

EiP Statement

St Helens Delivery and Allocations Local Plan

Bericote Properties Limited

Representor ID RO1656

Our ref 41575/12/CM/AMCL
Date 28 May 2021

Subject **Matter 6 - Employment Land Supply, Employment Policies and Town Centres**

1.0 Introduction

- 1.1 Lichfields is instructed by Bericote Properties Limited [Bericote] to make representations on its behalf to the St Helens Borough Local Plan 2020-2035 [SHBLP].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions [MIQs] raised by the Inspector for the Matter 6 Examination in Public [EiP] hearing session.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Legal Compliance, Procedural Requirements, and the Duty to Cooperate;
 - 2 Matter 2 - Housing and Employment Needs and Requirements;
 - 3 Matter 4 – Allocations, Safeguarded Land and Green Belt Boundaries.
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the SHBLP [Representator ID RO1656] as well as those made on other Matters listed above.
- 1.5 These Matters Papers have been prepared in the context of Bericote’s Florida Farm site [Local Plan Allocation Site Reference: 2EA] on which hybrid planning permission (ref. P/2016/0608/HYBR) was granted on 27th April 2017. The outline element secured permission for the erection of 2no. commercial/industrial buildings providing up to 135,000sq. m of employment floorspace (B2/B8 uses with up to 10,000 square metres of office accommodation). Reserved matters approval has been secured for Unit 1 (34,114 sq. m) and Unit 2 (48,634 sq. m) and both buildings are now completed and occupied by Amazon and Kellogg’s respectively.
- 1.6 Although Unit 1 and 2 have been completed and occupied, the full development potential of the Florida Farm site has not been reached. The EIA undertaken as part of the hybrid planning application assessed the environmental effects of up to 135,000 sq. m. of employment floorspace and only 82,748 sq. m of B2/B8 floorspace was delivered as part of the reserved matters approvals. The full quantum of development that could be achieved on the site has therefore not been realised. A residual parcel of land on the site (2.26ha) remains available and it is Bericote’s intention to bring forward additional employment development on the site, within the boundary of Allocation 2EA. The approved Unit 2 Site Layout Plan (Appendix 1) illustrates the residual area of land to the south west of the Unit 2 parcel within the boundary of Allocation 2EA.

- 1.7 Bericote is therefore concerned that Allocation 2EA is proposed to be removed from the Plan as a Main Modification. This reason for this appears to be due to the Inspector coming to a view that the site has been completed and the Council not clarifying the position as set out above. Bericote therefore strongly oppose the removal of Allocation 2EA from the SHBLP.
- 1.8 This statement expands upon Bericote's previous representations made throughout the Local Plan preparation process in light of the Inspector's specific issues and questions. This statement also directly responds to the suggested removal of Allocation 2EA from the Local Plan.
- 1.9 Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Policy Practice Guidance [Practice Guidance].

2.0 Planning Issues

Issue 1: Employment land supply

Q1. Will the up to date employment land supply position and the components of the employment land supply that will meet the employment land requirement be clearly shown in the Plan (base date of 31 March 2021)?

- 2.1 It is for the Council to directly answer whether the up to date employment land supply and the components of the employment land supply (base date of 31 March 2021) will be clearly shown in the SHBLP, however, Bericote considers that this will comprise a fundamental part of the Plan and should be made sufficiently clear within the adopted version of the SHBLP.
- 2.2 The Employment Land Need and Supply [ELNS] Background Paper (SD022) provided an update to SHBLP Table 4.4, which has since been further updated as set out in the Updated Employment and Housing Land Supply Position as of 31.03.2021 (May 2021) (SHBC007). It sets out at Appendix 4 that as of 31 March 2021 the supply of developable employment land was 4.04ha, which takes account of the fact that Sites 2EA, 3EA and 10EA have all been 'completed' and are therefore not included within the up to date supply.
- 2.3 The Inspector initially acknowledged this position and previously stated within the MIQs that Site 2EA is completed and occupied and therefore should be treated as such rather than an allocation. However, the position stated by the Council is incorrect as Site 2EA has not been completed.
- 2.4 Although Unit 1 and 2 have been completed and occupied, the full development potential of the Florida Farm site has not been reached. The EIA undertaken as part of the hybrid planning application assessed the environmental effects of up to 135,000 sq. m. of employment floorspace and only 82,748 sq. m of B2/B8 floorspace was delivered as part of the reserved matters approvals. The full quantum of development that could be achieved on the site has therefore not been realised. A residual parcel of land on the site (2.26ha) remains available and it is Bericote's intention to bring forward additional employment development on the site, within the boundary of Allocation 2EA.
- 2.5 It has always been the intention to develop the site to its full potential, and the Council is aware of this aspiration having undertaken pre-application discussions with Bericote on 5th July 2019.
- 2.6 Considering the Council is releasing Green Belt land as part of its supply to meet its needs for employment development, it is only logical to retain Site 2EA as an allocation to provide the appropriate designation to the existing Unit 1 and Unit 2, maximise its development potential

and take advantage of the option to fully utilise an established and sustainable site for employment development. Bericote therefore considers that Site 2EA should be retained as an allocation and the remaining 2.26ha parcel of land included as part of the Council's up to date employment land supply position within the adopted version of the SHBLP.

- 2.7 As set out above, 82,748 sq. m of B2/B8 floorspace has already been delivered on the site, which is 52,252 sq. m short of what had been assessed as part of the hybrid planning permission. It is entirely reasonable to consider that additional development can be accommodated and delivered on the site, which is demonstrated by the Unit 3 Site Layout Plan (Appendix 1).
- 2.8 Bericote is concerned that if Site 2EA is not allocated and remains in the Green Belt it will be necessary for occupiers to demonstrate very special circumstances for any operational development that may be necessary. This would be wholly unacceptable and conflict with the status of the site as an employment development. As we have set out in the previous Matters Papers, we are unclear as to how the Council intends to deal with the importance of this site in the plan if it is not retained as a strategic employment allocation.
- 2.9 The entire Florida Farm Site (36.7ha) as defined on the red line location plan (Appendix 2) should be protected and retained as an existing strategic employment site under Policy LPA04. Bericote considers that if the site is not retained as an allocation, the employment land policies to facilitate future development on the site are wholly ineffective and conflict with the importance of this site. The adjacent Haydock industrial estate is referred to as an important and significant employment site for Haydock and the Florida Farm Site should be identified as equally as important, be removed from the Green Belt as a whole and identified clearly as protected to meet employment needs. As we have identified in previous Matters Papers, development of the residual parcel of land on the site can meet the needs of non-strategic employment development and will ensure that Site 2EA is completed and its full development potential realised.

Q2. Would the modification referred to above be justified and necessary?

- 2.10 The Council has suggested an additional criterion as a Main Modification to Policy LPA04 (and the reasoned justification) relating to economic growth in the context of the Covid-19 pandemic (references MM011 and MM012 in the Council's Schedule of Modifications). Bericote considers that the proposed modification is both justified and necessary. The pandemic has had a significant impact on the economic performance of the country, and the Council should seek to facilitate economic growth by supporting businesses and organisations, and helping the local and regional economy adjust to and recover from the Covid-19 recession.
- 2.11 Bericote also considers that there is a clear need for employment sites to be brought forward in the short term to assist in this recovery from the Covid-19 recession. This will help to ensure that the Council's objectives set out in MM012 (formerly AM092) can be addressed and the Local Plan Vision can be realised. Bericote considers that the remaining land present within Site 2EA represents a prime opportunity to bring forward much needed employment development in the Borough, to provide additional jobs and help address the economic issues created by the pandemic.
- 2.12 Bericote therefore considers that Site 2EA should be retained as an allocation to enable the residual 2.26ha parcel of land to come forward for non-strategic employment development. The land would also be available in the short term owing to its nature as an established site for employment development with all necessary infrastructure already in place, and would assist in economic recovery from the pandemic.



Appendix 1: Unit 3 Site Layout Plan



Appendix 2: Site Location Plan