 - St Helens Allocations Local Plan – Economic Evidence Base Paper (2015); and
 - Parkside Logistics and Rail Freight Interchange Study (2016).

2. Policy Context

- 2.1 The following outlines the policy framework at the national, regional and local levels in which the Local Plan is being prepared, in particular, the policy framework that is of relevance to employment land needs and supply. Key evidence base documents are also summarised.

National

National Planning Policy Framework (February 2019)

- 2.2 An economic objective of the National Planning Policy Framework (NPPF) is to:

“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” (Paragraph 8).

- 2.3 Plans should apply a presumption in favour of sustainable development (Paragraph 11), which means they should positively seek opportunities to meet the development needs of their area and provide for objectively assessed needs for housing and other uses.

- 2.4 In plan making, the NPPF requires strategic policies in a Local Plan to make sufficient provision for employment and commercial development. Paragraph 23 of the NPPF states:

“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption of sustainable development.”

- 2.5 NPPF Paragraph 23 also confirms this should include planning for and allocating sufficient sites to deliver the strategic priorities of the area, except where needs can be met more appropriately through alternative mechanisms.

- 2.6 Paragraph 80 of the NPPF is clear that economic growth and productivity should be supported through Local Plan policies. Paragraph 80 states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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.”

2.7 Paragraph 81 of the NPPF states that planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

2.8 The NPPF also requires planning policies to recognise and address the specific locational requirements of different employment sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Planning Practice Guidance, Employment Land Review Guidance – Housing and Economic Needs Assessment (July 2019)

2.9 Supporting the NPPF is a series of Planning Practice Guidance (PPG) documents that provide direction on the implementation of the NPPF and assessments to prepare Local Plans. The Housing and Economic Needs Assessment document outlines the approach to be taken to prepare needs assessments.

2.10 This guidance states that *“strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions.”*

2.11 The guidance states that the following would need to be assessed:

- *“the best fit functional economic market area;*
- *the existing stock of land for employment uses within the area;*
- *the recent pattern of employment land supply and loss – for example based on extant planning permissions and planning applications (or losses to permitted development);*
- *evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence, such as recent surveys of business needs,*

discussions with developers and property agents and engagement with business and economic forums;

- *wider market signals relating to economic growth, diversification and innovation; and*
- *any evidence of market failure – such as physical or ownership constraints that prevent the employment site being used effectively” (026, Reference ID: 2a-025-20190220).*

2.11.1 The guidance states that when forecasting employment land requirements local authorities should develop an idea of future needs based on a range of data which is current and robust, such as:

- *“sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);*
- *demographically derived assessments of current and future local labour supply (labour supply techniques);*
- *analysis based on the past take-up of employment land and property and/or future property market requirements;*
- *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics” (027, Reference ID: 2a-027-20190220).*

2.11.2 The PPG gives specific recognition to the logistics sector, stating that:

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).”

2.11.3 The PPG emphasises that *“strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour” (031, Reference ID: 2a-031-20190722).*

Sub Regional

Draft Liverpool City Region Local Industrial Strategy (March 2020)

2.11.4 NPPF Paragraph 81a and the PPG place specific emphasis on the need to take account of policy and evidence contained in Local Industrial Strategies when setting out a clear economic vision in Local Plans. The Liverpool City Region (LCR) Draft Local Industrial Strategy (LIS), building on the UK Industrial Strategy (2017) identifies five foundations of productivity that require strengthening to unlock the full potential of opportunities that exist in the City Region. The LIS indicates that the full potential of the opportunities that exist

in the LCR can only be unlocked if the foundations of the LCR economy are sufficiently strengthened. Performance gaps must be addressed in order to level up with the rest of the UK economy and maximise the potential for transformation. These foundations include:

- the opportunity to turn potential into prosperity (people);
- a dynamic business base creating opportunity (business environment); and
- connecting all communities to opportunity (infrastructure).

2.11.5 The LIS states that delivering the infrastructure foundation includes supporting the clean growth of freight and logistics. The LIS indicates that given the LCR'S identified assets including the port, inland ports, Liverpool John Lennon Airport, the Manchester Ship Canal, proximity to national arterial road networks, and the potential for a major intermodal freight interchange at Parkside in St Helens, the LCR will continue to be a hub for freight and logistics.

2.11.6 Securing HS2 and Northern Powerhouse Rail is also identified as integral to delivering the infrastructure foundation. The LIS suggests that a Northern Powerhouse Rail would form a 'belt' between Liverpool / Manchester / Sheffield / Leeds / Hull, enabling increased service patterns and frequency, providing a stronger link to Manchester's international airport, and helping to ensure that Liverpool City Region is central to, and fully contributing towards, the success of the wider northern economy. Importantly for the proposed SRFI site at Parkside, the LIS states that this could also free up capacity for freight and logistics, bringing national benefits economically and environmentally.

Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) (March 2018)

2.12 The main objective of the SHELMA was to provide a consistent joint evidence base for housing and employment land needs over the period to 2037 for the LCR and West Lancashire.

2.13 The scope of the SHELMA document was to review:

- future economic performance, and the scale of growth in jobs to 2037;
- the objectively assessed need (OAN) for housing; and
- the need for B-class employment land.

2.14 The SHELMA report considered the evidence prepared by the individual local authority areas for housing and employment land needs, including the St Helens Employment Land Needs Study (2015).

- 2.15 The SHELMA's calculations for employment land by type for the local authority areas are provided in the table below.

Table 2.1: Employment Land Requirements (Excluding Strategic B8), 2012-2037 (ha)

Local Authority	Baseline Scenario		Growth Scenario		Completions Trend		
Basis for Scenario	Oxford Economics baseline forecasts		Includes inputs on transformational projects		Assumed continuation of historic trends of employment floorspace completions		
	B1	B2	B1	B2	B1	B2	Small Scale B8
Halton	28.1	20.9	39.8	21.1	63.0	62.3	26.2
Knowsley	24.4	33.0	26.8	33.0	20.7	88.0	15.7
Liverpool	39.7	29.4	70.0	29.4	79.2	117.8	12.7
Sefton	14.2	6.1	18.4	6.1	24.2	15.0	9.5
St Helens	11.6	13.7	28.8	27.3	6.3	44.8	10.3
West Lancs	14.5	7.7	14.9	7.7	16.3	20.4	29.2
Wirral	27.6	29.1	33.8	30.1	26.1	89.0	14.5
FEMA	160.1	139.8	232.5	154.8	235.7	437.3	118.2

Source: LCR SHELMA, 2018

- 2.16 In addition to this, an estimate of large-scale B8 land requirements to 2037 for the city region was provided (308-397 ha) though this was not disaggregated to the local authority level.

Liverpool City Region Assessment of the Supply of Large-Scale B8 Sites (June 2018)

- 2.17 This report was prepared by a consultant team led by GL Hearn on behalf of the LCR authorities to assess sites for large scale logistics premises (defined as being over 9,000 sqm or 100,000 sqft). The report looked at two scenarios – a do minimum approach (current economic growth and committed transport investments) and a do something approach (substantial transport infrastructure investment including a Transport for the North Strategy).
- 2.18 While the SHELMA provided OAN for housing and employment, the review of the large-scale B8 sites was undertaken separately.
- 2.19 The report included assessments of current and potential sites within the LCR that could accommodate large-scale logistics and warehousing uses. The potential sites were those that were known across the city region as they have been in the planning pipeline for a long time (such as Parkside) or they benefit

from a Local Plan allocation or a planning permission. This included four sites within St Helens:

- Parkside Strategic Rail Freight Interchange, (Local Plan site 7EA);
- Parkside West (Local Plan site 8EA);
- Land to the North of Penny Lane, Haydock (Local Plan site 3EA – the site is now fully complete and operational); and
- Land at Florida Farm North, Haydock (Local Plan site 2EA – the site is now fully complete and operational).

2.20 The following table summarises the key metrics and concluding comments that were presented in the report pertaining to the sites in St Helens.

2.22 Table 2.2: Site Assessment Findings and Net Size Areas (ha)

Source: LCR Assessment of the Supply of Large-Scale B8 Sites, June 2018

Site Name	Available land with development potential (ha)	Likely to come forward for strategic B8 (ha)	Likely to come forward for either strategic B2 or B8 (ha)	Green Belt	Conclusion of Site Assessment
Parkside West	51.6	~	51.6	✓	A prime site within the City Region providing potential for 63.65 ha of strategic B2 and B8 development at a location which provides excellent access to strategic road and rail networks. A planning application to develop 47.9 ha of the site for B8 uses is currently pending determination.
Parkside East	63.7	47.9	15.8	✓	A prime site within the City Region to support development of a new SFRI and the potential for 51.64 ha of related employment uses. This site provides an attractive location for regional and national distribution activities and would be an attractive location for large scale B8 and B2 uses. Infrastructure requirement mean the site represents a medium- to long-term prospect.
Land North of Penny Lane, Haydock	8.8	8.8	~	✓	Greenfield site on the edge of the existing Haydock Industrial Estate, providing a natural expansion of the industrial area close to the M6 and A580. The site benefits from planning permission for B8 uses and should therefore be considered as part of the strategic B8 land supply.
Florida Farm North, Haydock	28.1	~	28.1	✓	Greenfield site on the edge of the existing Haydock Industrial Estate, which would provide an expansion of the industrial area. The site is located on the edge of the existing industrial area and close to the M6 and A580 and represents a commercially attractive location for both B8 and B2 uses.

- 2.23 From this analysis of the St Helens and other local authority area sites, the report estimated a total available land area that would be appropriate for large-scale warehouse uses. The table below replicates the local authority area breakdown total land area for such sites. The report identified sites that have been identified specifically for B8 uses (e.g. through planning applications) and those sites that would be appropriate for B2 or B8. For this second category, the report assumed that 80% of this land would be for B8 uses, in line with historic trends. This is reflected in the difference between the sub-total and the strategic B8 total.

Table 2.3: Summary of Supply by Local Authority

Local Authority	Sum of strategic B8 (ha)	Sum of strategic B2 or B8 (ha)	Total
Halton	30.0	53.5	83.5
Knowsley	5.0	29.7	34.7
Liverpool	0.0	22.4	22.4
Sefton	10.0	11.9	21.9
St Helens	56.7	95.5	152.2
West Lancs	17.0	0.0	17.0
Wirral	0.0	8.1	8.1
Sub-total	118.7	221.1	339.8
Strategic B8 Total	118.7	176.9	295.6

Source: LCR Assessment of the Supply of Large-Scale B8 Sites, June 2018

- 2.24 From the table it is apparent that St Helens has the highest amount of available land in the LCR for B8 uses, comprising 45% of the Region's supply of B8 land. However, this total includes a number of sites which are proposed in emerging Local Plans but are currently under Green Belt designation (such as the Parkside sites).
- 2.25 The report also quantified the amount of committed supply in the city region (those with allocations and permissions). St Helens had 8.8 ha of committed strategic B8 land and a further 28.1 ha of committed B2 or B8 land, which equates to 19% of the Region's committed supply.
- 2.26 The report looked at the demand and supply balance for strategic B8 land. The demand requirement¹ to 2037 was estimated to be between 339 ha (do minimum scenario) and 437 ha (do something scenario). When considering

¹ The demand requirement is slightly higher than the LCR SHELMA (2018) indicated as it includes a 10% buffer to account for churn, flexibility, normal market vacancy and choice.

available supply, this results in a requirement of a further 43.4-141.4 ha of strategic B8 land by 2037.

Liverpool City Region SHELMA Areas of Search Assessment (August 2019, and Addendum Sheet, November 2019)

- 2.27 The LCR Areas of Search Assessment (August 2019) built on the work previously undertaken in the LCR Assessment of the Supply of Large-Scale B8 Sites (June 2018), by assessing sites that were not part of the 'committed supply' (sites within the planning pipeline or with allocations and planning permissions) that could be considered to provide further development potential for strategic B8 warehousing and distribution requirements.
- 2.28 The Areas of Search Assessment updated the committed supply position in the Assessment of the Supply of Large-Scale B8 Sites (June 2018), and indicates that if the supply of land likely to support strategic B8 development is extended to include sites as set out in the Table 3 of the Assessment (as corrected by the Addendum Sheet 2019), then the total supply increases to 342.68ha (previously 295.6ha in the Assessment of Supply of Large-Scale B8 Sites, June 2018).
- 2.29 The Areas of Search Assessment establishes a residual over-supply of 3.68ha for the 'Do Minimum' scenario and a residual requirement of 94.32 ha for the 'Do Something' scenario.
- 2.30 The Areas of Search Assessment then goes on to review several potential sites that could meet the residual requirement of 94.32ha. Table 8 of the Areas of Search Assessment summarises the findings of the assessment of these sites, and proposed SHBLP employment allocation sites 1EA (Omega South Western Extension), 5EA (Land to the West of Haydock Industrial Estate) and 6EA (Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock) totalling 60.2ha in are identified as sites that could help meet the residual requirement in the short term.

Local

St Helens Allocations Local Plan – Economic Evidence Base Paper (2015)

- 2.31 The Allocations Local Plan Economic Evidence Base Paper (2015) prepared by consultants AECOM and DTZ provides an expert view of market demand for employment land in St Helens. The Paper demonstrates strong recent demand for modern large scale logistics development in the North West, particularly over 100,000 square feet. SuperPort² is identified as a project that will increase the demand for large logistics and manufacturing space in the

² SuperPort is the enhancement of sea and airports and freight facilities along the River Mersey and Manchester Ship Canal. A key part is the new Liverpool 2 deep water container port at Seaforth.

Borough. The Paper concludes that large scale logistics is the most active market in the region and a particular opportunity for St Helens given its location straddling the M6.

- 2.32 The Paper identifies a number of key locational and site specific criteria for large scale distribution uses (300,000 square feet), including a minimum site size of 5ha and a drive time to motorway junctions of 10 minutes or less. The Paper concludes none of the sites identified in the evidence base that supported the St Helens Core Strategy (2012) 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. This shortage of available land to build large distribution facilities has meant that in recent years, when demand for such premises has been high, occupiers have had to locate elsewhere.

St Helens Employment Land Needs Study (2015)

- 2.33 The ELNS prepared by BE Group assessed the quantitative employment land need in St Helens between 2012 and 2037. The study reviewed the local commercial property market and the socio-economic characteristics of St Helens and consulted directly with local businesses through one-on-one interviews and a telephone survey. The data gathering informed the forecasting of the OAN for employment land to 2037, which was assessed using three approaches – historic land take-up, jobs forecast and residential labour force projections. The historic land take-up was assessed to be the most appropriate approach for St Helens. Additional to a baseline general employment land needs forecast, an assessment of the additional demand due to major employment projects in the region, including the Parkside SRFI and SuperPort Liverpool, as well as the strong logistics market, was undertaken. The OAN, including the additional demand, was forecast to be 177-214 ha to 2037.
- 2.34 This was a demand side assessment and did not fully assess the supply of available employment land in St Helens. However, in the course of the study it was identified that there was a lack of large scale, strategic sites in the LCR appropriate for logistics units. Furthermore, recent take-up of employment land in St Helens appeared to be constrained by lack of local supply, limiting take-up in the 2012-15 time period.
- 2.35 The ELNS found that St Helens' location on the M6 and M62 motorways means that it is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector. The ELNS indicates whilst traditionally St Helens has been a manufacturing centre, with the largest consumers of land being B2 (general industrial) operations, it is likely that the mix of uses will change during the Plan period, with a strong shift to B8 (storage and distribution) uses.

St Helens Employment Land Needs Study Addendum Report (2019)

- 2.36 This report was prepared by BE Group as an addendum to the main ELNS report (2015) and should be read in conjunction with the earlier document. The addendum was commissioned to assess whether the OAN was still valid in light of further information available since 2015. It also provided further information on the likely ultimate job levels on the proposed employment allocations and potential job growth trajectories and where the additional labour to fill these jobs might emerge from.
- 2.37 The OAN was revised upwards, recognising the continued strength of the logistics sector and interest in and around St Helens, particularly for regionally significant, strategic sites. The OAN range was identified as 190-239 ha (from 2012 to 2037).
- 2.38 The ultimate capacity of jobs on the allocated employment sites was estimated using jobs/sqm of floorspace and floorspace/ha of land estimates, as well as judgements on the potential types of uses on each site and any likely lower yield of employment (e.g. part of a site having undevelopable land). The ultimate capacity was estimated to be some 14,200 full-time equivalent positions.
- 2.39 The trajectories of employment growth on the sites were modelled with assumptions as to timing of when sites would be brought to the market (reference to planning approvals/applications and developer interest) and types of uses. Three growth scenarios were prepared – assuming all would be developed as soon as possible, assuming prioritisation of sites to allow smoother growth, and assuming proposed employment sites at Haydock would be delayed until Junction 23 improvements were complete.
- 2.40 The final chapter of the report provides a discussion on the likely sources of additional labour, including tapping into the unemployed and underemployed market, increasing participation of 65+ years age cohort, commuting and in-migration.

Parkside Logistics and Rail Freight Interchange Study (2016)³

- 2.41 The Parkside Logistics and Rail Freight Interchange Study prepared by AECOM and Cushman & Wakefield investigated delivery options for road and rail-linked logistics development on land at Parkside East and West. It confirmed, having regard to the results of consultation with relevant industry stakeholders, that there is a clear demand for a new SRFI in the North West. It also identified that, due to its geographical location and specific characteristics Parkside is uniquely placed to satisfy this demand. The

³ Please see Parkside SRFI Background Paper SD024 for further information in relation to the Parkside site.

opportunities for rail access from the site are considered to be second to none in the North West with access being easily achievable to both the West Coast Mainline and to the East-West ('Chat Moss') line between Liverpool and Manchester. This will allow train movements to / from the north, south, east and west to be catered for at the site.

- 2.42 The Study also identified that the development of an SRFI at Parkside would bring substantial benefits in terms of modal shift of freight movement (from road to rail) and therefore of reducing carbon emissions, when compared with the development of purely road based logistics uses of an equivalent scale.
- 2.43 Based on available evidence, the Study indicates that the Parkside site could viably deliver a medium (8 trains per day) to large (12 trains per day) facility. The Study concludes that to deliver a viable SRFI at Parkside, land on both the west and east side of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

St Helens Council Plan 2018-2020 (2018)

- 2.44 St Helens Council Plan 2018/2020 is the Council's current corporate Plan. The Council Plan identifies high levels of worklessness in the Borough as a key challenge, with lower numbers of people in work, higher numbers of people on out of work benefits and less economic activity than the national average. A key challenge is low attainment and skill levels, as although having shown improvement, school attainment and adult skill levels lag behind the national averages, particularly higher level skills for specialist sectors.
- 2.45 The Council Plan is structured around three key ambitions, one of which is to create a '*Better Place*'. Growing the Economy is identified as one of four Borough level strategic objectives, which can help deliver this key ambition.
- 2.46 The Council Plan sets a number of ambitions relevant to employment land and the Local Plan. The Council's ambition is for a strong, well connected and sustainable St Helens to prosper at the centre of a northern economic powerhouse. The Plan seeks to implement an approach to promoting greater economic development activity and growth within the Borough. The adoption of a new Local Plan that establishes the Borough's future planning priorities for the next 15 years and allocates sites for housing, employment, retail and green space development is identified as being key to meeting the Borough's strategic objectives.
- 2.47 The Council Plan identifies ways it will deliver the strategic objectives. Those relevant to employment land and economic growth include:
- a growth focussed planning and development service with landowners and developers to increase economic development, growth and investment;

- promote the Borough as a northern hub for logistics, maximising the potential of the M6 growth corridor, the immediate focus of which includes the development of Parkside strategic employment site;
- successfully deliver the £4.9 million 'Ways to Work' programme to reduce worklessness, in particular youth unemployment, engaging over 3,700 people and creating over 800 jobs through a series of apprenticeship and employment support schemes; and
- work collaboratively to maximise the borough's transportation assets and further establish St Helens reputation as a well-connected location for national road and rail, whilst delivering a safe and sustainable transport offer. Key projects to be delivered include access to Parkside, national road network improvement to the M6 and A580, the redevelopment of Newton-le-Willows rail station and improved accessibility to the Town Centre.

3. The Local Plan Employment Land Requirement

Determining St Helens' Employment Land Needs

- 3.1 BE Group prepared the St Helens ELNS in 2015 and an addendum report providing updated advice in 2019. The ELNS provided an estimate of the OAN for employment land in St Helens to 2037. The addendum report provided a revised OAN for St Helens, primarily based on further analysis of the B8 warehousing market in St Helens and the wider LCR.
- 3.2 The OAN was calculated using three separate methodologies and then commentary of which would be the most appropriate approach for the St Helens market was provided. However, the assessment of the OAN is more than a calculation exercise and has a range of inputs that would influence the approach to the assessment, including:
- policy framework;
 - socio-economic characteristics of St Helens, particularly the workforce characteristics;
 - review of the property market, including types and sizes of units transacted in recent years and availability of stock;
 - review of the overarching property trends in St Helens and the broader region; and
 - consultations with relevant property stakeholders, commercial agents and key businesses.
- 3.3 The ELNS used three methodologies referred to as Models in the report:
- Model 1: Historic Land Take-Up;
 - Model 2: Employment Based Forecast; and
 - Model 3: Residential Workforce.
- 3.4 These approaches rely on extrapolating past data on the St Helens market over the forecast period. **Model 1** used the data compiled over the previous two decades on the employment land take-up in St Helens. Averages of the past annual take-up of land was used as the assumed growth rate over the forecast period. It was observed that the data included time periods of considerable growth and times of low or nil growth. This reflected the overall confidence in the economy and is a typical observation for a local authority area over a long time period. Therefore, for this analysis, an overall average and a growth period average were calculated.
- 3.5 Furthermore, the forecast period was 2012 to 2037, but given the original analysis was undertaken in 2015, there was data available for the period 2012-2015. This data showed very low take-up, which appeared to be due to a lack of available sites. Therefore, two overall averages were calculated – one based on the data for the period 1997-2012 and one for the period 1997-

2015. A further average was calculated based on a growth period only (1998-2008), which provided an indication of the potential growth trajectory over the forecast period of a sustained high growth outcome.

- 3.6 Land take-up by businesses is not a neat occurrence with each last parcel of employment land matching the needs of local businesses. Therefore, there needs to be a margin included within the modelling to enable choice of land for businesses. This margin was approximated using a five-year buffer (i.e. five years of average growth) on top of the original forecasts.
- 3.7 The forecasts based on the 1997-2012 and 1997-2015 averages were recommended as the preferred trajectories, given that they are based on a wider time period and it is assumed that there would be high and low growth periods in the 25-year forecast period.
- 3.8 The **Model 2** approach was to use employment forecasts by industry sector to estimate floorspace and land requirements to 2037. Two employment forecasts were purchased – from Oxford Economics and Cambridge Econometrics – which provided annual employment estimates by sector to 2037. It is the change in employment numbers which is the key in this analysis – growth in employment implies a growth in demand for land and premises and a decline in numbers implies a decline in land and premises demand. Different industry sectors have different requirements for B-class employment land (for offices, warehousing and industry). Employment in sectors such as manufacturing, professional services, administrative support, etc. would be overwhelmingly within premises that would be classified as B-class uses. Other sectors would be overwhelmingly within premises not classified as B-class uses (e.g. education, accommodation and food services) and some would have a portion of their employment within B-class premises (e.g. public administration and defence, construction, health and social work).
- 3.9 Therefore, assumptions were made of the percentage of the employment growth within each sector that would be located within B-class employment land. These assumptions were based on the characteristics of each employment sector and typical averages that BE Group has applied in other analyses. Job densities (amount of floorspace required to support one job) were estimated using HCA's Employment Densities Guide, using the Second edition for the 2015 report and the Third edition for the addendum report. These job densities figures are accepted averages for employment premises in England and are widely used. From this the change in floorspace requirements is calculated for each sector. Land estimates are calculated based on standard development ratios for B-class employment.
- 3.10 Therefore, Model 2 converts the employment forecasts by sector to land requirements by sector. The employment land need calculated through this method is comprised of increasing employment land needs (from growth employment sectors) and decreasing employment land needs (from declining employment sectors). As such, a net figure was presented. However, this net

figure assumes that declining employment sectors would be able to transfer their 'excess' employment land smoothly to the growth sectors. However, this may not be the case, as B-class employment land may not be appropriate for all use types (e.g. moving from factory to offices) and declining employment numbers may not be commensurate with changes in floorspace of premises. Therefore, as well as a net figure, a growth sectors figure was also presented (i.e. the land requirements from only the growing employment sectors). Due to the potential difficulties in reusing declining sector floorspace for growth sectors, it was determined that the growth sector forecasts were the most appropriate figures from this methodology.

- 3.11 The approach in **Model 3** was to look at the residential workforce in St Helens to 2037, estimating the employment land need based on forecast changes in the number of working residents in the Borough. These residents may be working within St Helens or elsewhere and thus only a portion of them would lead to a requirement for employment land in St Helens.
- 3.12 Similar to the Model 2 approach, the Model 3 methodology looked at the growth of employed residents over the forecast period by industry sector. Considerations of the economic activity of the residential population, unemployment levels and an increase proportion of workers aged over 65 years were also included. The forecasts were then converted to floorspace and land requirements through the same approach as Model 2 (assumptions on the proportion of the workforce that would be within B-class premises and job density calculations). Similar to Model 2 the floorspace and land requirement using this methodology was estimated on a net basis (growth and declining sectors) and a growth sectors only basis, with the growth only approach being the preferred trajectory for Model 3.
- 3.13 In summary, three methodologies were used to forecast the employment land need. Within these three methodologies, multiple approaches were also taken – in Model 1 three trajectories were analysed, in Models 2 two employment forecasts were used, in Model 3 two population growth forecasts were used and in Models 2 and 3 the net employment land need and the land needs of only the growth sectors were examined. Therefore, the examination of employment land growth was a detailed, multi-faceted approach.
- 3.14 All forecasts and modelling are approximations and have limitations. The Model 1 approach assumes that the type and scale of employment land take-up will average the same as in past years, but this may not be the case if there are significant structural changes to the economy, policy interventions or supply constraints. It cannot adequately account for spikes in take-up that may occur if a very large occupier enters the market. Model 2 would also be limited in accounting for economic and policy changes. Furthermore, it assumes that the job density (floorspace per worker) will remain constant over the forecast period, which may not be the case (e.g. improvements in efficiencies, automation). Model 3 has the same limitations as Model 2 and assumes that the commuting patterns between St Helens and the surrounding

local authority areas is constant over the forecast period, which may not be the case.

- 3.15 The results of the three models are summarised in the table below, replicated from the 2015 report.

Table 3.1 Summary of Modelling for Employment Land Needs 2012-2037 (ha)

Model	Scenario	Land Need (inc 5 year buffer)	Assumptions
1. Land take up	Period 1997-2015	147.0	Based on 4.9ha/yr, the average for 1997-2015
	Period 1997-2012	174.0	Based on 5.8ha/yr, the average for 1997-2012
	Growth Period	225.0	Based on 7.5ha/yr, the average for growth period 1998-2008
2. Employment Base	Cambridge base	37.0	Growth sectors only
	Oxford base	21.8	Growth sectors only
3. Resident Workforce	ONS base	29.6	Growth sectors only
	Oxford base	20.4	Growth sectors only

Source: ELNS 2015

- 3.16 These forecasts had significant variability between them, and therefore it was appropriate for BE Group to advise on which forecast trajectory would be most suitable as a basis for planning. The ELNS reviewed past take-up rates and employment growth in St Helens and this demonstrated that land requirements based on employment numbers underestimated the actual take-up of land in the Borough. Therefore, it was recommended that the Model 1 approach was the most appropriate for St Helens.
- 3.17 Of the three Model 1 growth forecasts, it was considered that the forecast based on the growth period (and therefore the highest forecast) was likely to be too high for St Helens and unsustainable over the forecast period. The recommended baseline employment land needs for St Helens was in the range provided by the other two Model 1 trajectories – 147-174 ha over the forecast period.

- 3.18 The assessment of the employment land need also considered the regional context, in particular the strong growth in the logistics market and the implications of the Liverpool 2 SuperPort on demand for warehousing. Therefore, in addition to the baseline demand, an allowance was made for demand in St Helens resulting from major projects, such as SuperPort, which was estimated to be 30-40 ha above the baseline. Estimating this figure was a judgment, rather than an exact calculation, and considered the overall regional demand, St Helens' potential share of this demand and the Borough's attractiveness as a destination for warehousing. The overall employment land need was estimated in the ELNS 2015 to be 177-214 ha for St Helens between 2012 and 2037.
- 3.19 The 2019 Addendum report provided a review and update of the employment land need based on further information available at the time. The further information included updated land take-up data and more evidence of the warehousing and logistics market performing strongly in the region, with major interest in sites within St Helens. Therefore, the baseline requirement and the additional requirement due to the major projects were updated, with the revised employment land need being 190-239 ha between 2012 and 2037. Once again, the additional requirement due to the major projects was a judgment based on the available information and St Helens' likely share of the warehousing market.

Setting the Local Plan Employment Land Requirement

- 3.20 As part of the preparatory work for the Local Plan, it has been important to acknowledge St Helens' role within the wider LCR by understanding its key strengths and how these can help support the aspirations of the LCR Combined Authority and the LCR Local Economic Partnership (LEP) (as set out in the LIS), particularly in driving forward the logistics and foundation industries such as glass making. Both the LCR Combined Authority and the LEP are seeking to strengthen the LCR economy with the overall aim of 'levelling up' with the rest of the UK economy and maximising the potential for transformation.
- 3.21 It has also been important to take account of the Council's own economic objectives as set out in the Council's corporate plan, which places further emphasis on the importance of a growth focused Local Plan in order increase economic development, growth and investment. The Local Plan is seen as key to maximising the potential of the Borough as a northern hub for logistics, the potential of the M6 growth corridor as well as helping to deliver the Ways to Work' programme to reduce worklessness.
- 3.22 So, at both the local and sub regional scale, relevant economic and corporate strategies are clear that the Local Plan is integral in helping meet wider economic objectives as part of a sustainable approach that combines job creation and reduced inequalities.

- 3.23 The Council therefore recognise that it is vital that the Local Plan identifies a future supply of land which is suitable, available and deliverable for economic development uses over the Plan period. Ensuring there is a sufficient supply of employment land - of the right type and in the right locations for new and existing businesses and especially for the employment growth sectors has been a key consideration in the plan-making process. Getting it right clearly matters, for local and inward investment and for business growth.
- 3.24 In setting the employment land requirement for the Local Plan, it is therefore necessary to consider if the OAN figure can be met in terms of any constraints to delivery. Through the development of the Local Plan the Council has identified that there are no fundamental constraints to delivery in terms of land availability (once Green Belt sites have been released), viability, environmental capacity and infrastructure capacity. There is, therefore, considered to be no justification for setting a Local Plan employment land requirement lower than the OAN if the Council is to meet local and wider economic objectives.
- 3.25 The Council's approach has been to provide for the levels of growth in both employment and housing that are realistic, deliverable and therefore achievable within the Plan period. When setting the Local Plan employment land requirement, the Council have sought to provide a balance between ensuring the local plan delivers employment land to meet the Borough's employment land needs in full and protecting the Green Belt.
- 3.26 As referred to earlier in section 3, the ELNS followed the approach outlined in the PPG, modelling a range of scenarios using techniques that clearly align with the PPG. The ELNS Addendum Report (2019) identified the OAN for employment land needs as 239 ha between 2012 and 2037.
- 3.27 SHBLP Policy LPA04 'A Strong and Sustainable Economy' identifies an OAN of 227.4ha for new employment land for the period 2012 to 2035 (Table 4.3 of the SHBLP). This figure has been calculated based on the ELNS Addendum (2019) assessment, adjusted for the slightly different time period.
- 3.28 Table 4.4 of the SHBLP identifies a residual employment land requirement of 215.4ha (to be updated to 219.2ha through proposed modification AM015, due to a 'double counting' of site 10EA in both the allocations and existing deliverable supply in Table 4.4 of the Local Plan Submission Draft). This residual requirement accounts for actual take-up of employment land from 2012 to 2018, removing this from the OAN estimate and then stating the residual requirement for the period 2018 to 2035. The residual requirement as of 31.03.2020 has been updated in table 4.2 of this Paper.
- 3.29 The proposed approach to employment land will also help meet employment land needs across the City Region and West Lancashire as a whole, as identified in the LCR Strategic Housing and Employment Land Assessment (SHELMA) 2017. The Plan will address an identified shortage of large sites, suitable for the needs of the growing logistics sector and the clear evidence of

market demand in the Borough. It also takes into account the need for flexibility and choice in site supply and the strategic location of St Helens in relation to the motorway and rail networks.

- 3.30 Of the 11 sites allocated for employment use all but 3 would be released from current designation as Green Belt⁴. This is justified because of the limited land supply (particularly for large employment sites with good access to transport routes) which exists in urban areas in St Helens and in nearby districts, and the opportunity provided at Parkside.
- 3.31 The Council see the proposed employment allocations for logistics development in the Local Plan as being vital to assisting the delivery of the sub regional economic development objectives of the Government's Northern Powerhouse agenda and also reflecting the LCR LEP's support for logistics in association with Liverpool SuperPort. There is considered to be an evidenced need (as set out in the ELNS 2015 and ELNS Addendum Report 2019) to identify and allocate new land for logistics at commercially attractive strategic sites, enabling the sector to grow in a sustainable manner.
- 3.32 Logistics space markets and networks often cut across local authority boundaries, with wide functional economic market areas and specific needs in terms of access to the strategic transport network. As set out in section 2 above, the PPG emphasises that policies for logistics should be formulated "separately from those relating to general employment land". The 2015 ELNS and the ELNS Addendum Report considered the need for large scale strategic B8 needs due to major projects in the region (i.e. over and above typical St Helens growth) separately above the baseline demand. In conformity with the PPG, the Council has considered the most appropriate locations for meeting identified strategic logistics needs (whether through the expansion of existing sites or development of new ones). In addition, it is considered that the protection of existing employment sites through Policy LPA4 and the smaller employment land allocations, will provide land for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets, in accordance with the PPG.
- 3.33 It is considered that the 227.4ha Local Plan employment land requirement represents a sound requirement which supports economic growth ambitions. The Local Plan seeks to address in full employment land needs in St Helens and consequently there is no current requirement to reach agreement with others to accommodate the Borough's needs elsewhere.
- 3.34 The land at Omega South Western Extension (site 1EA) has been identified, following discussions with Warrington Council officers carried out under the 'duty to cooperate', as being allocated to help meet the employment land needs of Warrington (rather than St Helens). This is due to its location

⁴ See Developing the Strategy Background Paper, SD026, for more information.

immediately next to, and with its access to be provided through, the existing Omega employment area in Warrington⁵.

- 3.35 Other neighbouring authorities are preparing their own Local Plans to address their specific needs in full. Statements of Common Ground have been prepared with neighbouring and wider LCR authorities to ensure that strategically important cross boundary issues have been properly considered when preparing the Plan⁶.

Meeting Needs Beyond the Plan Period

- 3.36 The NPPF requires that when local planning authorities define Green Belt boundaries, they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period. However, national planning policy and guidance does not set out how local planning authorities should determine what amount of land beyond the Plan period would be deemed adequate.
- 3.37 In the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land. Being mindful of the uncertainties that are inherent with calculating longer term needs and the need to demonstrate exceptional circumstances to justify the release of Green Belt land, the Council have not sought to identify a specific employment land need figure for post 2035. The Council have instead identified a reasonable amount of land to be safeguarded in order to meet future development needs. SHBLP Policy LPA06 identifies 2 sites to be removed from the Green Belt and safeguarded in order to meet longer term development needs beyond the Plan period:
- Site 1ES: Omega North Western Extension, Bold (29.98 ha); and
 - Site 2ES: Land north east of Junction 23 M6, south of Haydock racecourse, Haydock (55.9 ha).
- 3.38 SHBLP Policy LPA06 makes it clear that safeguarded land is to meet longer term development needs well beyond the Plan period, and that planning permission for the development of the safeguarded sites will only be granted following a future Local Plan Review that proposes such development.
- 3.39 The estimated combined capacity of 1ES and 2ES safeguarded for employment use is 85.88ha. Of these sites, site 1ES would form an extension to Omega North in Warrington, whilst site 2ES would form an easterly expansion of Haydock Industrial Estate, albeit on the opposite side of the M6.
- 3.40 The timing, form and extent of any development that may be acceptable in the future on these sites is likely to be influenced by the need to ensure a phased

⁵ See St Helens Borough Local plan 2020-2035 Duty to Cooperate Statement (SD009) and Warrington Borough Council - Statement of Common Ground (SD012) for further information.

⁶ See St Helens Borough Local plan 2020-2035 Duty to Cooperate Statement (SD009) and Liverpool City Region Spatial Planning Statement of Common Ground (SD010).

approach to meeting overall employment needs and the extent to which current constraints affecting these sites have been overcome. In the case of site 1ES, these include the need to ensure that the site can be satisfactorily accessed from the highway across land outside the site and that the site can be developed, in conjunction with other sites, without causing unacceptable impacts on the highway network in both St Helens and Warrington. In the case of site 2ES, the form and extent of any development that may be acceptable in the future is likely to be influenced by its interrelationship with Junction 23 of the M6, where a need for substantial improvements to enhance junction capacity within the Plan period has been identified (see Policy LPA07).⁷

Development of the Local Plan Employment Land Requirement Through the Plan Preparation Process

Stage 1: Local Plan Scoping Consultation January 2016

- 3.41 The Local Plan Scoping Consultation sought views on what level of economic growth St Helens should plan for. Consultees were asked if they thought the OAN of 178.5ha from 2012 up to 2033 (expected to be the end date of the Plan at the time) established in the ELNS (2015) was appropriate for St Helens. The OAN factored in the potential uplift in employment land demand due to the potential multiplier effects of Parkside SRFI and SuperPort.

Stage 2: Preferred Options December 2016

- 3.4 The consultation focussed on a range of options for the quantum of development in the Borough; its distribution; and strategic sites. The employment requirement options put forward for consultation were:
1. Preferred Option: allocate a minimum of 306ha of employment land up to 2038. Allowing for take-up and losses of employment land since 2012 (2.37ha of take-up and 34.96ha of losses) against an OAN of 190.8ha, the residual requirement for the Plan was identified as 223.4ha.

The preferred option was considered a robust approach when allowing for the Council's economic growth ambitions, the position of the SHELMA (which was still being prepared) and the comments received from consultees during the Local Plan Scoping Consultation (2016), which suggested St Helens should play a greater role in meeting sub

⁷ M6 Junction 23 Haydock Island Capacity Feasibility Study (TRA007) and A580 / M6 J23 Improvement Options Supplementary Report Junction Assessment Results - Vista Road Link Option (TRA008) provide the latest position in relation to the feasibility of different options improving capacity at M6 Junction 23. The site is currently the subject of a planning application for large scale B8 development (P/2017/0254/OUP). See table 4.3 of this Paper for further information.

regional large scale B8 strategic land needs than what had been suggested at the Local Plan Scoping Stage in 2016.

2. Alternative Option 1: use economic forecasts to determine the objectively assessed employment land needs;
 3. Alternative Option 2: provide less employment land than identified objectively assessed needs;
 4. Alternative Option 3: provide significantly more employment land than the identified employment land requirement; and
 5. Alternative Option 4: relaxation of policy protecting existing employment land.
- 3.5 Option 1 was rejected because the ELNS tested the reasonability of using economic forecasts by comparing historic forecasts to actual employment land take-up data in the Borough. The ELNS indicates that the actual gain of employment land in St Helens has been significantly higher than previous economic forecasts. Therefore, the land take-up methodology is considered the most likely predictor of future land take-up and has been used in the ELNS to establish baseline objectively assessed employment land needs.
- 3.6 Option 2 was rejected because it would not be compliant with the NPPF (2012 version) which required each authority to meet its own 'objectively assessed' development needs with sufficient flexibility to adapt to rapid change. It would not proactively encourage sustainable growth and inward investment to the Borough and therefore economic demand and creation of new jobs would not be realised in St Helens. This would result in slower growth in the Borough's economy.
- 3.7 Option 3 was rejected because a significant oversupply of employment land could result in pressure for more housing, create labour supply difficulties and could therefore result in unsustainable commuting. It could also result in a large oversupply of development land, with many of the allocated sites remaining vacant. A significant oversupply of development land in St Helens could also undermine the delivery of employment land in neighbouring authorities.
- 3.8 Option 4 was rejected because the NPPF does recognise that some employment allocations may need to change over time, this option could result in piecemeal change across the Borough's existing business and industrial areas with successful employment areas being undermined by higher value uses driving out employment uses. This would be harmful to the local economy and limit the opportunity for existing business to confidently invest in the area.

Stage 3: Submission Draft Local Plan

- 3.9 The Local Plan Submission Draft proposed a residual employment requirement of a minimum of 215.4ha (to be updated to 219.2 ha through proposed modification AM015) of land for employment development between 1 April 2018 and 31 March 2035. This was based on an OAN of 227.4ha between 2012-2035 as set out in the ELNS Addendum Report 2019.
- 3.10 The Local Plan Submission Draft proposed 234.08ha of employment land allocations in the Plan period. This was less than the 306ha proposed in the Local Plan preferred options up to 2038. This was a reflection of the large number of objections the Council received to the proposed amount of Green Belt release for employment land at the Preferred Options stage and the findings of an updated Green Belt Review (2018). Also, the Council no longer considered it appropriate to consider losses of all employment land in the residual employment land calculation as not all losses of employment land in the Borough will need to be replaced. Some losses will reflect local restructuring, as the current stock contains several older sites that are less likely to meet future needs and are on a scale that reflects past industrial patterns rather than future requirements.
- 3.11 This reduction in the proposed employment land requirement included a key change compared to the previous Preferred Options consultation proposals relating to land north east of Junction 23 of the M6 (site 2ES). Whereas the Preferred Options document proposed that this site be allocated for employment development before 2033, the Local Plan Submission Draft proposed that it be removed from the Green Belt but safeguarded to meet potential employment needs after 2035. It was considered that this change of approach will have the benefit of avoiding narrowing down the options for the development of a scheme to improve Junction 23 of the M6. The significant improvement of this junction is identified as a key infrastructure priority within the Plan, which would bring substantial benefits to the Borough and the wider transport network. The need for this new approach is also evidenced by the St Helens Council Transport Impact Assessment 2018. This confirms that Junction 23 currently experiences queues and delays during peak periods and that this situation is likely to substantially worsen as the Plan period progresses without effective mitigation being undertaken. It is also not considered essential for the land north east of Junction 23 to be developed before 2035 to meet evidenced needs for employment development within that period.⁸
- 3.12 The employment land requirement in the SHBLP seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG. The employment land requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, with preserving the Green Belt.

⁸ M6 Junction 23 Haydock Island Capacity Feasibility Study (TRA007) and A580 / M6 J23 Improvement Options Supplementary Report Junction Assessment Results - Vista Road Link Option (TRA008) provide the latest position in relation to the feasibility of different options improving capacity at M6 Junction 23.

- 3.13 As set out in Policy LPA04, through the Local Plan the Council is seeking to build a strong and sustainable economy. Policy LPA04 sets out other measures apart from the allocation of new employment land to promote employment including (in summary):
- protecting existing sites and premises from proposals for other uses except where (for example) they are no longer suitable for employment uses;
 - supporting the re-use and reconfiguration of employment areas and the recycling of land within them for employment use;
 - supporting diversification of the rural economy; and
 - supporting (subject to specified criteria) the enhancement and expansion of tourism resources and facilities; and encouraging use of local suppliers and training opportunities.
- 3.14 A priority of Policy LPA04 is also to protect existing employment sites and provide opportunities for the growth of existing businesses in the Borough.
- 3.15 As proposed through modification AM014, through LPA04 the Council is also seeking to support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.
- 3.16 The Council will continue to support the use of local suppliers of goods and services and the creation of apprenticeships and training opportunities for local people in accordance with the requirements of the existing Local Economy SPD.

Criticism of the Local Plan Employment Land Requirement

- 3.17 Some representors to the Plan have suggested that the employment land requirement in the SHBLP is too low and more land should be identified given the Council's economic growth aspirations and to meet the large scale B8 needs of the LCR. The effects of influences on demand arising from SuperPort and the Parkside SRFI and the appeal of St Helens to the increasingly active large scale logistics market, is justification for some representors to increase the major projects uplift to 80ha compared to the 65ha proposed in the SHBLP.
- 3.18 The SHBLP seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG. The economic aspirations of the SHBLP are significantly higher than baseline growth as identified in the ELNS. It is therefore ambitious in the Council's opinion. In addition, the Council's approach to determining its employment land requirement has been subject to agreement with neighbouring authorities and wider LCR authorities. The LCR LEP or the LCR Combined Authority have also not raised any concerns about the proposed Local Plan employment land requirement.

- 3.19 In addition, at 234.08ha the SHBLP employment land allocations are 14.68ha⁹ higher than the residual employment land requirement (excluding site 1EA and allowing for proposed modification AM015, which updates the residual requirement to 219.2ha). This approach is based on the need to reverse the suppression of employment land take-up the Borough has experienced since 2005 and the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above the 65ha uplift already applied to the baseline OAN. There is therefore considered to be sufficient contingency in the SHBLP employment land allocations to meet sub-regional B8 strategic land needs and consequently there is no need to increase the OAN.
- 3.20 In addition, a higher employment land requirement could also lead to an excessive loss of Green Belt, which is not justified by the evidenced level of need for new employment land. This would conflict with national policy that seeks to protect the openness and purposes of the Green Belt.
- 3.21 Some representors have raised concerns that the likelihood is that in excess of 60 hectares will be developed as SRFI or associated uses at Parkside (site 7EA), and therefore if the SRFI occupies in excess of 60 hectares then this will reduce the contribution that the site can make to meeting general employment needs. It is argued that this will dilute the flexibility of the supply and increase the risk that the minimum employment land requirement is not met and therefore there is a need to build in additional flexibility by increasing the supply through the allocation of more employment land, such as site 2ES.
- 3.22 The employment land requirement set out in Policy LPA04 is inclusive of a 5ha buffer to ensure flexibility. As set out previously, the land allocations are 14.68ha higher (or 17.42ha higher based on the residual requirement as of 31.03.2020) than the residual employment land requirement. There is therefore considered to be sufficient contingency in the SHBLP employment land allocations, and thus the Council can meet its needs for employment development up to 2035 without the need to allocate more employment land.
- 3.23 If a SRFI scheme in excess of 60ha is developed at site 7EA, the need to allocate more employment land would be considered through any future Local Plan Review in accordance with Policy LPA06.
- 3.24 Other representors have raised concerns that the employment land requirement is too low because the OAN is calculated predominately from using past delivery rates which have been constrained by a lack of available sites. Therefore, if there had previously been a better supply of market attractive sites, the delivery of land would have increased, and the OAN would rise. Other representors suggest that the logistics sector had particularly strong growth over the period from 1998-2008, and therefore, it is far more

⁹ Table 4.2 of this Paper shows an updated residual requirement as of 31.03.2020. Based on this residual requirement the SHBLP employment land allocations are 17.42ha higher than the residual employment land requirement.

appropriate to base the employment land need on the 1998-2008 scenario period, when economic trends better reflected the positive growth strategy which the Plan purports to establish.

- 3.25 BE Group in the ELNS (2015) used three averages for growth scenarios based on different time periods of the available historical data – 1997-2012 (Scenario 1), 1997-2015 (Scenario 2) and 1998-2008 (Scenario 3). The three periods were chosen for the following reasons:
- Scenario 1, 1997-2012: full data period available excluding the early forecast period (from 2012). This includes time periods when the overarching economic conditions varied, including strong growth, a recession period and slow recovery after the recession.
 - Scenario 2, 1997-2015: full data period available including the early forecast period (from 2012). This includes time periods when the overarching economic conditions varied, including strong growth, a recession period and slow recovery after the recession. It also includes the recent years, where it had become apparent that lack of land choice is a constraint in the market.
 - Scenario 3, 1998-2008: period of strongest growth in employment land take-up since 1997. This period is a time of strong economic growth in the UK and the time period ends as the recession starts.
- 3.26 Forecasts were based on the three scenarios, which resulted in a forecast range for employment land. The Scenario 1 and 2 forecasts were adopted as the baseline employment land requirement for St Helens in both the 2015 ELNS and the addendum report. This resulted in a range for the baseline employment land requirement.
- 3.27 BE Group chose this approach for the following reasons:
- The longer time period of data upon which to base the forecasts meant that the data included stronger and weaker economic times, which is more likely to reflect the 25-year forecast period.
 - By using the two scenarios for the forecasts and thus having a range for the baseline employment land requirement, this was able to account for the inherent uncertainties within forecasting over a 25-year period.
 - The growth period scenario (Scenario 3) was considered to be too bullish and would require St Helens' economy to perform at peak levels over a sustained period.
 - Strategic warehousing demand due to major projects in the region (i.e. over and above typical St Helens growth) was considered separately above the baseline demand.
- 3.28 Since the original ELNS report (2015), the following factors have emerged in the market that are of relevance to this assessment:

- key sites for large warehousing projects around Haydock were progressed in terms of gaining planning permissions;
- regional studies on the regional warehousing and logistics market continue to suggest strong growth in this market; and
- the 2015-2017 take-up period was low, suggesting continued land availability constraints dampening the market.

- 3.29 Therefore, the ELNS Addendum report (2019) revised the employment land requirement in two ways. The baseline forecast was revised, which kept the upper limit of the range but decreased slightly the lower limit (as the 2015-17 take-up was lower), though in the commentary it was stated that the upper limit was more likely to be a better representation of the market without supply constraints. Secondly, the additional demand due to strategic warehousing demand from major projects was increased. Therefore, the overall employment land need was increased compared to the original ELNS (2015).
- 3.30 It is BE Group's opinion that the growth period 1998-2008 represented a 'boom' time in the St Helens economy, reflecting strong growth in the UK economy and confidence in the market. To only consider such an outcome for St Helens over the 25-year period is likely to be overly optimistic for St Helens and a more balanced forecast would also consider the potential for low and moderate growth times. Furthermore, the growth period 1998-2008 was primarily led by B2 industrial demand, with some distribution floorspace also at irregular intervals. The online retailing market was only beginning to emerge as a significant player in the 1998-2008 period and distribution networks to support major retailers' online retailing had yet to be established widely. Therefore, this growth period was a different type to that anticipated in coming years, and consequently the growth period average would only be an approximation of take-up and would need to be applied with caution. Adopting a longer-term average would also be an approximation but would help to remove some of the biases resulting from unusual (peak or trough) periods.
- 3.31 It remains BE Group's opinion that the St Helens economy would not sustain the annual take-up levels matching the Scenario 3 growth period over the full 25-year forecast period. While growth may well be strong in the near-term, with the logistics sector looking for further land and there is likely to be some spike in take-up once the market is less constrained, it is BE Group's opinion that a high growth period would not be sustainable over the full forecast period.
- 3.32 Given that recent take-up levels have been impacted by supply constraints, it is appropriate to discount the most recent growth rates. Looking at the annual take-up levels, 2012 appears to be a reasonable estimate of when supply constraints were starting to have a significant impact on take-up. The end of the 1998-2008 growth period was not due to the end of supply in St Helens, it was the economic downturn and resulting recession period experienced at this time. Therefore, in adopting such a time period upon which to base the forecasts, it would need to be understood that this period is a growth or boom period only and not a period selected because of its supply of land.

- 3.33 Furthermore, it should be noted that current overarching economic conditions have softened, primarily due to Brexit, but also global economic and trade uncertainties have reduced confidence in the economy. Market uncertainty surrounding the economic impact of Covid19 must not be overlooked either. This is a reminder that many factors may impact on take-up in the St Helens market over the 25-year forecast period, that would mean peak growth levels are not likely to be sustainable over such a timeframe.
- 3.34 Clearly the take-up of the proposed employment allocations in the SHBLP will be monitored and the need for further employment allocations will be reviewed as a minimum every 5 years through a Local Plan Review.
- 3.35 Other representors have raised concerns that the employment land requirement is too high and therefore the amount of Green Belt release required to meet these needs is not justified. The LPSD seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG. As set out in the Green Belt Review (2018) and Developing the Strategy Background Paper (SD026) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed employment land needs. Exceptional circumstances therefore exist to release land from the Green Belt. The Council consider this is a robust approach and is consistent with national policy. The employment land requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, with preserving the Green Belt. Economic growth is central to the Council's overall strategy and to that of the LCR. Economic growth will be essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities in the Borough.
- 3.36 Some representors have suggested that the Council's economic aspirations are too narrow and only focus on the logistics sector which will only bring low paid and low skilled jobs to the Borough. In accordance with the NPPF and PPG the employment allocations in the SHBLP to seek to provide suitable land for the identified growth sectors in the Borough, with logistics being a key one. The Council consider the skills mix of potential new jobs in the logistics industry are a good fit for the local area, providing a mix of skilled, semi-skilled and entry level jobs, which will serve to retain more St Helens residents within the Borough and support prosperity in surrounding communities, some of which are some of the most deprived in the country. It is considered that new operative jobs are an essential first opportunity for many in the labour force and they are highly valuable in communities with high unemployment and lower skills attainment, as is the case in parts of the Borough. Such jobs opportunities will be particularly important as part of the recovery from the adverse economic impacts of the ongoing Covid pandemic where the amount of other job opportunities is likely to be reduced.
- 3.37 Importantly, the type of jobs employed in warehousing is getting broader and more skilled. British Property Federation¹⁰ refers to the "low skills myth" in

¹⁰ British Property Federation, 2015, Delivering the Goods page 11.

reference to the negative perceptions of warehouse jobs. Technological advances mean that IT, robotics, engineering and data analysis are a key part of warehouse management now. British Property Federation indicate that the sector has an above national average representation of managers, directors, senior officials and administrative and secretarial occupations, particularly in businesses operating freight terminals and cargo handling. Specific roles include purchasing managers and directors, importers and exporters, transport and distribution clerks, large goods and van drivers, forklift truck drivers, postal workers and couriers, and storage occupations.

- 3.38 In addition, the Council will continue to with partners such as the LCR Combined Authority and the LEP to seek to expand the business base of the Borough and provide job opportunities in various sectors. For example, the Council is currently working in partnership with Glass Futures Limited and Network Space to deliver a new research and innovation centre for the glass industry in St Helens – Glass Futures. The project has enormous potential to attract associated investment and serve as a catalyst for business creation, inward investment and further R&D activities as well as attract new manufacturing capability to the area.

4. Delivering the Local Plan Employment Land Requirement

Historic Delivery

- 4.1 As set out in the ELNS Addendum Report (2019) and as illustrated in table 4.1 below, up until the past two years the take-up of employment land in the Borough has been extremely low since 2012¹¹ (the base date of the employment land requirement/ commencement of the ELNS' forecast period), and as explained in the ELNS this is due to a lack of market attractive sites. At the same time, employment sites have faced increased pressure from higher value uses such as residential and retail and consequently the Borough experienced a loss of 28ha of employment land between 2012-2020. There are also a number of large sites with extant planning permission for residential use that have not yet commenced (as of 31.03.2020) on former employment sites, these include Former Linkway Distribution Park (proposed SHBLP housing allocation 9HA), Former Ibstock Brick Site (SHLAA ref HL483) and Land At Lea Green Farm East (SHLAA ref HL496), these total 27.94ha. At 31.09ha proposed SHBLP housing allocation 6HA Land East of City Road, Cowley Hill would also represent a large loss of employment land in the Borough.
- 4.2 The recent delivery of SHBLP proposed employment sites 2EA (36.67ha), 3EA (11.05ha) and 10EA (3.84ha) (in years 2018-2020) constitute the only substantial take-up of employment land in the Borough in the past 8 years.

Table 4.1: St Helens Employment Land Take-up 2012-2020 (Gross)

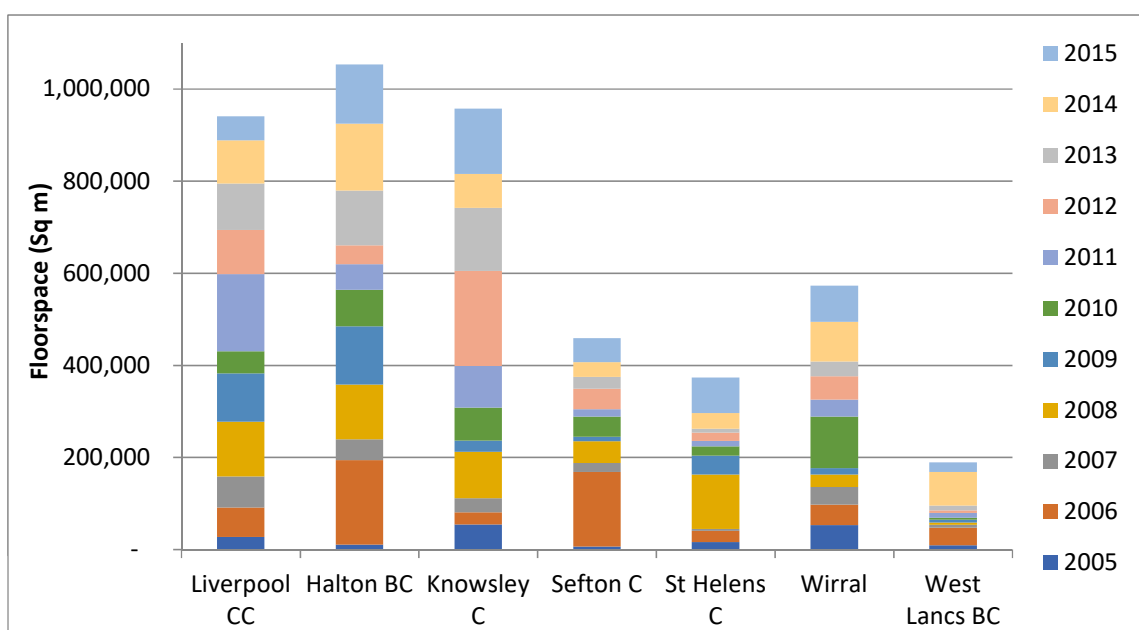
Year	Total (ha)
2012-13	0.11
2013-14	0.08
2014-15	0.53
2015-2016	1.65
2016-2017	0.33
2017- 2018	0.02
2018-2019	4.19
2019-2020	51.53
Total	58.26 ha

- 4.3 As set out in the section 2.11 of the ELNS Addendum Report (2019), it is considered that employment land take-up in St Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites. This is best illustrated by the experience of other authorities in the same functional economic market area. As illustrated in Figure 1 below, Halton, Liverpool, Knowsley and Wirral all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015.

¹¹ Please see page 84-85 of the ELNS (2015) for a full analysis of past take-up on the Borough from 1997.

- 4.4 In Warrington 116.59 ha of employment land (predominately B8) was taken-up during 2012-2016 of which 109.05 ha was at the Omega development site.
- 4.5 The last large scale B8 site taken-up in St Helens prior to the recent completions of SHBLP proposed allocations 2EA and 3EA was the 15.66 ha Somerfield/Co-op distribution facility (56,290 sqm /605,920 sqft) in 2002/03, and since then whilst there has clearly been market demand, as illustrated in the high take-up rates in Warrington, there has not been an adequate supply of market attractive sites in St Helens.

Figure 1: Liverpool City Region take-up of Industrial floorspace by year and local authority, 2005-15



Source: Liverpool City Region Draft SHELMA, January 2017, G L Hearn, Figure 34, Page 64

Employment Land Supply

- 4.6 The table below provides an update to SHBLP Table 4.4: Residual Employment land requirement – 2018 until 2035.

Table 4.2 Residual Employment Land Requirement 2020-2035 (as of 31.01.2020)

Requirement	Hectares
Local Plan OAN 2012-2035 including 5 year buffer and allowance for Parkside SRFI and SuperPort	227.4
Take-up between 1 April 2012 and 31 March 2020 (includes completions at Local Plan Proposed Allocation sites 2EA-	58.26

Florida Farm, Slag Lane Haydock, Site 3EA, Land North of Penny Lane, Haydock and Site 10ea, Land at Lea Green Farm West, Thatto Heath)	
Existing Supply of Developable Employment Land (31 Mar 2020) (This is made up of Land North of Kilbuck Lane (3.46ha) and Pilkingtons Cowley Hill Site (0.58ha)). ¹²	4.04
Total Residual Requirement 2020-2035	165.1

- 4.7 As indicated in Table 4.3, to help meet the shortfall of land, planning permission has already been granted for employment development on 2 sites that are proposed for removal from the Green Belt and allocated for this use in the SHBLP, namely site 2EA (Florida Farm North, Slag Lane, Haydock) and site 3EA (land north of Penny Lane, Haydock). Site 2EA known as 'M6 Major' is occupied by Amazon (34,114 sqm unit) and Kellogg's (48,634 sqm unit) and site 3EA is occupied by Movianto (46,264 sqm unit) who are a healthcare distribution firm. Whilst the relevant applications were referred to the Government under departure procedures, the Secretary of State decided not to call them in for decision. The development planned for these sites has been completed as at October 2020. These points indicate the urgency of addressing the need for new employment land in the Borough.
- 4.8 Since the preparation of the Local Plan there has been an increasing demonstration of the need for employment sites in St Helens that could provide for large-scale logistics operators. This remains the case in 2020, with as mentioned above the completions and occupation of SHBLP sites 2EA and 3EA and the developer interest in and around St Helens, for example at Parkside and at the growth of and proposed extension of Omega, Warrington.
- 4.9 As of October 2020, there were three live planning applications in the Borough for the large scale B8 logistics development. The table below provides the latest position in relation to these applications. A planning application at SHBLP proposed allocation 5EA, Land to the West of Haydock Industrial Estate, for 4 industrial units totalling nearly 300,000 sq. ft was refused at planning committee in July 2019.

¹² Please note that the 2ha site identified in the LPSD supply was based on a draft Masterplan that had been prepared for the Cowley Hill site in 2018. There is now a live planning application for a residential led, mixed use development on the site P/2020/0083/OUEIA, which only identifies a non-residential mixed use area of 1.17ha. Based on the proposed masterplan the Council consider it reasonable to assume 0.58ha of employment land could be delivered on the mixed use element of the site. This supply position will be updated if required following the determination of the planning application.

Table 4.3: Live Planning Applications for Large Scale B8 Development

Site Reference	Site Details and Latest Position	Site Area for new large-scale B8 (ha)	Gross new large-scale B8 floorspace (sqm)
LPSD 2ES: Land North East of Junction 23 M6 (P/2017/0254/OUP)	Outline planning application pending for: Land North East of Junction 23, M6, Haydock: 1,799,341 sqft (167,225 sqm) scheme consisting of three buildings of circa (there are different masterplan options) 1,000,680 sqft (93,200 sqm), 301,011 sqft (27,975 sqm) and 456,815 sqft (42,455 sqm). Application was submitted in March 2017 and has now been submitted to SoS on the grounds of non-determination. Determination of the application has been delayed due to the need for the applicant to determine a suitable solution, in consultation with Highways England, to likely capacity and safety issues at M6 Junction 23 from the proposed development. Site due to go to planning committee late 2020 or early 2021.	55.9	167,225
LPSD 8EA (part of): Parkside West, Newton-le-Willows (P/2018/0048/OUP)	Outline application (all matters reserved except for access) for the construction of up to 92,900 m2 of employment floorspace (Use Class B8 with ancillary B1(a)) ... Planning Committee approval on 17/12/2019 and has since been called in by SoS. A public inquiry is likely in early 2021. Please note a separate application for a link road from the A49 Winwick Road through the former Parkside Colliery (Site 8EA) to Junction 22 of the M6 motorway, known as the 'Parkside Link Road' (P/2018/0249/FUL) has also be called in by SoS and will also be subject to a public inquiry in early 2021.	47.9	92,900
LPSD 1EA Omega South Western Extension (P/2020/0061/HYBR)	Full Planning Permission for the erection of a B8 logistics warehouse (unit 1: 81,570 sqm) offices...Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices...the outline proposals include an extension to unit 1 of 123,930 sqm. (totalling 205,500sqm). The site was granted planning permission on 27/10/2020 subject to conditions and the Secretary of State not wishing to intervene.	75.3	205,500
	Total	179.1	465,625

Local Plan Allocations

- 4.10 As set out in this Paper, it has been established that St Helens has a need for at least 219.2ha of land to be developed for employment use between 2018 and 2035. The LCR SHELMA 2018 (document ref SUB001) identifies a substantial need for large scale B8 warehousing and logistics buildings (defined as over 9,000m²) for the city region.
- 4.11 To strengthen the local economy, St Helens needs to build on those sectors where the Borough enjoys a competitive advantage. It has been established that there is a particular need for large scale B8 storage and distribution uses in the Borough given St Helens' location astride the M6 and M62 motorways, making it particularly attractive for development.
- 4.12 As set out in Section 2 of this Paper, the Allocations Local Plan Economic Evidence Base Paper (2015) concludes that none of the developable sites 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.
- 4.13 Market needs for the large scale distribution sector (for units of above 9,000m²) generally focus on sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in the SHBLP. Compared to housing sites, the potential pool of sites that meet these requirements and could be made readily available for employment development is limited.
- 4.14 To meet identified employment land needs, SHBLP Policy LPA04 proposes to allocate 11 sites for employment development up to 2035. Of the 11 sites allocated for employment all but 3 would be released from current designation as Green Belt. The Green Belt Review (2018) (SD020) provides an assessment of the proposed allocations against the purposes of Green Belt and an assessment of site deliverability.
- 4.15 The largest of the proposed site allocations for employment development are at Parkside West and Parkside East. These sites are capable of providing transformational employment opportunities that will make a major contribution to the economic development of St Helens, the LCR and beyond. Parkside West is identified as being suitable for 'general industrial' or 'warehousing and distribution' uses. Parkside East is subject to its own policy (LPA10), which establishes firstly that the site is suitable for use as a SRFI or for other rail enabled employment uses. It also indicates that (to ensure a suitably flexible approach to the delivery of the site) part of it could be developed for non-rail enabled employment uses, provided that at least 60 hectares of the site is reserved for the provision of infrastructure to link to the rail system. This approach is justified by the unique combination of locational advantages of this site, including its ready accessibility to both the West Coast and east-west ('Chat Moss') rail lines and to the motorway system.

- 4.16 Several of the sites are (due to their size) designated as 'Strategic Employment Sites' by Policy LPA04.1, the development of which will need to meet specified requirements and be informed by a single master plan for each site. The development of all the sites would also be subject to consideration of infrastructure impacts at the time of any planning application.

Office Development

- 4.17 The ELNS 2015 identified 14,474 sqm of marketed offices (46 premises) in St Helens with the largest nodes for available office space in central St Helens and Newton-le-Willows, heavily influenced by the availability in Woodlands Park. The ELNS identified an office vacancy rate of 9.8% and suggested that this is sufficient capacity to absorb further growth in the near term. The ELNS concludes that there is likely to be more demand for the B1 uses in business park locations rather than town centre locations in St Helens. The ELNS indicates that while office growth would play a role in the continued operation of the town centre, the market in St Helens and surrounding areas such as Warrington has shown a preference for the business park model of providing office space. The ELNS recommends that opportunities for town centre redevelopment of older stock should be encouraged, however it should be realised that this will be a very long, incremental process.
- 4.18 Given the current office vacancy rate coupled with the lack of previous demand for office space in St Helens, with larger office occupiers favouring the regional centres of Liverpool and Manchester and the secondary location of Warrington, a 4.79ha allocation (sites 10EA and 11EA) for B1a office use is considered appropriate (in line with its extant planning permission for industrial storage and office accommodation site 9EA could also be suitable for office use as suggested through proposed modification AM016).

Urban Supply of Employment Land

- 4.19 As shown in Appendix 2, the suitability of the identified Core Strategy supply of employment sites originally assessed in the St Helens Employment Land and Premises Study (May 2011) and in the Review of Employment Land in St Helens to 2027 (September 2011) have been reassessed for potential allocation for employment uses. Some sites that were not considered suitable to count as part of the Core Strategy supply have been reassessed. Some sites have not been reassessed as they have already been lost to other uses such as residential.
- 4.20 Many of these sites are unavailable as they have been lost to higher value uses, been developed as expansion land or are not presently viable or developable for speculative employment development without gap funding. The costs associated with dealing with abnormalities such as contamination, site specific constraints or infrastructure requirements means that these sites are of a poor quality in terms of their attractiveness to the market, and ultimately the cost of providing employment floorspace is greater than its subsequent market value. Three sites from the identified Core Strategy supply are

considered to be deliverable over the Plan period and these have been allocated for employment development in the SHBLP: Land to the West of Sandwash Close, Rainford (Site 9EA), Land at Lea Green Farm West, Thatto Heath (10EA) and Gerard's Park, College Street, St Helens Town Centre (11EA).

- 4.21 It is not considered appropriate to allocate the remaining sites identified in the Core Strategy supply as the sites are not considered deliverable having regard to site constraints and viability considerations, particularly given the reduced availability of funding support. However, the Council will continue to support proposals for employment uses on these sites if viable proposals come forward. Importantly, the Local Plan still provides the policy framework (particularly Policy LPA04) to support new employment development on these sites.
- 4.22 In addition, smaller existing urban employment areas will still have an important role to play in accommodating smaller scale employment development during the Plan period and as such Policy LPA04 seeks to protect the Borough's existing business and industrial areas.
- 4.23 As of 31.03.2020 in terms of existing planning permissions for employment use, these are made up of changes of use for existing buildings on existing employment sites, small expansions to existing employment sites for specific occupiers, or are on sites proposed to be allocated in the SHBLP. Therefore, no sites from the existing planning permissions (other than the proposed allocations) are counted as part of the Plan period supply to meet the need for new employment land.

Employment Land Trajectory

- 4.24 Appendix 1 provides an indicative employment land trajectory. The trajectory is informed by the Employment Growth Trajectory Table 10 in the ELNS Addendum Report (2019) which identifies a smooth uptake of employment sites over the Plan period, factoring in potential infrastructure upgrades at M6 Junction 23. Some of the assumptions on some of the sites have been updated to reflect recent planning permissions and site masterplans, and to reflect a Local Plan estimated adoption date of December 2021. A trajectory looking 15+ years into the future has a substantial level of uncertainty and should be seen as provisional and indicative only.
- 4.25 As set out in the ELNS Addendum Report (2019) larger schemes are typically developed in stages. Large-scale warehouse schemes are generally developed on a design and build basis; that is, an occupier is secured prior to development, with the final design specifications determined between occupier and developer. Speculatively developed units take time to find tenants, which will vary depending on the market conditions at the time.
- 4.26 Specifically, for certain sites in the Borough, the timing of the development of the schemes around Haydock may depend on further transport investment around Junction 23 of the M6 due to congestion at this junction (this is subject

to an ongoing study¹³). Therefore, employment land take-up in this area could be dependent on factors outside of the market and property interest. The ultimate development of the Parkside scheme will depend on the investment in the freight rail infrastructure, as well as the proposed link road opening up parcels within sites 7EA and 8EA.

Risks to Delivery and Monitoring

- 4.27 The employment land requirement set out in Policy LPA04 is inclusive of a 5ha buffer to ensure flexibility. The SHBLP proposed employment allocations are all considered to be developable within the Plan period.
- 4.28 At 234.08ha the SHBLP employment land allocations are 14.88¹⁴ha higher than the residual employment land requirement (excluding site 1EA and allowing for proposed modification AM015, which updates the residual requirement to 219.2ha). This will provide flexibility to respond to any requirement to meet LCR B8 strategic land needs over and above the 65ha uplift already applied to the baseline OAN.
- 4.29 In addition, as stated earlier employment land delivery will be monitored annually to ensure that there is a deliverable supply of sites and there is a requirement for a Local Plan review after 5 years. Such mechanisms will allow the Council to identify any potential problems with employment land delivery well before the end of the Plan period.

Covid-19 Pandemic

- 4.30 The analysis underpinning the employment land assessments and economic evidence base for the SHBLP were undertaken prior to the Covid-19 pandemic, so are based on scenarios that have not taken account of the economic and social impacts of the virus and the resulting recession.
- 4.31 The OAN established in the ELNS Addendum Report (2019) was prepared by looking at baseline trend (based on past take-up of employment land) and additional demand due to regional projects (Parkside rail freight terminal and SuperPort) and the strength of the logistics market. For this additional demand, it was difficult to precisely quantify additional demand due to each of the rail terminal, SuperPort and the broader strength of the logistics market. Therefore, the assessment of additional demand was a judgement based on several factors (see Chapter 2 of the ELNS Addendum Report). It is considered that these factors are still likely to be generally applicable in 2020, with additional demand for logistics space due to changing consumer behaviours in lockdown, though more economic uncertainty.

¹³ M6 Junction 23 Haydock Island Capacity Feasibility Study (TRA007) and A580 / M6 J23 Improvement Options Supplementary Report Junction Assessment Results - Vista Road Link Option (TRA008) provide the latest position in relation to the feasibility of different options improving capacity at M6 Junction 23.

¹⁴ Table 4.2 of this Paper shows an updated residual requirement as of 31.03.2020. Based on this residual requirement the SHBLP employment land allocations are 17.42ha higher than the residual employment land requirement.

- 4.32 As the Covid-19 pandemic is still ongoing we can only speculate on potential impacts on employment land. In relation to office space, while there is likely to be a negative economic impact as some companies make cuts and some go out of business, there may be some replacements in sectors that will be in greater demand following the pandemic. These could include digital technology companies.
- 4.33 Office densities could reduce in order to take account for social distancing measures – this could increase the demand for office floorspace. In regard to logistics, as more people shop online (especially during 'lockdowns'), the demand for logistics floorspaces and to move deliveries faster could increase. Local Plan reviews every 5 years will provide an opportunity for further economic assessments as the impact of the virus becomes clearer.
- 4.34 Despite the current economic uncertainty, the Council consider that the delivery of new employment development in the Borough through the SHBLP will be vital in kick-starting the local economy and supporting businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.

Appendix 1: Indicative Employment Land Trajectory

Site Ref and Name	Indicative Site Area (hectares)	Current Position / Assumptions	2020	2021 (Assumed adoption of the Local	2022	2023	2024	2025	2030	2035 (End of Plan Period)	2040	2045
1EA: Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington)	31.22	Site is currently the subject of a planning application for: full Planning Permission for the erection of a B8 logistics warehouse (unit 1: 81,570 sqm) offices...Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices...the outline proposals include an extension to unit 1 of 123,930 sqm. (totalling 205,500sqm). Site due to go to planning committee in October-November 2020.			Site is partly built out and operational				Site is fully operational			
2EA: Florida Farm North, Slag Lane, Haydock	36.67	P/2018/0478 Florida Farm (M6 Major) two units complete (measuring 34,114 sqm and 48,634 sqm). 34,114sqm unit is occupied by Amazon and 48,634sqm is occupied by Kellogg's.	Site complete and fully occupied									

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Site Ref and Name	Indicative Site Area (hectares)	Current Position / Assumptions	2020	2021 (Assumed adoption of the Local	2022	2023	2024	2025	2030	2035 (End of Plan Period)	2040	2045
3EA: Land North of Penny Lane, Haydock	11.05	P/2015/0571 Penny Lane North (Haydock Green) - unit is occupied by Movianto.	Site complete and fully occupied									
4EA: Land South of Penny Lane, Haydock	2.16	No imminent planning application. Assume developed after site to the north of Penny Lane Assume site is operational by 2033.								Site is fully complete and operational		
5EA: Land to the West of Haydock Industrial Estate, Haydock	7.75	Assume that the larger unit is developed first, followed by smaller units in parallel				Development commenced			Site is fully complete and operational			
6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	20.58	Assume that site promoter to develop after its neighbouring scheme to the east. Delayed growth to allow for improvements to M6 Junction 23 to be made. Assumes development commences on the site in 2028.							Site is operational	Site is complete and fully operational		
7EA: Parkside East,	64.55	Assumes a rail terminal opening in 2026-2028.							Site is operational	Site is operational and		Site is fully complete

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Site Ref and Name	Indicative Site Area (hectares)	Current Position / Assumptions	2020	2021 (Assumed adoption of the Local	2022	2023	2024	2025	2030	2035 (End of Plan Period)	2040	2045
Newton-le-Willows										development is ongoing on the site		and operational
8EA: Parkside West, Newton-le-Willows	79.57	A phase 1 application for the site (P/2018/0048/OUP) for the construction of up to 92,900 m2 of employment floorspace (Use Class B8 with ancillary B1(a)) received planning committee approval on 17/12/2019 and has since been called in by SoS. A public inquiry is likely in early 2021. Please note a separate application for a link road from the A49 Winwick Road through the former Parkside Colliery (Site 8EA) to Junction 22 of the M6 motorway, known as the 'Parkside Link Road' (P/2018/0249/FUL) has also be called in by SoS and will also be subject to a public inquiry in early 2021.				Phase 1 development is operational				Site is fully complete and operational		

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Site Ref and Name	Indicative Site Area (hectares)	Current Position / Assumptions	2020	2021 (Assumed adoption of the Local	2022	2023	2024	2025	2030	2035 (End of Plan Period)	2040	2045
9EA: Land to the West of Sandwash Close, Rainford	6.96	Hybrid application (1291/017) for a 6500sqm building and outline permission was granted permission on 20/5/92. 500sqm building and outline permission was granted permission on 20/5/92. This permission was part implemented and is therefore extant. Flood risk 2 and 3 on the site.			Development commences on the site				Site is fully operational			
10EA: Land at Lea Green Farm West, Thatto Heath	3.84	P/2016/0567/HYBR for residential (outline) and employment (full). Assuming that it is developed in accordance with 2 stages in masterplan	Site is fully operational and complete.									
11EA: Gerards Park, Phases 2 and 3, College Street, St Helens Town Centre	0.95	P/2016/0903/FUL granted permission for phase 2: erection of three industrial units containing 20 workshop units for use class B1, B2 and B8 totalling 3308 m2 (on the remainder of the site). Development			Development commences on the site				Development is fully operational			

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Site Ref and Name	Indicative Site Area (hectares)	Current Position / Assumptio ns	2020	2021 (Assumed adoption of the Local	2022	2023	2024	2025	2030	2035 (End of Plan Period)	2040	2045
		has not commenced yet.										

Appendix 2: Assessment of Core Strategy Supply of Employment Land

¹⁵ Site reference from Core Strategy Supply (2012)	Site	Current Planning Policy Status	Gross Site Area (ha)	Net Site Area (ha)	Residual Available (ha)	Status	Likely to be suitable for	Residual remaining and likely to be	Comments / Latest Position 31.03.2020
7.7 / W13	Land Adjacent to Empress Works	Not allocated	1.60	1.6	0.00	Complete	n/a		
7.3	Former Empress Works	Not allocated	0.58	0.58	0.00	Complete	n/a		
2Ec9 / W9	Land North of Kilbuck Lane	Allocated	3.46	3.46	3.46	Available. Site had full PP for 12,263m2 on a 3.46ha site which has now expired.	Yes	3.46	Planning permission P/2016/0299/OUP for 12,263m2 B8 unit on a 3.46ha site has now expired. Site to be counted in SHBLP employment land supply as it

¹⁵ The site references are taken from the Review of Employment Land in St. Helens to 2027 (2012), Employment Land and Premises Study (2011) and St. Helens Economic Land Position Statement 2009.

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¹⁵ Site reference from Core Strategy Supply (2012)	Site	Current Planning Policy Status	Gross Site Area (ha)	Net Site Area (ha)	Residual Available (ha)	Status	Likely to be suitable for	Residual remaining and likely to be	Comments / Latest Position 31.03.2020
									is still considered developable.
2Ec4 / W21	Land East of Millfield Lane	Allocated	0.77	0.77	0.00	Complete	n/a	0	
7.2	Land at Deacon Trading Estate	Not allocated	0.47	0.47	0.00	Site did form part of P/2009/1016 for commercial and residential use but has since been lost to residential use.	No	0	Site has been developed for residential use.
7.1	Land at Deacon Trading Estate	Not allocated	0.17	0.17	0.17	As above	No	0	As above

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¹⁵ Site reference from Core Strategy Supply (2012)	Site	Current Planning Policy Status	Gross Site Area (ha)	Net Site Area (ha)	Residual Available (ha)	Status	Likely to be suitable for	Residual remaining and likely to be	Comments / Latest Position 31.03.2020
6Ec13	Land at Brindley Road	Allocated	0.63	0.63	0.63	Unavailable. Site has planning permission (P/2017/0365/FUL) for erection of a single storey L shaped portal frame warehouse extension to existing warehouse (used by Cheshire Mouldings) (Use class B8).	No	0	Site cannot be counted as part of general market supply as already has permission for extension to existing business on neighbouring site (Cheshire Mouldings). Adjoins site 6EC14 below. Site remains undeveloped.
6Ec14 / FF5	Land at Abbotsfield Road	Allocated	0.65	0.65	0.65	Available. Site looks to be a farmer's field and is very narrow. Site abuts Green Belt.	No	0	Adjoins site 6EC13 above. 2011 ELR indicated that speculative development here would struggle in terms of viability and there could be practical development issues due to the narrowness of the site. The site has been

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¹⁵ Site reference from Core Strategy Supply (2012)	Site	Current Planning Policy Status	Gross Site Area (ha)	Net Site Area (ha)	Residual Available (ha)	Status	Likely to be suitable for	Residual remaining and likely to be	Comments / Latest Position 31.03.2020
									available for a considerable period without being taken up and is relatively small. High voltage overhead power lines run along the south eastern boundary of the site. On balance potential deliverability is not considered strong enough to count the site as part of the supply.
6.7 / R4	Land at Hertford St	Not allocated	0.95	0.95	0.95	Available. Within Parr industrial estate. Flood zone 2.	No	0	Part of site R4 in 2011 ELR. Expired PP (P/2009/0394) for nursing home and apartments schemes and another residential scheme. Access exists on the bend in Hertford Street, which also serves residential properties and is unsuitable for HGVs. Gaskell Street onto which

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									Hertford Street leads is also residential and has speed bumps along its length. Site viability looks very challenging. The site has been available for a considerable period without being taken up and is relatively small.
6Ec1 / R5	Land North of Bedford St	Allocated	0.55	0.55	0.55	Site was the subject of a withdrawn application for 25 units P/2017/0909/OUP. Unlikely to be viable for employment and could have amenity issues.	No	0	Outline permission for light industrial P/2011/0376 (B1c) expired and live application for residential use. Part of site R5 in 2011 ELR. The site comprises vacant land on the fringe of Parr Industrial Estate which is bounded by residential dwellings to the north and west, and industrial units to the east. Site access, viability and amenity are likely to be issues.

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5Ec8	Land at Burtonhead Rd	Allocated	0.48	0.48	0.48	Unsuitable on the edge of Ravenhead retail park.	No	0	
5Ec1(a) / GG2	Land at Lea Green Farm East	Allocated	6.60	6.6	0.00	Has been lost to housing P/2015/0309	No	0	
5ec1(b) / III1	Land at Lea Green Farm West (Mere Grange)	Allocated	9.55	3.84	3.84	Available in part. P/2016/0567/HYBR for residential (outline) and employment.	Yes	3.84	9.55 ha was counted in the Core Strategy supply for B1a offices. Latest permission only allows for only 3.84 ha of employment land. Allocated UDP site. The employment element is complete, and the residential development is still under construction with 15 units completed out of 82 units as of 31/03/2020. Proposed SHBLP allocation 10EA.

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6Ec7(b)	Sutton Fold (Sidac)	Allocated	1.40	0.93	0.93	Available in part. 0.47 ha has planning permission and is being used for storage Turbosider UK Ltd who manufacture big corrugated steel pipes and storm water tanks on the site to the north.	No		Remaining part of the site likely to be deliverable for expansion land only not general market employment use.
7.4	Former Lead Mill Site	Not allocated	0.62	0.62	0.62	Available but restrictions due to railway bridge at Salisbury Street	No		Not considered developable at this stage.

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7.6 / AA1	Former Sankey Sugar Works	Not allocated	4.7	4.7	4.70	Available. But two planning application refusals at Sankey Valley Industrial Estate (upheld at appeal) based on harmful impact of HGVs on local highway network makes it very difficult for this site to be a developable site to be counted in the supply.	No		7.5ha worth of brownfield and greenfield land put forward in Call for Sites. Reduced site area as P/2013/0037 completed. Two planning application decisions and two appeals at Sankey Valley Industrial Estate have held that an increase in HGVs will have held that an increase in HGVs along Market Street/Sankey Street would result in material harm to amenity and highway users.
6Ec17 / FF3	Land at Abbotsfield Rd Ind Est (East Of TAC)	Allocated	0.95	0.95	0.95	Available	No		Site is heavily treed and overgrown. Small site speculative development likely to be unviable. Two lapsed permissions

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									P/2005/0844 and P/2000/0269.
6ec15 / FF3	Land at Abbotsfield Rd Ind Est (North Of TAC)	Allocated	0.95	0.95	0.95	Available	No		The site is uneven in levels and a footpath runs north west – south east through the site to the residential area of Sutton Leach across the dismantled Railway line to Hawthorne Road. General industrial uses are likely to be unsuitable due to the proximity of the adjacent residential area. Site has been available for a long time.

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6Ec5 / Q8	Land West of Lancots Lane (N of Hays)	Allocated	1.73	1.73	1.73	Available	No	1.73	Viability for employment use is likely to be challenging given potential abnormalities due to previous use. There was active interest in the site for employment a few years ago but nothing has come forward. Site remains undeveloped.
6.4 / Q8	Hays Chemicals	Not allocated	1.86	1.86	1.86	Available	No	1.86	As above

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6Ec6 / Q8	Land East of Baxters Lane (S of Hays Chemicals)	Allocated	1.85	1.85	1.85	Available and vacant.	No	1.85	As above. Site remains undeveloped.
5Ec3(c) JJ6	Land east Of M62 Link Rd (E of Remploy)	Allocated	0.83	0.83	0.83	Available in part.	No	0	Access is a big problem as the site occupies a backland position. The last two ELRs indicated that it could only be expansion land for existing business as a shared access would be required and recommended it be discounted from the supply. Part of the site has PP (P/2015/0197) amended via A/2017/0017/NMA for a rear extension to existing factory to provide additional storage.

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5Ec9 / KK2	Stoney Lane Ind Est Rainhill	Allocated	0.86	0.86	0.00	Unavailable. Gone to housing - Stephenson Grove.	No	0	
EM06 / G1	East side Masterplan Parr/Church St	Allocated	1.49	1.49	1.11	Partly available.	No		0.383ha has been developed as a car park. Site is being promoted for mixed use development by Network Rail and has been identified by the Council has opportunity to improve facilities at Central Station.
6.9	Gerards Bridge	Unallocated	0.95	0.95	0.95	Available.	Yes	0.95	P/2016/0903/FUL granted permission for phase 2: erection of three industrial units containing 20 workshop units for use class B1, B2 and B8 totalling 3308 m2 (on the remainder of the site). Development has not

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									commenced yet. Proposed allocation 11EA.
7.8 / C4	Land at Cowley Hill	Unallocated	3.9	3.9	3.00	0.9ha forms part of project chocolate. 3ha remaining from the original 3.9ha.	Yes (in part)		Site forms part of wider SHBLP proposed housing site 6HA. There is now a live planning application for a residential led, mixed use development on the site P/2020/0083/OUEIA, which only identifies a non-residential mixed use area of 1.17ha. 0.56ha to be counted in the SHBLP employment land supply, but this supply position may have to be updated if appropriate following the determination of the planning application.

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7.5 / C4	Pilkingtons City Road Site	Unallocated	1.4	1.4	1.40	Available.	Yes (in part)	1.4	As above
4.1a / C4	Land South of Washway Lane	Unallocated	5.3	5.3	5.30	Available. Forms part of P/2012/0414 mixed use permission	No		There is now a live planning application for a residential led, mixed use development on the site P/2020/0083/OUEIA.
4.1b / C4	Land South of Washway Lane	Unallocated	0.9	0.9	0.90	Available. Forms part of P/2012/0414 mixed use permission	No	0.9	There is now a live planning application for a residential led, mixed use development on the site P/2020/0083/OUEIA.

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3Ec2 / B4	Land South West of Sandwash Close	Allocated	6.96	6.96	6.96	Available.	Yes	6.96	Flood risk 2 and 3 on site. 1291/017 Hybrid application for a 6500sqm building and outline permission was granted permission on 20/5/92. This permission was part implemented and is therefore extant. Proposed allocation 9EA.
5.1 / M2	Ravenhead Glass	Unallocated	9.17	9.17	9.17	Site is unavailable	No	9.17	Completion in October 2019 of a new workshop building (B2) with ancillary offices (B1) (20,843sqft/ 1936.4sqm workshop and 4,885sqft/ 453.9sqm of offices) for vehicle inspection, repair and refurbishment and retention of existing areas of hardstanding for vehicle storage (B8) and staff parking.

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									The primary use is for car parking. Site is not available.
EM03 / F1	St Helens Glass	Unallocated	2.4	2.4	2.40	Part of the site is now unavailable. Whole site is in the SHLAA.	No		Part of the site is under construction for 130 extra care apartments (P/2017/0634/FUL). All of the site is the SHLAA. Not considered viable for speculative employment use.

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7.9 / AA1	Land at Sankey Valley Industrial Estate	Unallocated	7.5	7.5	4.80	Available but reduced developable area as there is a large existing building in use by Starrbank Panels Products.	No		Site is being promoted by REVPLAN. Without the existing buildings available developable area is roughly 4.8ha. But site is heavily treed and a former playing field for workers (disused for a number of years). As per site 7.6 above two planning application decisions and two appeals at Sankey Valley Industrial Estate have held that an increase in HGVs along Market Street/Sankey Street would result in material harm to the amenity and highway users. Therefore, overall does not look to be a deliverable site.