



ST HELENS COUNCIL LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

WEEK 1 MATTER 3:

SPATIAL STRATEGY AND STRATEGIC POLICIES

**ON BEHALF OF
OMEGA ST HELENS LTD**

INTRODUCTION

This Hearing Statement has been prepared by Progress Planning Consultancy (PPC) on behalf of Omega St Helens Ltd (OSHL).

OSHL are in a conditional contract for the sale of the land referred to as the Omega South Western Extension, with the landowner Homes England. This land comprises 31.2ha and is subject to a proposed Employment Allocation (Site 1EA) in the St Helens Council Local Plan Submission Draft (LPSD).

The Site 1EA is currently the subject of a Hybrid planning application for: Full Planning Permission for the erection of a B8 logistics warehouse (Unit 1: 81,570 sqm) offices and Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices (Totalling 205,500 sqm).

St Helens Council's Planning Committee resolved to grant planning permission on 27 October 2020 subject to a referral to the Secretary of State. The application was subsequently called-in by the Secretary of State and a Public Inquiry (APP/H4315/V/20/3265899) was held between the dates of 27 April – 06 May 2021.

This Hearing Statement supplements our client's formal representations to the previous stages of the Local Plan process and considers the Inspector's Matters, Issues and Questions (April 2021) in relation to Week 1 - Matter 3 of the St Helens Local Plan Examination in Public and in particular Issue 2, Questions 4, 5 and 6.

Matter 3: Spatial Strategy and Strategic Policies

Issue 2: Green Belt and Exceptional Circumstances

Question 4 - Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

The Local Plan Submission Draft (LPSD) evidence base establishes that Green Belt land will be required to meet the employment (and housing) needs of the Borough in the future, which is considered an exceptional circumstance.

The LPSD evidence base clearly demonstrates a significant lack of available brownfield sites capable of responding to the employment land requirements of the Borough and the wider Liverpool City Region. Para. 8.15 of the *Development the Strategy Background Paper* (SD026) identifies that St Helens has a need for at least 227.4ha of land to be developed for employment use between 2018 and 2035. The current deliverable supply of land on urban sites in the Borough (i.e. sites which do not have a Green Belt designation) amounts to just 15.79ha of land. This shortfall has led to the need to revisit the Green Belt to consider the release of land for employment land.

The October 2019 Statement of Common Ground between the LCR authorities entitled '*Liverpool City Region Spatial Planning Statement of Common Ground*' was prepared to

demonstrate joint working and compliance with the Duty to Cooperate requirements across the seven authorities. Statement 4 of the LCR SOCG - advises that the authorities will continue involving each other when considering the case of localised changes to the Green Belt (with the supporting text noting the strategic need to reconsider Green Belt boundaries and acknowledges that St Helens has undertaken its Green Belt review).

St Helens' *Employment Land Need and Supply Background Paper* (SD022, Section. 4.8) states that there has been increasing evidence of the need for employment sites in St Helens that could provide for large-scale logistics operators (defined in the LPSD as over 100,000 sq.ft). This is most clearly demonstrated by the recent take-up of large-scale B8 floorspace at proposed allocations 2EA and 3EA (Haydock) and, as discussed above at Omega, Warrington. It is also considered that the Call-In applications at Parkside (APP/H4315/V/20/3253194) and Omega West (APP/H4315/V/20/3265899) provide further proof of the high level of interest within and surrounding St Helens for large-scale logistics development.

Additionally, the *LCR SHELMA 2018* (SUB001, Section 12) identifies a substantial need for large-scale B8 warehousing and logistics buildings (9,000 sq.m / 100,000 sq.ft) for the LCR. Over the period to 2037, a 'Do Minimum' need of 308ha rising to a 'Do Something' need of 397ha for strategic B8 development is identified in the SHELMA. The Report's market analysis points to a shortage of large sites capable of accommodating large-scale B8 development and there is an evident need to identify additional land.

It has also been demonstrated that employment land take-up within the Borough, particularly for large-scale B8 logistics (over 100,000 sq.ft) has been suppressed by a lack of suitable and available brownfield sites within St Helens. The Council's *Green Belt Review* (SD020) sets out that substantial shortfalls have been identified in the overall quantity, quality and range of sites within existing urban areas that can be made available for housing and employment development over the Local Plan period, both within the Borough and in other nearby locations.

The Council has fully considered, including through their Duty to Cooperate with adjoining authorities, whether employment land needs can be met without the need for further Green Belt release. However, the requirement is significant and there is no scope to substantially increase the supply of deliverable land within the urban area.

In addition to meeting this need, the release of Green Belt land for employment development will deliver significant economic and social benefits:

- Economic
 - job creation and increased expenditure in the local economy
 - build on the competitive advantages of the area for the distribution sector, including investment in the SuperPort, and help to grow a sustainable logistics sector in the Liverpool City Region that is necessary to maintain and support the growth of other sectors such as manufacturing and higher technology activities and build upon on the investment in the SuperPort.
 - In this way, the proposals will directly meet the Government's objective of 'levelling up.'

- Social
 - Some of the areas of greatest deprivation in the region and UK are situated within the Borough. As a consequence, the employment generated by the release of Green Belt land will have a significant and positive impact on reducing deprivation in St Helens.

Summary Question 4

The evidence shows that there is a significant shortfall of land within St Helens, including the urban area, to meet the St Helens employment land needs. The Council have considered the availability of non-Green Belt sites and through their Duty to Cooperate they have established that there are no suitable alternatives in adjoining authorities that could help meet the needs of St Helens and mitigate the release of Green Belt land.

It is also considered that the release of Green Belt land for employment uses will also deliver significant economic and social benefits for the wider community.

It is therefore considered that exceptional circumstances have been demonstrated to justify the release of Green Belt land to meet the identified employment needs of St Helens.

Question 5 - On the assumption that the housing and employment requirements are justified, has the quantum of Green Belt release been supported by proportionate evidence? For example, has effective use of sites in the built-up areas and brownfield land been fully explored, including optimising the use of such land?

As discussed in response to Question 4, the *St Helens' Employment Land Need and Supply Background Paper* (SD022, section 4.8) identifies an increasing need for employment sites for large scale logistics operators. In addition, the *LCR SHELMA 2018* (SUB001, Section 12) also identifies a significant need for large-scale B8 warehousing and logistics buildings for the LCR. The report's market analysis points to a shortage of large sites capable of accommodating large scale B8 development and there is an evident need to identify additional land.

The primary requirements of this sector are for sites capable of accommodating large, single floorplate units in a flexible manner, with excellent motorway access and limited development constraints or nearby sensitive receptors.

The Council's *Green Belt Review* (SD020) confirms that none of the sites in the urban areas (brownfield land) of the Borough are suitable for large-scale distribution and manufacturing uses on the basis that they fail to satisfy the selection criteria identified by the market for such uses. As a consequence, the Green Belt Review concludes that there is no provision of suitable land for large-scale distribution uses within the Borough's identified employment land supply in the urban areas.

This inability to respond to the market requirements is reflected in the low take-up rates in St Helens where brownfield sites have been available, but have not come forward for logistics use, despite strong market demand, which has led to occupiers locating elsewhere.

This is borne out by the success at Omega, where the availability of large, flat sites with easy and immediate access to the motorway network and limited development constraints has enabled the site to respond to market demand accommodate significant employment development in a short period of time.

The primary purpose of these large-scale single floorplate units is to allow for the full / part automation of the operations, thereby increasing the operational efficiencies of the logistics sector. This means that the other consideration of disaggregation of floorspace across smaller brownfield site / existing warehouse stock is also not appropriate because the development of several smaller units spread across numerous sites would not offer these efficiencies and would lead to unsustainable forms of development.

Summary Question 5

The evidence indicates that the bulk of the demand for employment land is focused on the large-scale logistics sector, whose requirements are not suited to brownfield sites within the existing urban areas.

This is confirmed by the Council's *Green Belt Review* which has identified no suitable land for large-scale distribution uses within the Borough's identified employment land supply in the urban areas. This lack of suitable sites is also evidenced by the low take up rates in the Brough and the success of other locations with the North West such as Omega.

It is also the case that the nature of the demand (for large-scale logistics) does not support the disaggregation of the floorspace as this would lead to sub-optimal and unsustainable development.

It is considered therefore that the Council have given full consideration of the effective use of brownfield land but that no suitable sites exist to facilitate this.

Question 6 - On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?

It is considered that there is no prescribed approach or methodology for Councils to follow when undertaking a Green Belt Review. However, section 2.1 of the Council's *Green Belt Review* (SD021) states that the Review's methodology has followed a step-by-step approach, that is consistent with similar reviews successfully undertaken by neighbouring authorities.

St Helens' *Duty to Cooperate Statement* (SD009) highlights that the Council engaged closely with the neighbouring authorities and other relevant bodies when undertaking the Green Belt review. Where bodies commented, the Council have fully considered the comments submitted and made changes to the Plan at subsequent stages where justified.

Section 3 of the *Green Belt Review* (SD021) demonstrates how its methodology has informed the Local Plan process, taking account of consultation results and the findings from the assessment of importance of identified parcels of land. There are stated references to National Policy throughout and the rationale for the approach to the methodology is clearly established.

Summary Question 6

It is considered that the overall methodology used by the Council for the Green Belt Review is in accordance with National Policy and Best Practice. A consistent approach with neighbouring authorities has also been adopted and is evidenced in the Council's Green Belt Review, Developing the Strategy Background Paper and the Duty to Cooperate.

The overall methodology is therefore considered to be a robust and reasonable approach when assessing the contribution of land parcels to the Green Belt and for assessing the potential impact on the remaining Green Belt where releases have been proposed.