

ST HELENS BOROUGH LOCAL PLAN 2020-2035

COPIES OF REGULATION 20 REPRESENTATIONS (REGULATION 22 (1) (D)) DOCUMENT

PLAN ORDER

PO1001 - PO1100

SEPTEMBER 2020

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D00770 to D00000	Green Belt Review 2018				
PU3//3 to PU3883 SDU0/.32, SD00/.33		PO3773 to PO3883	SD007.32, SD007.33		

Habitats Regulations Assessment				
	PO3884 to PO3885 & PO3887	SD007.33		
Heritage Impact Assessment				
	PO3886	SD007.33		
Infrastructure Delivery Plan				
	PO3888 to PO3961	SD007.33, SD007.34		
Landscape Character Assessment Re				
	PO3962	SD007.34		
LPPO Report of Consultation (2018)				
	PO3963 to PO3965	SD007.34		
Statement of Community Involvement				
	PO3966	SD007.34		
Strategic Housing Land Availability A				
	PO3967 to PO3968	SD007.33		
Strategic Housing Market Assessmen				
	PO3969 to PO3971	SD007.34		
Sustainable Transport Impact Assess				
	PO3972	SD007.34		
Transport Impact Assessment				
	PO3973 to PO3976	SD007.34		
Policies Map				
	PO3977 to PO3981	SD007.34		
Sustainability Appraisal				
	PO3982 to PO4039	SD007.34		
Sustainability Appraisal – Non Technical Summary				
	PO4040 to PO4047	SD007.34		
Sustainability Appraisal –Technical Appendix				
	PO4048 to PO4050	SD007.34		

40101



ST HELENS BOROUGH LOCAL PLAN 2020-2035 SUBMISSION DRAFT – PUBLIC CONSULTATION 2019 LETTER OF REPRESENTATION – OMEGA

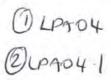
WARRINGTON LTD

Chris Gardner to:

planningpolicy 12/03/2019 16:18

Cc:

Colin Graham











Representation letter 12032019.pdf St Helens LDP Rep Form 11032019.pdf

Dear Sir/Madam

On behalf of our clients, Omega Warrington Ltd (OWL), we are pleased to submit a letter of representation and duly completed representation form to the St Helens Borough Local Plan 2020-2035 Submission Draft (Draft Local Plan) consultation process.

We trust you find the attached in order and look forward to receiving confirmation of receipt of these documents in due course.

Regards

Chris Gardner Director





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Chris
Last Name:	Last Name: Gardner
Organisation/company: Omega Warringont Ltd	Organisation/company: Progress Planning Consultancy
C/O Agent	Address: 16 Norwood, Newport-on-Tay FIFE Postcode: DD6 8DW
Tel No: C/O Agent	
Mobile No: C/O Agent	
Email: C/O Agent	
Signature:	Date: 12 March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the
Inspector's recommendations and	adoption of the Plan)
Yes 🛛 (Via Email)	No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy LPA04: A Strong and Sustainable Economy & LPA04.1:Strategic Employment Sites	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
locuments (please na evant part/section)	ame documen	t		

4. Do you consider the St He Please read the Guidance note	for explanations of Legal	1 2020-2035 is: Compliance and the Tests of Soundness
Legally Compliant?	Yes J	No
Sound?	Yes -	No
Complies with the Duty to Cooperate	Yes J	No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness			
Positively Prepared?			
Justified?			
Effective?			
Consistent with National Policy?			

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to accompanying representation letter submitted on behalf of Omega Warrington Ltd

Please continue on a separate sheet if necessary

com relatinca the l	ipliant or sound, having regard to the matter tes to soundness (NB please note that any n ipable of modification at examination). You w	on-compliance with the duty to cooperate is vill need to say why this modification will make be helpful if you are able to put forward your
supposed in the second	ase note your representation should cover so porting information necessary to support / justification, as there will not normally be a substresentations based on the original representations that is stage, further submissions will be a matters and issues he/she identifies for expressions.	stify the representation and suggested sequent opportunity to make further ation at the publication stage. only at the request of the Inspector, based
3. If	your representation is seeking a modification oral part of the examination? (the hearings in	on; do you consider it necessary to participate at
X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
his	to be necessary:	
	ase note the Inspector will determine the mo to have indicated that they wish to participate	ost appropriate procedure to adopt to hear thos at the oral part of the examination



Local Plan St Helens Town Hall Victoria Square St Helens Merseyside WA10 1HP

12 March 2019

Dear Sir/Madam

ST HELENS BOROUGH LOCAL PLAN 2020-2035 SUBMISSION DRAFT – PUBLIC CONSULTATION 2019 LETTER OF REPRESENTATION – OMEGA WARRINGTON LTD

On behalf of our clients, Omega Warrington Ltd (OWL), we are pleased to submit a representation to the St Helens Borough Local Plan 2020-2035 Submission Draft (Draft Local Plan) consultation process.

The site subject of this representation comprises the land to the west of Omega South, identified in the Draft Local Plan document as a Strategic Employment Site under policy LPA04 and LPA04.1. The allocation reference under Policy LPA04.1 is 1EA 'Omega South Western Extension, Land north of Finches Plantation, Bold'.

OWL fully support the allocation of 1EA as employment land under LP Policies LPA04 and LPA04.1. and will continue to work closely with both St Helens Council and Warrington Borough Council to ensure the delivery of this Strategic Employment Site during the Local Plan Period.

Our clients also welcome the requirement established by Policy LPA04.1 that all applications, made within a Strategic Employment Site must be supported by a comprehensive masterplan for the whole site. Miller Developments will, at the appropriate stage, seek to promote a development masterplan for the site that will address the matters of detail set out in the Policy and also see to take cognisance of the high level, site specific requirements set out in Appendix 5 of the Draft Local Plan.

Whilst OWL is fully supportive of the proposed allocation, as a natural extension to Omega South, it is considered that the extent of the current allocation site may not be sufficient to allow for the successful masterplanning of the site.

In allocating the site, the land has been removed from the Green Belt and it is therefore important as part of any masterplan process that the relationship between the Green Belt and the development is appropriately managed.





Any masterplan for the site will need to provide robust, long-term defensible boundaries to the west where potential impact on the Green Belt may be most apparent. The ability to deliver these boundaries in the form of mature woodland areas, as part of a comprehensive masterplan process will enable the successful integration of the development within the wider Bold Forest Park to the benefit of the surrounding communities.

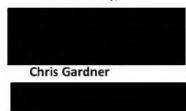
To ensure the site is able to respond to the varied occupier requirements in the market and that the site makes an effective contribution to employment land supply, it is considered likely that any masterplan for the site may need to consider an area beyond the allocation identified in the Draft Local Plan. A more far reaching masterplan will maximise the developable area of the site whilst allowing for the implementation of sufficient, high quality landscaping and other features that will safeguard the appearance and purpose of the Green Belt and contribute to the wider Mersey Forest objectives for the area.

As a consequence, we write to confirm OWL's intention to enter into further dialogue with St Helens Council regarding the full extent of the allocation at 1EA, with a view to extending the allocation boundaries to allow for the viable development of the site, whilst ensuring a comprehensive and effective masterplan can be delivered.

(2)

We trust you find this in order and look forward to receiving confirmation of receipt of this representation in due course.

Yours sincerely,





Page 1 of 2

EL0105



Local plan Lorna Chana planningpolicy 12/03/2019 16:36

58 Springfield Lane Eccleston St Helens WA105HA

11 March 2019

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any







exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring. —

The plan promotes unsustainable traffic growth which will cause severe traffic—issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues.

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified; effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Lorna Chana

EL0107



st helens local plan

to: planningpolicy 12/03/2019 17:03 Hide Details

From:

To: planningpolicy@sthelens.gov.uk

()- LP904 2)- LP905

Dear Sirs,

The local plan mentions developments at Haydock and Parkside that will increase traffic where I live in Newton-le-willows. There will also be increased house building which will again further increase the traffic.

As the plan points out

Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.HelensBorough as follows:

•High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street:

We already have a problems with air quality and what is proposed will make it worse. We live just off the High Street at 27 the Parchments so are concerned about our health plus health.

Lots of children also walk in this area to attend Hope Academy on Ashton Road - It cannot be good for them walking in such a polluted area and it will get worse.

Regards, Hazel Kelly





EL 0108



D-LPAOL



The local plan mentions developments at Haydock and Parkside that will increase traffic where I live in Newton-le-willows. There will also be increased house building which will again further increase the traffic.

As the plan points out

Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.HelensBorough as follows:

•High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;

We already have a problems with air quality and what is proposed will make it worse. We live just off the High Street at 27 the Parchments so are concerned about our health plus on the High Street and this cannot be good for them but have to put up with this pollution.

Lots of children also walk in this area to attend Hope Academy on Ashton Road - It cannot be good for them walking in such a polluted area and it will get worse.

Regards, David Kelly







St Helens Borough Local Plan: Submission draft bebbington kathleen

110001

planningpolicy



Good afternoon

Thank you for your general letter sent to residents regarding the above proposals. I wish to object for the following reasons:-

- · Loss of Greenbelt land and the subsequent loss of the wildlife and it's habitats in the area. Already, there has been the removal and destruction of a number of trees for the changes to the Penny Lane junction leaving the area looking bear. The loss of these trees (some of which were really mature) is disgraceful. More trees need to be planted to replace these and to disguise the horrendous warehouses already built on the Old Boston and help to reduce the noise and pollution from the site and the M6.
- Increase in both air and noise pollution already have pollution from the traffic on the M6 and A580 and numerous HGVs going along the A49 and A58 through Ashton town centre. Plus with the addition of other similar sites being constructed in the area this will dangerous, resulting in an increase of respiratory disease.
- · Congestion on the adjacent roads and towns ie Ashton which already becomes gridlocked with normal traffic, Golborne and Haydock. Already get large lorries going to Three Sisters and Haydock Industrial Estate coming through Ashton. The roads cannot continue to take such heavy traffic. This development will impact more in the Wigan area than the St Helens area as it is on the outskirts of Merseyside.
- · The sites are too close to residential areas noise and disturbance from the vehicles entering and leaving the sites 24 hours a day is not acceptable. The area will become more of an industrial site rather than residential.
- Too close to local schools there are 3 secondary schools almost adjacent to this area.
- The loss of Greenbelt land will be devastating to the surrounding area as a whole this land could be used for farming, allotments leisure etc. Residents need these areas for clean air, wild life, trees etc for pleasure.
- · The promise of jobs for the local area will only be short lived automation etc will take over and the buildings will eventually be left to go to ruin once the incentives/ have run out leaving a huge blot on the landscape. There are plenty empty warehouses near the Costco site - evidence that firms move on and leave property to just deteriorate. Use these first.

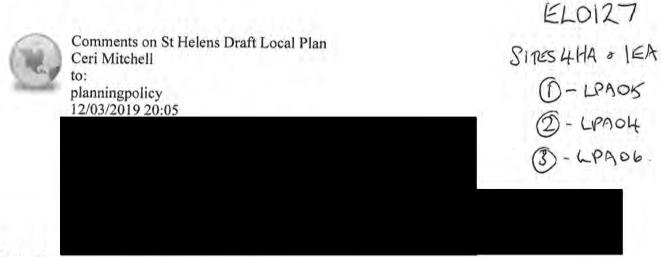
Please give your consideration to these issues for the future of everyone.

Kind regards

Mrs K Bebbington

5 Chetwode Avenue.

Ashton-in-Makefield WN4 9PP



Dear Sirs

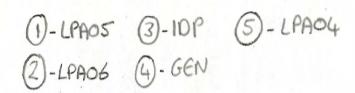
Here are my objections to the St Helens Draft Local Plan:

- 1. Bold Forest Garden Suburb. This is a huge development area representing 42% of the housing development in the plan. This is a disproportionately large development in a rural area. Development should be spread over the area of the Plan. There will also be a considerable impace on Schhols and other services in Burtonwood and Westbrook
- 2. Bold Forest Garden Suburb. Much of the consideration for removing this land from the Greenbelt seems to be that built up areas can be seen from it. However part of he nature of Greenbelt is to protect the separation between built up areas, therefore I do not consider this a valid reason. Taking this land out of Greenbelt and developing it will reduce the rural nature of Burtonwood village and it's separation from St Helens
- 3. The traffic predictions in the Plan focus on the impact on St Helens town Centre. I am extremely concerned new traffic linked with Bold Forest Garden Suburb and the Omega extensions will impact greatly on Burtonwood and Westbrook as this will be a route to M62 Junction 8 and onwards to Omega, Gemini and the Westbrook Centre. The road infrastructure surrounding the planned area is poor. There is no detail I can see about measures to protect Burtonwood and Westbrook from this development or predictions of the impact.
- 4. The term "Safeguarded" when used in relation to land removed from Greenbelt status is misleading and a misappropriation of the term. The land is in fact less "safe" from development than if it remained as Greenbelt. Land for future development should be included clearly in the plan or removed if it not to be used in term of the plan.

Kind regards
Ceri Mitchell
Parish Councillor, Burtonwood Ward
Burtonwood and Westbrook Parish Council









URGENT - Representation in response to Local Plan Submission Draft (LPSD)

Sue Lea-Jones to: planningpolicy

12/03/2019 20:28

1 attachment



objections.docx

Please find attached my Representation in respect of the above local plan. Please acknowledge safe receipt as I note the deadline is 13th March 2019.

Many thanks

Mrs Lea-Jones

Susan Lea-Jones 32 Crantock Grove Windle St Helens WA10 6EJ

11th March 2019

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

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Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan,—but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1^{st} April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

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The economic growth predictions for St Helens seem to be based on flawed historical data which—does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

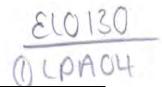
Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Mrs Susan Lea-Jones



St Helens local plan Gill Dickinson to: 'planningpolicy@sthelens.gov.uk' 12/03/2019 21:07



To whom it may concern

I wish to object in the strongest possible terms to the local plan which will remove tracts of land from the Green Belt in the area of Parkside and beyond. Brown field land should be used in preference. There are no special circumstances that warrant this removal as the rail terminal has not been specifically sited in the plan. No reference has been made to surrounding villages in adjacent local authorities who will bear the brunt of congestion and increased air pollution in an area already of very poor air quality.

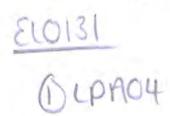
Regards John Dickinson 9 Winwick Lane Lowton Warrington WA3 1LR





Fwd: St Helens local plan John and Gill Dickinson

planningpolicy 12/03/2019 21:11



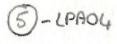


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Regards Gill Dickinson 9 Winwick Lane Lowton Warrington WA3 1LR

()-LPAOS

3-10F



Page 1 of 3

EL0137



Representation in response to local plan Dave Twentyman

to:

planningpolicy@sthelens.gov.uk 12/03/2019 22:25

Please see below my representation in response to local plan. However, I would just like to express my disappointment in the presentation of the online form. The form is simply not practicable and the terminology used is a deliberate attempt to baffle, confuse and ultimately obstruct ordinary taxpayers from articulating their objections to this plan. It is quite obvious that this is an attempt to reduce the number of objections and no doubt will be quite successful in doing so.

David Lea-Jones

32 Crantock Grove

St Helens

Merseyside

WA10 6EJ

12th March 2019

Reference: St Helens Local Plan

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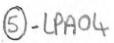


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Yours Sincerely	

David Lea-Jones

Sent from Yahoo Mail for iPhone





Page 1 of 1

ELOIGI



- LPAO6 4- GEN

Local Plan Objections Brian Muskett to:

planningpolicy@sthelens.gov.uk 12/03/2019 22:44



1 Attachment



LPSD - Brian Muskett.docx

Find attached my comments and objections to the Local Plan.

I realise you have the online form but my preference is the letter version attached.

Yours faithfully

B Muskett

Mr Brian Muskett

10th March 2019

Reference: St Helens Local Plan

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Yours Sincerely,

B Muskett

PO1012



St Helens Local Plan - Presubmission consultation John Fleming

planningpolicy@sthelens.gov.uk 13/03/2019 10:13



2 Attachments





St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

St Helens Local Plan - Presubmission consultation

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)				
Title: Mr	Title:				
First Name: John	First name:				
Last Name: Fleming	Last Name:				
Organisation/company: Gladman Developments	Organisation/company:				
Address: Gladman House, Alexandria Way, Congleton	Address:				
Postcode: CW12 1LB	Postcode:				
	Tel No:				
	Mobile No:				
	Email:				

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. If no e-mail

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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St Helen's Local Plan

Pre- Submission Version

Gladman Representations



March 2019

and opportunities, such as those arising from major improvements in infrastructure" (emphasis added)

4.2.2 It is unlikely that the Plan will be submitted, examined and adopted by the end of 2019. Accordingly, the plan period may need to be reconsidered so that it covers an appropriate time horizon. This may require additional housing and employment land to be identified to ensure these needs are met in full over the plan period.

03

Previously Developed Land

4.2.3 Although it is recognised that the majority of land outside the builtup urban area falls within Green Belt, Gladman do not consider the
use of wording that the re-use of Previously Developed Land (PDL)
will remain a key priority. Indeed, paragraph 117 of the NPPF 2019
clearly states that strategic policies should set out a clear strategy
for accommodating objectively assessed needs, in a way that makes as
much use as possible of previously developed or brownfield land except
where this would conflict with other policies in the Framework.
National policy does not set such a high bar as to require development
proposals to be located on PDL as a priority it merely considers it
preferable and does not discount the sustainability credentials of
greenfield development proposals. Gladman suggest that references to
development on PDL as a priority be removed from the Local Plan and
instead flexibility to be added to the policy which offers 'support'
to the re-use of PDL in Key settlements.

04

Green Belt release

4.2.4 Gladman supports the reasoning behind the need to release land from the Green Belt owing to the fact that every update of the SHLAA since 2010 has found that there is inadequate land in urban areas to meet housing needs in the longer term.

05

4.3 Policy LPA04: A strong and sustainable economy

- 4.3.1 The above policy seeks to deliver a minimum of 215.4ha of land for employment development over the period 2018 2035.
- 4.3.2 In principle, Gladman are supportive of the economic ambition and commitment towards the creation of sustainable locations by allocating employment development to meet the needs of the current and future generations of the borough as well as strengthening its position in the Liverpool City Region (LCR). However, it is vital

06

that the SHLP contains policies that positively and proactively encourage the scale of development that is required to support sustainable economic growth and in doing so help contribute towards building a strong, competitive economy both locally and nationally. A clear economic vision and strategy is needed to be put in place. This should reflect local business needs and be responsive to any wider opportunities that will allow the area to build on its strengths, counter any weaknesses and address future challenges. The policies of the local plan should therefore match the economic strategy for the area and encourage the local and inward investment that is required to meet anticipated needs over the plan period. Furthermore, it is vital that local policies are responsive to changing circumstances and that they are suitably flexible to ensure that sufficient land of the right type is made available in the right places and do not act as an impediment to additional sustainable growth opportunities that may come forward over the plan period.

4.3.3 However, it is important that the Council's economic aspirations are matched with its housing need to enable the town to grow and ensure the future prosperity of the borough, as well as the wider LCR region.

4.4 Policy LPA05: Meeting St. Helens Borough's housing needs

- 4.4.1 The above policy seeks to deliver, as a minimum, 9,234 net additional dwellings over the period 2016-2035. This equates to an average of at least 486 dwellings per annum.
- 4.4.2 Whilst the housing requirement contained within the Local Plan follows the three-step process outlined in the PPG for undertaking the standard method, it is important to note that the standardised methodology only represents the minimum demographic starting point and is still subject to change and may have implications for the progression of the Local Plan if new projections/methodology is released prior to the commencement of the examination in public.
- 4.4.3 The Council's ambitions for future economic growth, reducing the affordability gap and accommodation of any unmet housing needs from neighbouring authorities must be considered through a separate exercise when determining the housing requirement. The Council will also need to ensure that the plan is sufficiently flexible (in

06

01

PO1013



St. Helens Borough local plan Liz Roughsedgr to: planningpolicy

13/03/2019 11:43

Dear Sir

I wish to voice my objections to the proposed local plans as follows

- 2 ES Land to the East of M6 junction 23 Haydock.
- 4 EA Land South of Penny Lane, Haydock.
- 6 EA Land West of Millfield Lane and South of Liverpool Road. 3.
- 4. 5 EA Land West of Haydock Estate.

The proposed plans will have a negative effect on the roads in Ashton In Makerfield, impacting on the quality of life for local residents.

Junction 23 of the M6 at the A580 is already a traffic black spot and the A49 along Warrington Road and through Ashton town centre is very often gridlocked.

The added traffic generated by these developments will make a bad situation even worse.

Another concern is local air quality. The Greater Manchester Clean Air Plan has identified the A49 as a road of concern. This will only be made worse if the proposed developments go ahead and will impact on the health and well being of local residents.

Using the building of these developments as a means of increasing employment in the local area is a farce. There is no guarantee that these jobs would benefit local people.

In fact it would please me greatly that should these plans go ahead , all the jobs were taken by people living in St Helens, as maybe St Helens Council would wake up to the problems of traffic congestion and air pollution if their roads were constantly gridlocked.

There must be plenty of brownfield sites available in the St Helens area that the council could use for these developments, if they are so desperate for the revenue.

I feel however that the council will take the easier and cheaper option of using Greenbelt Land. What happens when we have no Greenbelt Land left? People are more important than profit.

I consider that using the local Green Belt Land is morally wrong and I appeal to St Helens council to consider how the decisions they make now could have disastrous consequences for future generations.

Yours sincerely

Elizabeth Roughsedge

1 Berrington Grove Ashton In makerfield Wigan WN4 9LD

PO1014



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In fact it would please me greatly that should these plans go ahead , all the jobs were taken by people living in St Helens, as maybe St Helens Council would wake up to the problems of traffic congestion and air pollution if their roads were constantly gridlocked.

There must be plenty of brownfield sites available in the St Helens area that the council could use for these developments, if they are so desperate for the revenue.

I feel however that the council will take the easier and cheaper option of using Greenbelt Land. What happens when we have no Greenbelt Land left? People are more important than profit.

I consider that using the local Green Belt Land is morally wrong and I appeal to St Helens council to consider how the decisions they make now could have disastrous consequences for future generations.

Yours sincerely

Elizabeth Roughsedge

1 Berrington Grove Ashton In makerfield Wigan WN4 9LD

PO1015



St. Helens Borough local plan Liz Roughsedgr to: planningpolicy

13/03/2019 11:43

Dear Sir

I wish to voice my objections to the proposed local plans as follows

- 2 ES Land to the East of M6 junction 23 Haydock.
- 4 EA Land South of Penny Lane, Haydock.
- 6 EA Land West of Millfield Lane and South of Liverpool Road. 3.
- 4. 5 EA Land West of Haydock Estate.

The proposed plans will have a negative effect on the roads in Ashton In Makerfield, impacting on the quality of life for local residents.

Junction 23 of the M6 at the A580 is already a traffic black spot and the A49 along Warrington Road and through Ashton town centre is very often gridlocked.

The added traffic generated by these developments will make a bad situation even worse.

Another concern is local air quality. The Greater Manchester Clean Air Plan has identified the A49 as a road of concern. This will only be made worse if the proposed developments go ahead and will impact on the health and well being of local residents.

Using the building of these developments as a means of increasing employment in the local area is a farce. There is no guarantee that these jobs would benefit local people.

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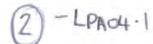
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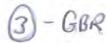


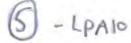
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation Peter Black

planningpolicy

13/03/2019 11:46







1 Attachment



St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black Blackfryers Planning and Environmental Consultants 9 Ecclesbridge Road MARPLE SK6 7PF

St Helens Local Plan - submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX

Croft Parish Council
Clerk to the Council Mr. M. Pope
Unit K1, Taylor Business Park
Warrington Road, Risley WA3 6BH

1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the <u>Submission Draft</u> for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- Employment Land Needs Assessment Addendum Report January 2019; and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision 'By 2035, St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. A range of high-quality new employment development will have taken place...'.

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide 'balanced regeneration' or 'sustainable growth' or provide 'high quality new employment'. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a <u>world</u> leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

2 Summary

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by existing and new road building. It:

- · Is wasteful of land, including good quality agricultural land
- · Would destroy the integrity of the Green Belt
- · Bring a low density of poorly paid and low skilled jobs
- Would entrench car dependency both in St Helens and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality
- · Increase climate change gas emissions and reduce air quality
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

Parkside West and Parkside East, rather than offering a 'transformational employment opportunity' will mainly attract low-skilled and poorly paid jobs, eat up large tracts of Green Belt and are unlikely to bring many of the claimed benefits. The same is true for the other planned Green Belt logistics developments within St Helens such as Florida Farm.

For employment, the Growth Scenarios used are over-optimistic and are based on significant and unrealistic assumptions about in-migration to the Liverpool City Region. Estimation of land required has used a poor methodology, leading to a gross overestimate of land needed. The focus on logistics creates poor quality employment – low employment density, low skilled jobs and low wages. It also ensures a 'Race to the bottom' with other local authorities chasing the same logistics jobs.

We oppose the following proposed allocations as Strategic Employment Sites under Policy LPA04.1 for reasons outlined in the rest of this document:

- · 2EA: Land at Florida Farm North, Slag Lane, Haydock22;
- 6EA: Land west of Millfield Lane, south of Liverpool Road and N of Clipsley Brook, Haydock;
- 7EA: Parkside East, Newton-le-Willows; and
- 8EA: Parkside West, Newton-le-Willows.

We think the employment strategy should be recast to focus on education and training, leading to higher quality employment and manufacturing. This is a more difficult path to follow than drawing a red line around large sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if St Helens is to be prosperous and have a future good quality of life.

3 Employment land and logistics

3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
- · Amount of employment land needed per year calculated illogically
- Five-year buffer included this is not required by any planning guidance

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· Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the <u>Employment Land Needs Assessment – Addendum Report January 2019</u> (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

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3.1.1 Baseline calculations

Confusingly the submission draft details employment land need from **2012**-2035 rather than the plan period 2020-35. It suggests 5.8 ha/y is needed, making 133.4ha, plus a five year 'flexibility buffer' (29ha) and an 'allowance for Liverpool SuperPort¹ and Parkside (65ha) making 227.4ha.

Netting off 'Take-up between 1 Apr 2012 and 31 Mar 2018' and 9.3ha existing land supply, the submission draft suggests that **215.4 hectares** of land for employment development should be allocated between April 2018 and March 2035. As relatively little employment land was used from 2012 to 2018, the effect of using 2012 as a baseline is to inflate the theoretical amount of land needed. This is nonsensical, as 2012-8 is in the past – there is no need to provide land for a period that has already happened



Using ELNA methodology but applying it to the actual plan period (2020-35) and assuming 15 years@5.8 ha/y = 87ha, plus buffer (29ha) and allowance for SuperPort and Parkside (65ha) gives 181ha. Adding 5.8ha for 2019 but netting off 9.3ha existing land supply suggests 177ha is required – roughly 50 ha less than claimed by St Helens, even if ELNA methodology is accepted.

3.1.2 Amount of employment land needed per year

The ELNA methodology is far from objective. It is predicated on the assumption (ELNA 2.11) 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 not supported by evidence. The only evidence provided is that take-up in some other areas such as Liverpool and Warrington (but not others) was historically greater. Liverpool has a city centre and port - no port in St Helens! Warrington has far better road and public transport communications, and the benefits of new town development including good quality housing and an environment far more attractive for higher quality employment. This means it is not possible to compare arbitrary local authority areas on this basis.

ELNA considered past take-up of employment land and job forecasts as the preferred basis of the forecasting of the employment land need, and this has some merit. However, this past take-up has not been constant, with lower growth before 1998 and little after 2008. Therefore, longer historical take-up periods are the most appropriate for the forecasting as they smooth out boom and bust. ELNA arbitrarily chose 1997-2012, as from 2012-2015 there was a significant decline in employment land take-up in the Borough. This was attributed to a lack of sites, although ELNA presented no evidence as to why this might be the case. This is important as from 1997-2015 147 ha were taken (4.9 ha/y), but 1997-2012 take up was 174 ha (5.8 ha/y). Given that 2015 is more recent than 2012, it seems logical and more scientific that the 4.9 ha/y figure for the period 1997-2015 is used².

¹ Liverpool SuperPort is in Liverpool rather than St Helens.

² Central Government offered a comparable example of unscientific use of statistics in 2019 by choosing to ignore new household formation statistics because the outdated figures fitted their political policy better.
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3.1.3 Five-year buffer

ELNA also included a five-year buffer. National Planning Policy Framework (NPPF) mentions the need to make provision for employment land. It mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion that there needs to be a buffer for employment land.

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3.1.4 Need for 'Major sites'

ELNA 2.3 suggests 'Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation'. Estate agents would say this, wouldn't they! This is simply hearsay, not scientific and should have no place in a report that purports to provide an 'objective' assessment. Or perhaps estate agents should write the housing policies too?

ELNA also added '30-40ha' for 'additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends'. No justification was provided for either 'major projects' need or why 30-40 ha was chosen. In the submission draft 30-40ha figure has been arbitrarily inflated to 65ha, without justification.



Given that other local plans and GMSF intend to allocate land for major projects, this is an issue that should be settled at a regional level. It is possible that a 'Major Site' is needed in St Helens. Given the lack of evidence to establish need (which is not the same as demand) there is no justification to simply add the areas for a major site onto a calculation of need. On this basis, allocation of land for 'major projects' fails the 'Duty to Co-operate' test.

3.1.5 Actual need for employment land

The table below shows several alternative ways of using past demand data to estimate how much land should be allocated for employment uses. A more objective view suggests that the methodology adopted in the submission draft grossly overestimates both need and demand.

In a scenario with realistic growth, no buffer (which is not required by NPPF) and no additional allowance for major sites (which have not been agreed regionally anyway) assumed, then the Councils' allocation exceeds need by a massive 158 ha, or 329%. The Council figures are not credible.

Table 1 Employment land needed under different scenarios

(All ha)	5.8 ha/y	4.9 ha/y	5y buffer	SuperPort Parkside	Adjustment	Allocation required	Difference to draft
Submission draft 2012-2035	133.4	(2)	29	65	-2.7 -9.3	227.4	0
2020-35 using ELNA and higher demand	87	1-2	29	65	+5.8 -9.3	177	-50
2020-35 ELNA methodology	-	73.5	24.5	65	+4.9 -9.3	158.6	-68.8
2020-35 ELNA methodology, no 5y buffer	4	73.5	0	65	+4.9 -9.3	134.1	-93.3

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2020-35 ELNA methodology, no 5y buffer or	73.5	0	0	+4.9 -9.3	69.1	-158.3
major sites						

3.2 Employment and related issues

Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. Excluding construction jobs which are temporary, a Regional Distribution Centre houses just one job per 77m2. It is widely accepted that increased automation is having a particularly significant effect on distribution. There is a drive towards greater automation to increase the speed and efficiency of multi-product order picking, which at present is largely manual. As racking techniques and stock management software advance there will be further reductions in jobs.

Unemployment in St Helens appears relatively low compared to historic levels, but this is disguised by a harsh social security regime that deters claimants, and the absolute unemployment level hides low pay, increasing casualisation of work, low productivity, under employment³ and poverty. The proportion of residents without any qualifications (12.4%) is 58% above the national average (7.6%). Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages. St. Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics.

The Liverpool City Region LEP: Growth Scenario, November 2016 was intended to present an upbeat picture of potential growth in order to attract central Government funding. This approach is flawed because all regions (including Warrington/North Cheshire and Greater Manchester) have to present high growth to access funding otherwise lack of his funding will ensure the area falls further behind — a Catch 22 situation. Other issues with the Growth Scenario include:

- Higher in-migration to the City Region is assumed without any evidence where the people will come from or what they will do. Will Manchester empty out?
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through 'transformational developments'.

It is understood that 'transformational developments' means 'logistics'. Of 10,000 jobs expected to be created, about 80% are in logistics warehousing and support services and associated transport. It remains to be seen if logistics jobs result in a rush of bright, well-educated, enthusiastic people into St Helens who will transform the economy.

The growth forecasts deliberately underestimate job displacement. The number of logistics jobs for import and distribution of a given amount of goods is relatively fixed although the locations are footloose. This means additional logistics jobs in St Helens would otherwise have been located elsewhere. If logistics jobs are truly additional for the sector, then they probably represent:

- Additional imports—in which case jobs are being displaced in UK manufacturing
- Growth of internet shopping in which case jobs are being displaced in traditional shops

³ ELNA 5.16 suggests underemployment in St Helens is 'hard to quantify', so doesn't bother. Page **5** of **11**

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests 'Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

4 Green Belt

4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that 'The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment.' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'.

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen 'large previously undeveloped sites in *close proximity to the M6 and M62 in order to meet modern requirements and market demand*'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside.

4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration.

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

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ensure that it is developed. Given the uncertainty and volatility of the logistics sector, and the significant oversupply of employment land explained in 3.1.5 of this document it is neither necessary nor prudent to take this land out of the Green Belt now.

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- 5 Parkside East, West and rail interchange
- 5.1 What is Parkside?

One of the problems with discussing 'Parkside' is that it means different things to different people. 'Parkside colliery' includes just the footprint of the original colliery buildings to many but usually also includes the spoil heaps and ancillary infrastructure much of which is now green and home to more biodiversity than when the land was agricultural. The 'Parkside area' includes additional land between the M6, the A49, the Chat Moss rail line and Warrington which was never affected by colliery activity and has remained open and agricultural. St Helens consider land to the East of the M6, as 'Parkside East' although this is clearly a misnomer and intended to convey the impression that it is either previously used or otherwise suitable for development. It is not related to the Parkside Colliery area and will probably attract different types of employment.

The whole site is currently Green Belt. Mining and associated activity was allowed through a special license and there was a clear understanding that the land remained Green Belt during this activity, and that it should be restored to a land-use compatible with its Green Belt designation when coal-related activity ceased. The preferred use at the time was agriculture, although now other uses could be compatible with Green Belt designation. Given the large amount of available distribution warehouses and proposals elsewhere, the scheme cannot possibly meet the very high bar of 'very special circumstances' that are needed to justify removal of land from the Green Belt.

Part of Parkside West is currently subject to a piecemeal, speculative planning application known as 'Parkside Phase 1'. An analysis of this suggests that the development will create a few low paid and low-skilled jobs; no development alternative have been considered that would lead to higher skilled, better paid jobs. An objective assessment suggests that just 100 new jobs would be created.

5.2 Parkside and the Green Belt

The Green Belt is designated for five reasons:

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

In the northwest urban regeneration was the most important reason for Green Belt designation. In this case the Green Belt performs an important role in separating Newton-le-Willows and north Warrington/Winwick. The proposal for Parkside East particularly would constitute very significant encroachment into the countryside and narrow the gap between settlements unacceptably.

While some of the land in Parkside West could be considered derelict or brownfield, a large part of it is not, the site is essentially rural. Warehouses next to a motorway are not 'urban regeneration'.

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

5.3 Parkside and other plan policies

Parkside fails Policy LPA03: Development Principles '3. Improve the economic well-being of the Borough's residents by a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people'. Parkside does not create 'a range of employment and training' - it continues the dominance logistics jobs, provides almost no training opportunities at all, and is certainly not 'readily accessible by non-car modes of transport', being a motorway-based site inevitably poorly served by public transport and with a hostile local environment for walking and cycling.

5.4 Rail connection at Parkside?

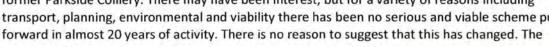
Page 8 of 11

Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) 'with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes'. Of the proposed allocation of 124ha of land at Parkside East it is estimated that 64.55ha will contribute to employment land with the remaining 60ha being required to provide related rail access. This is used as a justification for removal from the Green Belt.

Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing railbased logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

4.6.12 suggests Parkside 'will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort.' St Helens is 13 miles from Liverpool, which already has excellent existing rail and road links to the docks, so it is hard to see how development at Parkside could add to Liverpool SuperPort. Similarly, the regional already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. There are other currently underused rail links (for instance in Halton and Knowsley).

4.36.1 states that there is 'a long-standing history of developer interest in providing a SRFI' near the former Parkside Colliery. There may have been interest, but for a variety of reasons including transport, planning, environmental and viability there has been no serious and viable scheme put



'reasoned justification' for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

It is not obvious how a rail link would be funded. The promoters (effectively St Helens Council) wish to go ahead with a first phase of development at Parkside West now, without this providing any contribution towards a rail connection. If, as seems likely the sites are developed piecemeal, then there is no prospect of a rail connection, or significant use if it is provided.

5.5 Battle of Winwick

The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

- A574 from Risley through Culcheth and Glazebury to the A580. Vehicles cannot get out onto the A580, which is itself completely jammed by the traffic escaping from the M6.
- B5207 from Culcheth to Lane Head (Golborne) has cars backed up to Culcheth village centre.
- Kenyon Lane, Stone Pit Lane/Sandy Brow Lane, and Heath Lane/Mustard Lane from Lane
 Head to Winwick/Birchwood via Kenyon and Croft, with static queues in both communities.

The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards 'just in time' logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.



The area already suffers from air pollution including designated air quality management areas. NPPF para 7 suggests that planning has an environmental role – 'using natural reserves prudently, minimising waste and pollution, and mitigate and adapt the climate change including moving to a low carbon economy'. The designation of Parkside East and West will:

- Use fossil fuel reserves profligately and encourage climate change gas production
- Encourage production of air quality pollutants (mainly NOx, but also particulates) through the current exclusive use of diesel engines in goods vehicles.

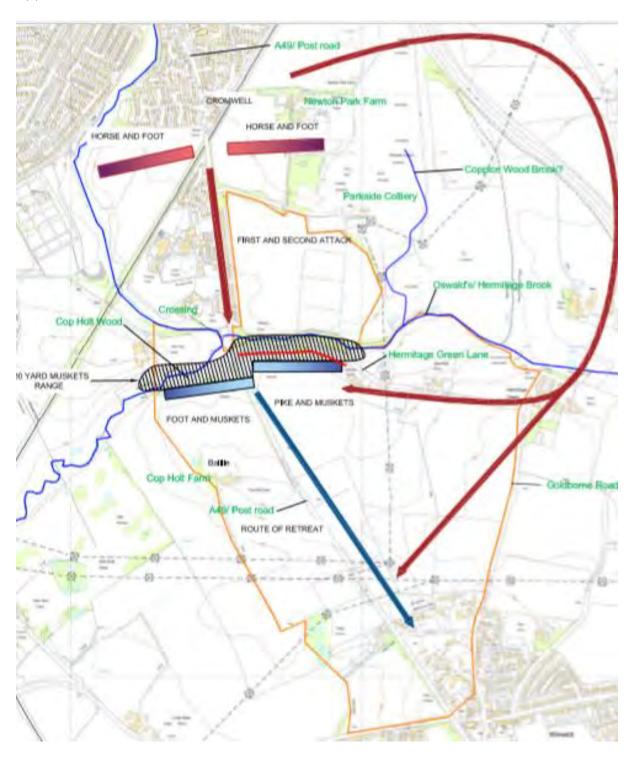
Para 17 suggests that local authorities should 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'. Parkside East and West would be difficult to access except by car. Walking and cycling in the area is already inconvenient, indirect, and dangerous due to traffic speed and volumes and poor air quality

NPPF suggests that planning should 'Support the transition to a low carbon future'. Parkside East and West is wholly based on road transport that creates more carbon emissions than either rail transport – which in this location would be powered by electricity and increases the likelihood that goods will travel long distances to their destination. It will therefore increase carbon emissions.

NPPF also suggests that development should 'Contribute to conserving and enhancing the natural environment and reducing pollution'. A currently open and mainly green site will be covered with an urban sprawl, and the main access method will be by diesel heavy goods vehicles that will produce particulates and oxides of Nitrogen that are known to cause hundreds of early deaths each year in the St Helens area, and thousands nationally.

End of document appendix follows

Appendix Battle of Winwick battlefield site



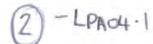
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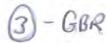


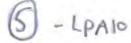
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation Peter Black

planningpolicy

13/03/2019 11:46







1 Attachment



St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black Blackfryers Planning and Environmental Consultants 9 Ecclesbridge Road MARPLE SK6 7PF

St Helens Local Plan - submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX

Croft Parish Council
Clerk to the Council Mr. M. Pope
Unit K1, Taylor Business Park
Warrington Road, Risley WA3 6BH

1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the <u>Submission Draft</u> for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- Employment Land Needs Assessment Addendum Report January 2019; and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision 'By 2035, St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. A range of high-quality new employment development will have taken place...'.

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide 'balanced regeneration' or 'sustainable growth' or provide 'high quality new employment'. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a <u>world</u> leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

2 Summary

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by existing and new road building. It:

- · Is wasteful of land, including good quality agricultural land
- · Would destroy the integrity of the Green Belt
- · Bring a low density of poorly paid and low skilled jobs
- Would entrench car dependency both in St Helens and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality
- · Increase climate change gas emissions and reduce air quality
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

Parkside West and Parkside East, rather than offering a 'transformational employment opportunity' will mainly attract low-skilled and poorly paid jobs, eat up large tracts of Green Belt and are unlikely to bring many of the claimed benefits. The same is true for the other planned Green Belt logistics developments within St Helens such as Florida Farm.

For employment, the Growth Scenarios used are over-optimistic and are based on significant and unrealistic assumptions about in-migration to the Liverpool City Region. Estimation of land required has used a poor methodology, leading to a gross overestimate of land needed. The focus on logistics creates poor quality employment – low employment density, low skilled jobs and low wages. It also ensures a 'Race to the bottom' with other local authorities chasing the same logistics jobs.

We oppose the following proposed allocations as Strategic Employment Sites under Policy LPA04.1 for reasons outlined in the rest of this document:

- · 2EA: Land at Florida Farm North, Slag Lane, Haydock22;
- 6EA: Land west of Millfield Lane, south of Liverpool Road and N of Clipsley Brook, Haydock;
- 7EA: Parkside East, Newton-le-Willows; and
- 8EA: Parkside West, Newton-le-Willows.

We think the employment strategy should be recast to focus on education and training, leading to higher quality employment and manufacturing. This is a more difficult path to follow than drawing a red line around large sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if St Helens is to be prosperous and have a future good quality of life.

3 Employment land and logistics

3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
- · Amount of employment land needed per year calculated illogically
- Five-year buffer included this is not required by any planning guidance

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· Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the <u>Employment Land Needs Assessment – Addendum Report January 2019</u> (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

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3.1.1 Baseline calculations

Confusingly the submission draft details employment land need from **2012**-2035 rather than the plan period 2020-35. It suggests 5.8 ha/y is needed, making 133.4ha, plus a five year 'flexibility buffer' (29ha) and an 'allowance for Liverpool SuperPort¹ and Parkside (65ha) making 227.4ha.

Netting off 'Take-up between 1 Apr 2012 and 31 Mar 2018' and 9.3ha existing land supply, the submission draft suggests that **215.4 hectares** of land for employment development should be allocated between April 2018 and March 2035. As relatively little employment land was used from 2012 to 2018, the effect of using 2012 as a baseline is to inflate the theoretical amount of land needed. This is nonsensical, as 2012-8 is in the past – there is no need to provide land for a period that has already happened



Using ELNA methodology but applying it to the actual plan period (2020-35) and assuming 15 years@5.8 ha/y = 87ha, plus buffer (29ha) and allowance for SuperPort and Parkside (65ha) gives 181ha. Adding 5.8ha for 2019 but netting off 9.3ha existing land supply suggests 177ha is required – roughly 50 ha less than claimed by St Helens, even if ELNA methodology is accepted.

3.1.2 Amount of employment land needed per year

The ELNA methodology is far from objective. It is predicated on the assumption (ELNA 2.11) 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 not supported by evidence. The only evidence provided is that take-up in some other areas such as Liverpool and Warrington (but not others) was historically greater. Liverpool has a city centre and port - no port in St Helens! Warrington has far better road and public transport communications, and the benefits of new town development including good quality housing and an environment far more attractive for higher quality employment. This means it is not possible to compare arbitrary local authority areas on this basis.

ELNA considered past take-up of employment land and job forecasts as the preferred basis of the forecasting of the employment land need, and this has some merit. However, this past take-up has not been constant, with lower growth before 1998 and little after 2008. Therefore, longer historical take-up periods are the most appropriate for the forecasting as they smooth out boom and bust. ELNA arbitrarily chose 1997-2012, as from 2012-2015 there was a significant decline in employment land take-up in the Borough. This was attributed to a lack of sites, although ELNA presented no evidence as to why this might be the case. This is important as from 1997-2015 147 ha were taken (4.9 ha/y), but 1997-2012 take up was 174 ha (5.8 ha/y). Given that 2015 is more recent than 2012, it seems logical and more scientific that the 4.9 ha/y figure for the period 1997-2015 is used².

¹ Liverpool SuperPort is in Liverpool rather than St Helens.

² Central Government offered a comparable example of unscientific use of statistics in 2019 by choosing to ignore new household formation statistics because the outdated figures fitted their political policy better.
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3.1.3 Five-year buffer

ELNA also included a five-year buffer. National Planning Policy Framework (NPPF) mentions the need to make provision for employment land. It mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion that there needs to be a buffer for employment land.



3.1.4 Need for 'Major sites'

ELNA 2.3 suggests 'Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation'. Estate agents would say this, wouldn't they! This is simply hearsay, not scientific and should have no place in a report that purports to provide an 'objective' assessment. Or perhaps estate agents should write the housing policies too?

ELNA also added '30-40ha' for 'additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends'. No justification was provided for either 'major projects' need or why 30-40 ha was chosen. In the submission draft 30-40ha figure has been arbitrarily inflated to 65ha, without justification.



Given that other local plans and GMSF intend to allocate land for major projects, this is an issue that should be settled at a regional level. It is possible that a 'Major Site' is needed in St Helens. Given the lack of evidence to establish need (which is not the same as demand) there is no justification to simply add the areas for a major site onto a calculation of need. On this basis, allocation of land for 'major projects' fails the 'Duty to Co-operate' test.

3.1.5 Actual need for employment land

The table below shows several alternative ways of using past demand data to estimate how much land should be allocated for employment uses. A more objective view suggests that the methodology adopted in the submission draft grossly overestimates both need and demand.

In a scenario with realistic growth, no buffer (which is not required by NPPF) and no additional allowance for major sites (which have not been agreed regionally anyway) assumed, then the Councils' allocation exceeds need by a massive 158 ha, or 329%. The Council figures are not credible.

Table 1 Employment land needed under different scenarios

(All ha)	5.8 ha/y	4.9 ha/y	5y buffer	SuperPort Parkside	Adjustment	Allocation required	Difference to draft
Submission draft 2012-2035	133.4	(-)	29	65	-2.7 -9.3	227.4	0
2020-35 using ELNA and higher demand	87	1-2	29	65	+5.8 -9.3	177	-50
2020-35 ELNA methodology	-	73.5	24.5	65	+4.9 -9.3	158.6	-68.8
2020-35 ELNA methodology, no 5y buffer	4	73.5	0	65	+4.9 -9.3	134.1	-93.3

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2020-35 ELNA methodology, no 5y buffer or		73.5	0	0	+4.9 -9.3	69.1	-158.3
major sites	1						

3.2 Employment and related issues

Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. Excluding construction jobs which are temporary, a Regional Distribution Centre houses just one job per 77m2. It is widely accepted that increased automation is having a particularly significant effect on distribution. There is a drive towards greater automation to increase the speed and efficiency of multi-product order picking, which at present is largely manual. As racking techniques and stock management software advance there will be further reductions in jobs.

Unemployment in St Helens appears relatively low compared to historic levels, but this is disguised by a harsh social security regime that deters claimants, and the absolute unemployment level hides low pay, increasing casualisation of work, low productivity, under employment³ and poverty. The proportion of residents without any qualifications (12.4%) is 58% above the national average (7.6%). Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages. St. Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics.

The Liverpool City Region LEP: Growth Scenario, November 2016 was intended to present an upbeat picture of potential growth in order to attract central Government funding. This approach is flawed because all regions (including Warrington/North Cheshire and Greater Manchester) have to present high growth to access funding otherwise lack of his funding will ensure the area falls further behind — a Catch 22 situation. Other issues with the Growth Scenario include:

- Higher in-migration to the City Region is assumed without any evidence where the people will come from or what they will do. Will Manchester empty out?
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through 'transformational developments'.

It is understood that 'transformational developments' means 'logistics'. Of 10,000 jobs expected to be created, about 80% are in logistics warehousing and support services and associated transport. It remains to be seen if logistics jobs result in a rush of bright, well-educated, enthusiastic people into St Helens who will transform the economy.

The growth forecasts deliberately underestimate job displacement. The number of logistics jobs for import and distribution of a given amount of goods is relatively fixed although the locations are footloose. This means additional logistics jobs in St Helens would otherwise have been located elsewhere. If logistics jobs are truly additional for the sector, then they probably represent:

- Additional imports—in which case jobs are being displaced in UK manufacturing
- Growth of internet shopping in which case jobs are being displaced in traditional shops

³ ELNA 5.16 suggests underemployment in St Helens is 'hard to quantify', so doesn't bother. Page **5** of **11**

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests 'Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

4 Green Belt

4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that 'The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment.' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'.

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen 'large previously undeveloped sites in *close proximity to the M6 and M62 in order to meet modern requirements and market demand*'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside.

4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration.

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

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ensure that it is developed. Given the uncertainty and volatility of the logistics sector, and the significant oversupply of employment land explained in 3.1.5 of this document it is neither necessary nor prudent to take this land out of the Green Belt now.

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- 5 Parkside East, West and rail interchange
- 5.1 What is Parkside?

One of the problems with discussing 'Parkside' is that it means different things to different people. 'Parkside colliery' includes just the footprint of the original colliery buildings to many but usually also includes the spoil heaps and ancillary infrastructure much of which is now green and home to more biodiversity than when the land was agricultural. The 'Parkside area' includes additional land between the M6, the A49, the Chat Moss rail line and Warrington which was never affected by colliery activity and has remained open and agricultural. St Helens consider land to the East of the M6, as 'Parkside East' although this is clearly a misnomer and intended to convey the impression that it is either previously used or otherwise suitable for development. It is not related to the Parkside Colliery area and will probably attract different types of employment.

The whole site is currently Green Belt. Mining and associated activity was allowed through a special license and there was a clear understanding that the land remained Green Belt during this activity, and that it should be restored to a land-use compatible with its Green Belt designation when coal-related activity ceased. The preferred use at the time was agriculture, although now other uses could be compatible with Green Belt designation. Given the large amount of available distribution warehouses and proposals elsewhere, the scheme cannot possibly meet the very high bar of 'very special circumstances' that are needed to justify removal of land from the Green Belt.

Part of Parkside West is currently subject to a piecemeal, speculative planning application known as 'Parkside Phase 1'. An analysis of this suggests that the development will create a few low paid and low-skilled jobs; no development alternative have been considered that would lead to higher skilled, better paid jobs. An objective assessment suggests that just 100 new jobs would be created.

5.2 Parkside and the Green Belt

The Green Belt is designated for five reasons:

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

In the northwest urban regeneration was the most important reason for Green Belt designation. In this case the Green Belt performs an important role in separating Newton-le-Willows and north Warrington/Winwick. The proposal for Parkside East particularly would constitute very significant encroachment into the countryside and narrow the gap between settlements unacceptably.

While some of the land in Parkside West could be considered derelict or brownfield, a large part of it is not, the site is essentially rural. Warehouses next to a motorway are not 'urban regeneration'.

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

5.3 Parkside and other plan policies

Parkside fails Policy LPA03: Development Principles '3. Improve the economic well-being of the Borough's residents by a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people'. Parkside does not create 'a range of employment and training' - it continues the dominance logistics jobs, provides almost no training opportunities at all, and is certainly not 'readily accessible by non-car modes of transport', being a motorway-based site inevitably poorly served by public transport and with a hostile local environment for walking and cycling.

5.4 Rail connection at Parkside?

Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) 'with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes'. Of the proposed allocation of 124ha of land at Parkside East it is estimated that 64.55ha will contribute to employment land with the remaining 60ha being required to provide related rail access. This is used as a justification for removal from the Green Belt.

Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing railbased logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

4.6.12 suggests Parkside 'will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort.' St Helens is 13 miles from Liverpool, which already has excellent existing rail and road links to the docks, so it is hard to see how development at Parkside could add to Liverpool SuperPort. Similarly, the regional already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. There are other currently underused rail links (for instance in Halton and Knowsley).

4.36.1 states that there is 'a long-standing history of developer interest in providing a SRFI' near the former Parkside Colliery. There may have been interest, but for a variety of reasons including transport, planning, environmental and viability there has been no serious and viable scheme put forward in almost 20 years of activity. There is no reason to suggest that this has changed. The

'reasoned justification' for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

It is not obvious how a rail link would be funded. The promoters (effectively St Helens Council) wish to go ahead with a first phase of development at Parkside West now, without this providing any contribution towards a rail connection. If, as seems likely the sites are developed piecemeal, then there is no prospect of a rail connection, or significant use if it is provided.

5.5 Battle of Winwick

The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

- A574 from Risley through Culcheth and Glazebury to the A580. Vehicles cannot get out onto the A580, which is itself completely jammed by the traffic escaping from the M6.
- B5207 from Culcheth to Lane Head (Golborne) has cars backed up to Culcheth village centre.
- Kenyon Lane, Stone Pit Lane/Sandy Brow Lane, and Heath Lane/Mustard Lane from Lane
 Head to Winwick/Birchwood via Kenyon and Croft, with static queues in both communities.

The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards 'just in time' logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.



The area already suffers from air pollution including designated air quality management areas. NPPF para 7 suggests that planning has an environmental role – 'using natural reserves prudently, minimising waste and pollution, and mitigate and adapt the climate change including moving to a low carbon economy'. The designation of Parkside East and West will:

- Use fossil fuel reserves profligately and encourage climate change gas production
- Encourage production of air quality pollutants (mainly NOx, but also particulates) through the current exclusive use of diesel engines in goods vehicles.

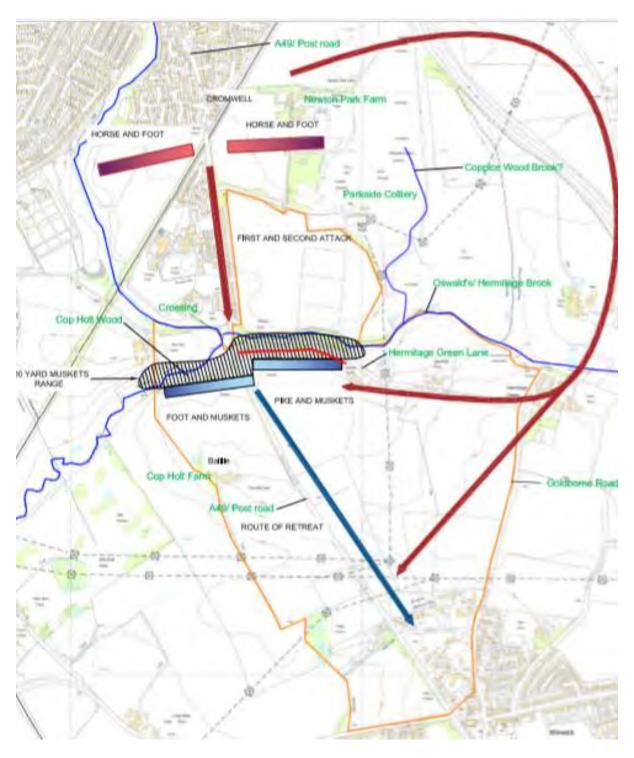
Para 17 suggests that local authorities should 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'. Parkside East and West would be difficult to access except by car. Walking and cycling in the area is already inconvenient, indirect, and dangerous due to traffic speed and volumes and poor air quality

NPPF suggests that planning should 'Support the transition to a low carbon future'. Parkside East and West is wholly based on road transport that creates more carbon emissions than either rail transport – which in this location would be powered by electricity and increases the likelihood that goods will travel long distances to their destination. It will therefore increase carbon emissions.

NPPF also suggests that development should 'Contribute to conserving and enhancing the natural environment and reducing pollution'. A currently open and mainly green site will be covered with an urban sprawl, and the main access method will be by diesel heavy goods vehicles that will produce particulates and oxides of Nitrogen that are known to cause hundreds of early deaths each year in the St Helens area, and thousands nationally.

End of document appendix follows

Appendix Battle of Winwick battlefield site



PO1018



St Helens Local Plan Submission Draft McBride, Sean

'planningpolicy@sthelens.gov.uk'

13/03/2019 12:30

5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm Ecological Statement(1.1).pdf





Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards Sean

Sean McBride

Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH

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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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EL0177

St. Helens Borough Local Plan 2020-2035 Submission Draft

Representations submitted on behalf of Persimmon Homes North West

March 2019



FL0177

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Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

- 3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework.
- 3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.
- 3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework.

Policy LPA03: Development Principles

4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents.

Policy LPA04: A Strong and Sustainable Economy

- 5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development.
- 5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

PO1019



St Helens Local Plan Submission Draft McBride, Sean

'planningpolicy@sthelens.gov.uk'

13/03/2019 12:30

5 Attachments



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Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards Sean

Sean McBride

Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH

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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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EL0177

St. Helens Borough Local Plan 2020-2035 Submission Draft

Representations submitted on behalf of Persimmon Homes North West

March 2019



FL0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework.

08

- 3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.
- 3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework.

00

Policy LPA03: Development Principles

4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents.

O

Policy LPA04: A Strong and Sustainable Economy

5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development.

1

5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

PO1020

EL0203

RE: Have your say on the St. Helens Borough Local Plan 2020-2035 Submission Draft planningpolicy 13/03/2019 15:11 1 Attachment

(D-LPA07 2) - LPA04 3) - Gweran



Local Plan PO Stage Comments March 2019.pdf

Dear Planning Policy

Please find my comments on the draft plan attached. Thank you.

Kind regards

Andrew Burrows MSc MCIHT MRTPI

11 Calday Grove, Pewfall, St Helens, WA11 9RS



Dear Sir or Madam,

St. Helens Borough Local Plan 2020-2035: Submission Draft Town and Country Planning (Local Planning) (England) Regulations 2012

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the abovementioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at https://www.sthelens.gov.uk/localplan and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St. Helens Council libraries (see https://www.sthelens.gov.uk/libraries for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

 by post to Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP; or

Peters Sine paternius

BHA EA 6

Dear Sir / Madam

Comments on 2020-2035 Submission Draft Local Plan

I object to allocations EA6, EA7 & HA3. My general and site-specific comments on the draft plan are provided below.

1. Inadequate Support for St Helens Central / St Helens Junction Rail Link

St Helens town centre has for many years needed a direct rail connection to Manchester. This plan will fail to deliver it yet again. The draft plan offers no clear strategy as to how this vital rail link will be delivered, how the plan will help fund it, or how the rail link will integrate with wider land use planning objectives.

PAILURE TO DELIVER RAIL CONNELL

2. Inadequate Support for Carr Mill Rail Station

The draft plan offers only vague warm words regarding the proposed rail station development at Carr Mill. It contains no clear strategy detailing how the development of Carr Mill Station integrates with nearby land uses and proposed developments, or how the plan will help fund construction of the station or safeguard appropriate car parking levels to assist the station's business case. The plan will fail to deliver this new rail station yet again (as the previous local plan did).

PELLIVER IN

AR MILL

3. Scale of Modern Warehousing Developments Out of Context Alongside Existing Residential Areas It should be obvious from recent developments at EA2 Florida Farm that the scale of modern warehousing developments is far too large to be positioned beside existing residential areas. The plan does nothing to address this issue, particularly in relation to EA6 & EA7 developments proposed alongside the A58 Liverpool Road.

LANDSCAPING EAG I CAS

4. Extent of Land Release & Securing Infrastructure Improvements

The plan does not sufficiently prioritise brownfield land for development and is too heavily reliant on taking 'easy wins first' by promoting excessive levels of greenfield / green belt development. The plan also contains no clear transparent mechanism for securing contributions to local infrastructure improvements — despite the lower land development costs associated with greenfield land release. The potential financial benefits of adopting the Community Infrastructure Levy have not been clearly or independently assessed.

(3) (2-

5. Partiality of the Council

The Council stands to make significant financial budgetary gains (in the form of increased council tax and business rates revenues) from the draft local plan. Yet the plan fails to acknowledge the scale of this financial gain and subsequently underplays the detrimental impacts of all proposed developments (excessive traffic levels, air pollution, CO2 emissions & impact on climate change).



6. No Clear Strategy for Public Transport

Virtually all bus services have been withdrawn from the A58 Liverpool Road, and yet the draft plan proposes large scale land releases in this area (HA3, EA6 & EA7). The draft plan will permit development proposals without securing significant improvements to public transport, thus encouraging over-reliance on the private car. The plan contains no clear strategy for improving public transport, or for developing the A580 as a key public transport corridor (as planned within the Greater Manchester Spatial Framework), despite promoting extensive site releases alongside the A580.



PO1021

RE: Repres	entations to St Helen	s Local Plan 2020-20	35 (Submission Draft) - Email 1 of
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				9-4PA04
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41575_09 lpsd-representa	tion-form Taylor Wimpo	ey St Helens 13.03.2019.	pdf (I) LPAOS	
			(12) LPNO9	(2) EVA
Sir/Madam,		•	(13) LPAIL	
Further to my colleague		and the link sent acro	oss, I attach a copy of	
Representation Form.	(4) LPCOV2	(18) LPC02	(23) LPC (3	66) LP DO1
Kind regards, Melissa	B) LPCOILS	(19) LPCOS	(EB) LPDOI	(7) LPDO2
Mensia	(LICON K	(S) LPC10	ED LPDOI	(28) LPD 03
Melissa Wilson Senior Planner	(1) LPCOV6	(SI) UPCIS	(2K) LPPO1	29 LPDOT
Lichfields, Ship Canal Ho	use, 98 King Street, Ma	nchester M2 4WU	(3) Choo!	(50) A/M
				er gy/(** ** ** ** ** ** ** ** ** ** ** ** **

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

https://we.tl/t-yDseY9rPfO

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards Brian

Brian O'Connor Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2 [NLP-DMS.FID606600] Brian O'Connor



1 Attachr



SPLIT 41874_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19_Part_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

https://we.tl/t-yDseY9rPfO

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards Brian

Brian O'Connor Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)				
Title: Ms	Title: Mr				
First Name: Kate	First name: Brian				
Last Name: McClean	Last Name: O'Connor				
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields				
Address: Ground Floor,	Address: Ship Canal House				
Washington House	98 King Street				
Birchwood	Manchester				
Postcode: WA3 6GR					
; 	Postcode: M2 4WU				
Tel No:	Tel No:				
Mobile No:	Mobile No:				
Email:	Email:				

And the state of t					
Signature		Date:	13/03/2019		
Topological parties	aure of:			-	
	*				

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

this form before you complete it.							
3. To wh	3. To which part of the Local Plan does this representation relate?						
Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental	Habitats Regulation Assessment			
See cover letter	See cover letter	See cover letter	Assessment				
Other do docume part/sec	ocuments (please name nt and relevant tion)	e See supporti	See supporting Representations and Appendices				
			egal Compliance and the	Tests of Soundness			
	Compliant?	Yes X					
		Yes 🗆					
Complies with the Duty to Ye Cooperate		Yes X	No □				
Please tick as appropriate							
5. If you Please re	consider the Local Pla ead the Guidance note fo	r explanations of th					
Justified	y Prepared?	X					
Effective		X					
	ent with National Policy		X				
6. Pleasi or fails to If you wi box to se	e give details of why yo comply with the duty	ou consider the Lo to cooperate. Plea compliance or so					
300 046	<u>-</u>						

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. See supporting Representations and Appendices
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.
8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination
Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited 13 March 2019



41874/03/SPM/MWI 17081285v8

Policy LPA04: A Strong and Sustainable 5.0 **Economy**

Introduction

Policy LPAo4 recognises the importance of achieving economic growth in the Borough to increase aspirations, skills and employment in St Helens. 5.1

Consideration of Policy

- TW is supportive of the Council's aspirations to maximise economic prosperity and promote employment development as identified in Policy LPA04. However, TW would note the 5.2 important link between integrating economic growth and housing need and both must be viewed symbiotically. It is considered that if the objective of employment growth is to be realised, then it will need to be supported by an adequate supply of suitable housing (identified in LPAo5). Failing to provide sufficient homes to align with economic growth will result in unsustainable levels of commuting into St Helens for employment purposes and undermine the Spatial Vision (achieving sustainable growth), the Strategic Objectives (Promoting Sustainable Transport) and Policy LPA01 (Presumption in Favour of Sustainable Development).
- TW believe that efforts have been made to positively prepare a strategy which seeks to meet the areas objectively assessed needs in terms of employment development. The SHMA considers 5.3 the housing needed to support the potential growth in the Borough's workforce at proposed major employment sites identified for release from the Green Belt, as set out in the St Helens Employment Land Needs Assessment [ELNA⁶] and this Policy. It also considered the growth in the non-employment land related workforce, as assessed in the Liverpool City Region Strategic Housing & Employment Land Market Assessment [SHELMA]7.
- The ELNA takes a supply-led approach to considering jobs growth based on a range of data to estimate the jobs yield of the Borough's employment sites. The ELNA considers 3 scenarios that 5.4 set out three different rates at which sites could be built out and jobs created -1 is the quickest, 2 is the middle option and 3 is the slowest, taking account of possible infrastructure constraints. The latter two scenarios were modelled as part of the ELNA. As noted in Appendix 1 and further explored in TW's representations to LPAo5, TW do not consider that the aspirations set out within Policy LPA04 can be supported with the current housing target as informed by the SHMA.
- The Framework states that planning policies should "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or poor environment". TW 5.5 considers that St Helens should ensure that barriers to investment in terms of housing provisions have been addressed. This is especially important if through further review it is considered that St Helens can provide additional employment allocations.

Tests of Soundness

TW considers Policy LPA04 to be sound but a greater alignment of the economic and housing 5.6 needs of St Helens is required.

Recommended Change

TW considers that no further change to this policy is required. 5.7

⁶ BE Group (January 2019): Employment Land Needs Study Addendum Report

⁷ GL Hearn (January 2017): Liverpool City Region: Strategic Housing and Employment Land Market Assessment [SHELMA]

PO1022



EL0216



Representations on behalf of Jones Homes (North West) Limited - Submission Draft Lorraine Robertson

to:

planningpolicy@sthelens.gov.uk 13/03/2019 15:49



1 Attachment



27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson

Senior Planner

BARTON

Tower 12, Bridge Street, Spinningfields, Manchester, M3 3BZ



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9-49104



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)			
Title:	Title: Mr			
First Name:	First name: Vincent			
Last Name:	Last Name: Ryan			
Organisation/company: Jones Homes (North West) Ltd	Organisation/company: Barton Willmore			
Address: c/o Agent	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester			
Postcode:	Postcode: M3 3BZ			
Tel No:				
Mobile No:				
Email:				
Signature:	Date: 40.44 + 20.40			
	13 March 2019			

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept update Plan 2020-2035? (namely submiss Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Council address is provided, we will contact	's preferred method of communication. If no e-mail at you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens

Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

BIRMINGHAM BRISTOL CAMBRIDGE CARDIFF EBBSFLEET EDINBURGH GLASGOW LEEDS LONDON MANCHESTER NEWCASTLE READING SOUTHAMPTON



Local Plan St Helens Borough Council Town Hall Victoria Square St Helens WA10 1HP

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR 13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 - SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange 153 units
- Eccleston Grange 283 units
- Former Caremlite Monastery 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.





utilised and is of poor quality, lacking dedicated car parking, leading to users having to park on the highway, and having no changing facilities. There is no known shortage of recreational facilities in Newton-le-Willows and informal discussions with the Council officers have revealed that the principle of releasing the land for housing has not been considered. The release of under-utilised Council-owned land for housing would be in accordance with Government initiatives encouraging Councils to make the most of such assets in contributing towards addressing the national housing crisis and releasing much needed capital for diversion into cash-starved public services.

We therefore conclude that the exclusion of the Council-owned land from the Site boundary is not sufficiently justified and we request that the Council takes the pro-active decision to reinstate the land.

Comments on Strategic Policies

Our Client supports the need for significant housing and employment growth and acknowledges the pragmatic approach by the Council in aiming to bring forward development which, at a minimum, seeks to meet the future residential and employment needs of the Borough and identifies additional land provision to provide flexibility in supply and beyond the Plan period. Our Client is concerned, however, the SDLP does not aim to support and deliver the wider aspirations of the Liverpool City Region ("LCR"), despite Paragraph 1.7.1 of the SDLP highlighting the extent to which the Council has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy ("SDS")). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority ("LCRCA") prepared a Strategic Housing and Employment Land Market Assessment 2017 ("SHELMA") which sought to assess the likely needs for housing and employment land across the LCR as a whole. We consider that a close alignment with the aspirations of the LCR is essential to help drive forward economic growth and reverse current trends of decline in deprivation and affordability within the Borough.

Policy LPA02 - Spatial Strategy

Our Client **supports** the SDLP's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be focussed on these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth. However, **we consider that this policy wording should be amended to specify that meeting development needs will necessitate development both in and around those Key Settlements**. This is because sufficient development cannot be located within existing settlement boundaries.

Our Client **supports** Paragraph 4 of Policy LPA02, which sets out that Green Belt release will be required to meet the development needs of the Borough over the Plan period and that further Green Belt land is required to be safeguarded to meet the needs of the Borough beyond the Plan period. We **support** the release of Green Belt land within the SDLP and the need for Safeguarded Land.

Policy LPA04 - A Strong and Sustainable Economy

We note at Paragraph 4.12.3 of the SDLP that the Council rightly acknowledges that the economy of the Borough is 'inextricably linked' to that of the wider LCR. It is stated that the Council will continue to work alongside its City Region partners 'to take full advantage of the continued growth of the City Region and to help deliver the economic growth'. However, in order to reflect the economic growth scenario supported in the SHELMA, a step change in proposed housing delivery is also required to reflect this, otherwise the Borough will not be able to fully contribute towards or take advantage of its position within the LCR.



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PO1023



+ OBTECTIVE



St Helens Local plan - Pre-Submission Draft - Response by Revelan John Pearce

planningpolicy@sthelens.gov.uk

13/03/2019 15:53



10 Attachments





Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf





lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf





lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf





lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf





lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

Dear Sir or Madam

Please find attached a response to the Local Plan - Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

John Pearce BSc (Hons) MTPL MRTPI

Senior Planner



Harris Lamb Ltd | 75-76 Francis Road | Birmingham | B16 8SP





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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan	Organisation/company: Harris Lamb
Developments Ltd.	Planning Consultancy
Address: c/o Agent	Address: Grosvenor House
	75 – 76 Francis Road
	Edgbaston
Postcode:	Birmingham
	Postcode: B16 8SP
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:	Date:	13 th March 2019	

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes x□ (Via Email)	No 🗌	
Please note - e-mail is the Cour	ncil's preferred method of communication.	If no e-mail
address is provided, we will con	ntact you by your postal address.	

RETURN DETAILS

Please return your completed form to us **by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> by:**

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part	of the Local P	an do	es this re	oreser	tation relate?			
Policy LPA04			Policies Map		Sustainabilit Appraisal/ Strategic Environmen Assessment	tal	Habitats Regulation Assessment	
Other document document and repart/section)		9						
4. Do you conside Please read the G	ler the St Heler	ns Bo r expl	rough Loc	al Plar	n 2020-2035 i	S: d the Tests	of Soundness	
Legally Complia		1	; □ √	Loguia		Vo □	on Gourianess	
Sound?		Yes	; 		1	40 □√		
Complies with th Cooperate	e Duty to	Yes	. □ ✓		N	No 🗆		
Please tick as appro	priate				1171444.4			
5. If you conside Please read the G Positively Prepai Justified? Effective? Consistent with N	uidance note for red?	expla	anations of √			SS		
6. Please give do or fails to comply lf you wish to sur box to set out yo	with the duty to boot the legal of	<u>o coc</u>	perate. Pl	<u>ease b</u>	e as precise	as possible	<u>e.</u>	
Please see attac	hed.							Annual States Sty

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	Please continue on a separate sheet if necessary
7. Please set out what modification(s) you consider	necessary to make the Local Plan legally
compliant or sound, having regard to the matter yo	u have identified at 6. above where this
relates to soundness (NB please note that any non	-compliance with the duty to cooperate is
incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be	heloful if you are able to out forward your
suggested revised wording of any policy or text. Pla	ease be as precise as possible.
	Please continue on a separate sheet if necessary
Please note your representation should cover suc	
supporting information necessary to support / justin	fy the representation and suggested
modification, as there will not normally be a subsec	quent opportunity to make further
representations based on the original representation After this stage, further submissions will be on	on at the publication stage. It at the request of the Inspector, based
on matters and issues he/she identifies for exa	mination.
p. r	Appearance of the control of the con
8. If your representation is seeking a modification; the oral part of the examination? (the hearings in p	do you consider it necessary to participate at authlich
No, I do not wish to participate at the	Yes, I wish to participate at the oral
oral examination	examination

9. If you wish to participate at the oral part of the examination, please outline within the examination of the examination, please outline within the examination of	vhy you consider
Please note the Inspector will determine the most appropriate procedure to accumulate who have indicated that they wish to participate at the oral part of the examina	dopt to hear those tion
Thank you for taking the time to complete and return this response	
Please keep a copy for future reference.	TOTIII.

(

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Grosvenor House

75-76 Francis Road Edgbaston Birmingham B16 8SP

Head of Local Plans St. Helens Council Town Hall Victoria Square St. Helens Merseyside **WA10 1HP**

BY EMAIL ONLY planningpolicy@sthelens.gov.uk

P1635/JP

13th March 2019

Dear

Our Ref:

Date:

St Helens Pre-Submission Draft Local Plan Response by Revelan Developments Ltd.

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

Spatial Vision

We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.















To: St Helens Council Date: 13th March 2019

Strategic Aims and Objectives

In light of the Council's vision, we specifically support the strategic aims and objectives that relate to ensuring a strong and sustainable economy.

Policy LPA02: Spatial Strategy

We support the Council's spatial strategy of directing sustainable regeneration and growth of St Helens to the main settlements, which includes Newton-le-Willows. Similarly, we support the intention to retain existing employment areas where they are suitable and viable to maintain a diverse portfolio of accessible employment opportunities across the Borough. The Sankey Valley Industrial Estate is one such employment area that successfully attracts a range of both local and national occupiers. In light of the success of the estate to attract occupiers, we consider it wholly appropriate to direct further development to it, particularly where there is market demand for new accommodation in this location. This aspect of the spatial strategy will assist with delivering economic growth objectives and job creation in the Borough.

The spatial strategy also seeks to take steps to maintain and enhance the Borough's network of ecological, open space and recreation sites in accordance with Policy LPA09. Whilst we do not object to this in principle, we return to this point below in the context of Revelan's land at Junction Lane, Newton-le-Willows.

The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

Policy LPA03: Development Principles

We generally support the development principles set out in the Policy, specifically, those that relate to improving the economic well-being of the Borough. The objective of creating and retaining a range of employment and training opportunities that are readily accessible by non-car modes is seen as particularly important and, therefore, supported.

The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

Policy LPA04: A Strong and Sustainable Economy

We support the Council's aim to deliver a minimum of 215.4 hectares of land for development over the Plan Period. We have no specific comments on any of the sites that are identified as draft allocations for employment development. Whilst the policy focuses on the protection and retention of sites in employment use, it could usefully include a reference to supporting new employment development on sites that are not currently, or have previously been, used for employment purposes, which subject to adherence with other policies of the Plan, will contribute to the pool of employment land and premises in the Borough.

As drafted, the policy is not positively prepared. To make the policy sound, we suggest that a further criteria is added, that states that new employment development will be supported on sites that are not currently employment sites, where the proposal would not conflict with other policies of the Plan.

Job Ref: P1635

PO1024



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

outlines the component parts of the representations. The cover letter addressed to

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

...

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

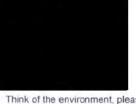
Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike

Turley
1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper I Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York St

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Turley
EL0228/01-41
Policies
LPA04/05,06
Sites IES, 2ES
GRP-036, GPP-053=
SA, Green Belt Review
SHLAA e EVA

Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD



- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

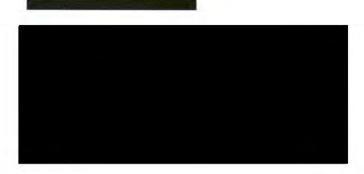
We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Representor Details

Web Reference Number	WF0095
Type of Submission	Web submission
Full Name	c/o Agent c/o Agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o Agent c/o Agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the Local Plan and its soundness

Response Date	3/13/2019 12:08:04 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 221-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, STICHAR

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Green Celt **Submission Draft**

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

2. Employment land requirement (Policy LPA04)

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Summary:

- The Council has significantly understated the employment land requirement for the Borough.
- In doing so the PSLP fails to accord with the expectations and requirements of national policy, and is internally inconsistent; the stated objectives of the PSLP are not adequately reflected in the policies intended to deliver on those objectives.
- The overall land requirement should be increased to 290 hectares, in order for Policy LPA04 to be sound.

Introduction

- 2.1 Supporting sustainable economic growth is at the heart of national planning policy. The National Planning Policy Framework ('the Framework') recognises the critical role the planning system plays in achieving sustainable development, and identifies economic growth as one of three overarching objectives. Through the preparation of plans and the application of policies in the Framework the planning system is expected '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 enhanced productivity'³. A failure to do so risks failing to fulfil this overarching objective and the achievement of sustainable development.
- 2.2 An expansion of this overarching objective makes clear that planning policies should help create favourable economic conditions, and significant weight should be placed on the need to support economic growth and productivity, both in meeting local business needs and wider opportunities for development. Areas should build on their strengths and address the challenges of the future. In plan-making, authorities should seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change, with strategic policies, as a minimum, providing for objectively assessed needs for all housing and other (and therefore employment) uses. 5
- 2.3 The expectations and requirements of national policy are clear and the PSLP must conform and respond. As drafted however, the PSLP does not.
- 2.4 The vision and intent of the PSLP is positive and reflects an ambition to drive economic growth and make the most of the Borough's strengths. Amongst its strategic objectives are maximising the contribution of St Helens to the economy of the Liverpool City Region and adjacent areas as well as meeting local employment needs. However, the

³³ National Planning Policy Framework (MHCLG 2019), paragraph 8

⁴ Ibid, paragraph 80

⁵ Ibid, paragraph 11

⁶ PSLP, Strategic Objective 5.1

- policies that follow within the PSLP undermine this objective and fail to respond to the core expectations of national policy.
- 2.5 At the heart of this is an assessment of employment land needs that significantly understates the needs and potential of the Borough, and a consequential underprovision of land capable of delivering on the PSLP's stated objectives and supporting sustainable economic growth. As this section goes on to demonstrate, Policy LPA04 of the PSLP is unsound as drafted and requires notable alteration, with consequential effects on other policies of the Plan (which following sections of this report address).

Objectively Assessed Needs

- 2.6 The substance of Peel's objection in respect of Policy LPA04 is expressed and evidenced in the Employment Land OAN Report provided at Appendix 2. This has been prepared by Turley, informed by specialist input from Amion (economics) and CBRE (market).
- 2.7 The Employment Land OAN Report provides a critical review of the Council's method and assumptions in deriving its objectively assessed need figure for employment land, and in turn the Council's employment land requirement specified in Policy LPA04. It does so with particular attention paid to a dimension of the employment land market, namely logistics. The Council's evidence base and the PSLP explicitly recognise the significant component of the employment land market that this represents, and the major role that St Helens can play in accommodating market demand given its locational and infrastructure advantages. Given this, it has a notable influence on the OAN for employment land and the Plan's response to this need.
- 2.8 The principal findings of the Employment Land OAN Report, which address the deficiencies of the Council's approach and identify a more appropriate approach in view of the PSLP's stated objectives and the expectations of national policy, are summarised below.

Past take-up as an indicator of baseline 'need'

- 2.9 Whilst the principle of having regard to past take-up levels in forward forecasting needs is reasonable, the Council's selection of an extended period of 1997-2012 in identifying a baseline annual average serves to understate those needs.
- 2.10 It fails to recognise the constraining effect of insufficient suitable employment land during this period. The Employment Land OAN Report highlights the Council's own concession that employment land has served as a constraint to development over extended periods during the selected timeframe. By rolling forward an annual average take-up which was deflated by land supply, the Council is simply perpetuating past deficiencies.
- 2.11 It involves the selection of a period which is not representative of the elevated levels of activity in the logistics sector now being experienced. The evidence in the Employment Land OAN Report shows the logistics sector has been a key driver of employment growth over an extended period in St Helens, but with particularly strong growth over the period from 1998-2008. The Council's evidence recognises that it is the most likely sector to drive growth in St Helens in the years to come. It is far more 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.

- 2.12 This is particularly the case given the dramatic and ongoing changes in the logistics market. The Employment Land OAN Report, by reference to CBRE evidence, identifies that especially due to the growth of the online retail market, the demand for logistics space has increased markedly over time and the average size of buildings has grown alongside this. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs, must be treated carefully as an indicator of future needs.
- 2.13 Where boroughs and locations have catered for this need the take-up of land has been much greater. Warrington borough being one such example, and a relevant one given its proximity and comparable relationship with both the Greater Manchester and Merseyside conurbations and the motorway network. Indeed when St Helens has catered for this need the take-up has more than kept pace; this has been evidenced as recently as the last 12 months where planning permissions have been granted for large-scale logistics in advance of the adoption of the Plan and development is already taking place. In a location such as St Helens, where all the evidence (includes the Council's) confirms its appeal to this sector of the employment market, the supply of sufficient suitable land will have a direct correlation with take-up as the demand is so strong.
- 2.14 The degree to which the demand is being met within the North West region is also a key influencing factor. CBRE's evidence (appended to the Employment Land OAN Report provided at Appendix 2) demonstrates the limited remaining supply capable of catering for the growing demand for large scale, highly accessible sites, such that St Helens is capable of delivering.
- 2.15 Taking these factors in to account, and reflecting on the both the emphasis in national policy and the PSLP's stated objectives of sustaining economic growth, the Employment Land OAN Report firmly concludes that the average take-up rate over the period 1998 2008 of 7.5ha per annum (a scenario recognised by the Council's own evidence base) is a more appropriate basis to forecast minimum 'baseline' employment needs.
- 2.16 In reflecting this over the same OAN period, the Council considers, 2012 2037, and building in the 5 year 'buffer' that the Council rightly recognises is appropriate to provide choice and flexibility, this equates to a base need for 225 hectares over the plan period.

Other factors in establishing need

2.17 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside Strategic Rail Freight Interchange ('SRFI'). This 'uplift' is increased from 40 hectares as included for within the POLP OAN figure.

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Appendix 2: Employment Land OAN report

Policy CPA04
(Points Picked up
in Sunnary rep-

St Helens Borough Local Plan 2020 – 2035 Submission Draft

Representations on behalf of Peel Holdings (Land and Property) Limited

Review of St Helens' Objectively Assessed Employment Needs

March 2019



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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum) ² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflects needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.

1.7 Of particular concern is that:

- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
- The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
- Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
- The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
 - Section 2: The Assessed Need for Employment Land provides an overview of the ELNS Addendum and recommended employment land OAN;
 - Section 3: Strategic Economic Drivers and Growth Aspirations provides an
 overview of the economic policy context and growth aspirations established by
 Government, the Liverpool City Region (LCR) Combined Authority and St Helens
 Council;
 - Section 4: Impact of the Constrained Land Supply examines the influences of past policy approaches and land supply on take up and economic growth;
 - Section 5: Drivers of Current and Future Logistics Demand examines the
 evolution of logistics market and implications for the supply of and demand for
 employment land in the North West.

- Section 6: Review of the Employment Land OAN recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- Section 7: Conclusions and Policy Implications sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms "...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 "continues to be low, limited by immediately available land supply" 10.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered "...to be a better representation of growth unencumbered by land shortages"¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions
Period 1997-2017	135.0	Based on 4.5 ha/yr
Period 1997-2012	174.0	Based on 5.8ha/yr
Growth period 1998-2008	225.0	Based on 7.5ha/yr

Source: ELNS, 2015 and ELNS Addendum, 2019

2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of 'transformational developments' planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the 'do something' scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 40 ha to 55 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of 'the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI'¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being "a better representation of the actual growth level if the market is without significant land supply constraints"15

Table 2.2: Updated Employment Land Needs 2012 - 2037

A STATE OF THE STA	На
Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- Using a land take-up scenario to estimate the baseline employment land needs figure is 2.13 considered to be a reasonable approach in principle. It is critical, however, that:
 - the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- It is accepted within the ELNS Addendum that the relative lack of adequate market-2.14 attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting "a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole" 17, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
 - The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put in a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 5 of this report with reference to:
 - The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a "vibrant and growing economy, a flourishing private sector and a highly skilled population" 18.
- 3.2 At a national level, the Government's goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that 'improving productivity is vital to building an economy fit for the future' 19. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government's Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country's economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough's location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

²¹ Ibid, paragraph 4.12.1

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

Realising the Growth Ambition for the Liverpool City Region

3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"22

- 3.9 The LCR Growth Strategy confirms the intention to ensure "the creation of over 100,000 additional jobs in the Liverpool City Region by 2040". It recognises that this growth will build upon a period of "economic renaissance with a diversifying economy of internationally-oriented markets and businesses".
- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"23.

- Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented 3.11 investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.
- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² lbid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

- Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"²⁵
- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:
 - "Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"
- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that "St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market".

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government's own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

²⁸ National Planning Policy Framework, MHCLG, 2019

The impact of historic land supply constraints

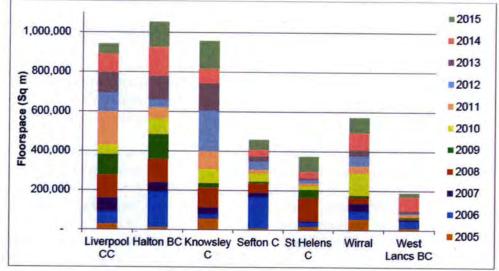
As widely acknowledged in the evidence base, the borough's constrained land supply is 4.1 considered to have acted as a significant constraint to economic growth and investment:

"...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...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"29.

This is evidenced in the analysis of comparative take up presented within the LCR 4.2 SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

2015 1,000,000 2014

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

- 4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:
 - 1997-2012;
 - 1998-2008; and
 - 1997-2017.
- 4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

- 4.5 Policy direction over much of the 1997 to 2017 period was provided by:
 - the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
 - The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
 - the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).
- 4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was "to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor building on opportunities created by the M62 link and at the existing Haydock Industrial Estate.
- 4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that "Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development" ³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that "the majority" of the UDP's allocated employment sites were:
 - "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network" ³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) 'to enable St Helens to compete with other regions for inward investment'³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ Ibid, p45

³⁸ Ibid, p46

- 4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.
- 4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:
 - "the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) 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"³⁹
- 4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.
- 4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

- 4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.
- 4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.
- 4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

- 4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:
 - administrative and support services;
 - health;
 - land transport, storage and post (which is taken to represent the logistics and distribution sector); and
 - professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

		ELNS	Take up	Scenario	period	ls
	1997	-2012	1997	-2015	1998	2008
Sector	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	8.0	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 2015/16.
- 4.13 The EDNS states that "the success of Omega over the last three years has been a key feature of the local economy" Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:

"The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options" ⁴³.

4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "high quality strategic business developments" ⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "contribute to economic opportunity and growth in the wider sub region", affirming that "proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

¹⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:

"Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62".

- 4.21 It is of note that "planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region"⁵¹, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
 - Site 2EA, Florida Farm North, Slag Lane, Haydock. This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - Site 3EA, Land North of Penny Lane, Haydock. This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough's employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ lbid, paragraph 2.7

4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand is it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land OAN.
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

22

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
 - the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up at across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

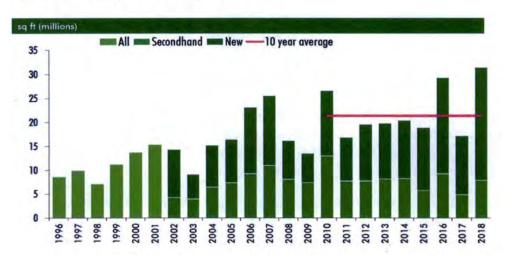


Figure 5.1: UK logistics take-up, 1996 - 2018*

*Note: CBRE logistics data covers units of over 100,000 sq ft only

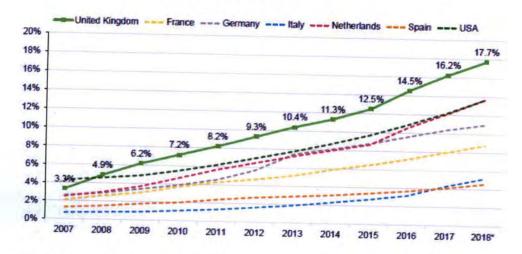
- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

% of total take-up ■ Food retail ■ Non retail occupiers 45% 40% 35% 0.9% 18.3% 31.7% 15.0% 29.1% 30% 5.2% 25% 0.6% 20% 15% 10% 5% 2012 2013

Figure 5.2: Online retail's contribution to the UK logistics take-up

5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can been seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

- Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017^{56} .
- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest 58. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West 59 of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

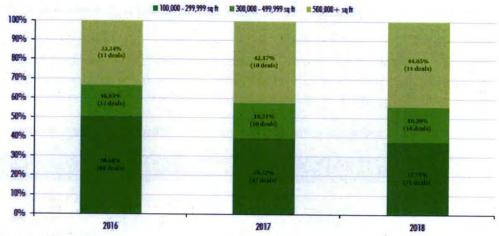
5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

⁵⁶ Retail Gazette (2018) https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/ (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

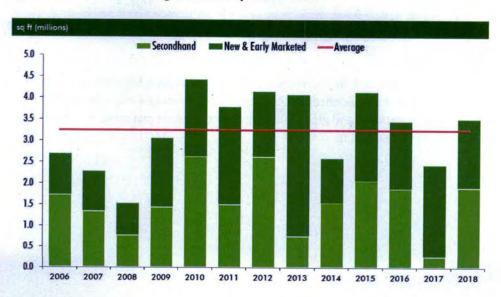
⁵⁹ Pitney Bowes; Oxford Economics (2018)

Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 - 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased
Apr 2010	Royal Mail	19,680	211,834
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590
Aug 2013	Brakes Brothers	18,426	198,336
Nov 2014	Travis Perkins Plc	58,570	630,442
Nov 2015	The Hut Group	63,731	685,994
Dec 2016	Amazon	33,166	356,996
Jul 2018	Royal Mail	32,516	350,000
Total		240,358	2,587,192
The second secon			

Source: CoStar, 2019

5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼
ВооНоо	North West	700,000 + expansion
DHL	M6 North West	700,000
L'Oréal	Manchester	600,000 + expansion
Stobart	M6 Corridor	600,000
IKEA	M6/M62 Corridor	500,000 + expansion
Ocado	North West	350,000 +
Makita	North West	350,000
c/o CBRE	M6 North West	200,000 – 400,000
c/o Avison Young	North West	200,000 - 300,000
CDDF 2010		

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

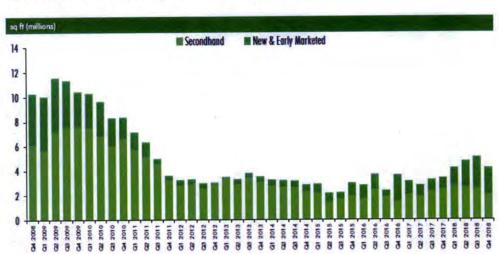


Figure 5.6: North West logistics availability, 2008 - 2018

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200
Courses CDDF 2010	

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being "oven ready" for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also "oven ready", but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Co	rridor	
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established submarket areas.
- Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
 - The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on "prime" development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months' when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of "oven ready" consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough's OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
 - a baseline (land take-up scenario) need of 135 174 ha; and
 - additional land demand associated with major projects of 55 65 ha.
- Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

• The inadequacy of the borough's historic land supply. It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

The sectors driving employment growth. Over the period from 1997-2012
employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0%
across the LCR and wider UK. In contrast, the relatively strong local performance
in the 1998-2008 period is evident, with St Helens (0.9%) performing better than
the LCR (0.8%). It is notable that employment growth in the logistics sector was
higher in St Helens over the period from 1998 to 2008, coinciding with improved
availability of larger scale sites.

Influences on future take up

- The growth of the online retail market. As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- The strong longer-term employment land take-up rates in Warrington. Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- The degree to which demand is being met within the North West region.
 CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.
- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
 - the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
 - "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more proeconomic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

63 Ibid, para 8.62

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market driven by e-commerce and the need for large floorplate units and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
 - a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	На	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

FEBRUARY 2019

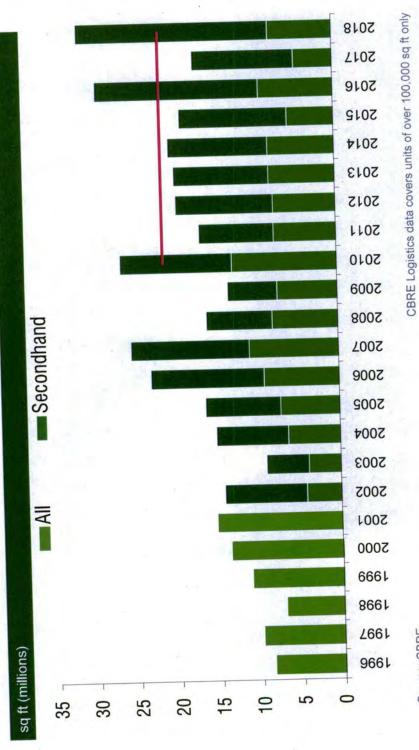
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UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

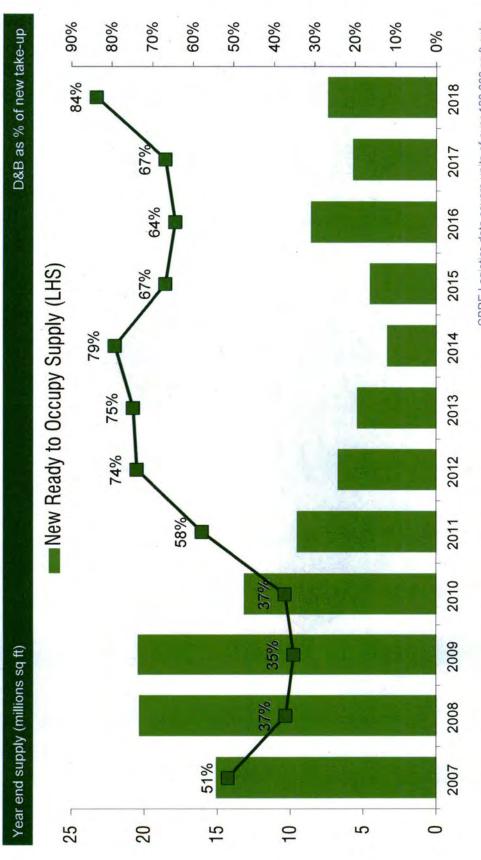
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
 - In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



Source: CBRE



DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 - 2018

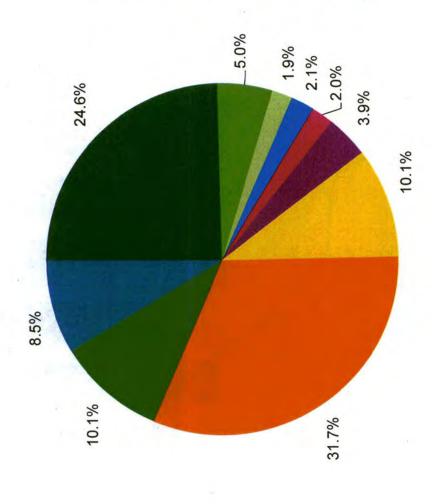


CBRE Logistics data covers units of over 100,000 sq ft only

CBRE

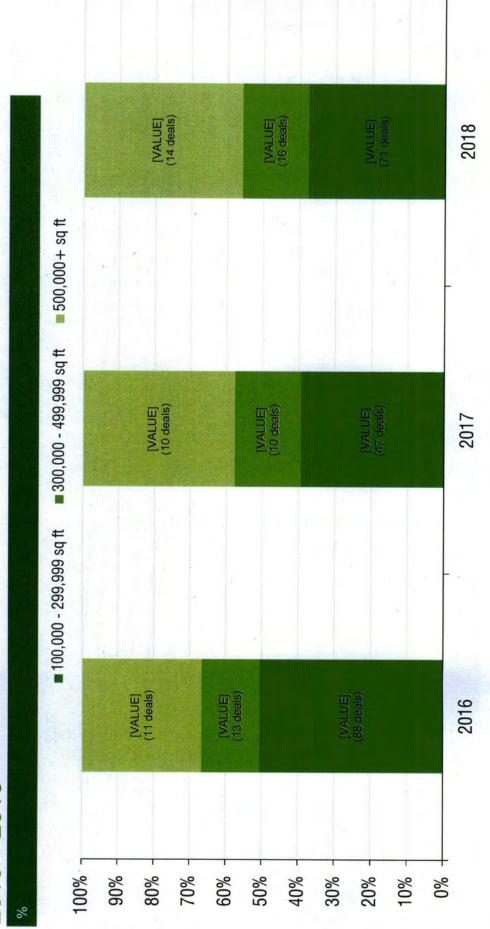


UK LOGISTICS TAKE-UP BY SECTOR 2018

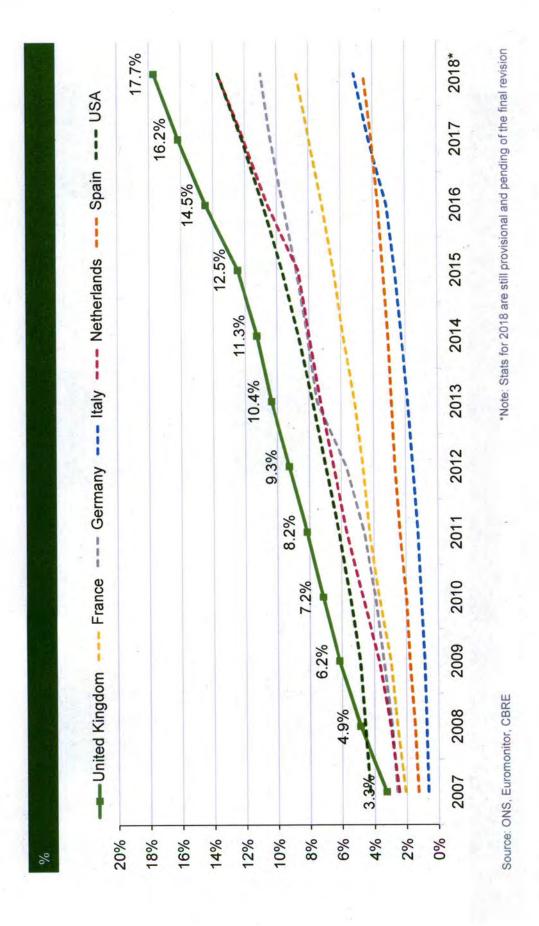


- ■3PL/
- Distribution
 Other
 manufacturing
 Construction
- Motor industry
- Food industry
- Post and
- Parcels Retail Food
- Retail Online

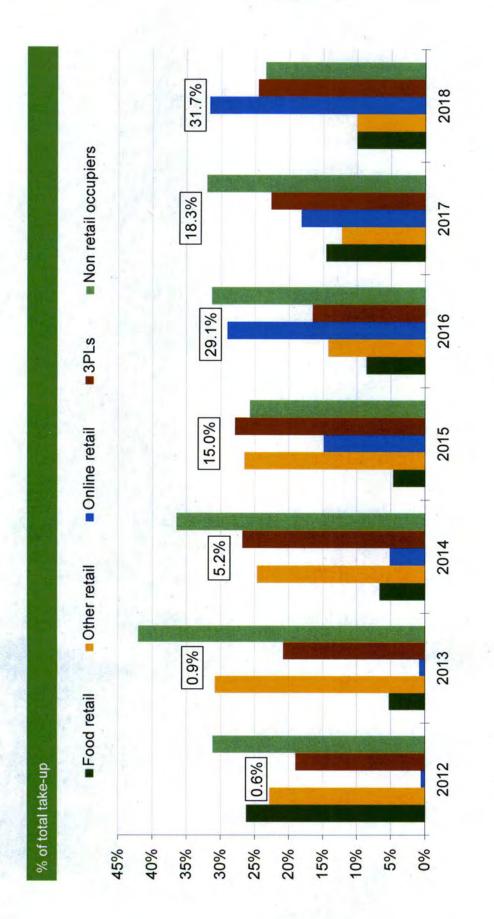
2016 - 2018



ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 - 2018



RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 - 2018



*Note: Stats for 2018 are still provisional and pending of the final revision

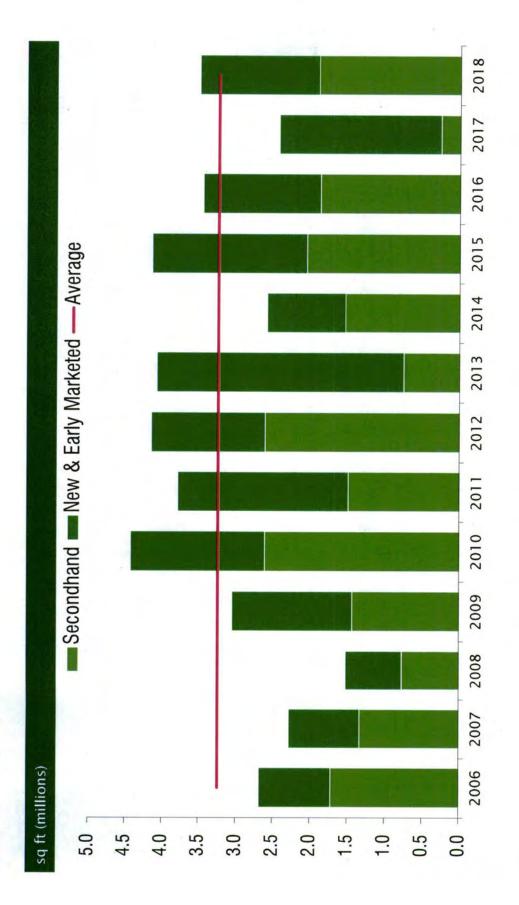
Source: ONS, Euromonitor, CBRE



NORTH WEST LOGISTICS TAKE-UP



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- · CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

Address	Town	Occupier	Size (sd ft)	Comments
Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent





NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Address	Town	Occupier	Size (sq ft)	Comments
Unit 3&4 M58	Skelmersdale	Kammac	370,000	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf
Middlewich 353	Middlewich	Go Outdoors	353,102	Existing unit Oct 2018 10 years £5.25 psf
K333	Trafford Park	Kinaxia	333,000	Existing unit Oct 2018 15 years £6.40 psf

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

NORTH WEST CURRENT DEMAND

KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
 - There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

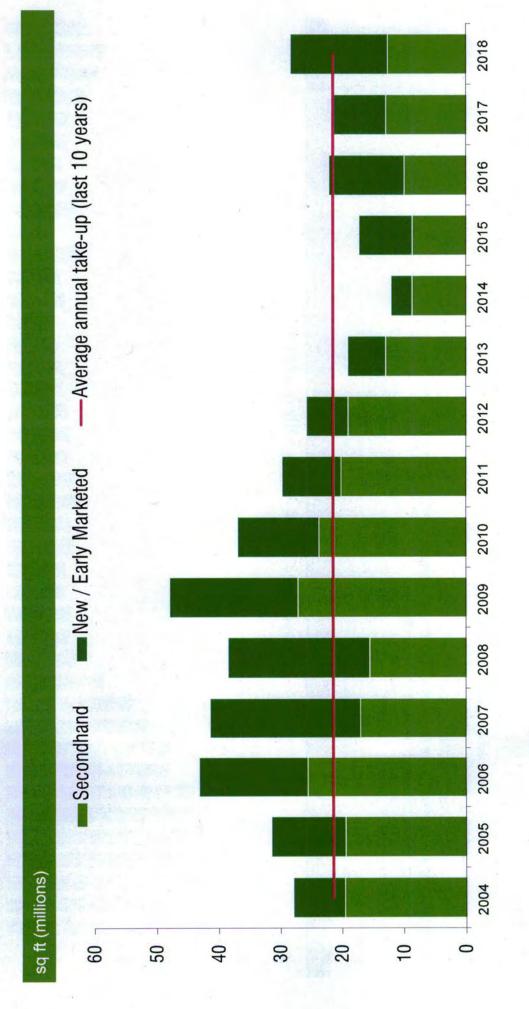
Size (sq ft) Comments	500,000 + expansion FH preferred. Occupation within 2 years. years. Colliers acting	600,000 + expansion LH. Occupation within 2 years. Colliers acting	350,000 + LH/FH. M6/M62. Gerald Eve acting	700,000 LH. New contract led requirement for European customer.	700,000 + expansion FH preferred. Ongoing requirement due to to growth of business. P3 Surveyors acting	200-400,000 LH requirement for US client. Timing 2020	350,000 . FH/LH. New build only.	200-300,000 LH. Grade A facility for PLC client	600,000 LH. Expansion of Warrington facility
Search Area	M6/M62 corridor	Manchester	North West	M6 North West	North West	M6 North West	North West	North West	M6 corridor
Occupier	IKEA	L'Oréal	Ocado	DHL	ВооНоо	c/o CBRE	Makita	c/o Avison Young	Stobart



UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018

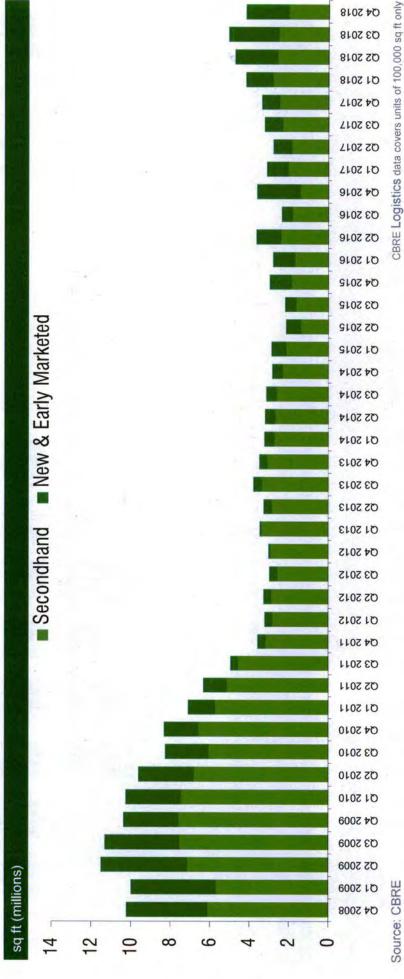


CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS AVAILABILITY 2008 - Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) representing sub 12 months' supply
 - Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
 - Grade A stock under construction is 1.21m sq ft (5 units)





SPECULATIVE LOGISTICS
AVAILABILITY



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

· As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)

A further 5 units are under construction providing 1.21m sq ft (see table on next page)

Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

		,			
SIZE (SQ FT)	149,148	216,410	236,915	216,410	375,000
ADDRESS	Unit F2, Multiply, Bolton	Kingsway 216 Rochdale	Crewe 240, Crewe	Kingsway 216 Rochdale	375, Logistics North Bolton
SIZE (SQ FT)	110,000	110,000	130,000	137,865	148,856
ADDRESS	Q110, Crewe	Academy, Knowsley	Unit 1, Evolution Park, Salford	Unit 2, Omega, Warrington	H2, Heywood Point Heywood



NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

SIZE (SQ FT)	107,210	183,669	185,500	208,000	523,500
ADDRESS	Liberty Park, Widnes	Unit 4, Omega, Warrington	Unit 1, Frontier Park, Blackburn	Venus 200, Knowsley	525 Haydock

NORTH WEST
EXISTING LOGISTICS
AVAILABILITY



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

Current availability for BIG BOX distribution units is limited

Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings - totalling 1.77m sq ft

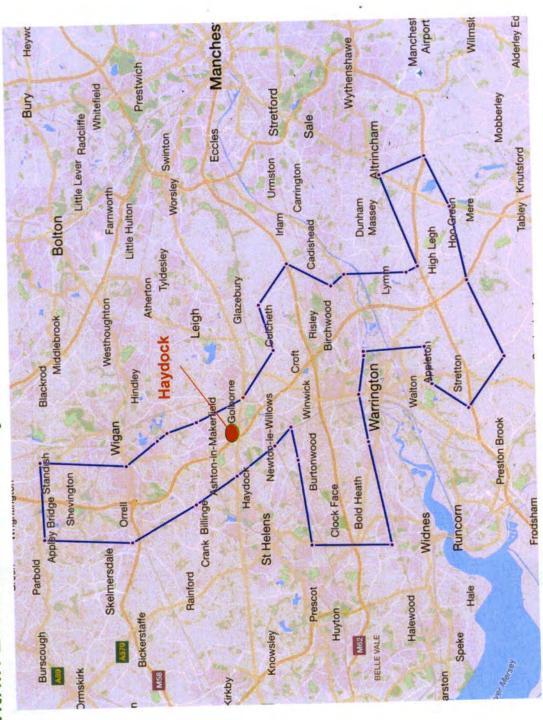
building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional Design & Build opportunities

ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000



NORTH WEST LAND AVAILABILITY

NORTH WEST LAND AVAILABILITY
Sites within 2.5km of Motorway Junctions



NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
 - Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
 - Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
 - Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icxn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMIMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	250,000	30	Land	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorsey Lane Widnes	200,000	40	Land	Former manufacturing facility with B2/8 use	Former manufacturing facility Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses Site likely to target similar uses
Haydock Lane Haydock	300,000	50	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft



NORTH WEST LAND AVAILABILITY NORTH WEST WIDE SITES

Detailed below are "oven ready sites" with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.

L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11

miles from the M6 motorway

K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK

Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million		Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	200,000	22	Land	Outline planning permission	Outline planning permission Site currently being sold to new developer



HOW HAYDOCK POINT CAN SATISFY FUTURE OCCUPIER DEMAND



HAYDOCK POINT - SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
- Haydock Point can satisfy future demand assuming consented
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - Haydock Point can procure a single building of this size
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - Haydock Point can satisfy this need
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - Haydock Point can satisfy demand of this size
- Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including single building in excess of 500,000 sq ft
- Haydock Point can accommodate a single unit up to 990,000 sq ft
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - Haydock Point can satisfy these needs
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic
- Haydock Point is located immediately adjacent to Junction 23, M6 motorway
- · The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - Haydock Point is ideally located to satisfy these demands

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only



Turley Office 1 New York Street Manchester M1 4HD



PO1025



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

outlines the component parts of the representations. The cover letter addressed to

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

...

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

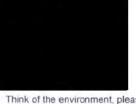
Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike

Turley
1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper I Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York St

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Turley
EL0228/01-41
Policies
LPA04/05,06
Sites IES, 2ES
GRP-036, GRP.0539
SA Green Belt Review
SHLAA e EVA

Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development as an alternative to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD



- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

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and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

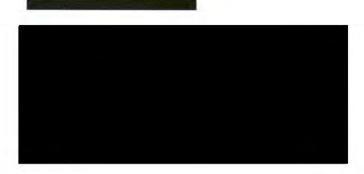
We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Representor Details

Web Reference Number	WF0095
Type of Submission	Web submission
Full Name	c/o Agent c/o Agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o Agent c/o Agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the Local Plan and its soundness

Response Date	3/13/2019 12:08:04 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 221-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, STICHAR

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Green Celt **Submission Draft**

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

trends better reflected the positive growth strategy which the Plan purports to establish.

- 2.12 This is particularly the case given the dramatic and ongoing changes in the logistics market. The Employment Land OAN Report, by reference to CBRE evidence, identifies that especially due to the growth of the online retail market, the demand for logistics space has increased markedly over time and the average size of buildings has grown alongside this. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs, must be treated carefully as an indicator of future needs.
- Where boroughs and locations have catered for this need the take-up of land has been much greater. Warrington borough being one such example, and a relevant one given its proximity and comparable relationship with both the Greater Manchester and Merseyside conurbations and the motorway network. Indeed when St Helens has catered for this need the take-up has more than kept pace; this has been evidenced as recently as the last 12 months where planning permissions have been granted for large-scale logistics in advance of the adoption of the Plan and development is already taking place. In a location such as St Helens, where all the evidence (includes the Council's) confirms its appeal to this sector of the employment market, the supply of sufficient suitable land will have a direct correlation with take-up as the demand is so strong.
- 2.14 The degree to which the demand is being met within the North West region is also a key influencing factor. CBRE's evidence (appended to the Employment Land OAN Report provided at Appendix 2) demonstrates the limited remaining supply capable of catering for the growing demand for large scale, highly accessible sites, such that St Helens is capable of delivering.
- 2.15 Taking these factors in to account, and reflecting on the both the emphasis in national policy and the PSLP's stated objectives of sustaining economic growth, the Employment Land OAN Report firmly concludes that the average take-up rate over the period 1998 2008 of 7.5ha per annum (a scenario recognised by the Council's own evidence base) is a more appropriate basis to forecast minimum 'baseline' employment needs.
- 2.16 In reflecting this over the same OAN period, the Council considers, 2012 2037, and building in the 5 year 'buffer' that the Council rightly recognises is appropriate to provide choice and flexibility, this equates to a base need for 225 hectares over the plan period.

Other factors in establishing need

2.17 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside Strategic Rail Freight Interchange ('SRFI'). This 'uplift' is increased from 40 hectares as included for within the POLP OAN figure.

01

02

2.18 The principle of such an uplift is appropriate, but the scale of the uplift is considered to be arbitrary and insufficient. As the Employment Land OAN Report identifies and explains, there is clear justification for a more notable uplift, more reflective of the influence such major infrastructure investment projects are likely to have, the appeal of St Helens to the increasingly active large scale logistics market and the role it can and is expected to play in meeting growing sub-regional needs.

02

2.19 The evidence presented in the Employment Land OAN Report makes the case for an uplift of 80 hectares compared to the 65 hectares proposed in the PSLP.

Overall OAN

2.20 Taken together, the two principal factors contributing to the OAN figure, generate a need figure of 304 hectares for 2012 – 2037, as summarised in the table below:

Table 2.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80 ⁷
Total Employment Land Needs	304
C	

Source: Turley

2.21 This represents an uplift of 66 hectares when compared to the upper end of the OAN range identified within the Council's evidence of 239 hectares, being the figure that underpins Policy LPA04.

02

Requirement and Residual Requirement

2.22 The OAN identified within the Council's evidence for the period 2012-2037 is adjusted within the PSLP to the end date of the Plan (2035). To make a commensurate adjustment to the amended OAN figure advised above generates a total employment land requirement for 2012-35 of 290 hectares. This compares to the PSLP figure of 227.4 hectares, as shown in the table below:

⁷ Existing allowance of 65ha plus an additional 15ha

Table 2.2: PSLP Employment Land Requirement 2012-2035

PSLP	На	Revised ONA	На	
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5	
5 year buffer	29	5 year buffer	37.5	
Allowance for SuperPort and 65 Parkside SFRI		Allowance for major projects and increasing logistics market demand		
Total Employment Land Needs	227.4	Total Employment Land Needs	290	

Source: PSLP Table 4.3 and Turley Analysis

- 2.23 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 2.24 The approach is replicated in the table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 2.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised OAN	На
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
Existing supply of 9.3 C. Existing supply of Developable evelopable Employment Employment Land		9.3	
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

2.25 Taking into account take up between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), then the total residual requirement (2018-2035) would be 278ha (an increase of 62.6ha from the 215.4ha established in Table 4.4 of the PSLP). This should be reflected in Policy LPA04.

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Conclusion

- 2.26 The Council's OAN for employment land is notably understated, with insufficient regard given to the balance between supply and demand, the constraining effect of insufficient supply in the past, the significantly altered context associated with the continued growth of the logistics sector (and the size of developments that operators require), the influencing effect of major infrastructure investment, and the contribution that St Helens can and should be making to meeting pressing regional and sub-regional demand within this sector. The Council's evidence base and the PSLP highlights the significant opportunity that the sector represents for the borough, and the PSLP commits to maximising the Borough's contribution to the economy of the Liverpool City Region. Yet a cautious and unduly negative approach is adopted.
- 2.27 The critique contained within the appended Employment Land OAN Report presents an evidenced alternative, one which is reflective of both national policy and the stated objectives of the PSLP. Policy LPA04 is presently unsound and requires notable amendment, in line with the position summarised above, in order to make it sound. Such an amended approach, which is then reflected elsewhere in Policy LPA04 and related policies of the Plan, will ensure there is a sufficiently responsive supply of employment land to cater for needs and support sustainable economic growth, as required by national policy.

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Appendix 2: Employment Land OAN report

Policy CPA04
(Points Picked up
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St Helens Borough Local Plan 2020 – 2035 Submission Draft

Representations on behalf of Peel Holdings (Land and Property) Limited

Review of St Helens' Objectively Assessed Employment Needs

March 2019



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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum) ² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflects needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.

1.7 Of particular concern is that:

- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
- The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
- Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
- The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
 - Section 2: The Assessed Need for Employment Land provides an overview of the ELNS Addendum and recommended employment land OAN;
 - Section 3: Strategic Economic Drivers and Growth Aspirations provides an
 overview of the economic policy context and growth aspirations established by
 Government, the Liverpool City Region (LCR) Combined Authority and St Helens
 Council;
 - Section 4: Impact of the Constrained Land Supply examines the influences of past policy approaches and land supply on take up and economic growth;
 - Section 5: Drivers of Current and Future Logistics Demand examines the
 evolution of logistics market and implications for the supply of and demand for
 employment land in the North West.

- Section 6: Review of the Employment Land OAN recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- Section 7: Conclusions and Policy Implications sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms "...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 "continues to be low, limited by immediately available land supply" 10.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered "...to be a better representation of growth unencumbered by land shortages"¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions	
Period 1997-2017	135.0	Based on 4.5 ha/yr	
Period 1997-2012	174.0	Based on 5.8ha/yr	
Growth period 1998-2008	225.0	Based on 7.5ha/yr	

Source: ELNS, 2015 and ELNS Addendum, 2019

2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of 'transformational developments' planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the 'do something' scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 40 ha to 55 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of 'the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI'¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being "a better representation of the actual growth level if the market is without significant land supply constraints"15

Table 2.2: Updated Employment Land Needs 2012 - 2037

A STATE OF THE STA	На
Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- Using a land take-up scenario to estimate the baseline employment land needs figure is 2.13 considered to be a reasonable approach in principle. It is critical, however, that:
 - the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- It is accepted within the ELNS Addendum that the relative lack of adequate market-2.14 attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting "a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole" 17, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
 - The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put in a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 5 of this report with reference to:
 - The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a "vibrant and growing economy, a flourishing private sector and a highly skilled population" 18.
- 3.2 At a national level, the Government's goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that 'improving productivity is vital to building an economy fit for the future' 19. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government's Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country's economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough's location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

21 Ibid, paragraph 4.12.1

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

Realising the Growth Ambition for the Liverpool City Region

3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"22

- 3.9 The LCR Growth Strategy confirms the intention to ensure "the creation of over 100,000 additional jobs in the Liverpool City Region by 2040". It recognises that this growth will build upon a period of "economic renaissance with a diversifying economy of internationally-oriented markets and businesses".
- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"23.

- Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented 3.11 investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.
- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² lbid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

- Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"²⁵
- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:
 - "Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"
- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that "St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market".

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government's own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

²⁸ National Planning Policy Framework, MHCLG, 2019

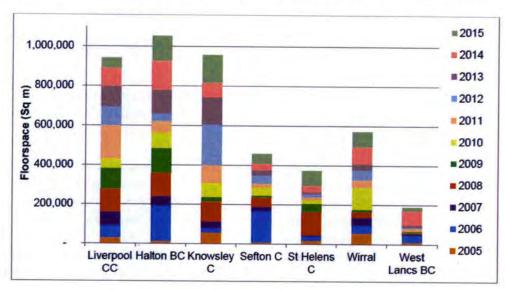
4. The impact of historic land supply constraints

4.1 As widely acknowledged in the evidence base, the borough's constrained land supply is considered to have acted as a significant constraint to economic growth and investment:

"...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...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"²⁹.

4.2 This is evidenced in the analysis of comparative take up presented within the LCR SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15, paragraph 2.11

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

- 4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:
 - 1997-2012;
 - 1998-2008; and
 - 1997-2017.
- 4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

- 4.5 Policy direction over much of the 1997 to 2017 period was provided by:
 - the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
 - The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
 - the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).
- 4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was "to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor building on opportunities created by the M62 link and at the existing Haydock Industrial Estate.
- 4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that "Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development" ³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that "the majority" of the UDP's allocated employment sites were:
 - "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network" ³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) 'to enable St Helens to compete with other regions for inward investment'³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ Ibid, p45

³⁸ Ibid, p46

- 4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.
- 4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:
 - "the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) 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"³⁹
- 4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.
- 4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

- 4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.
- 4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.
- 4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

- 4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:
 - administrative and support services;
 - health;
 - land transport, storage and post (which is taken to represent the logistics and distribution sector); and
 - professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

	ELNS Take up Scenario periods					
	1997-2012		1997-2015		1998-2008	
Sector	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	8.0	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 2015/16.
- 4.13 The EDNS states that "the success of Omega over the last three years has been a key feature of the local economy" Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:
 - "The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options"⁴³.
- 4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "high quality strategic business developments"⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "contribute to economic opportunity and growth in the wider sub region", affirming that "proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

¹⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:

"Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62".

- 4.21 It is of note that "planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region"⁵¹, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
 - Site 2EA, Florida Farm North, Slag Lane, Haydock. This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - Site 3EA, Land North of Penny Lane, Haydock. This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough's employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ lbid, paragraph 2.7

4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand is it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land OAN.
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

22

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
 - the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up at across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

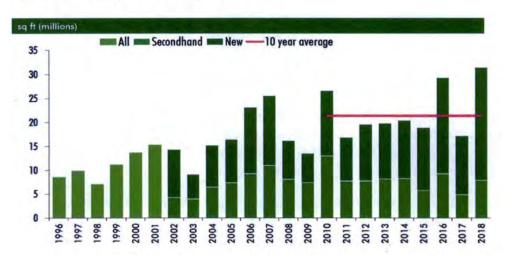


Figure 5.1: UK logistics take-up, 1996 - 2018*

Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

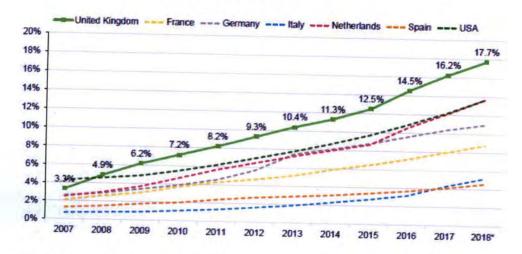
% of total take-up ■ Food retail ■ Non retail occupiers 45% 40% 35% 0.9% 18.3% 31.7% 15.0% 29.1% 30% 5.2% 25% 0.6% 20% 15% 10% 5% 2012 2013

Figure 5.2: Online retail's contribution to the UK logistics take-up

Source: CBRE, 2019

5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can been seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

- Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017^{56} .
- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest 58. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West 59 of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

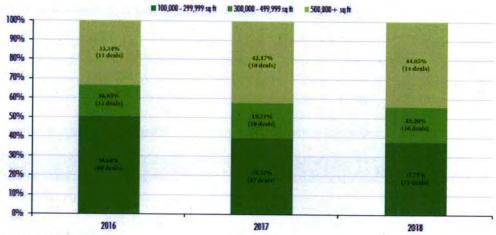
5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

⁵⁶ Retail Gazette (2018) https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/ (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

⁵⁹ Pitney Bowes; Oxford Economics (2018)

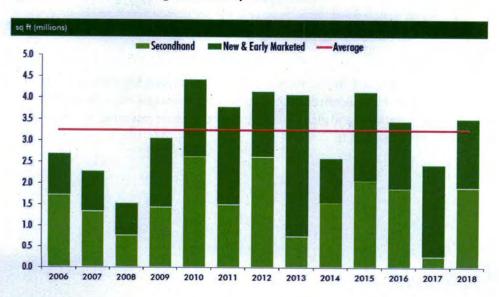
Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



Source: CBRE, 2019

5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 - 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased		
Apr 2010	Royal Mail	19,680	211,834		
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590		
Aug 2013	Brakes Brothers	18,426	198,336		
Nov 2014	Travis Perkins Plc	58,570	630,442		
Nov 2015	The Hut Group	63,731	685,994		
Dec 2016	Amazon	33,166	356,996		
Jul 2018	Royal Mail	32,516	350,000		
Total		240,358	2,587,192		
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Source: CoStar, 2019

5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼		
ВооНоо	North West	700,000 + expansion		
DHL	M6 North West	700,000		
L'Oréal	Manchester	600,000 + expansion		
Stobart	M6 Corridor	600,000		
IKEA	M6/M62 Corridor	500,000 + expansion		
Ocado North West		350,000 +		
Makita	North West	350,000		
c/o CBRE	M6 North West	200,000 – 400,000		
c/o Avison Young	North West	200,000 - 300,000		
CDDF 2010				

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

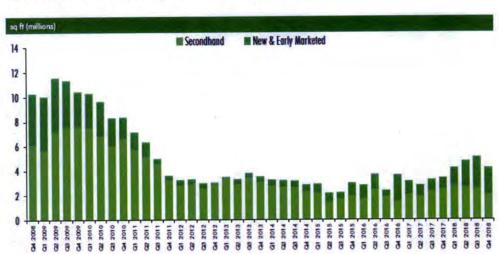


Figure 5.6: North West logistics availability, 2008 - 2018

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200
Courses CDDF 2010	

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being "oven ready" for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also "oven ready", but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Co	rridor	
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established submarket areas.
- Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
 - The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on "prime" development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months' when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of "oven ready" consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough's OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
 - a baseline (land take-up scenario) need of 135 174 ha; and
 - additional land demand associated with major projects of 55 65 ha.
- Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

• The inadequacy of the borough's historic land supply. It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

The sectors driving employment growth. Over the period from 1997-2012
employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0%
across the LCR and wider UK. In contrast, the relatively strong local performance
in the 1998-2008 period is evident, with St Helens (0.9%) performing better than
the LCR (0.8%). It is notable that employment growth in the logistics sector was
higher in St Helens over the period from 1998 to 2008, coinciding with improved
availability of larger scale sites.

Influences on future take up

- The growth of the online retail market. As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- The strong longer-term employment land take-up rates in Warrington. Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- The degree to which demand is being met within the North West region.
 CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.
- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
 - the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
 - "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more proeconomic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

63 Ibid, para 8.62

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market driven by e-commerce and the need for large floorplate units and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
 - a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	На	Revised ONA	Ha
Baseline employment 133.4 Land Needs – based on 1997-2012 scenario		Baseline employment Land 172.5 Needs – based on Growth Period 1998-2008	
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort 65 and Parkside SFRI		Allowance for major 80 projects and increasing logistics demand	
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

FEBRUARY 2019

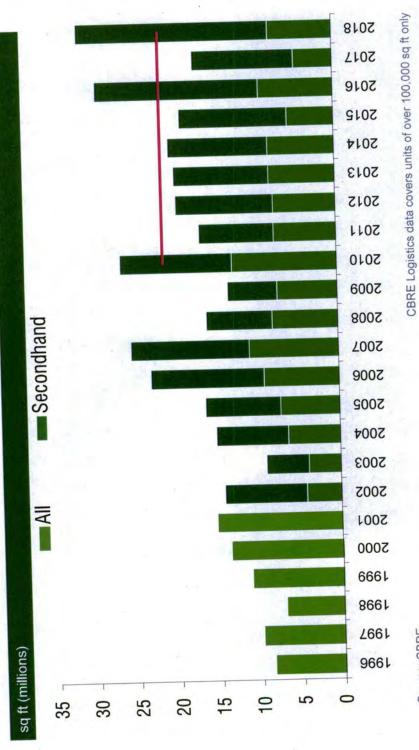
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UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

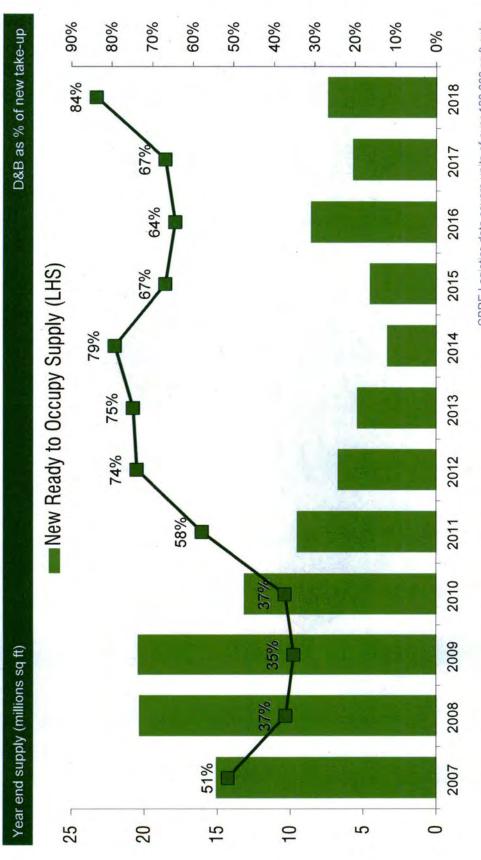
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
 - In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



Source: CBRE



DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 - 2018

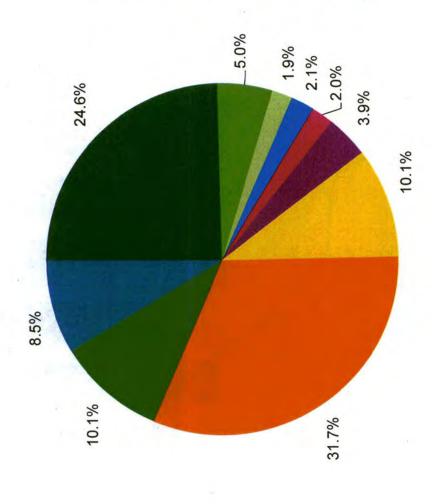


CBRE Logistics data covers units of over 100,000 sq ft only

CBRE



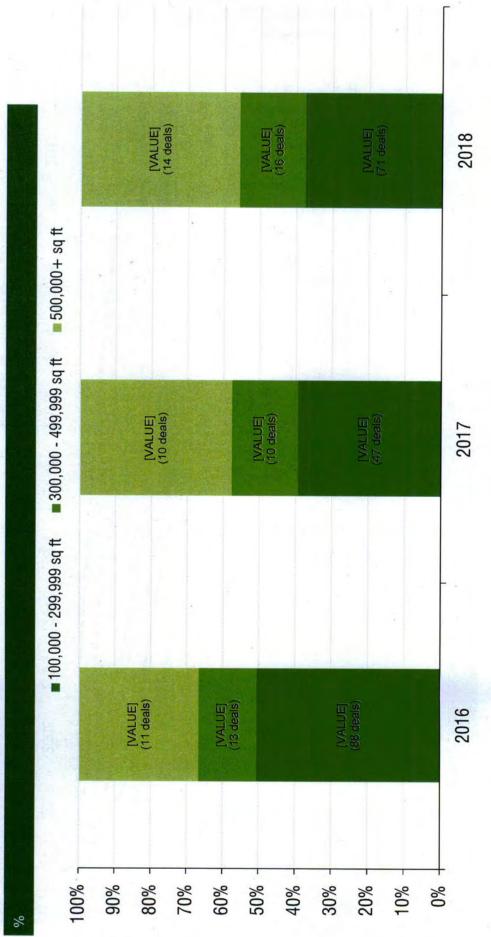
UK LOGISTICS TAKE-UP BY SECTOR 2018



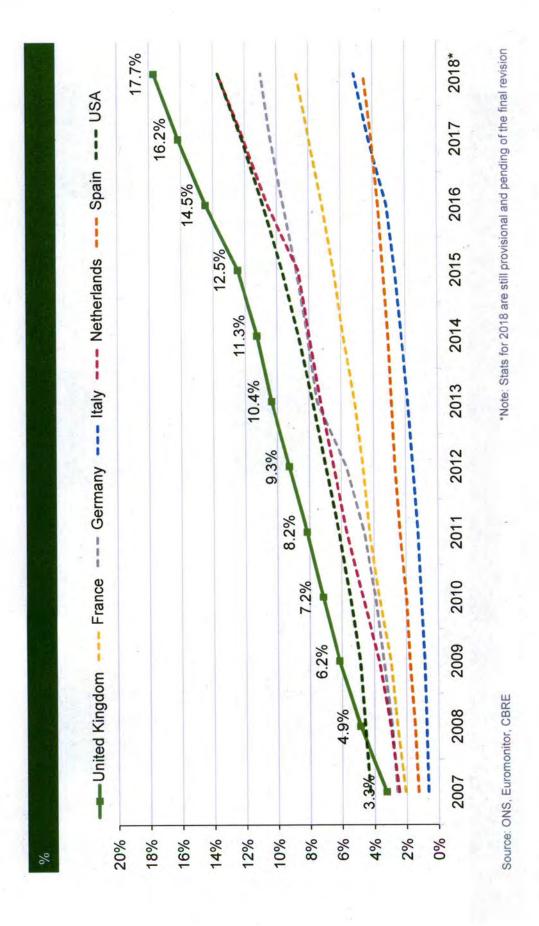
- ■3PL/
- Distribution
 Other
 manufacturing
 Construction
- Motor industry
- Food industry
- Post and
- Parcels Retail Food
- Retail Online

PERCENTAGE OF SPACE TAKEN AND NUMBER OF DEALS BY SIZEBAND IN THE UK

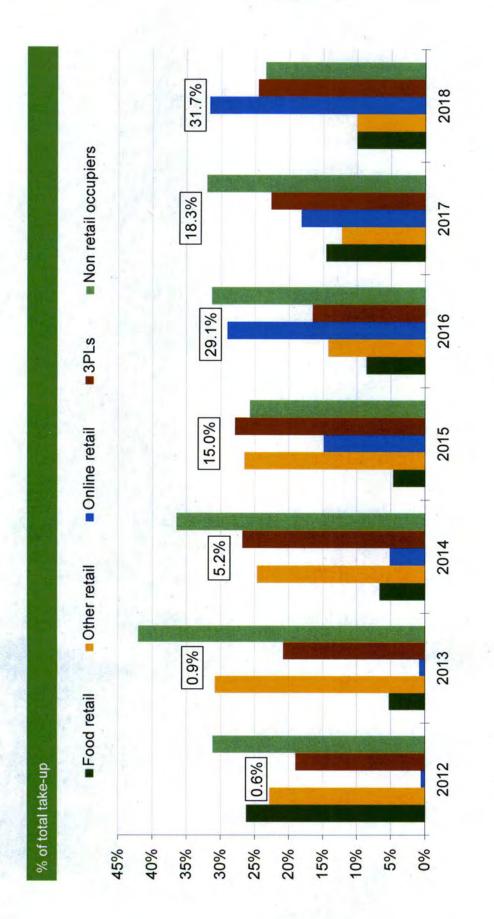




ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 - 2018



RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 - 2018



*Note: Stats for 2018 are still provisional and pending of the final revision

Source: ONS, Euromonitor, CBRE

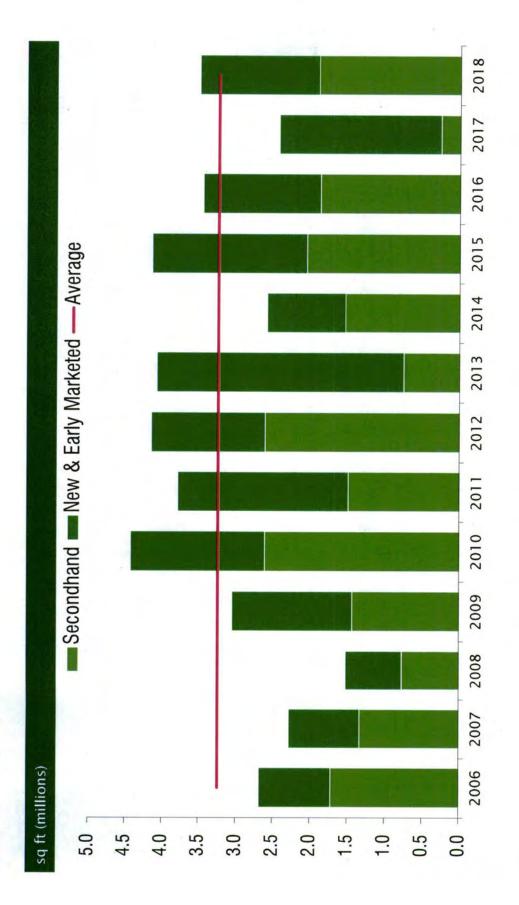


02

NORTH WEST LOGISTICS TAKE-UP



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- · CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

Address	Town	Occupier	Size (sd ft)	Comments
Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent





NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Comments	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf	Existing unit Oct 2018 10 years £5.25 psf	Existing unit Oct 2018 15 years £6.40 psf
Size (sq ft)	370,000	353,102	333,000
Occupier	Kammac	Go Outdoors	Kinaxia
Town	Skelmersdale	Middlewich	Trafford Park
Address	Unit 3&4 M58	Middlewich 353	K333

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

63

NORTH WEST CURRENT DEMAND

KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
 - There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

Size (sq ft) Comments	500,000 + expansion FH preferred. Occupation within 2 years. years. Colliers acting	600,000 + expansion LH. Occupation within 2 years. Colliers acting	350,000 + LH/FH. M6/M62. Gerald Eve acting	700,000 LH. New contract led requirement for European customer.	700,000 + expansion to to growth of business. P3 Surveyors acting	200-400,000 LH requirement for US client. Timing 2020	350,000 . FH/LH. New build only.	200-300,000 LH. Grade A facility for PLC client	600,000 LH. Expansion of Warrington facility
Search Area	M6/M62 corridor	Manchester	North West	M6 North West	North West	M6 North West	North West	North West	M6 corridor
Occupier	IKEA	L'Oréal	Ocado	DHL	ВооНоо	c/o CBRE	Makita	c/o Avison Young	Stobart

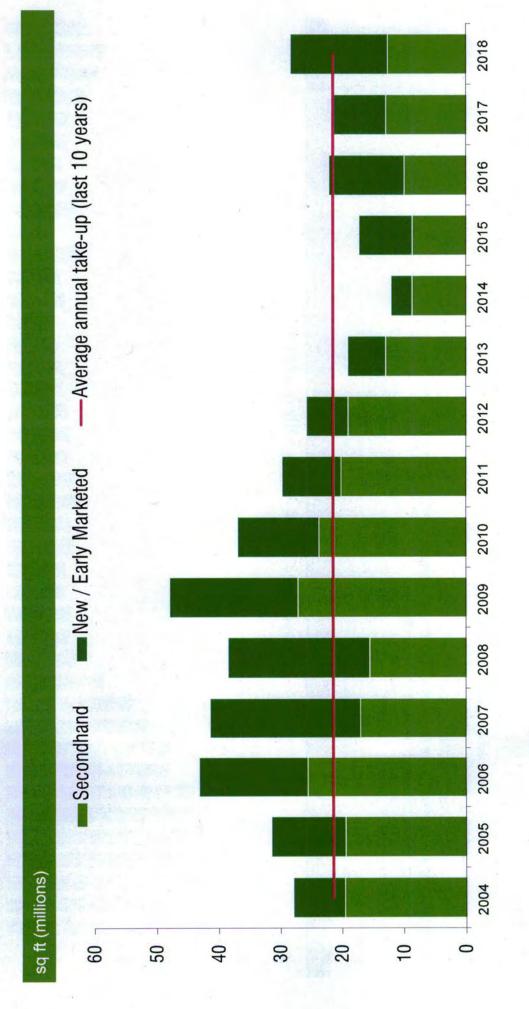


04

UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018

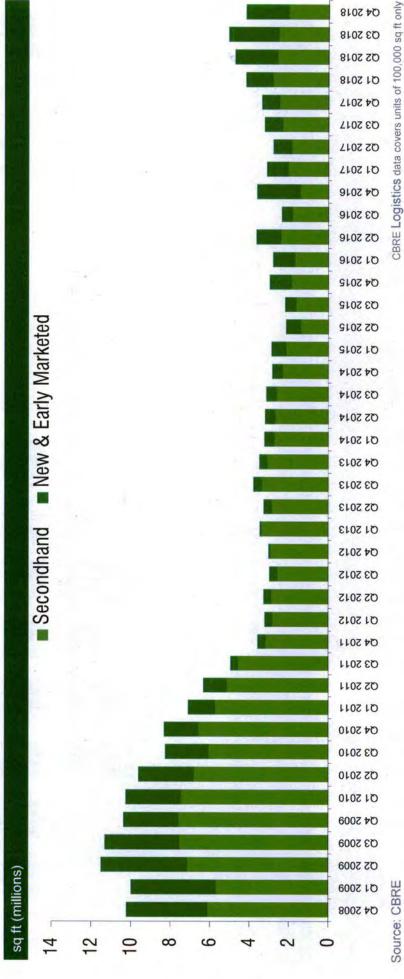


CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS AVAILABILITY 2008 - Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) representing sub 12 months' supply
 - Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
 - Grade A stock under construction is 1.21m sq ft (5 units)





05

SPECULATIVE LOGISTICS
AVAILABILITY



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

· As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)

A further 5 units are under construction providing 1.21m sq ft (see table on next page)

Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

		,			
SIZE (SQ FT)	149,148	216,410	236,915	216,410	375,000
ADDRESS	Unit F2, Multiply, Bolton	Kingsway 216 Rochdale	Crewe 240, Crewe	Kingsway 216 Rochdale	375, Logistics North Bolton
SIZE (SQ FT)	110,000	110,000	130,000	137,865	148,856
ADDRESS	Q110, Crewe	Academy, Knowsley	Unit 1, Evolution Park, Salford	Unit 2, Omega, Warrington	H2, Heywood Point Heywood



NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

SIZE (SQ FT)	107,210	183,669	185,500	208,000	523,500
ADDRESS	Liberty Park, Widnes	Unit 4, Omega, Warrington	Unit 1, Frontier Park, Blackburn	Venus 200, Knowsley	525 Haydock

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NORTH WEST
EXISTING LOGISTICS
AVAILABILITY



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

Current availability for BIG BOX distribution units is limited

Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings - totalling 1.77m sq ft

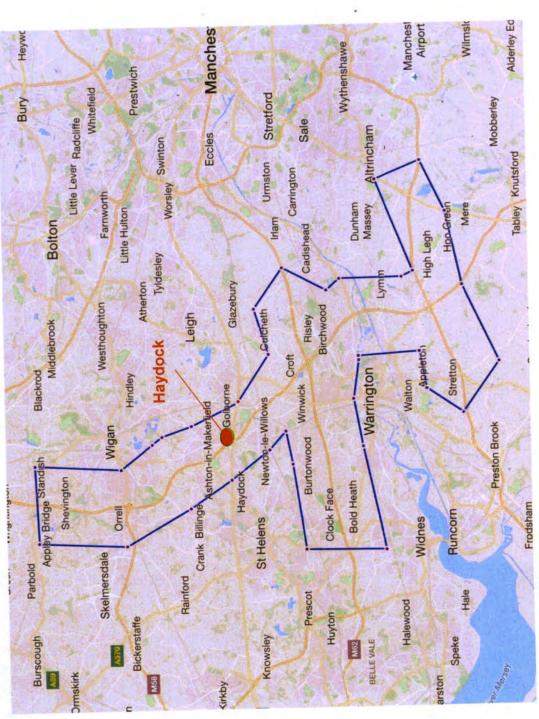
building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional Design & Build opportunities

ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000



NORTH WEST LAND AVAILABILITY

NORTH WEST LAND AVAILABILITY
Sites within 2.5km of Motorway Junctions





NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
 - Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
 - Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
 - Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icxn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	250,000	30	rand	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorsey Lane Widnes	200,000	40	Land	Former manufacturing facility with B2/8 use	Former manufacturing facility Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses Site likely to target similar uses
Haydock Lane Haydock	300,000	50	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft



NORTH WEST LAND AVAILABILITY NORTH WEST WIDE SITES

Detailed below are "oven ready sites" with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.

L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11

miles from the M6 motorway

K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK

Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million		Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	200,000	22	Land	Outline planning permission	Outline planning permission Site currently being sold to new developer



HOW HAYDOCK POINT CAN SATISFY FUTURE OCCUPIER DEMAND



HAYDOCK POINT - SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
- Haydock Point can satisfy future demand assuming consented
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - Haydock Point can procure a single building of this size
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - Haydock Point can satisfy this need
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - Haydock Point can satisfy demand of this size
- Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including single building in excess of 500,000 sq ft
- Haydock Point can accommodate a single unit up to 990,000 sq ft
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - Haydock Point can satisfy these needs
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic
- Haydock Point is located immediately adjacent to Junction 23, M6 motorway
- · The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - Haydock Point is ideally located to satisfy these demands

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only



Turley Office 1 New York Street Manchester M1 4HD



PO1026



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

outlines the component parts of the representations. The cover letter addressed to

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I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

...

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

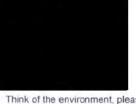
Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike

Turley
1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York St

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

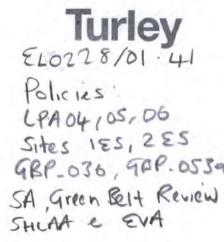
Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP



Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development as an alternative to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD



- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and
 Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and
 erroneous judgements, as a result of which the Council has understated the sustainability of these sites to
 accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

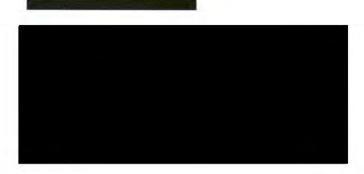
We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Web Reference Number	WF0078
Type of Submission	Web submission
Full Name	c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street
	Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	1
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 3 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of the Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:48:13 PM	
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Web Reference Number	WF0080
Type of Submission	Web submission
Full Name	c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy		
Paragraph / diagram / table		
Policies Map	a l	
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:41:59 PM	
---------------	-----------------------	--

Web Reference Number	WF0085	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street	
	Manchester, M1 4HD	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 3 of Paper 1

- 7. Please set out modification(s) you consider are necessary See section 11 of Paper 1
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:32:41 PM

Web Reference Number	WF0095
Type of Submission	Web submission
Full Name	c/o Agent c/o Agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o Agent c/o Agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the Local Plan and its soundness

Response Date	3/13/2019 12:08:04 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 221-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, STICHAR

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Green Celt **Submission Draft**

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Summary:

- There is a quantitative need to allocate c60 hectares of additional employment land to meet objectively assessed needs and to provide sufficient choice and flexibility.
- There is a particular and pressing need for, and a very significant opportunity to derive benefit from, large scale logistics development. The allocation of additional land should cater for those needs.
- The Haydock Point North site is the most appropriate candidate site in the Borough.
- The decision of the Council to designate the site as safeguarded land rather than allocating the land for development in the plan period, as was proposed in the POLP, is founded on flawed reasoning and in the absence of any material change in evidence.
- Regardless of whether the employment land requirement is increased, the site should nonetheless be allocated for development given its special attributes and alignment with market requirements, the significant benefits that would arise including the opportunity it presents to deliver infrastructure improvements (at Junction 23 of the M6), and the absence of any constraints to delivery.

Introduction

- 3.1 The preceding section demonstrates that the objectively assessed need (2012-35) and the residual employment land requirement (2018-2035) as defined at Policy LPA04 of the PSLP are both significantly understated. In order for the Plan to be sound, Peel would contend the objectively assessed need should be regarded as at least 290 hectares. Acknowledging the adjustments documented at Table 4.4 of the PSLP⁸ the minimum residual employment land requirement for the Plan period should therefore be increased to at least 278 hectares.
- 03
- 3.2 This shortfall means that the Plan is not meeting the minimum needs of the borough, and fails to provide a flexible and responsive supply of land. It is incumbent on the Local Planning Authority 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. The PSLP fails to respond to this core expectation of national planning policy, as it does other specific

⁸ 2.7ha deduction for take-up between 1 April 2012 and 31 March 2018, and 9.3ha for the 'existing supply of developable land' (31 March 2018)

⁹ National Planning Policy Framework (MHCLG 2019), paragraph 8(a)

- requirements of national planning policy: to plan positively¹⁰, to place significant weight on the need to support economic growth and productivity, and to address challenges of the future¹¹. In so doing, it also undermines its own stated objectives of maximising the contribution of St Helens to the economy of the Liverpool City Region and adjacent areas as well as meeting local employment needs.¹²
- 03
- 3.3 In order to address this notable deficiency and obvious inconsistency, and to provide sufficient choice and flexibility over and above meeting the minimum needs, the Plan must allocate additional employment land.
- 3.4 Haydock Point North (site plan provided at Appendix 1) is the most suitable candidate site to fulfil those requirements and should be allocated as a strategic employment site for development within the plan period (under Policy LPA04), rather than designated as safeguarded land as presently proposed in the PSLP (under Policy LPA06). Full details of the potential of the site, its capacity and its suitability for development can be found in the documents comprising and supporting the current planning application.
- 3.5 The site should be allocated for development in the plan period regardless of whether any adjustment is made to the employment land requirement. The reasons for not doing so, as documented within the Council's evidence base, are flawed, and the consequences for not doing so are significant.
- 3.6 This section proceeds to demonstrate the following:
 - Additional land, in the order of 60 hectares, needs to be allocated for employment development;
 - There are no substantive reasons for deferring the development of the Haydock Point North site to beyond the plan period;
 - The site has special attributes which distinguish it from alternative sites. The site
 is highly attractive to the large scale logistics market, and significant benefits
 would arise from its allocation and development. There is strong developer
 interest in bringing the land forward.
 - The site is eminently suitable for development, and deliverable in the short term.
- 3.7 We deal with each in turn.

The need for additional allocations

- 3.8 As summarised above and addressed in Section 2, the OAN for employment land has been understated, and the residual requirement should be 278 hectares (minimum) rather than 215.4 hectares.
- 3.9 The PSLP proposes the allocation of land comprising (indicatively) 265.3 hectares under Policy LPA04 (Table 4.1) to fulfil it stated minimum requirement, being 49.9 hectares

¹⁰ lbid , paragraph 16(b)

¹¹ Ibid , paragraph 80

¹² PSLP, Strategic Objective 5.1

above the minimum requirement (of 215.4 hectares). This reflects that the Plan needs to allocate a materially greater quantum of land than the minimum residual requirement, to ensure that there is sufficient choice and flexibility and that potential non- or under-delivery is catered for. This is an entirely appropriate response by the Council, consistent with national policy.

03

- 3.10 However, as the minimum residual requirement is increased, as is contended is necessary, the identified supply needs to increase commensurately. The same degree of flexibility must be retained. Therefore, with an amended residual minimum requirement of 278 hectares (as justified in Section 2) a need arises, including for necessary flexibility, to allocate in the order of 328 hectares (278 hectares plus a c.50 hectare flexibility allowance, consistent with the allowance in the PSLP). This equates to a need to allocate an additional 62.7 hectares, or c60 hectares on a rounded basis.
- 3.11 As the PSLP and its evidence base already recognises, the OAN for employment land is influenced by the need (and opportunity) to cater for logistics. The amended alternative OAN figure that is set out in Section 2 is also strongly influenced by this market sector. Therefore, the additional supply that has to be identified, or at least a very significant proportion of it, must respond to this specific need. In order to be sound Policy LPAO4 should allocate c60 hectares of additional land capable of catering for large scale logistics need.
- 3.12 The Haydock Point North site is the most suitable candidate site for allocation.

Flawed justification for deferral beyond the plan period

3.13 Within the POLP the Haydock Point North site¹³ was proposed to be allocated for employment development during the plan period. The Council recognised its strategic location and special attributes, and its ability to accommodate the specific and growing demand for large scale logistics development. It was informed by the ELNS (2015) which stated:

The largest component of employment land growth is anticipated to be in the B8 Storage and Distribution sector. This is expected to be led by the large scale operators (greater than 200,000 sqf t/19,000 sq m). In planning for the locations of such land, the likely land sizes, it should be understood that about 60-70 percent of this land growth is likely to be taken by the larger operators.

03

The locations of the additional land should build upon the existing employment nodes in St Helens and exploits St Helens' key location advantage — its proximity to the motorway network. In particular logistics operations needs excellent access to the motorway network and the first preference should be close proximity to a junction accessing the M6. The second most preferable area for major logistics access would be near the junction of the M62 and Linkway. An expansion of the Haydock industrial areas would also attract further warehousing and distribution uses. Therefore sites such

¹³ PSLP Policy LPA04, Site Ref. EA4

as the Parkside site, **the available land at Junction 23 of the M6** and Junction 7 of the M62 would be the key sites to secure for logistics purposes' (emphasis added).¹⁴

03

3.14 In proposing the site's allocation, the POLP specified high level site requirements, intended to be addressed as part of the site's development. This included the following:

'Any enhancement work required to M6 Junction 23 to mitigate the impacts from the proposed development and/or safeguard sufficient land for future enhancement works which may be required to Junction 23'. 15

- 3.15 In the context of an emerging policy framework which recognised the growing demand for large scale logistics development, the significant role that St Helens should play in accommodating this demand, and explicit support for the development of the Haydock Point North site, the Council encouraged Peel to make a planning application for the development of the site. A planning application was duly made for c.1.8m square feet of logistics development in March 2017. At the time of writing the application remains to be determined, but the majority of issues have been resolved.
- 3.16 At this stage of the Local Plan process, the Council both accepted the specific and special attributes of Haydock Point North site and the valuable contribution it could make, and encouraged Peel to advance proposals for its development.
- 3.17 The Council has now altered its position, instead proposing the site as safeguarded land under Policy LPA06. The PSLP still proposes the release of the site from the Green Belt, and therefore the Council accepts that exceptional circumstances exist to amend the Green Belt boundary in this location for the purposes of meeting future employment needs. The basis for this is addressed within the PSLP and the Green Belt Review (December 2018) ('GBR'), where:
 - The exceptional circumstances that justify Green Belt review to accommodate both housing and employment needs (both within the plan period and beyond, in order to ensure boundaries endure) are summarised in Section 1 of the GBR and in the Reasoned Justification to Policies LPA02 and LPA06 of the PSLP;
 - The reasons for amending the Green Belt and designating the land encompassing Haydock Point North as safeguarded land are addressed at Section 4 (paragraph 4.5), Section 5 (page 47) and Appendix C (page 256) of the GBR.
- 3.18 For the reasons set out below and in the following section of this report, the exceptional circumstances to justify the release of the site from the Green Belt are considered robust, and Peel is supportive of that decision.

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3.19 The only significant difference between the Council and Peel therefore, is one of timing: whether the site should be developed within the plan period, or beyond the plan period. However, the reasons behind the Council's change of stance, for not

¹⁴ ELNS Para. 9.6 – 9.8

¹⁵ PSLP Policy LPA04.1

allocating the site for development within the plan period, are flawed and do not withstand scrutiny.

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3.20 The Council's reasoning is set out in various documents:

 The officer report to Cabinet which recommended the approval of the PSLP for consultation¹⁶ states:

'A key change compared to the previous Preferred Options consultation proposals relates to land north east of junction 23 of the M6. Whereas the Preferred Options document proposed that this site be allocated for employment development before 2033, it is now proposed that it be removed from the Green Belt but safeguarded to meet potential employment needs after 2035. 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.'

The GBR concludes:

'The Council can meet its needs for employment development up to 2035 elsewhere within the Borough with this parcel being allocated. Due to the need to address the severe capacity issues at J23, and the need to avoid constraining the ability to design an appropriate junction layout, the parcel is only suitable for safeguarding to meet potential employment development needs after 2035 (as opposed to allocation for development before 2035)'. 17

The PSLP states:

'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 (likely to include enlargement of the junction) to enhance junction capacity within the Plan period has been identified (see Policy LPA07).'¹⁸

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3.21 In summary therefore, the Council's contention and reasons for deferring the development of the Haydock Point North site to beyond the plan period are that:

¹⁶ Cabinet Report 12 December 2018, para. 2.37 -2.38

¹⁷ GBR, Page 48

¹⁸ PSLP, para. 4.24.3

- The highway network is incapable of accommodating the traffic generated by the development;
- 03
- The development of the site could prejudice the ability to remodel Junction 23 of the M6;
- The development is not needed in the plan period.
- 3.22 We address each of these reasons below.

The highway network is incapable of accommodating the traffic generated by the development

- 3.23 The Council's transport evidence in support of the PSLP is principally contained within the Transport Impact Assessment (TIA) prepared by WSP, dated January 2019.
- 3.24 The TIA considers the sites suggested in the POLP (which included the Haydock Point North site) as allocations for the period 2018- 2033, stating that it is not a TIA for the PSLP. However, it informs that the analysis has been used to help inform the selection of sites for the PSLP. The document states that the expected outcome of this work is to provide a high level assessment of the potential implications of proposals, with more detailed assessments completed as sites progress through planning.
- 3.25 To assess the highway impact a SATURN model of St Helens authority area has been developed, which also extends along the A580 and the M6 into Wigan. SATURN is a traffic assignment modelling tool which is suited to consider changes in traffic flows over a large area but provides only a very coarse indication of network operation at a micro (i.e. junction by junction) level.
- 3.26 The SATURN model considers key junctions, including pertinent to the Haydock Point North site, the A580/ Haydock Lane junction, Penny Lane/ Lodge Lane junction, and M6 Junction 23. The TIA considers a 2033 future year and the following scenarios:
 - 2033 Do minimum "Business as usual" conditions without Local Plan allocations, but including sites with extant consents, SHLAA sites, planned infrastructure schemes on local and strategic network, including M6/ M62 smart motorway proposals and M6 Junction 22 capacity improvements.
 - 2033 Do Something 1 (DS1) As above plus all POLP sites.
 - 2033 Do Something 2a (DS2a) As DS1 plus assumed 5% reduction in commuter trips into/ out of St Helens.
 - 2033 Do Something 2b (DS2b) As DS1 plus 10% capacity improvements on all
 arms of congested junctions on the Key Route Network, together with large scale
 changes, which include grade separation of the A580 and M6 Junction 23 (this is
 described as a commenced feasibility study; however no plans are provided to
 show the detail of this scheme).
 - 2033 Do Something 2 (DS2)— combines DS2a and 2b

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- 2033 Do Something 2c As per DS2 plus the introduction of a 40mph speed limit introduced between A580 and A580/ B5202 junction to the west.
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- 3.27 From the scenario test WSP conclude that the overall impact of the POLP sites is likely to be substantially mitigated by a combination of committed infrastructure schemes, changes in travel behaviour and minor improvements at key junctions. The WSP analysis then focusses on 'hotspots' where the predicted volumes of traffic are likely to exceed the capacity of the network. The A580 is identified as such a 'hotspot', and in this context the TIA references a study at Junction 23 which is currently being undertaken by St Helens in conjunction with Wigan Council and Highways England. It is stated that this study will consider a variety of options covering small scale improvements within the current layout to more significant infrastructure enhancements which may involve removing key movements from the junction. The TIA notes that the feasibility study into potential improvements at M6 Junction 23 is on-going at the time of writing. This means that the mitigation modelled is not a fix, and the form is yet to be determined.
- 3.28 The TIA concludes that the upgrade to Junction 23 considered (i.e. introducing a grade separated arrangement) returns its operation to near do minimum levels in the AM peak, and improves operation during the PM peak. The detailed study of the A580 study concludes that all junctions on the corridor are forecast to operate at similar levels, or slightly better, under the DS2 scenario when compared to the 'do minimum'.
- 3.29 In considering the impact of the POLP sites on the strategic road network (including M6 Junction 23) the TIA concludes that the forecast operation under the DS2 scenario is generally similar, or slightly better than the 'do minimum' scenario, demonstrating the committed, or assumed highway improvements largely mitigate for the traffic generation of the POLP sites.
- 3.30 The TIA concludes that the traffic generated by the POLP sites can be substantially mitigated by a combination of committed and emerging highway schemes, in conjunction with modest changes in travel behaviour and low cost improvements at key junctions. The TIA also notes that further consideration be given to the forecast operation of a number of key junctions or corridors, including M6 Junction 23.
- 3.31 The TIA therefore suggests there are highway improvements available which would mitigate the cumulative traffic impact of the POLP sites, although in some instances details of these schemes are limited, for example no information is provided on the M6 Junction 23 grade separated option that was tested in DS2b.
- 3.32 The overall outcome of the analysis therefore is that there are capacity issues associated with delivering the POLP sites; that the A580 corridor and Junction 23 specifically would be faced with capacity issues; that significant mitigation is likely to be required to address the issues at Junction 23; but that modelling of such a mitigation solution (albeit one not yet determined) suggests that capacity could be readily created sufficiently to accommodate the POLP sites. Rather than indicate therefore that the POLP sites (including Haydock Point North) cannot be accommodated on the highway network, it actually identifies that subject to mitigation, they can be.

North site. It considers the traffic impact of the POLP sites as a whole rather than as single entities; consistent with the coarse modelling approach that has been undertaken. Based upon the TIA it is simply not possible to draw any conclusions as to the specific traffic impact of individual sites within the POLP, and therefore which sites should be taken forward to the PSLP. And yet the Council claims to have relied on this analysis in deciding not to allocate the Haydock Point North site. This is clearly a

flawed decision, without sound justification.

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3.34 It is also important to highlight that in the context of the current planning application for the site, the potential traffic impact of the specific development proposition for Haydock Point North has been comprehensively assessed. There are ongoing discussions with the Council, Wigan Council as adjoining authority and Highways England in order to identify the optimum mitigation solution. However, at no stage has it been determined that the highway network cannot accommodate the traffic associated with the development of the site; it is a matter of agreeing the appropriate approach to mitigation.

The development of the site could prejudice the ability to remodel Junction 23 of the M6;

Equally crucially, the TIA does not specifically address the impacts of the Haydock Point

- It is recognised that the TIA identifies capacity issues associated with Junction 23 of the 3.35 M6 and the need for mitigation to accommodate development within the POLP (but not limited to the Haydock Point North site). It is further recognised that there is an ongoing study being undertaken by the Council, Wigan Council and Highways England to identify a prospective mitigation solution for Junction 23, and that Policy LPA07 of the PSLP identifies 'improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7' as one of the measures to achieve its strategic priorities for the transport network. Finally, it is also recognised that the Haydock Point North lies adjacent to Junction 23.
- 3.36 However, none of this justifies the Council's decision to change its position, in no longer allocating the site for development in the plan period. The Council's decision is wholly undermined by the following considerations:
 - The POLP recognised the relationship between the site and Junction 23 and the likely need for a mitigation solution to enhance capacity of the junction as noted above. The Council nonetheless proposed the allocation of the site in full acknowledgement of that situation.
 - There is no published evidence in support of the PSLP which begins to outline or even consider the form of a prospective mitigation solution for Junction 23. The evidence base simply refers to an ongoing study being commissioned to consider a prospective mitigation solution. There is no scheme defined, no understanding of its potential land-take or integration with the existing network, no assessment of its effects and benefits, no business case assembled, and no funding in place 19. There is no evidential basis to inform the Council's decision not to allocate the

¹⁹ All acknowledged within the Infrastructure Delivery Plan (para. 3.20).

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site on this basis, and therefore no different circumstances than prevailed at the time of the POLP.

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- The Council proposes the release of the site from the Green Belt and its designation as safeguarded land, on the basis that it is expected to be needed to meet employment needs beyond the plan period and due to its specific locational and scale advantages (which directly align with the needs of large scale logistics). The Council necessarily therefore acknowledges that the site is capable of being sustainably developed for that envisaged purpose in the future, regardless of what prospective solution is identified for Junction 23. It does not follow that the site's development within the plan period cannot also accommodate such a prospective solution. There is no basis for sterilising the site's development potential until beyond 2035.
- The improvements to Junction 23 are intended to facilitate the economic growth of the borough the need for improvement is justified by the TIA not on the basis of existing capacity issues but the ability to accommodate the growth identified within the POLP. It is therefore counter-productive to constrain valuable economic development which would be best served by such improvements.
- The decision to delay the development of the Haydock Point North site is claimed to have been made in order to provide flexibility to accommodate a prospective mitigation solution, but the converse consideration is that the development of the site can support the delivery of the prospective solution by the provision of potential land required and/or by financial contribution. Rather than considering the development of the site as a potential constraint the Council should rather consider it as means of actively facilitating the delivery of infrastructure which can have significantly broader benefit, beyond purely mitigating the impact of this specific development. Peel has always been willing to engage with the Council in this regard, and remains so.
- Indeed, following the publication of the PSLP and in the context of the current application on the Haydock Point North site, the Council has shared emerging findings from the Junction 23 study and discussions have been held as to how the development could potentially accommodate and facilitate improvements to the junction. Work is ongoing but there is every indication that a positive solution can be found, which both facilitates the Junction 23 improvements and enables significant logistics development to be realised on the site. Indeed, the information presently available, which comprises information supplied to Peel by the Council in the context of the current planning application, in no way supports the contention that the site's development would prejudice the ability to deliver necessary improvements to Junction 23. Rather, it indicates that the prospective solution could readily be accommodated as part of the development of the site, and indeed requires Peel's land in order to deliver it. The allocation of the site for development is not prejudicial to delivering the desired strategic improvement of Junction 23; to the contrary, it will help the delivery of those improvements in a way that no other site in the borough can achieve. This in

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itself contributes to the exceptional circumstances justifying the site's removal from the Green Belt.

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The development is not needed in the plan period

3.37 There are a number of reasons why this conclusion is flawed:

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- In the preceding section of this report we have demonstrated that the
 objectively assessed need for employment land and the residual minimum land
 requirement are significantly understated and that additional land needs to be
 allocated. This in itself refutes the Council's contention that the development of
 the site is not needed.
- We address below the particular and special characteristics of the site that distinguish it from alternatives.
- Only once the Council had selected other sites for allocation to meet the residual land requirement did it reach a position where no additional land was considered necessary to meet that requirement. If the selection process up to that point is flawed, whereby the site is discounted for unjustified reasons, as we have shown above, then no weight can be applied to the conclusion that the site is not needed. It simply becomes a self-fulfilling prophecy.
- There are also legitimate questions over the flexibility of the supply that has been identified, specifically in relation to the Parkside East proposed allocation (Policy LPA04.1, Site 7EA; Policy LA10).

LPA 04

04

3.38 In demonstrating how the allocated sites will meet the minimum employment land requirement, Table 4.1 of the PSLP identifies Parkside East as contributing 64.55 hectares. Footnote 17 explains that Parkside East has a gross area of 124.55 hectares, but the 64.55 hectares is the residual beyond 60 hectares of land which is reserved for development of a Strategic Rail Freight Interchange ('SFRI') or other rail enabled use. The 64.55 hectares may be developed for a wider range of employment uses (i.e. not associated with the SRFI), subject to provisions of Policy LPA10.

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- 3.39 In essence, the PSLP assumes that 60 hectares of Parkside East will be developed for SRFI or other rail enabled use, and due to the special characteristics of that use, does not count it towards meeting general employment land requirements. It is therefore this arbitrary definition of 60 hectares that dictates the 64.55 hectares which is counted towards the general employment land requirement.
- 3.40 However, the evidential basis of the 60 hectares is unjustified. It is explained at paragraph 4.36.13 of the PSLP that the 60 hectares equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008. Whilst this is not disputed, it nonetheless cannot be a legitimate basis on which to delineate between the SRFI-related and general employment components of the allocation. It pays no regard to need, demand, or anticipated scale.

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3.41 It is important to highlight the significance of the Parkside site and the particular role it is intended to play. The Reasoned Justification to Policy LPA10 refers to national and regional policy and extensive evidence which identifies the need for and significant

benefits arising from rail-based freight facilities and the credentials of Parkside to meet that need. Paragraph 4.36.9 refers to the *Parkside Logistics and Rail Freight Interchange Study* and highlights that Parkside 'is uniquely placed to satisfy this demand' and 'the opportunities for rail access from the site are considered to be second to none in the North West'. Given this apparent uniqueness, one could legitimately expect its market appeal and the demand for space to be significant.

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- There is also the matter of the likely scale of development needed to justify the extent of investment required to create an SRFI. Peel has extensive experience in this field, including at Port Salford, the site of a proposed SRFI, and is well aware of the very significant cost of introducing site-specific rail infrastructure (estimated at £50m+ in the case of Port Salford). In order to underpin such investment decisions and be able to secure a return on investment, developers will naturally seek to maximise development which makes use of the infrastructure (i.e. rail-served development). One only needs to consider the size of SRFIs across the UK to identify the scale of development typically associated with this level of investment: for instance DIRFT (Daventry International Rail Freight Terminal) III extends to 345 hectares; the East Midlands Gateway extends to 283 hectares.
- In view of its significance as an SRFI opportunity, the arbitrary nature of the 60 hectares identified, and the commercial drivers underpinning infrastructure investment, the likelihood is that in excess of 60 hectares will be developed as SRFI or associated uses. Indeed there is a risk that allowing for other, general employment uses that serve to limit the SRFI to 60 hectares will undermine the significance of the site and its potential contribution to meeting such specific needs. The uniqueness of the site is recognised by the PSLP, but the policy approach doesn't adequately serve to protect this uniqueness.
- 3.44 The inherent risk in respect of the general employment supply is that the 60 hectares is not a cap, but rather an indicative (and indeed likely minimum, on the basis that it is a minimum threshold for NSIPs) size. If the SRFI occupies in excess of 60 hectares (as seems likely) then this will reduce the contribution that the site can make to meeting general employment needs. This will dilute the flexibility of the supply, and increase the risk that the minimum land requirement is not met.
- 3.45 This further highlights the need to build in additional flexibility by increasing the supply through the allocation of the Haydock Point North site, regardless of whether the minimum land requirement is increased as proposed in the preceding section of this report.

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The site has special attributes which distinguish it from alternatives and significant benefits would arise from its allocation and development

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3.46 The Council's own evidence and the supplementary evidence that has both informed the current planning application and these representations, summarised in the preceding sections, reveal a significant need and opportunity for new, high quality, large footprint logistics floorspace in St Helens to alleviate the growth of this key sector and maximise its contribution to the local economy. Demand is high and the need is pressing.

- 3.47 Modern logistics demand high quality accessible sites. Key requirements are for large floorplates with flexibility for cross docking capacity, accessible locations on the strategic highway network, including motorway junctions allowing multi-directional movements and connectivity within markets, and proximity to main population centres for speed of delivery.
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- 3.48 The Haydock Point North site perfectly aligns with this specific market demand and its particular characteristics are such that it would very likely have greater market appeal of any prospective site in St Helens. Like other sites in St Helens it has the benefit of proximity to the Liverpool and Manchester markets and its accessibility to a local labour market for employment and training opportunities. But it also possesses the following characteristics which set it apart (refer to CBRE report for further confirmation provided at Appendix 2).
 - The site's adjacency to Junction 23 of the M6 allows immediate and full accessibility to the motorway network north and south, and on to the A580 for east and west movement, half way between the Manchester and Merseyside conurbations. Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for modern logistical operators. "Prime" sites targeted for Regional Distribution Centres (RDCs), amongst the larger occupational requirements, have a particular need for motorway proximity given their range of coverage. The Haydock Point North site is the most accessible (in road transport terms) site within St Helens, and probably one of the best located in the North West of England.
 - The site is very large with few constraining features. This makes it both highly flexible and able to accommodate buildings of significant size. As illustrated within the current planning application, the site is capable of accommodating c1.8 m sq ft of logistics floorspace and importantly this can be formed of building up to 990,000 sq ft. This is highly unusual and offers an opportunity to create a product which is not only unavailable within St Helens but unavailable across the North West region. As the CBRE report (provided at Appendix 2) identifies the size of units which the market demands is increasing, and there is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West. The site's accessibility, referred to above, further lends itself to attracting the very largest occupiers (RDCs and the like).
- 3.49 The Council has paid insufficient regard to these special features. Nowhere in its site selection process, principally described and justified in the GBR, does the Council specifically address market appeal. The evaluation of "development potential" conducted at Stage 2b of the GBR contains no market evaluation, nor does it consider how the characteristics of sites corresponds with market needs/demand. Despite the assertions that the Plan seeks to maximise its contribution to the Liverpool City Region economy²⁰, and in doing so places a particular focus on accommodating specific demand for large scale logistics²¹, the Council, in the absence of any absolute or comparative evaluation of market appeal, has discounted a site which is uniquely placed to respond to this market demand.

²⁰ Strategic objection 5.1

²¹ PSLP Policy LPA02 : Spatial Strategy

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- 3.50 In so doing, the significant benefits associated with developing the site would be deferred until at least 2035, for reasons which are difficult to understand.
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- 3.51 The Economic Statement accompanying the current planning application identifies that the development would represent £140.6m of investment in the borough and create the following outcomes:
 - Over 250 jobs created during the construction period in a range of occupation and skillsets;
 - Potential to generate £127.5m construction expenditure and with additionality/induced benefits to local supplier and services potential to lead to 344 new jobs with 86 in St Helens and 140 in the local impact area;
 - Between 2,286 and 2,758 FTE equivalent jobs created on site once the development is fully operational – this could include 823 to the Borough and 1114 to the local impact area;
 - A £5.9m uplift annually in productivity measured in GVA within the Local Authority economy, with £9.8m generated within the local impact area and £22.8m within the wider impact area;
 - A £58.7m annual contribution to economic productivity within the Local Authority area during the operational phase, with £79.5m generated within the local impact area and £148.7m within the wider impact area; and
 - A £3.5m uplift in business rates revenue and £1.7m to be retained in the borough.
- 3.52 Beyond the social and economic benefits of the development, as noted above the site's development also provides the unique opportunity to improve the operation and capacity of Junction 23. This in itself distinguishes the site from alternatives, including those proposed for allocation, and comprises a very significant benefit of the proposals.

A suitable and deliverable site

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- 3.53 As noted, the Haydock Point North site was proposed for allocation as a strategic employment site in the POLP, and the Council explicitly encouraged Peel to pursue a planning application for its development. The Council has therefore previously accepted the suitability and deliverability of the site.
- 3.54 The reasons now given by the Council for designating the site as Safeguarded Land rather than allocating for development do not challenge the suitability or deliverability of the site. The only matter that could be deemed to relate to suitability / deliverability would be in respect of highways capacity, but as we have addressed above, this is principally concerned with the need to invest in improvements to Junction 23 of the M6 and the perceived potentially prejudicial effect that the development could have on that solution, rather than suitability per se. Indeed, the very fact the Council still proposes the site's removal from the Green Belt to meet longer term employment

needs, and therefore accepts that there are exceptional circumstances, demonstrates acceptance by the Council of the site's suitability and ultimate deliverability.

3.55 Nevertheless, there are aspects of the Council's evidence base that question the suitability of the site, and given Peel's contention that the Plan is unsound in the absence of the site's allocation, it is important to reiterate and demonstrate the suitability and deliverability of the site, which we now address.

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Location

- As addressed in relation to market appeal above, the site is located adjacent to the M6 motorway and A580, with ability to access directly on to the A580 and access to the M6 (both directions) via Junction 23. The site therefore has excellent connections, with the ability to make onward connection to the regional motorway network (M62/M58/M61) and to major urban centres and facilities across the North West, including the Port of Liverpool.
- 3.57 Whilst lying close to the urban areas of Ashton in Makerfield, Newton le Willows, Golborne and in particular Haydock, with the ability to provide accessible employment opportunities for those communities, there is adequate separation from sensitive residential receptors to support large scale industrial uses.

Green Belt

- North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high'²², i.e that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 preventing neighbouring towns merging is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. Those boundaries are only slightly weakened (in respect of the north western section) when one considers the Haydock Point North itself; there remain strong boundaries around most of the site. The GBR considers that the development of the parcel would likely lead to unrestricted sprawl. However, given the presence of those boundaries, and the definition they can provide over the long term, that assertion is untenable.
- 3.59 The principal concern, leading to the 'high' score, is that the development of the parcel would lead to the physical merging of Haydock and Ashton-in-Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne. Whilst it is accepted there would be a reduction in the gap between Haydock and both Ashton-in-Makerfield and Golborne, the development of the site (as opposed to the assessed parcel) would not lead to the merging of Haydock and Ashton-in-Makerfield and a significant gap would still remain between the expanded area of Haydock and those settlements, contained by defensible boundaries (reinforced as necessary in the north west). We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.

²² As presented in Appendix C, pages 256-258

Regardless, in acknowledging the specific need and demand for large scale logistics and the potential of the parcel to meet the size and locational requirements of that market, 3.60 the parcel was carried through the full GBR assessment and exceptional circumstances were identified to justify its release from the Green Belt. As we set out elsewhere, our only dispute in this regard relates to the timing of when the site may be developed.

Technical and Environmental Considerations

- The GBR summarises the findings of the Sustainability Appraisal ('SA') and a 3.61 'development potential' assessment undertaken as part of the GBR in respect of each parcel. Despite reliance being placed upon it, the detail of the 'development potential' assessment is not provided within the evidence base and therefore cannot be scrutinised. Given its absence, no reliance can be placed upon it. Again, the limitations of the assessment in respect of its consideration of parcels as opposed to prospective site allocations should also be noted.
- In respect of evaluation against the SA objectives / technical and environmental considerations that are transparently reported in the GBR, we would respond follows: 3.62

Would likely have a negative effect on biodiversity

The planning application has been supported by comprehensive ecological surveys and 3.63 the potential impacts of development of the site assessed. The site is not of high biodiversity value, but a suite of mitigation has been identified to address the impacts expected to arise. That suite of mitigation has been agreed with the Council and Merseyside Environmental Advisory Service (as a statutory consultee) on the basis that it would achieve a net beneficial effect. No objection has been raised to the application by Natural England. This contention is therefore without foundation.

It will likely impact on air quality

- In relation to road traffic emissions associated with the proposed development 3.64 computer modelling of the effect of road traffic during the construction and operation of the development have been completed as part of the planning application. The impacts of both construction traffic associated with the project and traffic associated with the operational phase of the project are considered to be negligible at all assessed receptor locations. No objection has been raised by the Council's Environmental Health department. This contention too is therefore without foundation.
- The development would 'potentially have positive effects on the local economy' Whilst presented as tentatively positive within the SA, we would note the clear 3.65 difference in approach when the Council presents sites that are proposed for allocation. For instance, the evaluation summary for Parkside East in the GBR (Parcel ref. GBP_039)23 states more definitively 'development of the parcel would benefit the local economy...' despite the same proximity to an area ranked as being of equivalent deprivation. The planning application has clearly demonstrated the very significant economic benefits that the development at Haydock Point North could have for the local population and has presented a local employment programme to ensure this is realised. This has been inexplicably played down in the SA.

²³ GBR, page 50

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Substantial landscape buffers would be required to mitigate the visual effects of any employment development

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- 3.66 This would be the case for any large scale employment development bounded by countryside and therefore does not distinguish it from any of the other sites under consideration. The design and layout of the proposed development as comprised within the planning application incorporates planted landscape corridors, which alongside existing woodlands on adjacent land will create a strong landscaped boundary treatment that will help to integrate the site into the local landscape and enhance woodland connectivity. The landscape and visual assessment of the application has shown that there would be no significant residual visual or landscape effects. Therefore, this consideration can be readily accommodated.
- 3.67 In respect of other technical and environmental considerations, the planning application and accompanying Environmental Statement has comprehensively demonstrated that the site and surroundings can readily accommodate the proposed development without significant adverse impacts. Aside from highways matters, where discussions are ongoing as to an appropriate mitigation solution, there are no outstanding objections from statutory consultees.
- 3.68 Given the additional depth of analysis that the application documents comprise relative to evidence that will be inform the consideration of sites through the Local Plan process, there can be the utmost confidence as to the suitability of the site for strategically significant employment development.

Deliverable

The site is within the single ownership of Peel, a willing landowner with a proven track record of delivering high quality, large scale, sustainable logistics development via a variety of means. Peel Logistics Property, a joint venture between Peel Land and Property and Macquarie Capital is presently developing out a number of logistics developments across the UK. The development of the site could be secured through different delivery models, including by Peel Logistics Property, by other development companies or by specific operator tenants. The flexibility of delivery options allied to the location, profile and scale of the site will make it highly attractive to the logistics market. Soft market testing has provided confidence that market demand would be very high for the development of this site. The land exhibits few constraints and with planning certainty, there can be complete confidence that the site will prove deliverable and very likely to be the subject of investment and development in the immediate term.

Conclusion

- 3.70 There is a need for at least c60 hectares of additional employment land to be allocated, assuming that all proposed allocations remain within the plan once adopted. The Haydock Point North site is the most suitable candidate site for allocation.
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- 3.71 However, regardless of any uplift to the residual land requirement, the Haydock Point North site should be allocated for development during the plan period.

- 3.72 The Council has accepted that there are exceptional circumstances that justify the release of the site from the Green Belt. The only dispute is in relation to timing as to when the site is needed and can be developed.
- 3.73 The Council's decision to safeguard rather than allocate the site is unsound. It's reasoning is flawed and not supported by robust evidence. The decision is also highly detrimental and inconsistent with the PSLP's stated strategic objectives.
- 3.74 For the PSLP to be sound, the Haydock Point North site should be allocated for development in the plan period under Policy LPA04.

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Appendix 2: Employment Land OAN report

Policy CPA04
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St Helens Borough Local Plan 2020 – 2035 Submission Draft

Representations on behalf of Peel Holdings (Land and Property) Limited

Review of St Helens' Objectively Assessed Employment Needs

March 2019



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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum) ² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflects needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.

1.7 Of particular concern is that:

- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
- The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
- Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
- The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
 - Section 2: The Assessed Need for Employment Land provides an overview of the ELNS Addendum and recommended employment land OAN;
 - Section 3: Strategic Economic Drivers and Growth Aspirations provides an
 overview of the economic policy context and growth aspirations established by
 Government, the Liverpool City Region (LCR) Combined Authority and St Helens
 Council;
 - Section 4: Impact of the Constrained Land Supply examines the influences of past policy approaches and land supply on take up and economic growth;
 - Section 5: Drivers of Current and Future Logistics Demand examines the
 evolution of logistics market and implications for the supply of and demand for
 employment land in the North West.

- Section 6: Review of the Employment Land OAN recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- Section 7: Conclusions and Policy Implications sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms "...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 "continues to be low, limited by immediately available land supply" 10.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered "...to be a better representation of growth unencumbered by land shortages"¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions
Period 1997-2017	135.0	Based on 4.5 ha/yr
Period 1997-2012	174.0	Based on 5.8ha/yr
Growth period 1998-2008	225.0	Based on 7.5ha/yr

Source: ELNS, 2015 and ELNS Addendum, 2019

2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of 'transformational developments' planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the 'do something' scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 40 ha to 55 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of 'the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI'¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being "a better representation of the actual growth level if the market is without significant land supply constraints"15

Table 2.2: Updated Employment Land Needs 2012 - 2037

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Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- Using a land take-up scenario to estimate the baseline employment land needs figure is 2.13 considered to be a reasonable approach in principle. It is critical, however, that:
 - the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- It is accepted within the ELNS Addendum that the relative lack of adequate market-2.14 attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting "a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole" 17, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
 - The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put in a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 5 of this report with reference to:
 - The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a "vibrant and growing economy, a flourishing private sector and a highly skilled population" 18.
- 3.2 At a national level, the Government's goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that 'improving productivity is vital to building an economy fit for the future' 19. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government's Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country's economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough's location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

21 Ibid, paragraph 4.12.1

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

Realising the Growth Ambition for the Liverpool City Region

3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"22

- 3.9 The LCR Growth Strategy confirms the intention to ensure "the creation of over 100,000 additional jobs in the Liverpool City Region by 2040". It recognises that this growth will build upon a period of "economic renaissance with a diversifying economy of internationally-oriented markets and businesses".
- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"23.

- Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented 3.11 investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.
- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² lbid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

- Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"²⁵
- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:
 - "Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"
- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that "St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market".

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government's own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

²⁸ National Planning Policy Framework, MHCLG, 2019

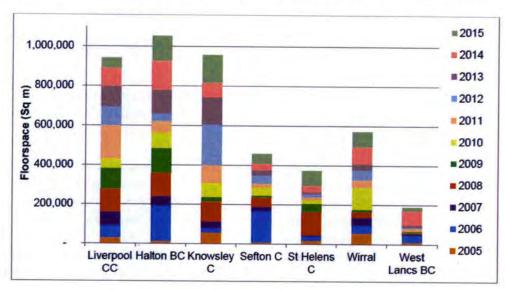
4. The impact of historic land supply constraints

4.1 As widely acknowledged in the evidence base, the borough's constrained land supply is considered to have acted as a significant constraint to economic growth and investment:

"...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...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"²⁹.

4.2 This is evidenced in the analysis of comparative take up presented within the LCR SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15, paragraph 2.11

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

- 4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:
 - 1997-2012;
 - 1998-2008; and
 - 1997-2017.
- 4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

- 4.5 Policy direction over much of the 1997 to 2017 period was provided by:
 - the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
 - The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
 - the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).
- 4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was "to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor building on opportunities created by the M62 link and at the existing Haydock Industrial Estate.
- 4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that "Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development" ³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that "the majority" of the UDP's allocated employment sites were:
 - "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network" ³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) 'to enable St Helens to compete with other regions for inward investment'³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ Ibid, p45

³⁸ Ibid, p46

- 4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.
- 4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:
 - "the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) 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"³⁹
- 4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.
- 4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

- 4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.
- 4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.
- 4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

- 4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:
 - administrative and support services;
 - health;
 - land transport, storage and post (which is taken to represent the logistics and distribution sector); and
 - professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

	ELNS Take up Scenario periods					ls
	1997-2012		1997-2015		1998-2008	
Sector	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	8.0	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 2015/16.
- 4.13 The EDNS states that "the success of Omega over the last three years has been a key feature of the local economy" Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:
 - "The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options"⁴³.
- 4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "high quality strategic business developments"⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "contribute to economic opportunity and growth in the wider sub region", affirming that "proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

¹⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:

"Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62".

- 4.21 It is of note that "planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region"⁵¹, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
 - Site 2EA, Florida Farm North, Slag Lane, Haydock. This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - Site 3EA, Land North of Penny Lane, Haydock. This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough's employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ lbid, paragraph 2.7

4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand is it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land OAN.
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

22

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
 - the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up at across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

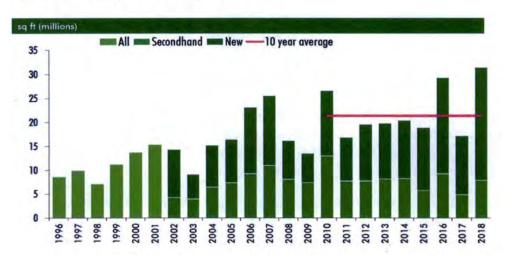


Figure 5.1: UK logistics take-up, 1996 - 2018*

Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

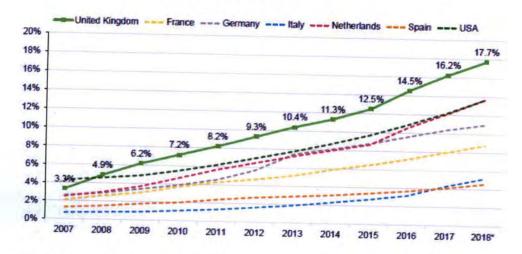
% of total take-up ■ Food retail ■ Non retail occupiers 45% 40% 35% 0.9% 18.3% 31.7% 15.0% 29.1% 30% 5.2% 25% 0.6% 20% 15% 10% 5% 2012 2013

Figure 5.2: Online retail's contribution to the UK logistics take-up

Source: CBRE, 2019

5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can been seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

- Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017^{56} .
- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest 58. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West 59 of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

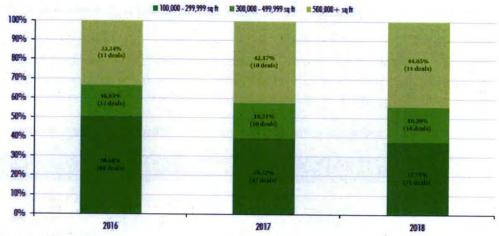
5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

⁵⁶ Retail Gazette (2018) https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/ (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

⁵⁹ Pitney Bowes; Oxford Economics (2018)

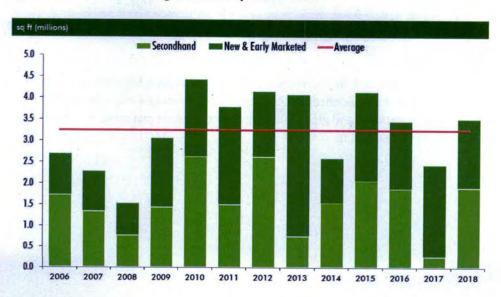
Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



Source: CBRE, 2019

5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 - 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased
Apr 2010	Royal Mail	19,680	211,834
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590
Aug 2013	Brakes Brothers	18,426	198,336
Nov 2014	Travis Perkins Plc	58,570	630,442
Nov 2015	The Hut Group	63,731	685,994
Dec 2016	Amazon	33,166	356,996
Jul 2018	Royal Mail	32,516	350,000
Total		240,358	2,587,192
The second secon			

Source: CoStar, 2019

5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼
ВооНоо	North West	700,000 + expansion
DHL	M6 North West	700,000
L'Oréal	Manchester	600,000 + expansion
Stobart	M6 Corridor	600,000
IKEA	M6/M62 Corridor	500,000 + expansion
Ocado	North West	350,000 +
Makita	North West	350,000
c/o CBRE	M6 North West	200,000 – 400,000
c/o Avison Young	North West	200,000 - 300,000
CDDF 2010		

Source: CBRE, 2019

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

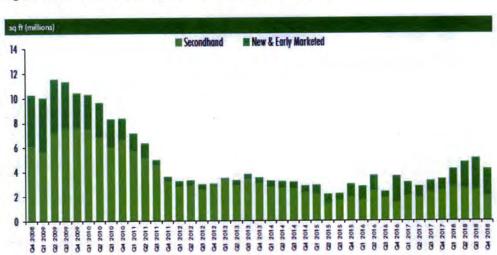


Figure 5.6: North West logistics availability, 2008 - 2018

Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200
Courses CDDF 2010	

Source: CBRE, 2019

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being "oven ready" for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also "oven ready", but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Co	rridor	
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

Source: CBRE, 2019

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established submarket areas.
- Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
 - The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on "prime" development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months' when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of "oven ready" consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough's OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
 - a baseline (land take-up scenario) need of 135 174 ha; and
 - additional land demand associated with major projects of 55 65 ha.
- Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

• The inadequacy of the borough's historic land supply. It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

The sectors driving employment growth. Over the period from 1997-2012
employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0%
across the LCR and wider UK. In contrast, the relatively strong local performance
in the 1998-2008 period is evident, with St Helens (0.9%) performing better than
the LCR (0.8%). It is notable that employment growth in the logistics sector was
higher in St Helens over the period from 1998 to 2008, coinciding with improved
availability of larger scale sites.

Influences on future take up

- The growth of the online retail market. As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- The strong longer-term employment land take-up rates in Warrington. Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- The degree to which demand is being met within the North West region.
 CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.
- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
 - the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
 - "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more proeconomic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

63 Ibid, para 8.62

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market driven by e-commerce and the need for large floorplate units and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
 - a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	На	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

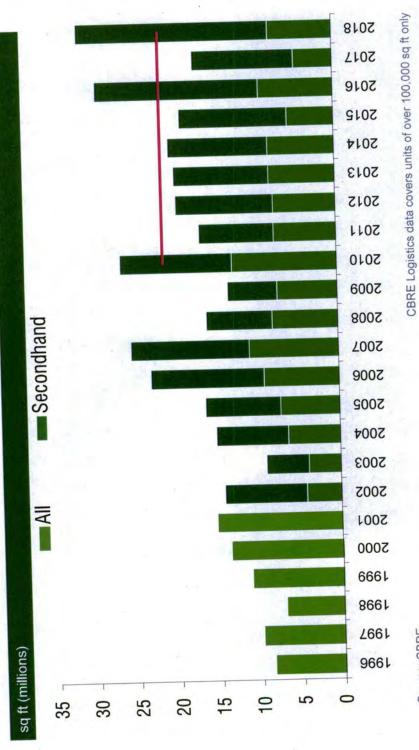
FEBRUARY 2019

UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

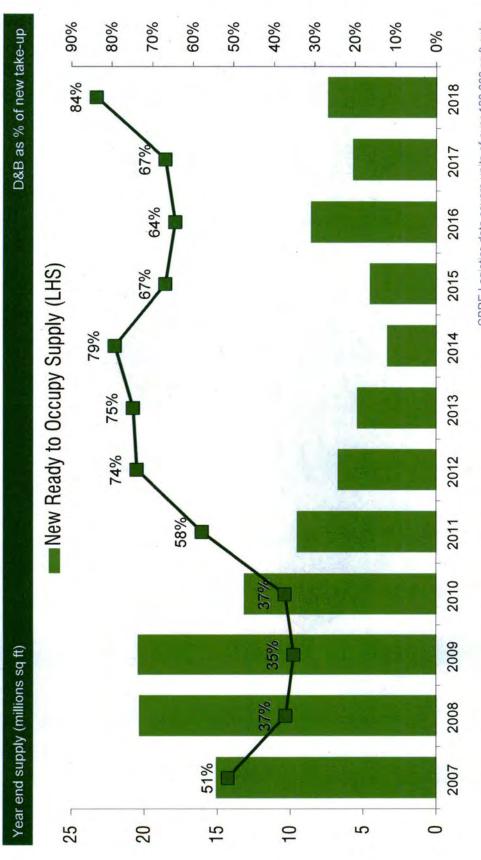
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
 - In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



Source: CBRE



DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 - 2018

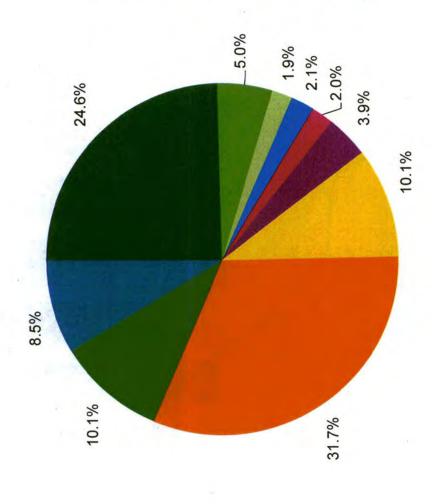


CBRE Logistics data covers units of over 100,000 sq ft only

CBRE



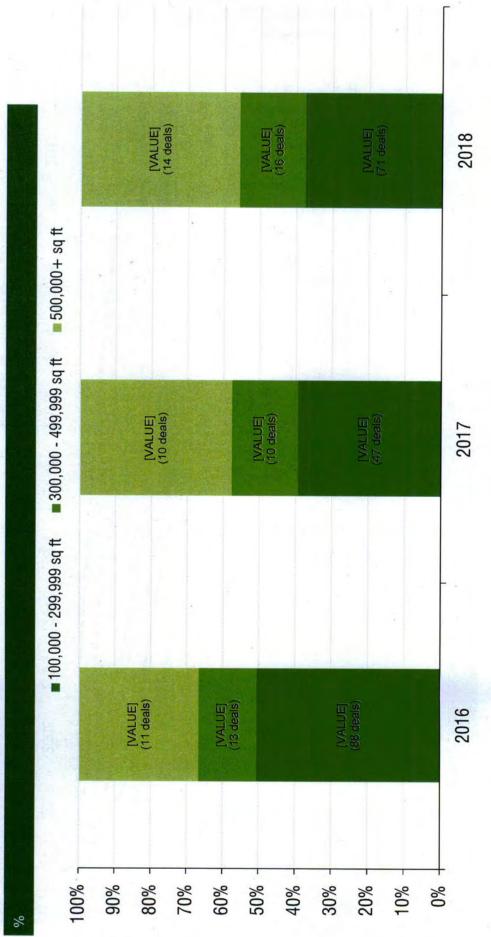
UK LOGISTICS TAKE-UP BY SECTOR 2018



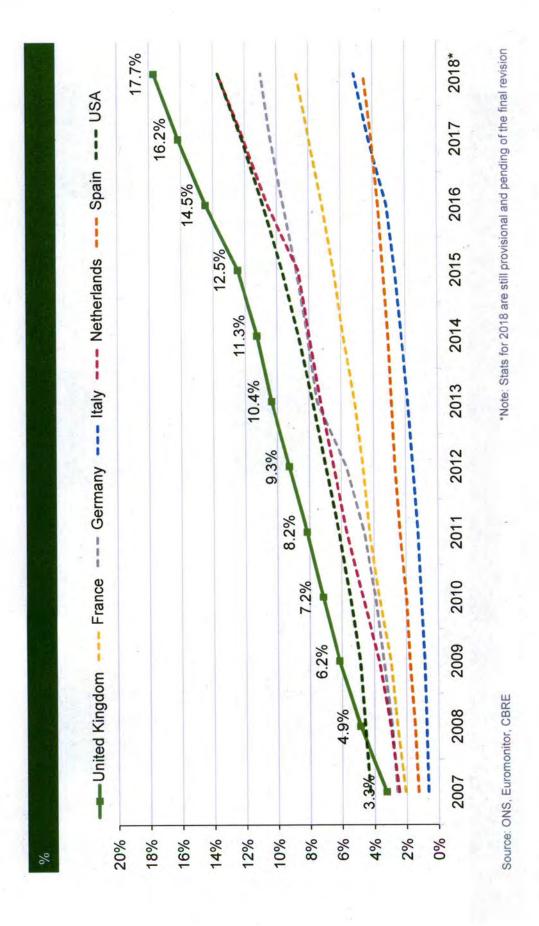
- ■3PL/
- Distribution
 Other
 manufacturing
 Construction
- Motor industry
- Food industry
- Post and
- Parcels Retail Food
- Retail Online

PERCENTAGE OF SPACE TAKEN AND NUMBER OF DEALS BY SIZEBAND IN THE UK

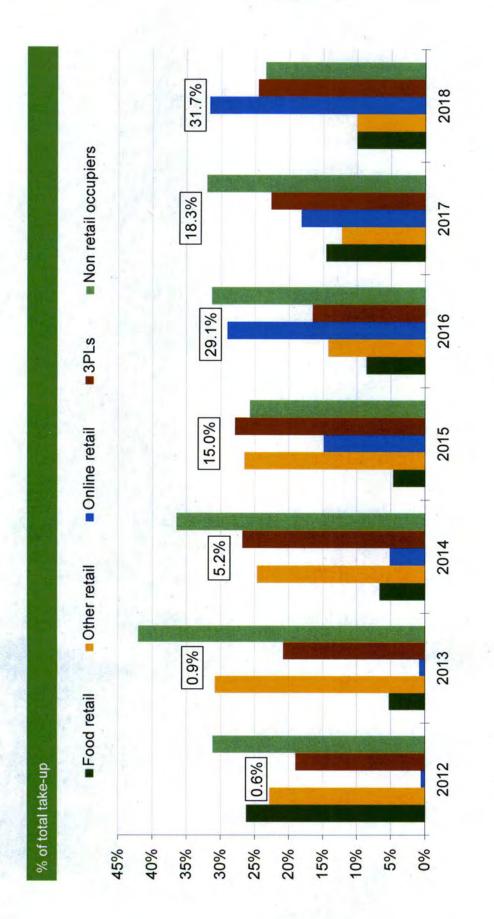




ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 - 2018



RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 - 2018



*Note: Stats for 2018 are still provisional and pending of the final revision

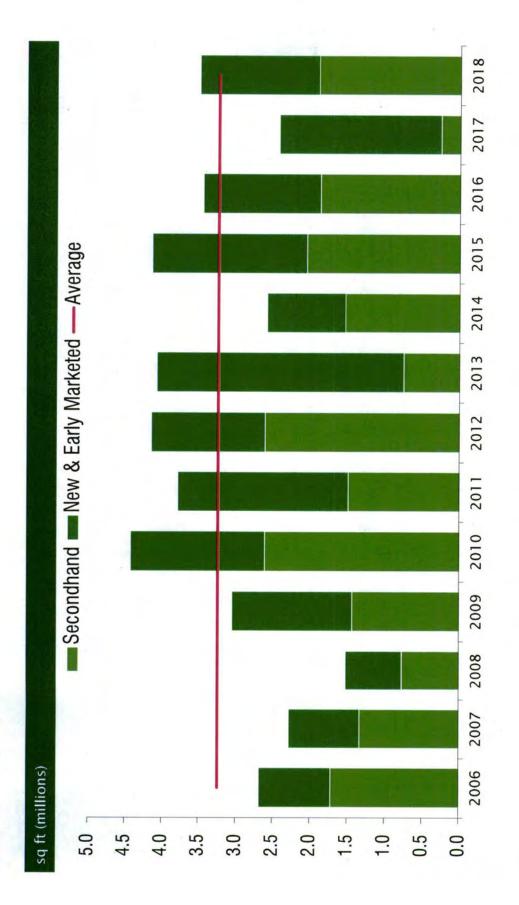
Source: ONS, Euromonitor, CBRE



NORTH WEST LOGISTICS TAKE-UP



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- · CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

Address	Town	Occupier	Size (sd ft)	Comments
Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent





NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Comments	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf	Existing unit Oct 2018 10 years £5.25 psf	Existing unit Oct 2018 15 years £6.40 psf
Size (sq ft)	370,000	353,102	333,000
Occupier	Kammac	Go Outdoors	Kinaxia
Town	Skelmersdale	Middlewich	Trafford Park
Address	Unit 3&4 M58	Middlewich 353	K333

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

NORTH WEST CURRENT DEMAND

KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
 - There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

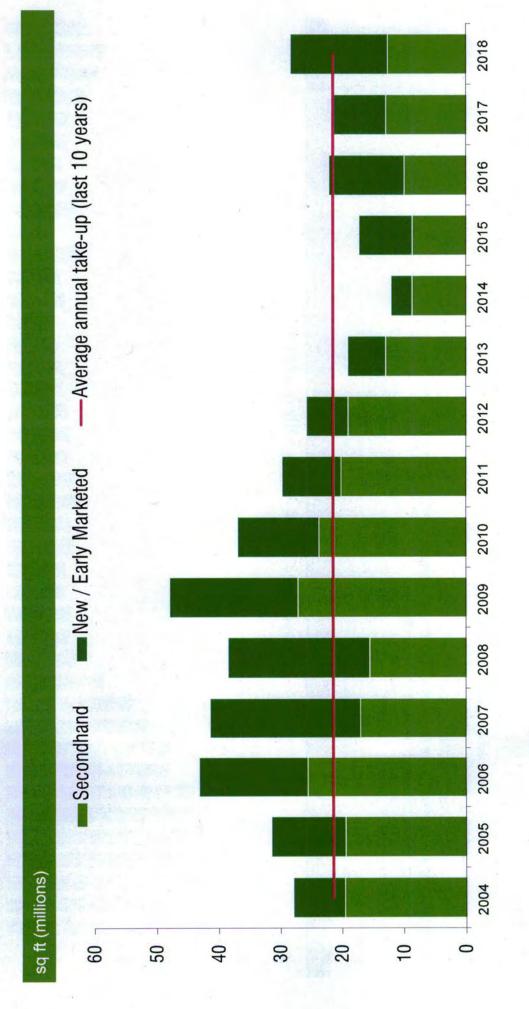
Size (sq ft) Comments	500,000 + expansion FH preferred. Occupation within 2 years. years. Colliers acting	600,000 + expansion LH. Occupation within 2 years. Colliers acting	350,000 + LH/FH. M6/M62. Gerald Eve acting	700,000 LH. New contract led requirement for European customer.	700,000 + expansion to to growth of business. P3 Surveyors acting	200-400,000 LH requirement for US client. Timing 2020	350,000 . FH/LH. New build only.	200-300,000 LH. Grade A facility for PLC client	600,000 LH. Expansion of Warrington facility
Search Area	M6/M62 corridor	Manchester	North West	M6 North West	North West	M6 North West	North West	North West	M6 corridor
Occupier	IKEA	L'Oréal	Ocado	DHL	ВооНоо	c/o CBRE	Makita	c/o Avison Young	Stobart



UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018

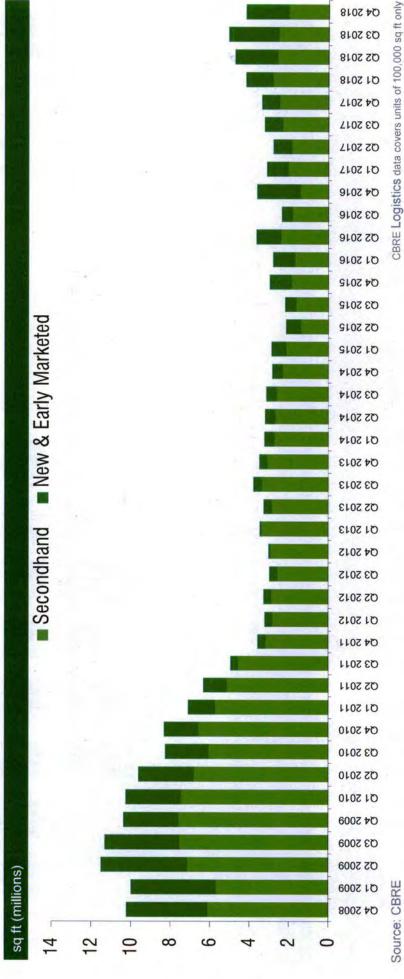


CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS AVAILABILITY 2008 - Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) representing sub 12 months' supply
 - Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
 - Grade A stock under construction is 1.21m sq ft (5 units)





SPECULATIVE LOGISTICS
AVAILABILITY



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

· As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)

A further 5 units are under construction providing 1.21m sq ft (see table on next page)

Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

		,			
SIZE (SQ FT)	149,148	216,410	236,915	216,410	375,000
ADDRESS	Unit F2, Multiply, Bolton	Kingsway 216 Rochdale	Crewe 240, Crewe	Kingsway 216 Rochdale	375, Logistics North Bolton
SIZE (SQ FT)	110,000	110,000	130,000	137,865	148,856
ADDRESS	Q110, Crewe	Academy, Knowsley	Unit 1, Evolution Park, Salford	Unit 2, Omega, Warrington	H2, Heywood Point Heywood



NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

SIZE (SQ FT)	107,210	183,669	185,500	208,000	523,500
ADDRESS	Liberty Park, Widnes	Unit 4, Omega, Warrington	Unit 1, Frontier Park, Blackburn	Venus 200, Knowsley	525 Haydock

NORTH WEST
EXISTING LOGISTICS
AVAILABILITY



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

Current availability for BIG BOX distribution units is limited

Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings - totalling 1.77m sq ft

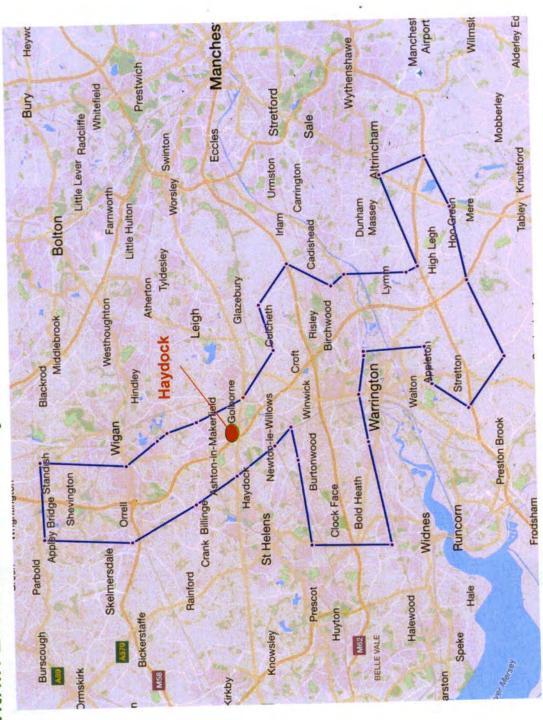
building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional Design & Build opportunities

ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000



NORTH WEST LAND AVAILABILITY

NORTH WEST LAND AVAILABILITY
Sites within 2.5km of Motorway Junctions



NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
 - Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
 - Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
 - Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icxn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	550,000	30	Land	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorsey Lane Widnes	500,000	40	Land	Former manufacturing facility with B2/8 use	Former manufacturing facility Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses Site likely to target similar uses
Haydock Lane Haydock	300,000	50	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft



NORTH WEST LAND AVAILABILITY NORTH WEST WIDE SITES

Detailed below are "oven ready sites" with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.

L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11

miles from the M6 motorway

K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK

Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million		Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	200,000	22	Land	Outline planning permission	Outline planning permission Site currently being sold to new developer



080

HOW HAYDOCK POINT CAN SATISFY FUTURE OCCUPIER DEMAND



HAYDOCK POINT - SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
- Haydock Point can satisfy future demand assuming consented
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - Haydock Point can procure a single building of this size
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - Haydock Point can satisfy this need
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - Haydock Point can satisfy demand of this size
- Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including single building in excess of 500,000 sq ft
- Haydock Point can accommodate a single unit up to 990,000 sq ft
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - Haydock Point can satisfy these needs
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic
- Haydock Point is located immediately adjacent to Junction 23, M6 motorway
- · The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - Haydock Point is ideally located to satisfy these demands

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only



Turley Office 1 New York Street Manchester M1 4HD



PO1027



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

outlines the component parts of the representations. The cover letter addressed to

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Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

...

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

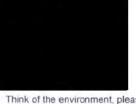
Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike

Turley
1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper I Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York St

1 New York Street Manchester M1 4HD



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Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Turley
EL0228/01-41
Policies
LPA04/05,06
Sites IES, 2ES
GRP-036, GPP-053=
SA, Green Belt Review
SHLAA e EVA

Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development as an alternative to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD



- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

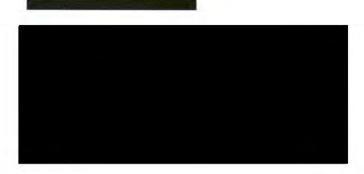
We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Representor Details

Web Reference Number	WF0080
Type of Submission	Web submission
Full Name	c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy		
Paragraph / diagram / table		
Policies Map	a l	
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:41:59 PM	
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Representor Details

Web Reference Number	WF0095
Type of Submission	Web submission
Full Name	c/o Agent c/o Agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o Agent c/o Agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the Local Plan and its soundness

Response Date	3/13/2019 12:08:04 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 221-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, STICHAR

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Green Celt **Submission Draft**

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

itself contributes to the exceptional circumstances justifying the site's removal from the Green Belt.

03

The development is not needed in the plan period

3.37 There are a number of reasons why this conclusion is flawed:

03

- In the preceding section of this report we have demonstrated that the
 objectively assessed need for employment land and the residual minimum land
 requirement are significantly understated and that additional land needs to be
 allocated. This in itself refutes the Council's contention that the development of
 the site is not needed.
- We address below the particular and special characteristics of the site that distinguish it from alternatives.
- Only once the Council had selected other sites for allocation to meet the residual land requirement did it reach a position where no additional land was considered necessary to meet that requirement. If the selection process up to that point is flawed, whereby the site is discounted for unjustified reasons, as we have shown above, then no weight can be applied to the conclusion that the site is not needed. It simply becomes a self-fulfilling prophecy.
- There are also legitimate questions over the flexibility of the supply that has been identified, specifically in relation to the Parkside East proposed allocation (Policy LPA04.1, Site 7EA; Policy LA10).

LPA 04

04

3.38 In demonstrating how the allocated sites will meet the minimum employment land requirement, Table 4.1 of the PSLP identifies Parkside East as contributing 64.55 hectares. Footnote 17 explains that Parkside East has a gross area of 124.55 hectares, but the 64.55 hectares is the residual beyond 60 hectares of land which is reserved for development of a Strategic Rail Freight Interchange ('SFRI') or other rail enabled use. The 64.55 hectares may be developed for a wider range of employment uses (i.e. not associated with the SRFI), subject to provisions of Policy LPA10.

04

- 3.39 In essence, the PSLP assumes that 60 hectares of Parkside East will be developed for SRFI or other rail enabled use, and due to the special characteristics of that use, does not count it towards meeting general employment land requirements. It is therefore this arbitrary definition of 60 hectares that dictates the 64.55 hectares which is counted towards the general employment land requirement.
- 3.40 However, the evidential basis of the 60 hectares is unjustified. It is explained at paragraph 4.36.13 of the PSLP that the 60 hectares equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008. Whilst this is not disputed, it nonetheless cannot be a legitimate basis on which to delineate between the SRFI-related and general employment components of the allocation. It pays no regard to need, demand, or anticipated scale.

04

3.41 It is important to highlight the significance of the Parkside site and the particular role it is intended to play. The Reasoned Justification to Policy LPA10 refers to national and regional policy and extensive evidence which identifies the need for and significant

04

benefits arising from rail-based freight facilities and the credentials of Parkside to meet that need. Paragraph 4.36.9 refers to the *Parkside Logistics and Rail Freight Interchange Study* and highlights that Parkside 'is uniquely placed to satisfy this demand' and 'the opportunities for rail access from the site are considered to be second to none in the North West'. Given this apparent uniqueness, one could legitimately expect its market appeal and the demand for space to be significant.

04

- There is also the matter of the likely scale of development needed to justify the extent of investment required to create an SRFI. Peel has extensive experience in this field, including at Port Salford, the site of a proposed SRFI, and is well aware of the very significant cost of introducing site-specific rail infrastructure (estimated at £50m+ in the case of Port Salford). In order to underpin such investment decisions and be able to secure a return on investment, developers will naturally seek to maximise development which makes use of the infrastructure (i.e. rail-served development). One only needs to consider the size of SRFIs across the UK to identify the scale of development typically associated with this level of investment: for instance DIRFT (Daventry International Rail Freight Terminal) III extends to 345 hectares; the East Midlands Gateway extends to 283 hectares.
- In view of its significance as an SRFI opportunity, the arbitrary nature of the 60 hectares identified, and the commercial drivers underpinning infrastructure investment, the likelihood is that in excess of 60 hectares will be developed as SRFI or associated uses. Indeed there is a risk that allowing for other, general employment uses that serve to limit the SRFI to 60 hectares will undermine the significance of the site and its potential contribution to meeting such specific needs. The uniqueness of the site is recognised by the PSLP, but the policy approach doesn't adequately serve to protect this uniqueness.
- 3.44 The inherent risk in respect of the general employment supply is that the 60 hectares is not a cap, but rather an indicative (and indeed likely minimum, on the basis that it is a minimum threshold for NSIPs) size. If the SRFI occupies in excess of 60 hectares (as seems likely) then this will reduce the contribution that the site can make to meeting general employment needs. This will dilute the flexibility of the supply, and increase the risk that the minimum land requirement is not met.
- 3.45 This further highlights the need to build in additional flexibility by increasing the supply through the allocation of the Haydock Point North site, regardless of whether the minimum land requirement is increased as proposed in the preceding section of this report.

03

The site has special attributes which distinguish it from alternatives and significant benefits would arise from its allocation and development

03

3.46 The Council's own evidence and the supplementary evidence that has both informed the current planning application and these representations, summarised in the preceding sections, reveal a significant need and opportunity for new, high quality, large footprint logistics floorspace in St Helens to alleviate the growth of this key sector and maximise its contribution to the local economy. Demand is high and the need is pressing.

Appendix 2: Employment Land OAN report

Policy CPA04
(Points Picked up
in Sunnary rep-

St Helens Borough Local Plan 2020 – 2035 Submission Draft

Representations on behalf of Peel Holdings (Land and Property) Limited

Review of St Helens' Objectively Assessed Employment Needs

March 2019



Contents

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2.	The Assessed Need for Employment Land	6
3.	Strategic Economic Drivers and Growth Aspirations	10
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5.	Drivers of current and future logistics demand	23
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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum) ² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflects needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.

1.7 Of particular concern is that:

- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
- The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
- Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
- The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
 - Section 2: The Assessed Need for Employment Land provides an overview of the ELNS Addendum and recommended employment land OAN;
 - Section 3: Strategic Economic Drivers and Growth Aspirations provides an
 overview of the economic policy context and growth aspirations established by
 Government, the Liverpool City Region (LCR) Combined Authority and St Helens
 Council;
 - Section 4: Impact of the Constrained Land Supply examines the influences of past policy approaches and land supply on take up and economic growth;
 - Section 5: Drivers of Current and Future Logistics Demand examines the
 evolution of logistics market and implications for the supply of and demand for
 employment land in the North West.

- Section 6: Review of the Employment Land OAN recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- Section 7: Conclusions and Policy Implications sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms "...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 "continues to be low, limited by immediately available land supply" 10.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered "...to be a better representation of growth unencumbered by land shortages"¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions
Period 1997-2017	135.0	Based on 4.5 ha/yr
Period 1997-2012	174.0	Based on 5.8ha/yr
Growth period 1998-2008	225.0	Based on 7.5ha/yr

Source: ELNS, 2015 and ELNS Addendum, 2019

2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of 'transformational developments' planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the 'do something' scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 40 ha to 55 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of 'the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI'¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being "a better representation of the actual growth level if the market is without significant land supply constraints"15

Table 2.2: Updated Employment Land Needs 2012 - 2037

A STATE OF THE STA	На
Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- Using a land take-up scenario to estimate the baseline employment land needs figure is 2.13 considered to be a reasonable approach in principle. It is critical, however, that:
 - the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- It is accepted within the ELNS Addendum that the relative lack of adequate market-2.14 attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting "a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole" 17, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
 - The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need partly by reference to current market demand it does not put in a Plan in place which enables that demand to be satisfied. It therefore fails to satisfy its own assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 5 of this report with reference to:
 - The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a "vibrant and growing economy, a flourishing private sector and a highly skilled population" 18.
- 3.2 At a national level, the Government's goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that 'improving productivity is vital to building an economy fit for the future' 19. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government's Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country's economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough's location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

²¹ Ibid, paragraph 4.12.1

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

Realising the Growth Ambition for the Liverpool City Region

3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"22

- 3.9 The LCR Growth Strategy confirms the intention to ensure "the creation of over 100,000 additional jobs in the Liverpool City Region by 2040". It recognises that this growth will build upon a period of "economic renaissance with a diversifying economy of internationally-oriented markets and businesses".
- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"23.

- Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented 3.11 investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.
- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² lbid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

- Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"²⁵
- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:
 - "Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"
- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that "St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market".

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government's own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

²⁸ National Planning Policy Framework, MHCLG, 2019

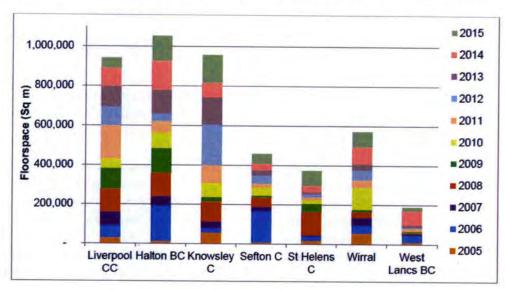
4. The impact of historic land supply constraints

4.1 As widely acknowledged in the evidence base, the borough's constrained land supply is considered to have acted as a significant constraint to economic growth and investment:

"...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...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"²⁹.

4.2 This is evidenced in the analysis of comparative take up presented within the LCR SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15, paragraph 2.11

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

- 4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:
 - 1997-2012;
 - 1998-2008; and
 - 1997-2017.
- 4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

- 4.5 Policy direction over much of the 1997 to 2017 period was provided by:
 - the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
 - The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
 - the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).
- 4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was "to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor building on opportunities created by the M62 link and at the existing Haydock Industrial Estate.
- 4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that "Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development" ³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that "the majority" of the UDP's allocated employment sites were:
 - "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network" ³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) 'to enable St Helens to compete with other regions for inward investment'³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ Ibid, p45

³⁸ Ibid, p46

- 4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.
- 4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:
 - "the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) 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"³⁹
- 4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.
- 4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

- 4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.
- 4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.
- 4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

- 4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:
 - administrative and support services;
 - health;
 - land transport, storage and post (which is taken to represent the logistics and distribution sector); and
 - professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

		ELNS	Take up	Scenario	period	ls
	1997	-2012	1997	-2015	1998	2008
Sector	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	8.0	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 2015/16.
- 4.13 The EDNS states that "the success of Omega over the last three years has been a key feature of the local economy" Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:

"The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options" ⁴³.

4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "high quality strategic business developments"⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "contribute to economic opportunity and growth in the wider sub region", affirming that "proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

¹⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:

"Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62".

- 4.21 It is of note that "planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region"⁵¹, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
 - Site 2EA, Florida Farm North, Slag Lane, Haydock. This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - Site 3EA, Land North of Penny Lane, Haydock. This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough's employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ lbid, paragraph 2.7

4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand is it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

22

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
 - the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up at across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

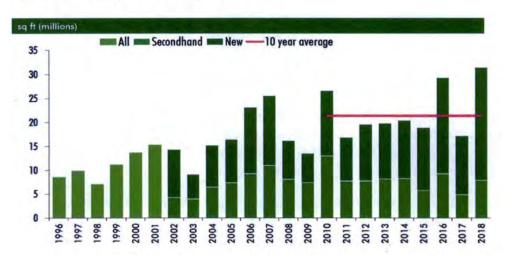


Figure 5.1: UK logistics take-up, 1996 - 2018*

*Note: CBRE logistics data covers units of over 100,000 sq ft only

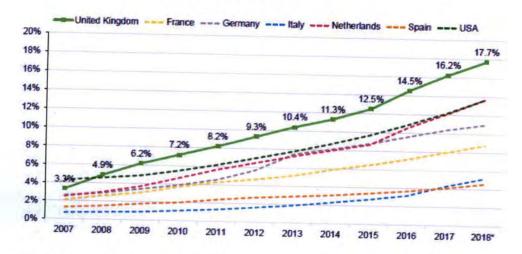
- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

% of total take-up ■ Food retail ■ Non retail occupiers 45% 40% 35% 0.9% 18.3% 31.7% 15.0% 29.1% 30% 5.2% 25% 0.6% 20% 15% 10% 5% 2012 2013

Figure 5.2: Online retail's contribution to the UK logistics take-up

5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can been seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

- Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017^{56} .
- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest 58. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West 59 of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

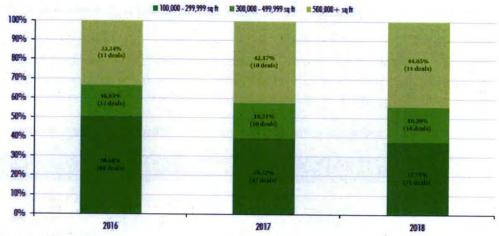
5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

⁵⁶ Retail Gazette (2018) https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/ (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

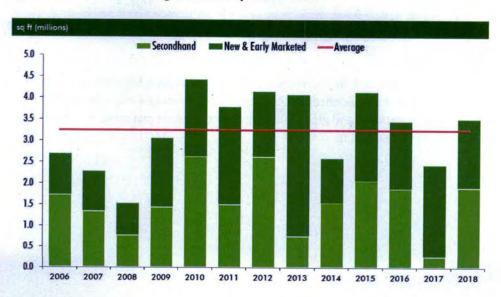
⁵⁹ Pitney Bowes; Oxford Economics (2018)

Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 - 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased
Apr 2010	Royal Mail	19,680	211,834
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590
Aug 2013	Brakes Brothers	18,426	198,336
Nov 2014	Travis Perkins Plc	58,570	630,442
Nov 2015	The Hut Group	63,731	685,994
Dec 2016	Amazon	33,166	356,996
Jul 2018	Royal Mail	32,516	350,000
Total		240,358	2,587,192
The second secon			

Source: CoStar, 2019

5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼
ВооНоо	North West	700,000 + expansion
DHL	M6 North West	700,000
L'Oréal	Manchester	600,000 + expansion
Stobart	M6 Corridor	600,000
IKEA	M6/M62 Corridor	500,000 + expansion
Ocado	North West	350,000 +
Makita	North West	350,000
c/o CBRE	M6 North West	200,000 – 400,000
c/o Avison Young	North West	200,000 - 300,000
CDDF 2010		

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

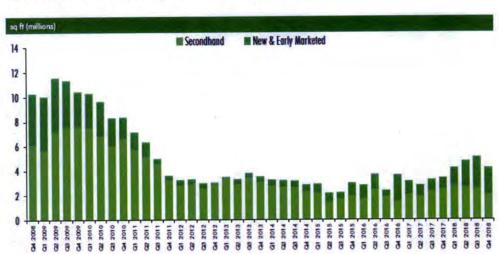


Figure 5.6: North West logistics availability, 2008 - 2018

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200
Courses CDDF 2010	

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being "oven ready" for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also "oven ready", but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Co	rridor	
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established submarket areas.
- Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
 - The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on "prime" development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months' when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of "oven ready" consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough's OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
 - a baseline (land take-up scenario) need of 135 174 ha; and
 - additional land demand associated with major projects of 55 65 ha.
- Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

• The inadequacy of the borough's historic land supply. It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

The sectors driving employment growth. Over the period from 1997-2012
employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0%
across the LCR and wider UK. In contrast, the relatively strong local performance
in the 1998-2008 period is evident, with St Helens (0.9%) performing better than
the LCR (0.8%). It is notable that employment growth in the logistics sector was
higher in St Helens over the period from 1998 to 2008, coinciding with improved
availability of larger scale sites.

Influences on future take up

- The growth of the online retail market. As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- The strong longer-term employment land take-up rates in Warrington. Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- The degree to which demand is being met within the North West region.
 CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.
- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
 - the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
 - "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more proeconomic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

63 Ibid, para 8.62

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market driven by e-commerce and the need for large floorplate units and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
 - a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	На	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

FEBRUARY 2019

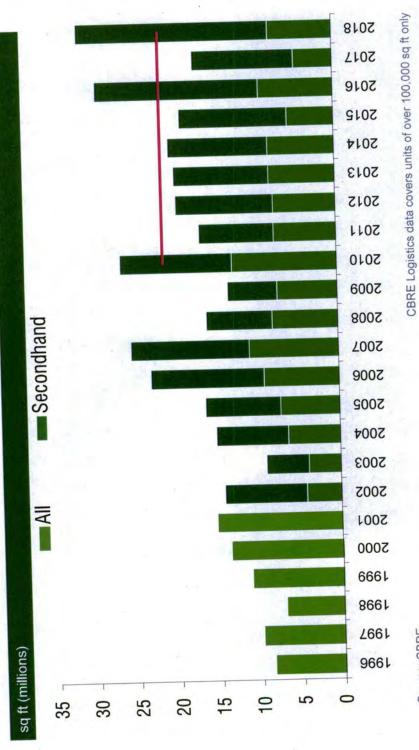
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UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

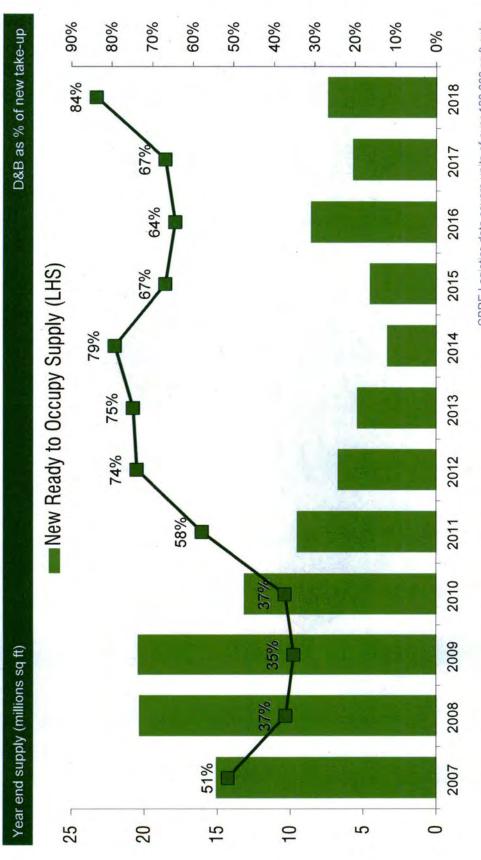
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
 - In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



Source: CBRE



DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 - 2018

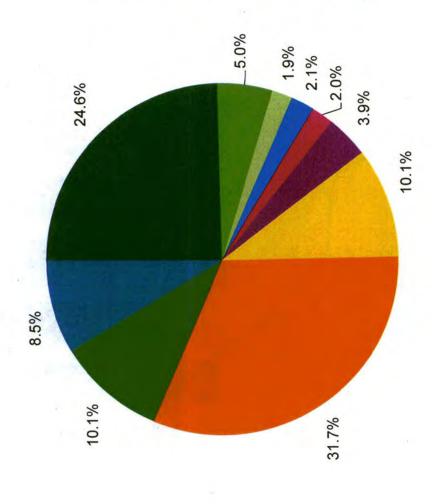


CBRE Logistics data covers units of over 100,000 sq ft only

CBRE



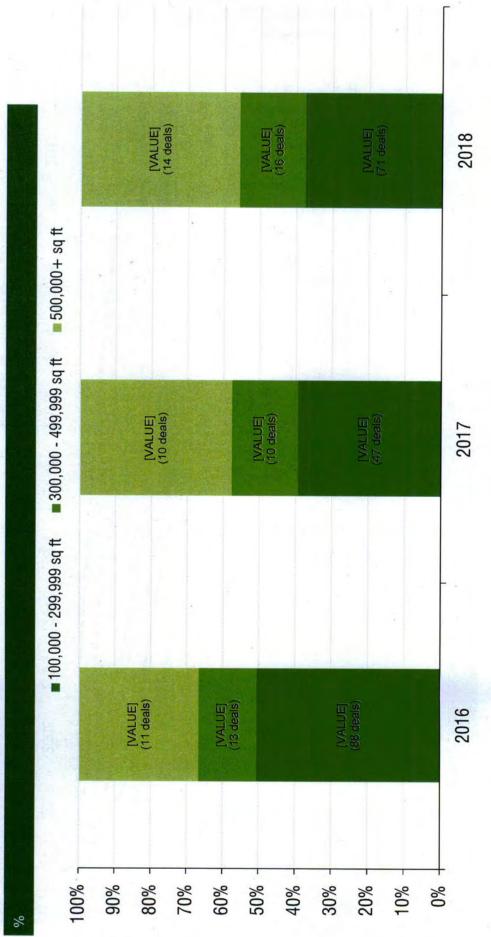
UK LOGISTICS TAKE-UP BY SECTOR 2018



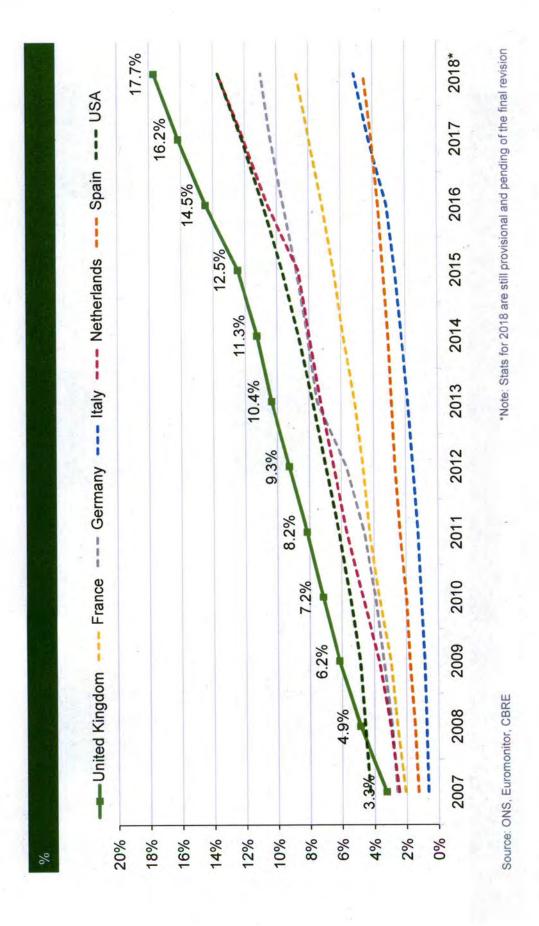
- ■3PL/
- Distribution
 Other
 manufacturing
 Construction
- Motor industry
- Food industry
- Post and
- Parcels Retail Food
- Retail Online

PERCENTAGE OF SPACE TAKEN AND NUMBER OF DEALS BY SIZEBAND IN THE UK

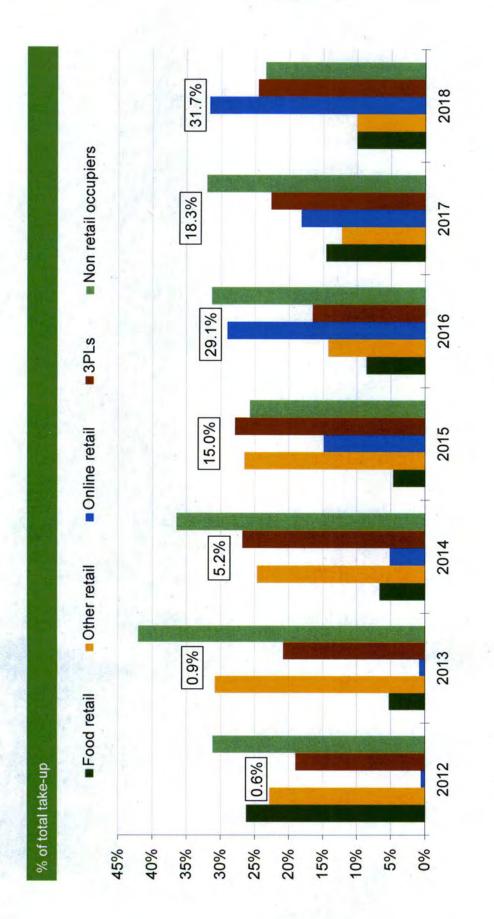




ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 - 2018



RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 - 2018



*Note: Stats for 2018 are still provisional and pending of the final revision

Source: ONS, Euromonitor, CBRE

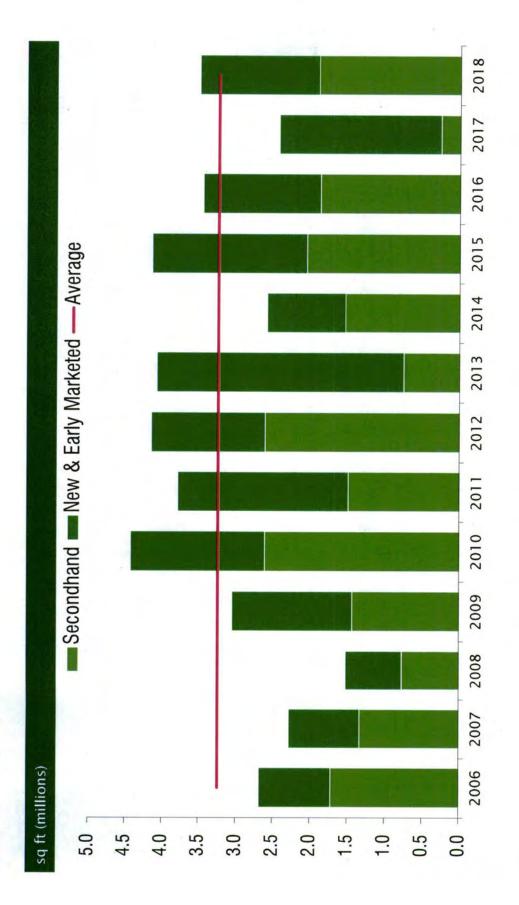


02

NORTH WEST LOGISTICS TAKE-UP



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- · CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

Address	Town	Occupier	Size (sd ft)	Comments
Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent





NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Address	Town	Occupier	Size (sq ft)	Comments
Unit 3&4 M58	Skelmersdale	Kammac	370,000	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf
Middlewich 353	Middlewich	Go Outdoors	353,102	Existing unit Oct 2018 10 years £5.25 psf
K333	Trafford Park	Kinaxia	333,000	Existing unit Oct 2018 15 years £6.40 psf

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

63

NORTH WEST CURRENT DEMAND

KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
 - There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

Size (sq ft) Comments	500,000 + expansion FH preferred. Occupation within 2 years. years. Colliers acting	600,000 + expansion LH. Occupation within 2 years. Colliers acting	350,000 + LH/FH. M6/M62. Gerald Eve acting	700,000 LH. New contract led requirement for European customer.	700,000 + expansion FH preferred. Ongoing requirement due to to growth of business. P3 Surveyors acting	200-400,000 LH requirement for US client. Timing 2020	350,000 . FH/LH. New build only.	200-300,000 LH. Grade A facility for PLC client	600,000 LH. Expansion of Warrington facility
Search Area	M6/M62 corridor	Manchester	North West	M6 North West	North West	M6 North West	North West	North West	M6 corridor
Occupier	IKEA	L'Oréal	Ocado	DHL	ВооНоо	c/o CBRE	Makita	c/o Avison Young	Stobart

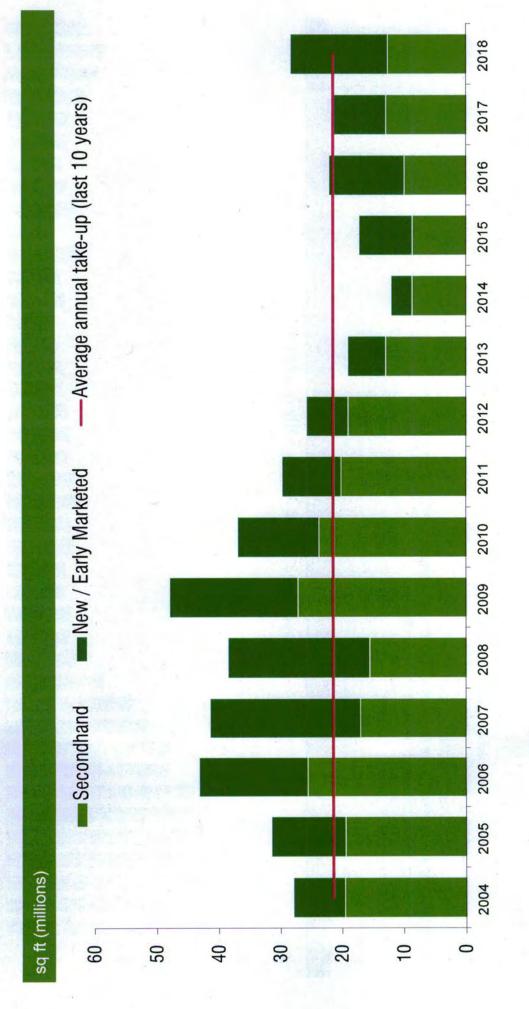


04

UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018

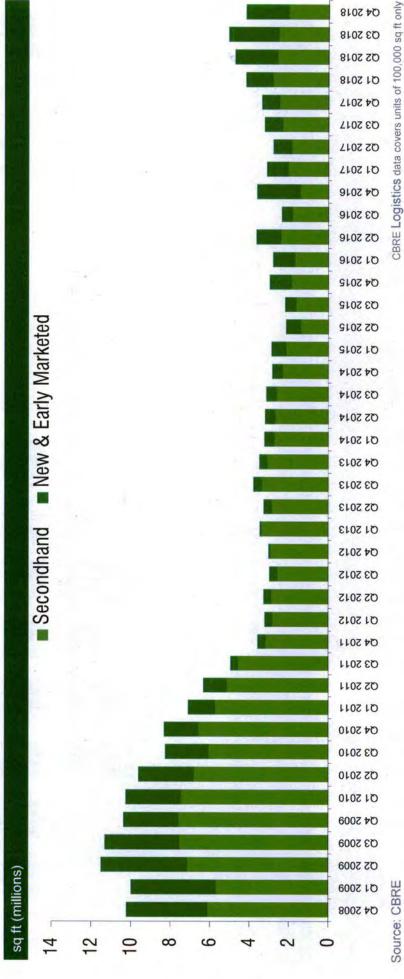


CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS AVAILABILITY 2008 - Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) representing sub 12 months' supply
 - Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
 - Grade A stock under construction is 1.21m sq ft (5 units)





05

SPECULATIVE LOGISTICS
AVAILABILITY



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

· As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)

A further 5 units are under construction providing 1.21m sq ft (see table on next page)

Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

		,			
SIZE (SQ FT)	149,148	216,410	236,915	216,410	375,000
ADDRESS	Unit F2, Multiply, Bolton	Kingsway 216 Rochdale	Crewe 240, Crewe	Kingsway 216 Rochdale	375, Logistics North Bolton
SIZE (SQ FT)	110,000	110,000	130,000	137,865	148,856
ADDRESS	Q110, Crewe	Academy, Knowsley	Unit 1, Evolution Park, Salford	Unit 2, Omega, Warrington	H2, Heywood Point Heywood



NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

SIZE (SQ FT)	107,210	183,669	185,500	208,000	523,500
ADDRESS	Liberty Park, Widnes	Unit 4, Omega, Warrington	Unit 1, Frontier Park, Blackburn	Venus 200, Knowsley	525 Haydock

90

NORTH WEST
EXISTING LOGISTICS
AVAILABILITY



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

Current availability for BIG BOX distribution units is limited

Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings - totalling 1.77m sq ft

building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional Design & Build opportunities

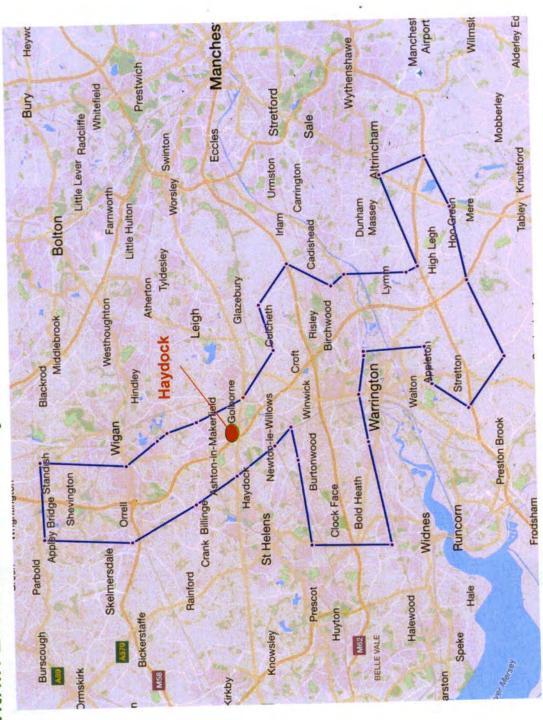
ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000



07

NORTH WEST LAND AVAILABILITY

NORTH WEST LAND AVAILABILITY
Sites within 2.5km of Motorway Junctions



NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
 - Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
 - Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
 - Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icxn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMIMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	250,000	30	Land	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorsey Lane Widnes	200,000	40	Land	Former manufacturing facility with B2/8 use	Former manufacturing facility Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses Site likely to target similar uses
Haydock Lane Haydock	300,000	50	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft



NORTH WEST LAND AVAILABILITY NORTH WEST WIDE SITES

Detailed below are "oven ready sites" with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.

L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11

miles from the M6 motorway

K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK

Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million		Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	200,000	22	Land	Outline planning permission	Outline planning permission Site currently being sold to new developer



080

HOW HAYDOCK POINT CAN SATISFY FUTURE OCCUPIER DEMAND



HAYDOCK POINT - SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
- Haydock Point can satisfy future demand assuming consented
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - Haydock Point can procure a single building of this size
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - Haydock Point can satisfy this need
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - Haydock Point can satisfy demand of this size
- Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including single building in excess of 500,000 sq ft
- Haydock Point can accommodate a single unit up to 990,000 sq ft
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - Haydock Point can satisfy these needs
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic
- Haydock Point is located immediately adjacent to Junction 23, M6 motorway
- · The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - Haydock Point is ideally located to satisfy these demands

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only



Turley Office 1 New York Street Manchester M1 4HD



PO1028



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

outlines the component parts of the representations. The cover letter addressed to

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I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

...

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

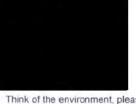
Kind regards

Andrew Bickerdike

Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike

Turley
1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York St

1 New York Street Manchester M1 4HD



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Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

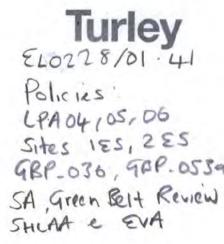
Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP



Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development as an alternative to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD



- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

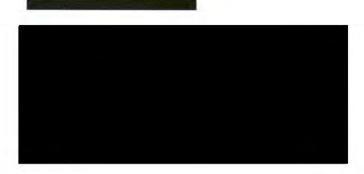
We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Representor Details

Web Reference Number	WF0005
Type of Submission	Web submission
Full Name	c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 and LPA05	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This form relates to Peel's additional submission in relation to its landholding at Haydock Green - see revised Paper 1 (Overarching Representation)

7. Please set out modification(s) you consider are necessary

See Paper 1 of Peel's submission

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

This representation raises matter of strategic relevance / importance to the Local Plan and its soundness

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 221-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, STICHAR

EVA

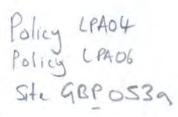
St Helens Borough Local Plan 2020 - 2035 SA, Green Celt **Submission Draft**

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley



6. Employment Potential of Haydock Green (Policies LPA04; LPA06)

Summary

- As an alternative to allocating the site for housing, as later sections of this report
 contend is appropriate, Haydock Green should be allocated for employment
 land. It is a suitable site with strong market appeal. It would facilitate a strategic
 objective, to improve Junction 23 of the M6.
- As a minimum the site should be designated as safeguarded land.
- 6.1 It has been demonstrated that the PSLP is unsound in respect of its employment strategy; in particular there is a significant deficiency in the quantum of employment land proposed for allocation and a need to allocate additional land. There is also a need to identify additional safeguarded land for future employment development beyond the plan period.
- 6.2 The sections of this report that follow identify serious issues with the soundness of the PSLP in respect of the housing strategy, and support the contention that Haydock Green should be allocated for housing development in the Plan period in order to overcome those issues.
- 6.3 Haydock Green also presents an alternative opportunity, should it not be allocated for housing. The site possesses comparable characteristics to the Haydock Point North and Haydock Point South sites, which make it suitable for employment development of the type needed.

6.4 In summary:

- The site is highly accessible to the motorway and strategic road network, lying adjacent to the A580 and Junction 23 of the M6. This is a key requirement of the logistics market for which a significant and growing need has been identified;
- The site is capable of accommodating large scale logistics buildings, ranging up to 38,000 sq m / 410,000 sq ft in size. As the preceding sections have identified, the logistics market is driving demand for these larger units and the supply of such opportunities is limited within the North West region;
- The site has no insuperable constraints. Landscape features of value can be readily incorporated; residential amenity can be protected by separation / suitable site masterplanning. Any impacts can be mitigated.

- 6.5 In addition, and consistent with Haydock Point North, the site's development would help to realise the strategic objective of improving Junction 23 comprising a significant benefits of the proposals. Draft Policy LPA07 of the PSLP identifies 'improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7' as a critical intervention needed to deliver its strategic priorities for the transport network; namely to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions.
- As noted earlier, St Helens Council, in consultation with Highways England, has commissioned a study to consider the opportunity for capacity improvements at Junction 23. While this study is currently on-going, it is understood that the preferred options all involve the diversion of the southern A49 Lodge Lane arm of the junction located to the east of the site such that this does not interact with the junction thus alleviating pressure on the junction. The diversion of this arm of the junction would therefore provide a primary and significant benefit of allowing traffic travelling between the A49 and the A580 to the west to bypass Junction 23.
- 6.7 In keeping with the aspirations of the Junction 23 Study, and recognising the importance of the A49 Lodge Lane as a link between Newton-le-Willows and the A580 and M6, Peel proposes that the A49 could be diverted to the west of J23 utilising land at Haydock Green and within its control. This diversion would be incorporated as part of the development of the site.
- 6.8 The potential route of the diverted A49 is shown on the Framework Masterplan contained within Appendix 7. This show the A49 diverting into the site at the eastern site boundary. However, subject to further development there could be the potential to retain southbound movements on the A49 away from Junction 23. Should this option be progressed then a priority controlled junction could be introduced to allow the A49 to divert into site. Under either option, sufficient land controlled by Peel and the highway authority is available to deliver a junction that would meet recognised highway design standards.
- 6.9 Within the Haydock Green site it is suggested that the A49 routes to the east of the existing woodland area, before finally forming a junction with the A580. While the design of the junction would be subject to detailed capacity assessment, it is anticipated that it be signal controlled and allow vehicles to turn east towards the M6 and Manchester and west towards St Helens and Liverpool. The Framework Masterplan suggests a location in which a junction fully compliant with recognised highway design guidelines can be delivered. However, alternative locations for a junction with the A580 are also available within the frontage of the Haydock Green site, and the site masterplan could be amended to accommodate an alternative alignment should this be a preferred option.
- 6.10 The Framework Masterplan at Appendix 7 therefore demonstrates how a critical part of the improvement scheme can be delivered and facilitated through the allocation and development of Haydock Green. There is no other means of achieving this aspect of the improvement scheme.

- 6.11 This is an additional and significant benefit of developing the site which weighs in favour of its allocation. The site is unique in this regard. This benefit should be reflected in the Council's consideration of this site and its sustainability credentials relative to others.
- 6.12 Appendix 7 illustrates the site's capability to accommodate large scale logistics development (totalling c 96,000 sq m /1,036,000 sq ft), taking in to account the site's features and surroundings, and considers the overall suitability of the site (paragraph 10.8). Further detail on the site's constraints and suitability for development is provided in Section 10 of this report. A consideration of the site's Green Belt contribution is also set out in Section 10 of this report (paragraphs 10.25 to 10.41). This demonstrates that the Council's GBR overstates the site's contribution and therefore the harm that would arise from its release and allocation for development.
- 6.13 The suitability and market appeal of the Haydock Point North site has been addressed in Section 3, with it being demonstrated that the Council's reasons for non-allocation are flawed. The Haydock Green site possesses many of the same positive features as the Haydock Point North site. As with the Haydock Point site, the Haydock Green represents a more suitable and deliverable site than sites that are proposed for allocation in the PSLP.
- 6.14 Should the site not be allocated for housing development as the Plan advances, Haydock Green site as a direct alternative it should be allocated for employment development alongside the Haydock Point North site, either as an additional site to address the land deficiency and provide greater flexibility, or as an alternative to less suitable and deliverable sites presently proposed within the PSLP.
- 6.15 As a minimum, the site should be designated as safeguarded land. In doing so, alongside the Haydock Point South site it can help address the notable deficiency in safeguarded land identified in Section 4. However, this would not bring about the same opportunity for Junction 23 improvements in the plan period as would be associated with the site's allocation for development.

located close to the site, the site is evidently characteristic of urban fringe as a result and, as such that Parcel 053_A should be given a 'low' score in respect of Purpose 3.

- 10.42 Taking these points into account, Peel considers that Parcel 053_A should be given the following scoring in respect of the three purposes of the Green Belt assessed:
 - Purpose 1(to check the unrestricted sprawl of large built up areas): LOW
 - Purpose 2 (to prevent neighbouring towns from merging into one another):
 HIGH
 - Purpose 3 (to assist in safeguarding the countryside from encroachment): LOW

Concluding comments

10.43 In the context of a need to allocate additional Green Belt land to meet the residential development needs of the Borough; to direct additional housing to Haydock to achieve a more balanced and proportionate distribution of housing; and to direct additional residential development to those areas of the Borough which are closest to the existing and proposed major employment sites to achieve an effective integration of the PSLP's housing and employment strategies, Haydock Green represents a sustainable development opportunity, capable of making a strategic contribution to meet the Borough's development needs in a sustainable manner.

Policies LPAO4-OS

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- 10.44 The site also provides the unique opportunity to deliver significant highway infrastructure benefits through facilitating the diversion of the A49 through the site and thus taking this out of Junction 23. This represents a significant benefit of the development which no other site in the Borough can provide. This has not been considered by the Council in assessing the site to date but should be taken into account in reconsidering the merits, benefits and sustainability credentials of this site relative to others.
- 10.45 In addition, the assessment above has identified a number of deficiencies in the Council's appraisal of the site through the Green Belt Appraisal and Sustainability Appraisal processes. This critique has demonstrated that:
 - The site's overall Green Belt contribution should be recorded as 'medium' rather than 'high' as concluded by the Council. The Council's conclusions in respect of Green Belt Purposes 1 and 3 are erroneous. Accordingly the site should have progressed beyond Stage 1b of the Green Belt Appraisal process and should be subject to a full assessment of its potential to be developed alongside other candidate Green Belt releases;
 - The Council has incorrectly scored the site against four of the seventeen SA Objectives against which the site is assessed in the Sustainability Appraisal. With these corrections, the site would be shown to be more sustainable than four out of six of the selected allocations in the PSLP and six out of eight sites proposed to be allocated as Safeguarded Land.

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10.46 The PSLP's evidence base is deficient as a result and so the PSLP cannot be justified. It is therefore unsound.

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10.47 Peel strongly objects to the Council's decision to no longer allocate the site for residential development, which results from a flawed process of assessing the site in terms of its sustainability, its contribution to the Green Belt and the failure in the process to have proper regard to the PSLP stated aspiration to achieve a balanced distribution of residential development and appropriate extent of co-location between residential and employment uses.

11.24

10.48 These deficiencies in the Council's assessment of the site should be addressed through an update to the Local Plan evidence base, undertaken on a more appropriate basis in response to the issues raised in this representation. This would demonstrate that the site represents a sustainable residential opportunity, providing unique benefits whilst avoiding the release of land which makes a significant contribution to the Green Belt and the purposes of including land within it.

Appendix 2: Employment Land OAN report

Policy CPA04
(Points Picked up
in Sunnary rep

St Helens Borough Local Plan 2020 – 2035 Submission Draft

Representations on behalf of Peel Holdings (Land and Property) Limited

Review of St Helens' Objectively Assessed Employment Needs

March 2019



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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum) ² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflects needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.

1.7 Of particular concern is that:

- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
- The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
- Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
- The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
 - Section 2: The Assessed Need for Employment Land provides an overview of the ELNS Addendum and recommended employment land OAN;
 - Section 3: Strategic Economic Drivers and Growth Aspirations provides an
 overview of the economic policy context and growth aspirations established by
 Government, the Liverpool City Region (LCR) Combined Authority and St Helens
 Council;
 - Section 4: Impact of the Constrained Land Supply examines the influences of past policy approaches and land supply on take up and economic growth;
 - Section 5: Drivers of Current and Future Logistics Demand examines the
 evolution of logistics market and implications for the supply of and demand for
 employment land in the North West.

- Section 6: Review of the Employment Land OAN recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- Section 7: Conclusions and Policy Implications sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms "...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 "continues to be low, limited by immediately available land supply" 10.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered "...to be a better representation of growth unencumbered by land shortages"¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions
Period 1997-2017	135.0	Based on 4.5 ha/yr
Period 1997-2012	174.0	Based on 5.8ha/yr
Growth period 1998-2008	225.0	Based on 7.5ha/yr

Source: ELNS, 2015 and ELNS Addendum, 2019

2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of 'transformational developments' planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the 'do something' scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 40 ha to 55 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of 'the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI'¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being "a better representation of the actual growth level if the market is without significant land supply constraints"15

Table 2.2: Updated Employment Land Needs 2012 - 2037

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Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- Using a land take-up scenario to estimate the baseline employment land needs figure is 2.13 considered to be a reasonable approach in principle. It is critical, however, that:
 - the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- It is accepted within the ELNS Addendum that the relative lack of adequate market-2.14 attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting "a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole" 17, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
 - The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need
 partly by reference to current market demand it does not put in a Plan in place
 which enables that demand to be satisfied. It therefore fails to satisfy its own
 assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 5 of this report with reference to:
 - The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a "vibrant and growing economy, a flourishing private sector and a highly skilled population" 18.
- 3.2 At a national level, the Government's goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that 'improving productivity is vital to building an economy fit for the future' 19. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government's Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country's economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough's location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

21 Ibid, paragraph 4.12.1

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

Realising the Growth Ambition for the Liverpool City Region

3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"22

- 3.9 The LCR Growth Strategy confirms the intention to ensure "the creation of over 100,000 additional jobs in the Liverpool City Region by 2040". It recognises that this growth will build upon a period of "economic renaissance with a diversifying economy of internationally-oriented markets and businesses".
- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"23.

- Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented 3.11 investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.
- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² lbid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

- Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"²⁵
- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:
 - "Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"
- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that "St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market".

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government's own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

²⁸ National Planning Policy Framework, MHCLG, 2019

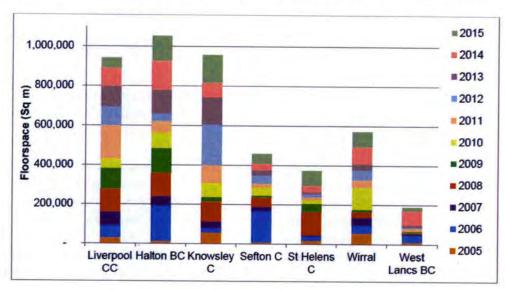
4. The impact of historic land supply constraints

4.1 As widely acknowledged in the evidence base, the borough's constrained land supply is considered to have acted as a significant constraint to economic growth and investment:

"...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...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"²⁹.

4.2 This is evidenced in the analysis of comparative take up presented within the LCR SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15, paragraph 2.11

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

- 4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:
 - 1997-2012;
 - 1998-2008; and
 - 1997-2017.
- 4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

- 4.5 Policy direction over much of the 1997 to 2017 period was provided by:
 - the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
 - The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
 - the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).
- 4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was "to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor building on opportunities created by the M62 link and at the existing Haydock Industrial Estate.
- 4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that "Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development" ³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that "the majority" of the UDP's allocated employment sites were:
 - "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network" ³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) 'to enable St Helens to compete with other regions for inward investment'³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ Ibid, p45

³⁸ Ibid, p46

- 4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.
- 4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:
 - "the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) 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"³⁹
- 4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.
- 4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

- 4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.
- 4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.
- 4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

- 4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:
 - administrative and support services;
 - health;
 - land transport, storage and post (which is taken to represent the logistics and distribution sector); and
 - professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

	ELNS Take up Scenario periods					
	1997-2012		1997-2015		1998-2008	
Sector	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	8.0	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 2015/16.
- 4.13 The EDNS states that "the success of Omega over the last three years has been a key feature of the local economy" Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:
 - "The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options"⁴³.
- 4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "high quality strategic business developments"⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "contribute to economic opportunity and growth in the wider sub region", affirming that "proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

¹⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:

"Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62".

- 4.21 It is of note that "planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region"⁵¹, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
 - Site 2EA, Florida Farm North, Slag Lane, Haydock. This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - Site 3EA, Land North of Penny Lane, Haydock. This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough's employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ lbid, paragraph 2.7

4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand is it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land OAN.
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

22

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
 - the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up at across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

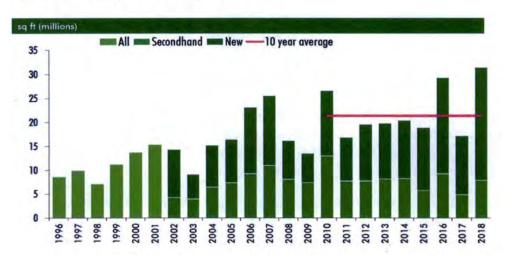


Figure 5.1: UK logistics take-up, 1996 - 2018*

*Note: CBRE logistics data covers units of over 100,000 sq ft only

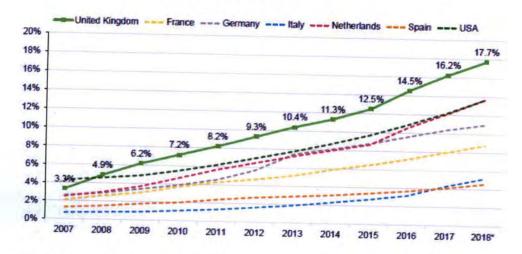
- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

% of total take-up ■ Food retail ■ Non retail occupiers 45% 40% 35% 0.9% 18.3% 31.7% 15.0% 29.1% 30% 5.2% 25% 0.6% 20% 15% 10% 5% 2012 2013

Figure 5.2: Online retail's contribution to the UK logistics take-up

5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can been seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

- Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017^{56} .
- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest 58. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West 59 of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

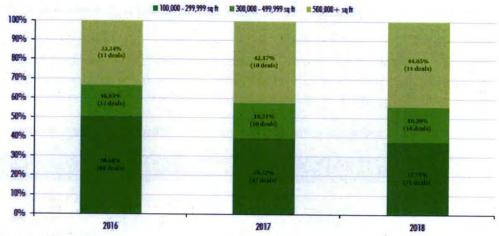
5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

⁵⁶ Retail Gazette (2018) https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/ (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

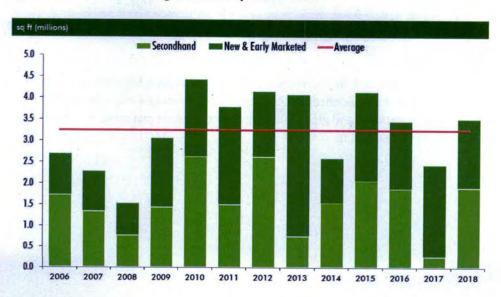
⁵⁹ Pitney Bowes; Oxford Economics (2018)

Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 - 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased
Apr 2010	Royal Mail	19,680	211,834
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590
Aug 2013	Brakes Brothers	18,426	198,336
Nov 2014	Travis Perkins Plc	58,570	630,442
Nov 2015	The Hut Group	63,731	685,994
Dec 2016	Amazon	33,166	356,996
Jul 2018	Royal Mail	32,516	350,000
Total		240,358	2,587,192
The second secon			

Source: CoStar, 2019

5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼
ВооНоо	North West	700,000 + expansion
DHL	M6 North West	700,000
L'Oréal	Manchester	600,000 + expansion
Stobart	M6 Corridor	600,000
IKEA	M6/M62 Corridor	500,000 + expansion
Ocado	North West	350,000 +
Makita	North West	350,000
c/o CBRE	M6 North West	200,000 – 400,000
c/o Avison Young	North West	200,000 - 300,000
CDDF 2010		

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

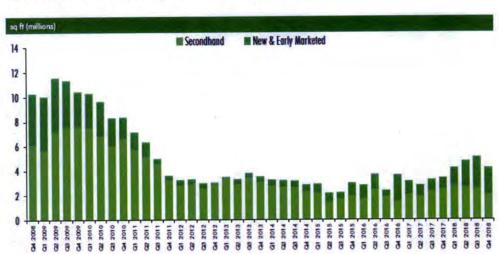


Figure 5.6: North West logistics availability, 2008 - 2018

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200
Courses CDDF 2010	

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being "oven ready" for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also "oven ready", but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Co	rridor	
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established submarket areas.
- Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
 - The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on "prime" development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months' when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of "oven ready" consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough's OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
 - a baseline (land take-up scenario) need of 135 174 ha; and
 - additional land demand associated with major projects of 55 65 ha.
- Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses' anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

• The inadequacy of the borough's historic land supply. It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

The sectors driving employment growth. Over the period from 1997-2012
employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0%
across the LCR and wider UK. In contrast, the relatively strong local performance
in the 1998-2008 period is evident, with St Helens (0.9%) performing better than
the LCR (0.8%). It is notable that employment growth in the logistics sector was
higher in St Helens over the period from 1998 to 2008, coinciding with improved
availability of larger scale sites.

Influences on future take up

- The growth of the online retail market. As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- The strong longer-term employment land take-up rates in Warrington. Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- The degree to which demand is being met within the North West region.
 CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.
- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
 - the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
 - "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more proeconomic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

63 Ibid, para 8.62

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market driven by e-commerce and the need for large floorplate units and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
 - a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	На
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	На	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
 - take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	На	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

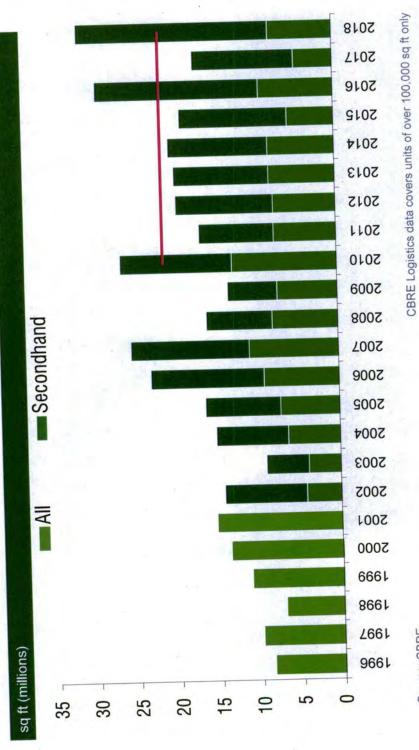
FEBRUARY 2019

UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

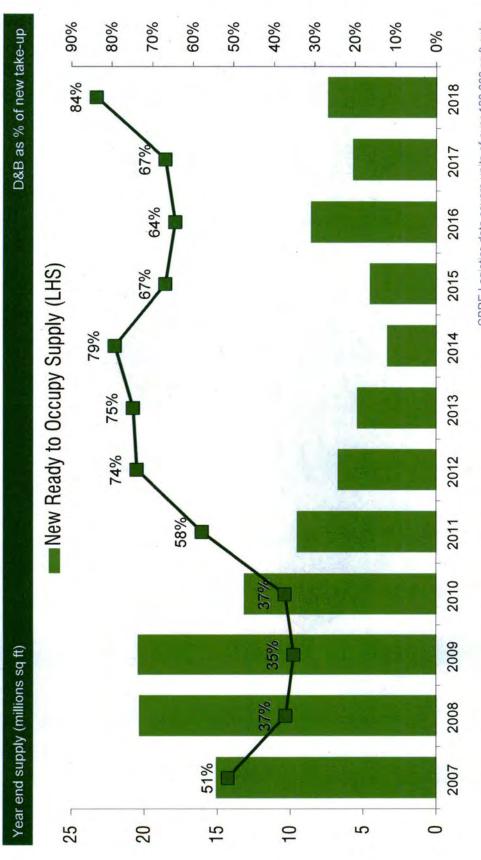
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
 - In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



Source: CBRE



DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 - 2018

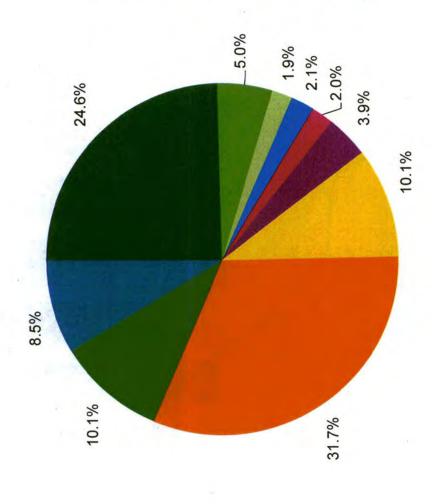


CBRE Logistics data covers units of over 100,000 sq ft only

CBRE



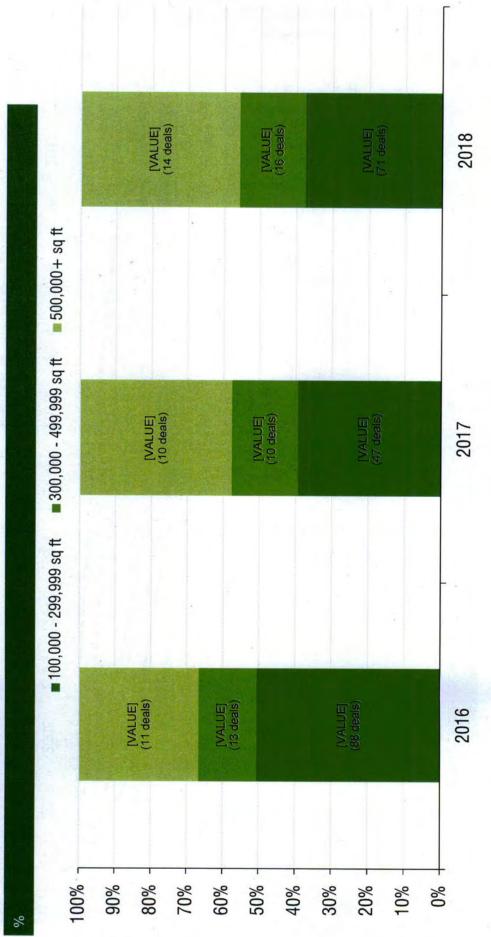
UK LOGISTICS TAKE-UP BY SECTOR 2018



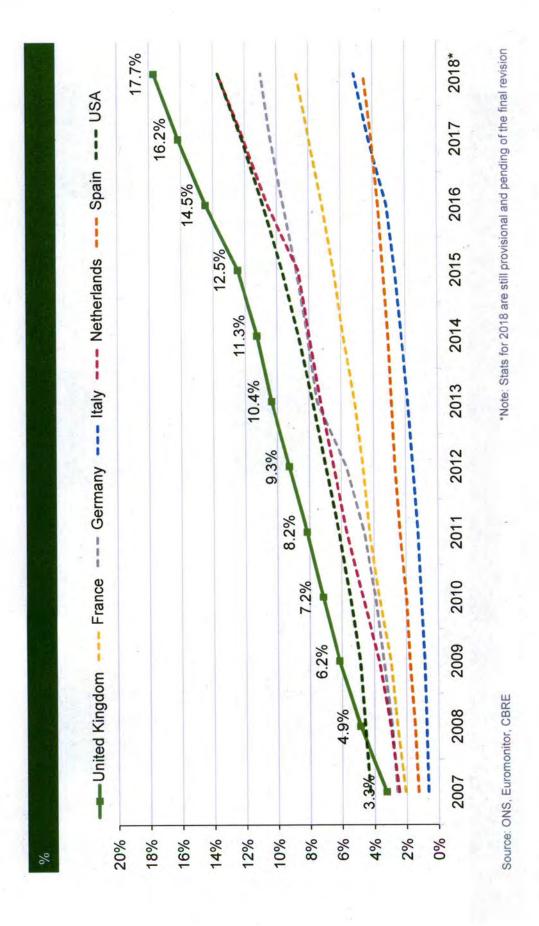
- ■3PL/
- Distribution
 Other
 manufacturing
 Construction
- Motor industry
- Food industry
- Post and
- Parcels Retail Food
- Retail Online

PERCENTAGE OF SPACE TAKEN AND NUMBER OF DEALS BY SIZEBAND IN THE UK

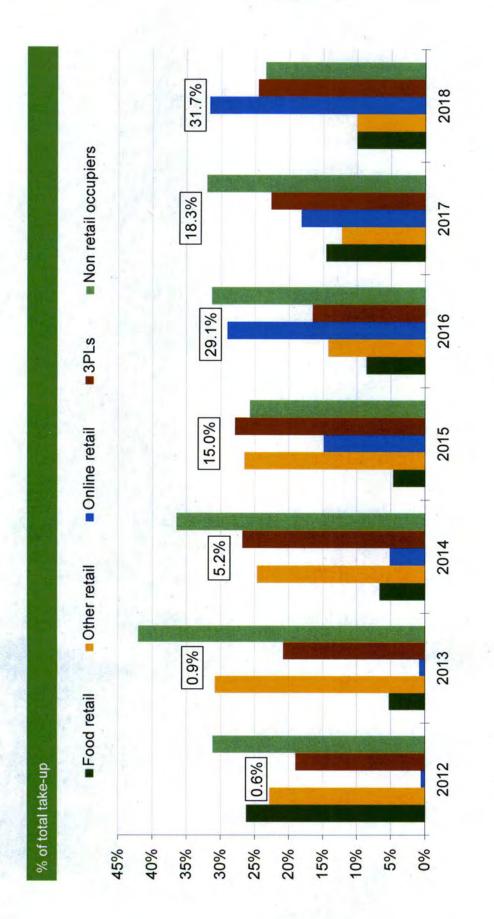




ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 - 2018



RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 - 2018



*Note: Stats for 2018 are still provisional and pending of the final revision

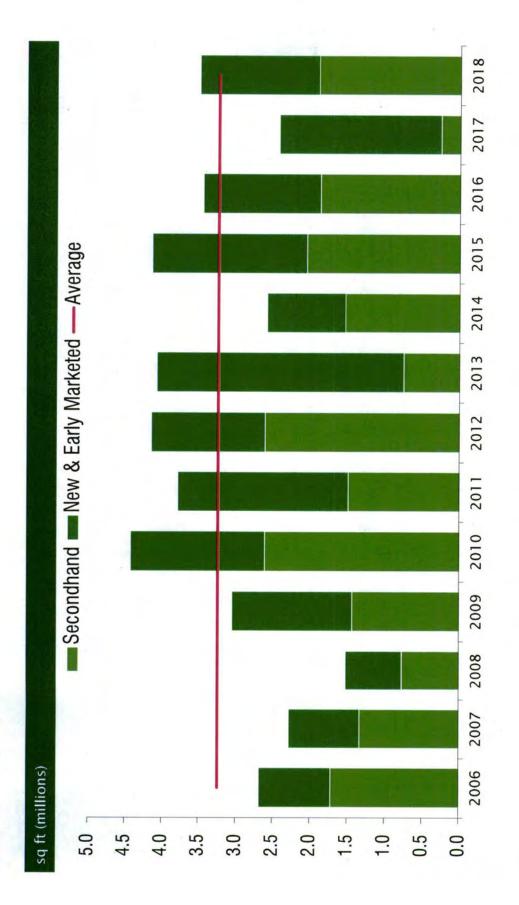
Source: ONS, Euromonitor, CBRE



NORTH WEST LOGISTICS TAKE-UP



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- · CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

Address	Town	Occupier	Size (sd ft)	Comments
Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent





NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Comments	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf	Existing unit Oct 2018 10 years £5.25 psf	Existing unit Oct 2018 15 years £6.40 psf
Size (sq ft)	370,000	353,102	333,000
Occupier	Kammac	Go Outdoors	Kinaxia
Town	Skelmersdale	Middlewich	Trafford Park
Address	Unit 3&4 M58	Middlewich 353	K333

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

NORTH WEST CURRENT DEMAND

KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
 - There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

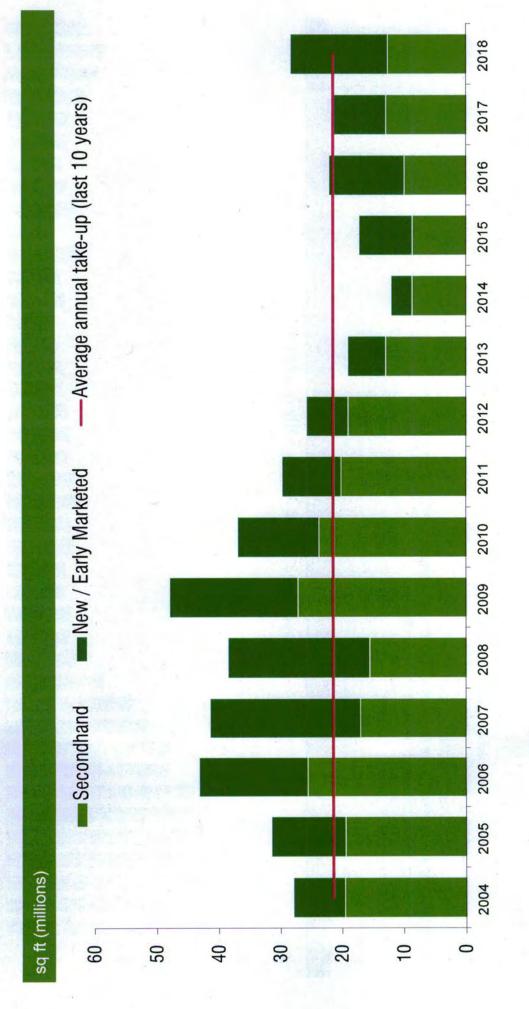
Size (sq ft) Comments	500,000 + expansion FH preferred. Occupation within 2 years. years. Colliers acting	600,000 + expansion LH. Occupation within 2 years. Colliers acting	350,000 + LH/FH. M6/M62. Gerald Eve acting	700,000 LH. New contract led requirement for European customer.	700,000 + expansion FH preferred. Ongoing requirement due to to growth of business. P3 Surveyors acting	200-400,000 LH requirement for US client. Timing 2020	350,000 . FH/LH. New build only.	200-300,000 LH. Grade A facility for PLC client	600,000 LH. Expansion of Warrington facility
Search Area	M6/M62 corridor	Manchester	North West	M6 North West	North West	M6 North West	North West	North West	M6 corridor
Occupier	IKEA	L'Oréal	Ocado	DHL	ВооНоо	c/o CBRE	Makita	c/o Avison Young	Stobart



UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018

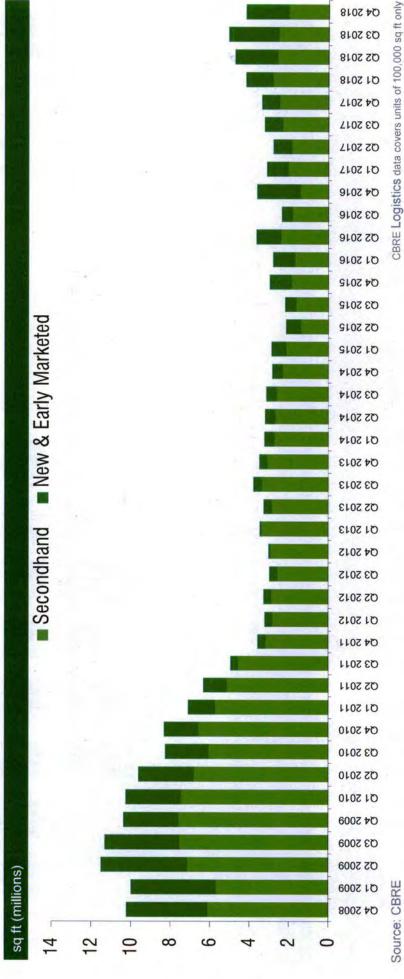


CBRE Logistics data covers units of 100,000 sq ft only



NORTH WEST LOGISTICS AVAILABILITY 2008 - Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) representing sub 12 months' supply
 - Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
 - Grade A stock under construction is 1.21m sq ft (5 units)





SPECULATIVE LOGISTICS
AVAILABILITY



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

· As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)

A further 5 units are under construction providing 1.21m sq ft (see table on next page)

Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

		,			
SIZE (SQ FT)	149,148	216,410	236,915	216,410	375,000
ADDRESS	Unit F2, Multiply, Bolton	Kingsway 216 Rochdale	Crewe 240, Crewe	Kingsway 216 Rochdale	375, Logistics North Bolton
SIZE (SQ FT)	110,000	110,000	130,000	137,865	148,856
ADDRESS	Q110, Crewe	Academy, Knowsley	Unit 1, Evolution Park, Salford	Unit 2, Omega, Warrington	H2, Heywood Point Heywood



NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

SIZE (SQ FT)	107,210	183,669	185,500	208,000	523,500
ADDRESS	Liberty Park, Widnes	Unit 4, Omega, Warrington	Unit 1, Frontier Park, Blackburn	Venus 200, Knowsley	525 Haydock

NORTH WEST
EXISTING LOGISTICS
AVAILABILITY



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

Current availability for BIG BOX distribution units is limited

Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings - totalling 1.77m sq ft

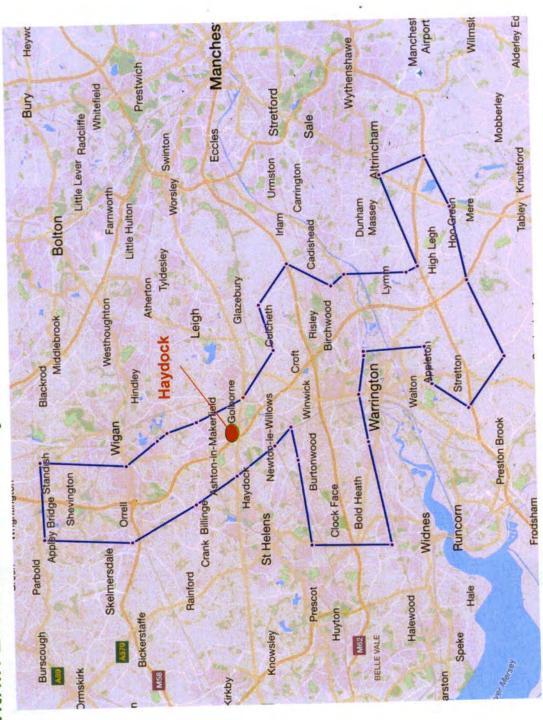
building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional Design & Build opportunities

ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000



NORTH WEST LAND AVAILABILITY

NORTH WEST LAND AVAILABILITY
Sites within 2.5km of Motorway Junctions



NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
 - Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
 - Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
 - Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icxn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMIMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	250,000	30	Land	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorsey Lane Widnes	200,000	40	Land	Former manufacturing facility with B2/8 use	Former manufacturing facility Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses Site likely to target similar uses
Haydock Lane Haydock	300,000	50	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft



NORTH WEST LAND AVAILABILITY NORTH WEST WIDE SITES

Detailed below are "oven ready sites" with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.

L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11

miles from the M6 motorway

K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK

Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million		Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	200,000	22	Land	Outline planning permission	Outline planning permission Site currently being sold to new developer



HOW HAYDOCK POINT CAN SATISFY FUTURE OCCUPIER DEMAND



HAYDOCK POINT - SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
- Haydock Point can satisfy future demand assuming consented
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - Haydock Point can procure a single building of this size
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - Haydock Point can satisfy this need
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - Haydock Point can satisfy demand of this size
- Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including single building in excess of 500,000 sq ft
- Haydock Point can accommodate a single unit up to 990,000 sq ft
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - Haydock Point can satisfy these needs
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic
- Haydock Point is located immediately adjacent to Junction 23, M6 motorway
- · The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - Haydock Point is ideally located to satisfy these demands

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only



Turley Office 1 New York Street Manchester M1 4HD



PO1029



Representation

() - LPAOS (2) - LPAOS (3) - LPAOU

Mrs. K.F.Johnson, 390, Newton Road, Lowton, Warrington. Cheshire. WA3 1JD.

I hereby make a representation regarding Local Plan2020-2035(submission draft.)
Section 5 Justified?

The total plan involves the removal from the Green Belt of hundreds of acres of open and farmed agricultural land which

a) is the breathing space and recreational area for residents of the adjacent densely developed areas of Wigan metro (Greater Manchester,) Newton le Willows and Warrington(Winwick) in fact it is now our only such area.

b) it is the only land separating Warrington, St. Helens and Wigan, thus serving the original purpose of Green Belt. Without it and with the current rate of development, the areas would merge. To do this can not be justified by either jobs or housing numbers which are over estimated and where brownfield sites and alternative locations are available and could be used. Thus the permanent loss of open land and its benefits for public health far outweighs any speculative financial advantage.

Effective ?

the policies would be more effective if the site allocations were based on brownfield sites and were not likely to put increased traffic on the local road network which is already saturated (and not in the St. Helens administrative area.)

Consistent with national policy?

Some policies are in conflict with the NPPF e,g,
Section 11-effective use of land,

7. St. Helens should have suitable policies for protecting what countryside and other natural spaces remain in order to fulfil their obligation to protect the health of its electorate.













The council's forecasts for employment needs are excessive and would cause over supply of employment spaces, possibly causing congestion with workforces having to travel in.

The established residential areas are already surrounded by warehouse and distribution centres and any further ones simply add to the mayhem.

I trust that these facts will be seriously considered.

Yours

8 D 3

faithfully

Mrs

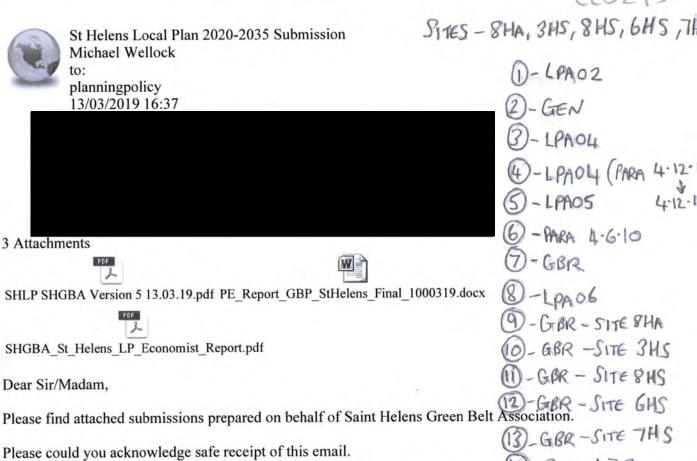
KathleenF

Johnson

PO1030

- PARA 1-7-2

CL0243



We have also been alerted to the fact that the consultation period may be extended - if so, we reserve the right to make further submissions during this period should the need arise.

The Association will be seeking to appear at any future examination.

Yours faithfully,

Michael

Michael Wellock Managing Director

Kirkwells
Lancashire Digital Technology Centre
Bancroft Road
Burnley
Lancashire
BB10 2TP

St. Helens Borough Local Plan 2020-2035 Submission Draft - SHGBA Response, March 2019

St. Helens Borough Local Plan 2020-2035 Submission Draft Response on behalf of St. Helens Green Belt Association (SHGBA)

March 2019



The Planning People

3.0 Economy

National Planning Policy

- 16. National planning policy sets out that "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." (NPPF, paragraph 80).
- 17. When preparing planning policies NPPF paragraphs 81 and 82 provide further guidance for plan-makers:
 - 81. 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 (see paragraph 10 of this submission for our comments on 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.
 - 82. Planning policies and decisions should recognise and address the specific locational requirements of different 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."

Economic Forecasts

18. The Council's planning policies for the economy are extremely aspirational. They are based on data derived from the *Oxford Economics Forecasts*. These forecasts are themselves optimistic and are based on the premise that by releasing Green Belt land, economic growth will be stimulated. This is not an objectively assessed need, it is speculative supply with a view to creating a need. This conclusion is borne out in the work of Dr Athey (economist, My Local Economy) who states:



"Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight." (Athey, paragraph 2.1)

19. Rather than set out an Objectively Assessed Need (OAN) using projections from past data e.g. BE Group's baseline figures in the *Employment Land Needs Study Addendum Report* (January 2019), the Council have taken that objectively assessed baseline figure and added in land that can only come forward by an inflated assessment of need in the Submission Draft. This is largely based on the assumed need to meet projected jobs forecasts, which themselves are based on assumptions about land supply. A circular argument. The Council need to return to a more realistic OAN for employment land based on the evidence available from past take-up rates.



Transparency

20. A further problem arises in relation to the Oxford Economic Forecasts in that they are not publicly available. Dr Athey concludes:



"However, whilst the Oxford Economics forecasts are integral to the Liverpool City Region SHELMA, and are referred to in documents supporting the SHBC Local Plan, and the LEP Economic Growth Strategy, the forecasts are not available publicly to appraise. The forecasts, data, and details about assumptions or methodology are not publicly available and were not available to support the SHBC draft local plan or the public consultation. (Athey, paragraph 4.2)

- 21. Formal enquiries made to the Council have not resulted in the Oxford Economics Forecasts or data being provided or made public. This data is not publicly available for scrutiny, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available. The Council were asked to supply these documents on a number of occasions, but the documents/data have not been provided.
- 22. This raises a soundness issue. To be sound plans have to be justified i.e. "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence",. Without access to supporting evidence the Council cannot demonstrate that the plan is justified. The Submission Draft is based on evidence that is not verifiable and, therefore, the Plan cannot be demonstrated to be sound without publication of the evidence used as its basis.

Circular Argument

23. As well as issues of transparency it is clear that the Council's forecasts are based on a circular argument with assumptions about land supply, including release of Green Belt being justified to provide employment. As Dr Athey quotes from the Employment Land Needs Study Addendum Report, January 2019 (pages 10-11):

> "This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt

sites around Haydock, west of Omega and Parkside West and East. (Athey, paragraph 2.3)

- 24. What is clear is that by the Council setting the criteria for the "Transformational Growth" Scenario in the *Oxford Economics Forecasts*, including the use of Green Belt land to provide employment sites, one of a range of policy scenarios has been chosen instead of an objectively based needs assessment of economic and market trends. This creates a circular argument more land for employment creates more jobs, more jobs justify more land for development. There are other reasonable alternatives, based on other policy scenarios, but these are rejected as not aspirational enough e.g. using the long-term land take-up for the period 1997-2015 of 4.9 hectares per year.
- 25. The Council's own evidence prepared by BE Group is revealing in this respect. In the *Employment Needs Study Addendum Report* (Amended January 2019). This states that the OAN for employment land was "forecast by looking at past take-up and considering job forecasts for the study" (Employment Needs Study *Addendum Report*, paragraph 1.3) (my emphasis). As has already been stated, the job forecasts include assumptions about significant future release of land through planning policy (see *Employment Needs Study Addendum Report*, paragraph 2.17). BE Group then compare this jobs figure with past land take-up and conclude that the area of land to be developed on that basis would not be sufficient to deliver the jobs forecast: a circular argument. Assumptions about future land provision having influenced the job forecast are then employed to justify release of additional employment land.
- 26. This reasoning can be seen in the Addendum Report. In that document the BE Group state that "past take-up of employment land was considered to be the preferred basis of forecasting of the employment OAN". They then point out that this past take-up has not been constant and that some periods had less growth. This is not considered to be unusual, the local economy and national economy goes through periods of growth and recession.

- 27. BE Group choose two long-term take-up periods 1997-2015 and 1997-2012. The former had a land take-up rate of 4.9 hectares per year, the latter 5.8 hectares per year.
- 28. The period 2011/12-2015 is excluded from the 1997-2012 baseline on the basis that "there was a lack of adequate market attractive supply. This is "cherry picking" data to suit the Council's aspirations. As previously stated, economies have periods of growth and contraction. The long-term 1997-2015 data should be used.
- 29. In the *Addendum Report* these two long-term take-up periods are then used to generate two baseline figures for the 25-year period, 2012-2037. On the 4.9 hectares per year scenario this generates a baseline of 122.5 hectares, but a 5-year buffer is added of 24.5 hectares, leading to a total figure for 2012-2035 of 147.0 hectares. Using the 5.8 hectares per year, with a 5-year buffer results in 174.0 hectares 2012-2035. To these two baseline figures of 147.0 and 174.0 an additional land for major projects is added of 30-40 hectares.
- 30. A more reasonable approach would have been to have taken an evidence based i.e. using the long-term 1997-2015 past take-up rate figure for the OAN. This reflects the ups and downs of the economic cycle. The OAN figure for employment land should be 4.9 hectares per year, 122.5 hectares over St Helens suggested plan period.
- 31. However, a further issue with the Council's approach is the use of the time period 2018-2037 for employment land needs. This is different from the housing figures (2016-2035) and different again from the plan period on the cover of the Submission Draft 2020-2035. Unfortunately, what has gone has gone. St Helens cannot plan for the past. There is nothing in national planning policy to say that employment land, perceived as having in some way been missed out on by St Helens, should be rolled forward into future plans. This may have some rationale and support in national policy when considering housing, for example, say to meet the assessed need of people living in the Borough whose housing needs are currently unmet. But, with regard to employment land, no such argument

pertains. The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, and using 4.9 hectares the baseline OAN should be a total of 93.1 hectares.



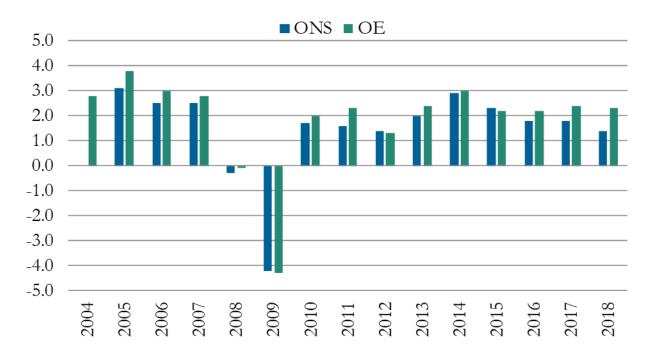
- 32. The Addendum Report also adds in assumptions for large strategic sites. It is accepted such sites may need to come forward and be added to the employment land requirement in Policy LPA04, 2. Such sites should be identified, if in Green Belt, as part of a selective review of Green Belt to meet the need for such strategic sites.
- 33. There is no justification for an additional five years of supply, this is an arbitrary figure and should be deleted.

3

Out of Date Forecasts

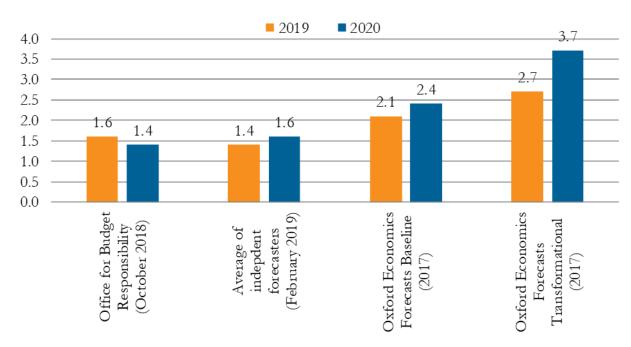
- 34. The third issue relates to the Council's economic forecasting made in 2016. They are now out of date. Compared with the evidence on economic growth over recent years (2015 to 2017), they are extremely over optimistic.
- 35. The Oxford Economic model uses national economic growth rates to inform forecast local growth rates. For example, Oxford Economics has projected the UK rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018).
- 36. Similarly, looking forward, in 2016, Oxford Economics forecast 2.1 per cent growth for 2019 and 2.4 per cent growth for 2020 in its baseline scenario, and 2.7 per cent and 3.7 per cent growth in 2019 and 2020 respectively in its Transformational Growth Scenario. Both scenario forecasts are very optimistic compared to recent forecasts by the Office for Budget Responsibility (in October 2018) of 1.6 per cent growth in 2019 and 1.4 per cent growth in 2020. These are shown in Figures 2 and 4 of Dr Athey's submission reproduced below as Figures 1 and 2:

Figure 1. Comparing Oxford Economics Forecast with Office for National Statistics Estimates of GVA Growth (Per Cent)



Source: Office for National Statistics and Oxford Economics.

Figure 2. Comparing Short-Run Forecasts for the UK Economy



Source: Office for Budget Responsibility, HM Treasury, Oxford Economics.

- 37. In addition, the 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context. By way of contrast, Oxford Economics' 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs and employee jobs. This further undermines their perceived accuracy (Dr Athey, paragraph 2.8)
- 38. The overall conclusion to draw from the Council's evidence and the interpretation of that evidence base is that:
 - a) It is not transparent and, therefore, not independently verifiable;
 - b) It is based on out dated data;
 - It is based on a circular, self-fulfilling argument that results from a flawed methodology.

For these reasons a lower OAN for employment land of 93.1 hectares 2016 to 2035 is justified. Larger sites to meet strategic needs can come forward. At this time, as part of a selective review of Green Belt.

Warehousing and Logistics

39. The Submission Draft seeks to secure significant growth in the warehousing and logistics industries. Table 4.2 of the Submission Draft identifies this as within the range 110-155 hectares. There are now considerable doubts about the data underpinning this approach.

Port Freight

40. The UK port freight forecasts used in the Liverpool City Region SHELMA are significantly out of date, this data was published in 2006. A 2019 forecast is now available from the Department of Transport. This forecast projects a much lower growth in freight volumes than the 2006 forecasts. In total, the 2006 forecasts projected a 12 per cent growth in UK port freight compared to an actual contraction of -13 per cent. The 2006 forecasts projected a growth of 12 per cent in port freight between 2020 and 2030, compared to the 2019 forecasts projecting

a single digit 8 per cent growth rate. (Dr Athey, paragraph 2.11). Dr Athey concludes that:

"Since port traffic will drive the need for storage and distribution facilities, this lower forecast for port freight will have significant implications for land use demand, and renders the assumptions behind the LCR SHELMA and St Helens Local Plan questionable." (Dr Athey, paragraph 4.22).

41. This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.



Vehicle Production

42. Further assumptions about the growth of UK vehicle production are also out of date, with vehicle production in steep decline since January 2017. This renders the assumptions in the SHELMA and Submission Draft concerning the growth of port freight movements and storage arising from motor vehicles redundant (Dr Athey paragraphs 2.12, 4.24 and 4.25). This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.



Sub-Regional Context

- 43. Based on the Addendum Report (paragraph 2.14) the forecasts for B8 requirements in the Liverpool City Region are for of 321 hectares of additional land by 2033.
- 44. If St Helens were to maintain a 16% share of such uses, which it currently has, this would equate to 51 hectares of land for B8 uses by 2033. with a two-year difference in time period (2033 as opposed to 2035). The Local Plan seeks to significantly exceed Liverpool City Region figures, based on Table 4.2 of the Submission Draft by in the region of 100-200%. Whilst it is part of the Council's aspirational strategy there is no evidence that this approach has been discussed or agreed at City Region level.





St. Helens Borough Local Plan 2020-2035 Independent Economist's Report

Evidence by Dr. Glenn Athey

11 March 2019

Athey Consulting Limited, Trading as "My Local Economy" Registered in England and Wales No. 7771760
Registered office address: 25 Claygate Road, Cambridge, CB1 9JZ
Contact: glenn@mylocaleconomy.org, Tel: 01223 655181 / 07799 880317
www.mylocaleconomy.org

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1. Expertise in economics and economic development

- 1.1. My name is Glenn Athey, I have a Ph.D in regional economic development, a Master's degree in European Political Economy and a BA honours degree in Economics and Geography. I am the Managing Director at Athey Consulting Limited (trading as My Local Economy) which has been trading for seven years, and specialises in all aspects of economic analysis, statistical analysis, and local and regional economic development. I am particularly experienced in analysing the characteristics and performance of local economies and labour markets, and formulating and advising on local economic and skills strategies. I have 23 years of experience as an economist, policy and strategy advisor working in this field.
- 1.2. I have also undertaken economic analysis and strategy development work for the London Borough of Haringey, Hertfordshire County Council, Stockton-on-Tees Borough Council, Harlow Council, Luton Borough Council, Norfolk County, Suffolk County, West of England Combined Authority, Skills Development Scotland and the Welsh Government.
- 1.3. I have a track record working as a senior officer within economic development organisations.

 Between 2001 and 2011 I worked as: Director of Research and Intelligence at the East of England Development Agency, Head of Business Economics and Policy at London Development Agency, and Senior Labour Market Economist at Scottish Enterprise.
- 1.4. I have worked with economic forecasting consultancies since 2001, including Cambridge Econometrics, Oxford Economics, Experian and the University of Warwick. I have commissioned forecasts as a public sector client, used them, and sat on the technical working groups for the development or regional and local forecasting models.
- 1.5. Since 2011 I have been the Managing Director of Athey Consulting Limited, a consultancy trading as "My Local Economy", which offers expert advice, analysis, and support to local and regional authorities.,
- 1.6. **This paper** contains discussion of the economic forecasts and assumptions that drive the St Helens Borough Council Draft Local Plan.
- 1.7. The evidence which I have prepared and provided in this report is true and I confirm that the opinions expressed are true and professional opinions.

Dr. Glenn Athey

11 March 2019

2. Employment land policies in the Draft Local Plan

ST HELENS BOROUGH COUNCIL EMPLOYMENT LAND NEEDS STUDY, ADDENDUM REPORT, AMENDED JANUARY 2019

- 2.1. The 2019 Employment Land Needs Study considers the Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA), and states that "The Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) (March 2018) considered the objective assessed needs for large scale B8 warehousing and distribution (over 100,000 sq ft) for the Liverpool City Region which forecast the land use requirements to 2043 of the large-scale B8 sector, defined as in excess of 9,000 sqm (approximately 100,000 sq ft).
- 2.2. The 2015 Employment Lands Need Study was revised in the January 2019 Addendum report, but it is noted that there is an identified future demand for logistics and warehousing land and premises as a result of the Parkside Intermodal Rail Freight Exchange proposals on the former Parkside Colliery Site a development of up to 750,000 sq ft. Section 1.4, p2. "The additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends was also forecast. As a result, the following OAN for employment land was forecast. The significant majority (about 80 percent) of the additional land demand generated through the major projects was forecast to be for B8 warehousing uses." This has been informed by a study undertaken by AECOM the Parkside Logistics and Rail Freight Interchange Study.
- 2.3. The Employment Land Needs Study Addendum Report, January 2019 also refers to the role of economic forecasts in informing employment land policy proposals (Quoting from p.10.) "Oxford Economics prepared a jobs growth scenario forecast for the LEP which took account of transformational developments that are intended for the region in coming years. This work has informed the SHELMA. The key findings of this study are:

The Liverpool City Region is forecast to have an additional 109,200 jobs by 2040 over 2016 levels in the growth scenario, compared to 34,100 additional jobs in the baseline scenario.

- St Helens is projected to have the second highest additional employment (behind only Liverpool City) in the growth scenario, with an additional 18,700 jobs projected for the borough. This compares to an additional 4,700 jobs over the same period for the baseline scenario. This took account of the large amount of potential B1/2/8 employment sites in St. Helens.
- Significantly, the growth scenario assumes strong growth in the 2016-26 period before tapering off, reflecting the development activity anticipated over the coming decade.
- The growth scenario assumes a higher in-migration to the City Region.
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through the transformational developments.
- The largest growth sectors by employment numbers in St Helens in the growth scenario are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200

- jobs) reflecting the key drivers of employment in the market (data provided in spreadsheets supporting this document).
- Manufacturing in St Helens is anticipated to grow by 2,000 jobs, a significant change from the
 baseline scenario which assumed declining employment in this sector. This is driven by the
 increasing availability of strategic industrial land in St Helens in coming years that would
 encourage manufacturers to locate to the borough, with further logistics infrastructure and
 warehousing capacity allowing for improved conditions to deliver goods to markets."
- 2.4. Further quoting from p10-11. Of the Employment Land Needs Study Addendum Report, January 2019: "This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt sites around Haydock, west of Omega and Parkside West and East."
- 2.5. What is clear is that if this statement is valid, that St Helens Borough Council itself set the criteria for the "Transformational Growth" Scenario including use of green belt land. This is a subjective policy scenario, and not an objectively based needs assessment of economic and market trends.
- 2.6. What is not clear is the role that the Oxford Economics Transformational Growth Scenario has played in in forming employment land allocations this is not transparent or clear from the Draft Local Plan and its supporting documents.
- 2.7. What is perhaps clear is that St Helens Borough Council have directly informed a set of economic aspirations, that have now become joint planning policy that endorses allocating new employment sites on green belt land and assuming these are built and occupied.

FIGURE 1: PROPOSED EMPLOYMENT LAND ALLOCATION FOR ST HELENS DRAFT LOCAL PLAN Table 7 – Breakdown of Employment Land Need by Type

Employment Type	Hectares
B1(a) Office	10-15
B1(b) Research and development	1-4
B1(c) Light Industry	15-20
B2 General industrial	55-70
B8 Storage and Distribution	110-155
Total employment needs	190-239

Source: BE Group analysis

3. Analysing the economic statistics and projections

INTRODUCTION

- 3.1. The starting point for assessing the need for employment land is the 2016 Liverpool LEP Transformational Growth Scenario Forecast. As far as I am aware (as the original forecasts are not available publicly as is pointed out throughout this briefing paper) this is based on local authority submissions concerning complete take-up of most of existing employment sites, and aspirations to designate more employment sites. There were also baseline forecasts based on existing trends in the Liverpool City Region and the UK.
- 3.2. However, whilst the Oxford Economics forecasts are integral to the Liverpool City Region SHELMA, and are referred to in documents supporting the SHBC Local Plan, and the LEP Economic Growth Strategy, the forecasts are not available publicly to appraise. The forecasts, data, and details about assumptions or methodology are not publicly available and were not available to support the SHBC draft local plan or the public consultation.
- 3.3. The Oxford Economics "Transformational Growth" forecasts (2016) are all quoted as being critical in informing assumptions about industry growth, jobs growth and the demand for employment land but are nowhere to be accessed. Formal enquiries made to SHBC and Liverpool City Region LEP have not resulted in the Oxford Economics forecasts or data being provided or made public. This document is not publicly available, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available.
- 3.4. For other non-statutory spatial strategies and local plans, forecasts are usually made publicly available. For example:
 - > Joint Core Strategy Cheltenham, Tewkesbury and Gloucester https://www.jointcorestrategy.org/examination – see Assessment of updated economic forecasts, Nathaniel Lichfield and Partners, April 2014
 - > Cambridgeshire and Peterborough Joint Strategic Planning Unity http://cambridgeshire.wpengine.com/document-library/ see under "Economy and Employment (this has now been superseded by development of non-statutory spatial strategy for the GC Combined Authority area)

USE OF FORECASTS

- 3.5. Generally forecasts are used cautiously as an indication of the possible direction of travel. Use of detailed figures from forecasts for decision making is generally discouraged.
- 3.6. Policy-on forecasts, those that are modelled from a policy outcome (such as build out of employment land) are generally only used to understand scenarios. As a planning tool they are limited as there are so many barriers to development and building work. It is also doubtful to assume policy continuity for the next 25 years after all, city regions and mayors are a relatively recent policy change (last 5 years), where in the past 15 years we have seen RDAs, LEPs, and combined authorities subsequently be implemented, largely to replace each other, not to mention the lack of parliamentary majority government twice in the past nine years, and the Brexit issue emerging in 2016.

- 3.7. It is unusual to develop a 'policy-on' forecast solely from land use / building and capital investments. This is because these types of scenarios can be highly speculative and subjective i.e. determining final occupation and use of a site particularly challenging for a greenfield site. Another reason is because the viability of these sites is often highly contingent on transport access, infrastructure and services. For example getting electricity supply to a new employment site on greenfield land can often take many years.
- 3.8. There have been significant changes since the 2016 forecasts, and use of forecasts generally. The elephant in the room is Brexit, and the impact that this will have on future economic growth and structural changes in the economy. Virtually all reliable economic models predict a negative effect of Brexit on the UK economy, on any outcome from full customs union and free market to hard Brexit. The negative consequences for northern regions, including LCR, are more severe.
- 3.9. The 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context.

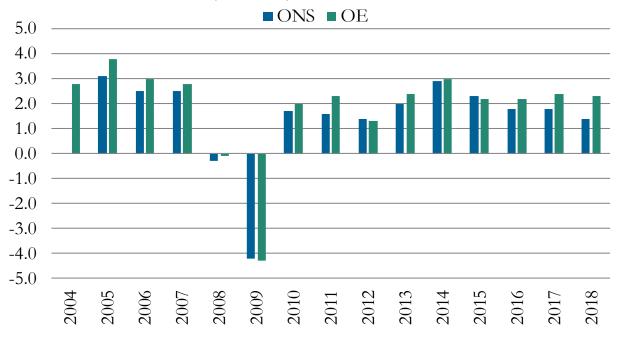
HISTORIC GROWTH TRENDS

Economic growth (economic output)

- 3.10. The Oxford Economics 2016 forecasts lack credibility compared to past and current trends they are far too optimistic. As can be seen in Figure 2 and 3, Oxford Economics has consistently been more optimistic in its estimates of UK economic growth, compared to official estimates. This is especially apparent in recent years, where Oxford economics has projected the rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018).
- 3.11. As apparent from **Figure 4**, from the 2016 forecasts, Oxford Economics's outlook for 2019 and 2020 in both the baseline scenario and transformational scenario is very optimistic compared to more recent official forecasts by the Office for Budget Responsibility and the Average of Independent Forecasters as calculated by HM Treasury in February 2019. The Oxford Economics Transformational Scenario projects twice the rate of growth for 2019 and 2020 compared to the average of independent forecasters.
- 3.12. Oxford Economics's 2016 baseline projections of economic growth for the Liverpool City Region do not credibly relate to historical trends, and the transformational growth scenario seems very optimistic. **Figure 6** examines the ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area. For small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum. Even the baseline forecasts seems to significantly stretch credibility being twice the rate of growth of the most recent 5-year period.
- 3.13. Economic forecasts can become dated very quickly, particularly if the economic environment is volatile, with unexpected events and new dynamics. Of course, Brexit is a significant uncertainty. Economic Forecasts do not cope well with unexpected events or 'paradigm shifts' in the global and domestic economic environment or dynamics. Economic Forecasts are also frequently updated, as new or revised historical data becomes available which happens on a regular basis –

for some datasets annually, for others quarterly. It is no surprise that the Oxford Economics 2016 Forecast looks optimistic, as they are almost three years out of date. It is unusual not to have these forecasts updated more regularly for statutory planning policies. It is therefore sensible to be cautious when basing land use and planning policies on economic forecasts – it is better to take a reasonable view based on past trends, rather than to expect transformational growth.

FIGURE 2: COMPARING OXFORD ECONOMICS FORECAST WITH OFFICE FOR NATIONAL STATISTICS ESTIMATES OF GVA GROWTH (PER CENT)



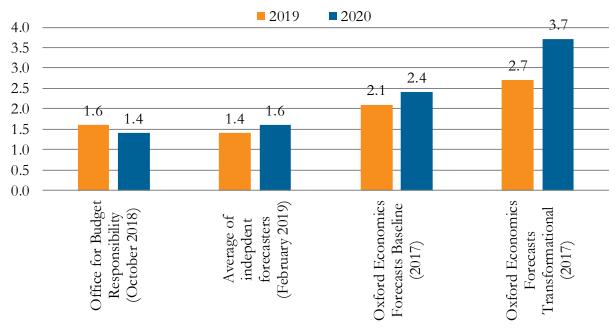
Source: Office for National Statistics and Oxford Economics.

FIGURE 3: COMPARING OXFORD ECONOMICS FORECAST WITH OFFICE FOR NATIONAL STATISTICS ESTIMATES OF GVA GROWTH (PER CENT)

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
ONS	2.3	3.1	2.5	2.5	-0.3	-4.2	1.7	1.6	1.4	2.0	2.9	2.3	1.8	1.8	1.4
OE	2.8	3.8	3.0	2.8	-0.1	-4.3	2.0	2.3	1.3	2.4	3.0	2.2	2.2	2.4	2.3

Source: Office for National Statistics and Oxford Economics.

FIGURE 4: COMPARING SHORT-RUN FORECASTS FOR THE UK ECONOMY



Source: Office for Budget Responsibility, HM Treasury, Oxford Economics.

FIGURE 5: NOMINAL RATES OF ECONOMIC GROWTH (THAT DO NOT ACCOUNT FOR INFLATION)

NOMINAL GROWTH I	RATES (THAT D	O NOT	ACCOU	NT FOR	INFLATI	ION)				
						Compound Annual Growth					
			Ann	ual grow	Rates						
	2013	2014	2015	2016	20-year 1998- 2017	10-year 2008- 2017	5-year 2013- 2017				
Liverpool City Region											
(NUTS2 Merseyside)	2.5%	5.0%	4.0%	-0.1%	2.8%	3.1%	1.4%	2.3%			
East Merseyside NUTS2	4.5%	7.9%	5.0%	-1.3%	3.0%	3.7%	2.1%	2.9%			
Liverpool NUTS2	0.9%	5.0%	3.0%	-0.1%	3.0%	3.4%	1.4%	2.2%			
Sefton NUTS2	1.3%	0.8%	3.7%	2.9%	1.4%	1.9%	0.4%	1.7%			
Wirral NUTS2	3.7%	3.3%	4.5%	0.0%	3.3%	2.3%	1.1%	2.2%			
UK	3.8%	4.6%	2.8%	3.8%	3.6%	3.6%	2.4%	3.0%			

FIGURE 6: ACTUAL REAL ECONOMIC (GVA) GROWTH RATES (THAT ACCOUNT FOR INFLATION - WITH NATIONAL GDP DEFLATORS APPLIED) VERSUS PROJECTED GROWTH RATES (OXFORD ECONOMICS

									FORECA GROWTH	ST GVA H RATES:			
ACTUAL GVA GROWT	H RATE	S (OFFI	CE FOR	NATIO	NAL STA	ATISTICS))		OXFORD				
		ECONOMICS 20				MICS 2017							
	Compound Annual Growth												
			OF GROV	WTH									
			Ann	ual grow	th rates			Rates	2016-2040				
						20-year	10-year	5-year	Baseline	Trans-			
						1998-	2008-	2013-		forma-			
	2013	2014	2015	2016	2017	2017	2017	2017		tional			
Liverpool City Region													
(NUTS2 Merseyside)	0.6%	3.3%	3.5%	-2.1%	0.6%	1.2%	0.0%	1.0%	1.9%	2.5%			
East Merseyside NUTS2	2.6%	6.0%	4.6%	-3.3%	0.8%	1.9%	0.6%	1.6%					
Liverpool NUTS2	-1.0%	3.2%	2.5%	-2.1%	0.8%	1.6%	-0.1%	0.9%					
Sefton NUTS2	-0.6%	-0.9%	3.2%	0.8%	-0.8%	0.1%	-1.0%	0.5%	_				
Wirral NUTS2	1.8%	1.6%	4.0%	-2.1%	1.1%	0.4%	-0.4%	0.9%					
UK	1.9%	2.9%	2.4%	1.7%	1.4%	1.8%	0.9%	1.7%					

Jobs growth

3.14. By contrast, Oxford Economics's 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs in **Figure 7** and employee jobs in **Figure 8**.

FIGURE 7: WORKFORCE JOBS

									OXFORD						
									ECONOM	ICS					
									FORECAS	TS –					
									ANNUAL	RATE					
							nual rate of	growth	th OF GROWTH						
	Annual ra	tes of jobs	growth			(compound	rate)	2016-2040							
									Baseline	Trans-					
						CAGR 18-	CAGR 10-	CAGR 5-		forma-					
Area	2013	2014	2015	2016	2017	year	year	year		tional					
Liverpool City Region	0.6%	2.0%	2.6%	2.0%	3.3%	0.9%	1.0%	2.0%	0.2%	0.6%					
Halton	-9.8%	9.1%	3.3%	4.8%	6.2%	1.2%	1.8%	4.6%							
Knowsley	1.6%	4.7%	3.0%	4.3%	-2.8%	1.3%	1.2%	1.8%							
Liverpool	1.6%	2.0%	2.7%	3.0%	2.2%	1.4%	0.9%	2.0%							
Sefton	6.2%	-1.9%	0.0%	2.0%	3.9%	-0.2%	0.5%	0.8%							
St. Helens	-2.9%	3.0%	-1.5%	0.0%	6.0%	0.8%	0.6%	1.5%							
Wirral	1.8%	-0.9%	6.3%	-1.7%	6.0%	0.6%	1.1%	1.9%							
England	1.6%	2.8%	3.1%	1.9%	1.8%	1.0%	1.3%	1.9%							

FIGURE 8: EMPLOYEE JOBS 2009 TO 2017

	BRES met	hodology I						"New" BR	ES Method	lology II
Area	2009	2010	2011	2012	2013	2014	2015	2015	2016	2017
Liverpool City	584,000	576,000	579,500	584,000	577,500	591,000	598,500	604,500	617,500	626,500
Region										
Halton	51,000	52,500	54,000	59,000	51,500	55,000	55,500	55,500	59,000	61,500
Knowsley	55,500	55,500	54,500	56,000	58,000	61,000	64,000	64,500	67,000	64,500
Liverpool	228,500	222,500	228,500	226,500	227,500	230,500	230,000	231,500	240,500	242,500
Sefton	92,500	91,500	88,000	85,000	87,000	87,000	89,500	91,000	92,000	92,000
St. Helens	60,500	60,000	59,500	61,500	59,500	60,000	59,000	60,000	59,000	62,500
Wirral	96,000	94,500	95,000	96,000	94,000	98,000	100,500	101,500	99,500	103,500
England	23,064,500	23,085,500	23,073,000	23,256,000	23,561,000	24,286,000	24,867,500	25,044,500	25,477,500	25,820,500
Great Britain	26,642,500	26,581,500	26,593,500	26,753,000	27,096,500	27,931,500	28,533,500	28,738,500	29,214,000	29,550,000

FIGURE 9: ANNUAL RATES OF EMPLOYEE JOBS GROWTH

									(OXFORD	
									ECO	NOMICS	
									FORE	CASTS -	
									ANNUAL RAT		
		Average annual rate of							OF G	ROWTH	
		Annu	al rates o	of jobs gr	owth		growth (con	pound rate)		2016-2040	
							CAGR 5-	CAGR 3-	Baseline	Trans-	
							year 2011-	year 2015-		form-	
Area	2012	2013	2014	2015	2016	2017	2015	2017		ational	
Liverpool City Region	0.8%	-1.1%	2.3%	1.3%	2.2%	1.5%	0.6%	1.2%	0.2%	0.6%	
Halton	9.3%	-12.7%	6.8%	0.9%	6.3%	4.2%	0.5%	3.5%			
Knowsley	2.8%	3.6%	5.2%	4.9%	3.9%	-3.7%	3.3%	0.0%			
Liverpool	-0.9%	0.4%	1.3%	-0.2%	3.9%	0.8%	0.1%	1.6%			
Sefton	-3.4%	2.4%	0.0%	2.9%	1.1%	0.0%	0.3%	0.4%			
St. Helens	3.4%	-3.3%	0.8%	-1.7%	-1.7%	5.9%	-0.2%	1.4%			
Wirral	1.1%	-2.1%	4.3%	2.6%	-2.0%	4.0%	1.1%	0.7%			
England	0.8%	1.3%	3.1%	2.4%	1.7%	1.3%	1.5%	1.0%			
Great Britain	0.6%	1.3%	3.1%	2.2%	1.7%	1.2%	1.4%	0.9%			

Industry growth trends

- 3.15. Figures 11 to 12 examine historical official data from the Office for National Statistics concerning employment by detailed industry. Trends for 2011-2015 (five-year) and 2015-2017 (three-year) are analysed. Data is available from 2009 to 2017 but there is no continuity of data after 2015, because of a change in the methodology used by the Business Register and Employment Survey after 2015. The Business Register and Employment Survey (BRES) is the official source of employee and employment estimates by detailed geography and industry. The methodology for the survey was changed from 2016 to account more accurately for solely PAYE based businesses with less than 20 employees.
- 3.16. According to **Figure 11**, the main growth industries for employment in Liverpool City Region include:
 - 86: Human health activities (+6,000 employees 2011-2015, or +2.0 per cent)
 - 56: Food and beverage service activities (+5,000 employees 2011-2015, or +3.1 per cent)
 - 45: Wholesale and retail trade and repair of motor vehicles and motorcycles (+ 4,000 employees 2011-2015, or +4.1 per cent)
 - 78 : Employment activities (employment agencies) (+3,500 employees 2011-2015, or +4.4 per cent)
 - 29 : Manufacture of motor vehicles, trailers and semi-trailers (+3,000 employees 2011-2015, or + 13.2 per cent)
 - 52: Warehousing and support activities for transportation (+3,000 employees 2011-2015, or +5.6 per cent)
 - 85 : Education (+3,000 employees 2011-2015, or +1.1 per cent)
- 3.17. The main declines in employment occurred in the following industries in Liverpool City Region:
 - 84 : Public administration and defence; compulsory social security(-9,000 employees 2011-2015, or -4.3 per cent)
 - 58: Publishing activities(-4,750 employees 2011-2015, or -23.1 per cent)
 - 64 : Financial service activities, except insurance and pension funding(-2,000 employees 2011-2015, or -4.1%)
- 3.18. According to **Figure 12**, the main growth industries for employment in St Helens Borough include:
 - 78: Employment activities (1,200 employees 2011-2015, or +26.0 per cent)
 - 46: Wholesale trade, except of motor vehicles and motorcycles (1,000 employees 2011-2015, or +7.6 per cent)
 - 52 : Warehousing and support activities for transportation (600 employees 2011-2015, or +5.3 per cent)
 - 80: Security and investigation activities (600 employees 2011-2015, or +15.4 per cent)
 - 93 : Sports activities and amusement and recreation activities (600 employees 2011-2015, or +15.4 per cent)
 - 47 : Retail trade, except of motor vehicles and motorcycles (500 employees 2011-2015, or +1.5 per cent)
- 3.19. The main declines in employment occurred in the following industries in St Helens Borough:
 - 81 : Services to buildings and landscape activities (-1500 employees 2011-2015, or -19.7 per cent)
 - 23 : Manufacture of other non-metallic mineral products (-800 employees 2011-2015, or -7.8 per cent)

- 49: Land transport and transport via pipelines (-600 employees 2011-2015, or -5.6 per cent)
- 25 : Manufacture of fabricated metal products, except machinery and equipment (-375 employees 2011-2015, or -7.8 per cent)
- 43: Specialised construction activities (-400 employees 2011-2015, or -3.6 per cent)
- 88 : Social work activities without accommodation (-400 employees 2011-2015, or -3.6 per cent)
- 42 : Civil engineering (-300 employees 2011-2015, or -per cent)
- 70 : Activities of head offices; management consultancy activities (-300 employees 2011-2015, or -9.0 per cent)
- 3.20. In sum, there has been significant jobs growth in wholesale, warehousing and transportation activities in LCR. However there has also been significant jobs growth in office based activities, and in industrial activities in LCR. In St Helens, jobs growth in Storage and Distribution has been more than offset by loss in Light Industrial jobs. This is reflected in **Figure 10** below which summarises jobs change by planning use class.

FIGURE 10: CHANGE IN EMPLOYEE JOBS BY USE CLASS 2011 TO 2015

	LIVERP	OOL CITY	REGION	1	ST HEL	ENS		
			2011-	2011-			2011-	2011-
JOBS BY USE CLASS	2011	2015	2015	2015	2011	2015	2015	2015
A retail	106,600	115,000	8,300	7.8%	11,100	12,100	1,000	9.2%
B1(a) Office	90,600	99,900	9,300	10.3%	8,200	10,300	2,100	25.1%
B1(b) R&D	3,500	3,800	300	7.1%	200	200	0	-19.1%
B1(c) Light Industrial	17,900	20,000	2,200	12.1%	2,700	1,200	-1,600	-56.6%
B2 General industrial	58,200	58,800	600	1.1%	7,000	6,100	-900	-13.0%
B8 Storage and Distribution	31,000	38,500	7,500	24.2%	4,900	6,500	1,600	32.0%
Sui Generis use	14,500	15,900	1,300	9.2%	2,700	2,100	-600	-20.9%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 11: CHANGE IN EMPLOYEE JOBS BY INDUSTRY – LIVERPOOL CITY REGION

LIVERPOOL CITY REGION EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total	Total 2011	Total 2015	Growth 2009- 2015		Annual growth rate 7-year 2009-2015	Annual growth rate 5- year 2011- 2015
01 : Crop and animal production, hunting etc	300	200	300	0	0	0.0%	3.5%
02 : Forestry and logging	0	0	0	0	0	25.8%	38.0%
03 : Fishing and aquaculture	0	0	0	0	0		21.7%
05 : Mining of coal and lignite	0	0	0	0	0		-
06: Extraction of crude petroleum and natural gas	0	0	0	0	0		-
07 : Mining of metal ores 08 : Other mining and quarrying	100	0	100	100	100		32.0%
09 : Mining support service activities	0	0	0	0	0		32.070
10 : Manufacture of food products	7,000	6,500	6,000	-1,000	-500		-1.6%
11 : Manufacture of beverages	500	500	500	-100	-100		-2.1%
12 : Manufacture of tobacco products	0	0	0	0	0		-
13 : Manufacture of textiles	900	700	800	-100	200	-0.9%	4.2%
14 : Manufacture of wearing apparel	300	300	100	-200	-200		-18.1%
15: Manufacture of leather and related products	0	0	0	0	0		21.7%
16: Manufacture of wood and of products	1,400	1,400	700	-700	-700		-13.9%
17: Manufacture of paper and paper products	700	800	1,000	400	300		5.9%
18: Printing and reproduction of recorded media 19: Manufacture of coke and refined petroleum products	2,800 400	2,800 400	1,900 200	-900 -200	-900 -200		-7.4% -11.3%
20 : Manufacture of coke and refined petroleum products	6,000	6,000	4,300	-1,800	-1,800		-6.7%
21 : Manufacture of basic pharmaceutical products preparations	2,800	2,300	2,300	-1,800	-1,000		0.0%
22 : Manufacture of rubber and plastic products	2,500	2,400	2,500	0	100		1.0%
23 : Manufacture of other non-metallic mineral products	2,800	4,500	2,800	0	-1,800		-9.4%
24 : Manufacture of basic metals	800	900	500	-300	-400		-11.1%
25 : Manufacture of fabricated metal products	6,000	5,500	5,000	-1,000	-500	-2.6%	-1.9%
26 : Manufacture of computer, electronic and optical products	1,000	1,600	1,100	100	-500		-7.1%
27 : Manufacture of electrical equipment	1,500	2,400	2,400	900	0		0.0%
28 : Manufacture of machinery and equipment n.e.c.	2,400	2,300	2,100	-300	-100		-1.1%
29: Manufacture of motor vehicles, trailers and semi-trailers	4,000	3,500	6,500	2,500	3,000		13.2%
30 : Manufacture of other transport equipment 31 : Manufacture of furniture	2,300 1,600	2,300 1,000	2,100 1,000	-100 -700	-100 -100		-1.1% -1.0%
32 : Other manufacturing	3,000	800	1,100	-1,900	300		7.1%
33 : Repair and installation of machinery and equipment	1,500	1,000	1,500	0	500		8.4%
35 : Electricity, gas, steam and air conditioning supply	900	900	1,000	200	100		2.1%
36 : Water collection, treatment and supply	300	100	100	-200	0		3.7%
37 : Sewerage	300	300	300	-100	0	-3.7%	-1.9%
38: Waste collection, treatment and disposal activities	1,900	2,800	3,000	1,100	300		1.8%
39: Remediation activities and other waste management services	0	0	200	200	200		-
41 : Construction of buildings	8,500	5,000	5,500	-3,000	500		1.9%
42 : Civil engineering	3,500	3,800	2,300	-1,300	-1,500		-9.7% 0.0%
43 : Specialised construction activities 45 : Wholesale and retail trade and repair of motor vehicles and	15,500	15,500	15,500	0	0	0.0%	0.0%
motorcycles	7,500	6,500	6,500	-1,000	0	-2.070	0.070
46: Wholesale trade, except of motor vehicles and motorcycles	16,500	18,000	22,000	5,500	4,000	4.2%	4.1%
47 : Retail trade, except of motor vehicles and motorcycles	64,000	63,500	66,000	2,000	2,500	0.4%	0.8%
49 : Land transport and transport via pipelines	11,000	13,000	14,500	3,500	1,500		2.2%
50 : Water transport	500	600	300	-300	-400		-16.1%
51 : Air transport	600	700	700	100	2 000	/-	0.0%
52: Warehousing and support activities for transportation	8,500	9,500	12,500	4, 000	3,000		5.6%
53 : Postal and courier activities 55 : Accommodation	6,000 5,500	3,500 6,500	4,000 7,000	-2 , 000	500 500		2.7% 1.5%
56 : Food and beverage service activities	33,000	30,000	35,000	1,500 2,000	5,000		3.1%
58 : Publishing activities	1,400	6,500	1,800	400	-4,800		-23.1%
59: Motion picture, video and television programme production,		-				-3.8%	-1.0%
sound recording and music publishing activities	1,300	1,000	1,000	-300	-100		
60: Programming and broadcasting activities	0	200	100	0	-100		-19.7%
61 : Telecommunications	4,500	4,300	4,500	0	300		1.1%
62: Computer programming, consultancy and related activities	6,000	5,500	7,000	1,000	1,500		4.9%
63 : Information service activities	700	800	1,000	400	200		4.6%
64 : Financial service activities	11,500	10,500	8,500	-3,000	-2,000		-4.1%
65: Insurance, reinsurance and pension funding	3,300	3,000	2,100	-1,100	-900		-6.7% 1.10/
66 : Activities auxiliary to financial services and insurance activities 68 : Real estate activities	5,500 9,500	4,500 8,500	4,3 00 9,0 00	-1,300 -500	-300 500		-1.1% 1.1%
69 : Legal and accounting activities	11,500	13,500	15,000	3,500	1,500		2.1%
70 : Activities of head offices; management consultancy activities	6,0000	6,500	7,000	1,000	500		1.5%

LIVERPOOL CITY REGION EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009- 2015	Growth 2011-2015	Annual growth rate 7-year 2009-2015	Annual growth rate 5- year 2011- 2015
71 : Architectural and engineering activities; technical testing and	7,000	6,500	7,000	0	500	0.0%	1.5%
analysis	7,000	*	Ť	ŭ			
72 : Scientific research and development	1,000	2,000	1,500	600	-500	6.7%	-5.6%
73 : Advertising and market research	1,100	1,300	1,300	100	0	1.5%	0.0%
74: Other professional, scientific and technical activities	1,600	1,500	2,300	600	800	4.8%	8.4%
75 : Veterinary activities	1,000	400	1,000	100	600	0.7%	20.1%
77 : Rental and leasing activities	2,500	4,000	4,300	1,800	300	7.9%	1.2%
78 : Employment activities	10,500	14,500	18,000	7,500	3,500	8.0%	4.4%
79: Travel agency, tour operator and other reservation service and related activities	700	1,100	1,000	300	-200	4.5%	-3.3%
80 : Security and investigation activities	3,000	4,000	5,500	2,500	1,500	9.0%	6.6%
81 : Services to buildings and landscape activities	9,000	11,000	12,500	3,500	1,500	4.8%	2.6%
82 : Office administrative, office support and other business support activities	6,000	7,500	10,000	4,000	2,500	7.6%	5.9%
84 : Public administration and defence; compulsory social security	49,500	45,500	36,500	-13,000	-9,000	-4.3%	-4.3%
85 : Education	61,500	55,500	58,500	-3,000	3,000	-0.7%	1.1%
86 : Human health activities	59,000	58,500	64,500	5,500	6,000	1.3%	2.0%
87 : Residential care activities	18,500	20,500	20,000	1,500	-500	1.1%	-0.5%
88 : Social work activities without accommodation	24,500	26,000	24,500	0	-1,500	0.0%	-1.2%
90 : Creative, arts and entertainment activities	1,000	800	1,600	700	800	8.0%	15.2%
91 : Libraries, archives, museums and other cultural activities	2,000	2,100	1,500	-500	-600	-4.0%	-6.7%
92 : Gambling and betting activities	3,500	3,500	3,800	300	300	1.0%	1.4%
93 : Sports activities and amusement and recreation activities	10,000	6,500	7,500	-2,500	1,000	-4.0%	2.9%
94 : Activities of membership organisations	3,800	4,500	4,000	300	-500	0.9%	-2.3%
95 : Repair of computers and personal and household goods	1,400	1,000	1,000	-400	0	-4.4%	0.0%
96 : Other personal service activities	6,500	5,500	6,500	0	1,000	0.0%	3.4%
97 : Activities of households as employers of domestic personnel	0	0	0	0	0	-	-
98: Undifferentiated goods- and services-producing activities of	0	0	0	0	0	-	-
private households for own use	0	0	0	0	0		
99 : Activities of extraterritorial organisations and bodies	0	0	0	0	0	-	-
Column Total	584,000	579,500	598,500	14,500	19,000	0.4%	0.6%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 11: CHANGE IN EMPLOYEE JOBS BY INDUSTRY – ST HELENS BOROUGH

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009- 2015		Annual growth rate 7-year 2009-2015	rate 5-
01 : Crop and animal production, hunting etc	200	200	300	0	100	1.5%	4.6%
02 : Forestry and logging	0	0	0	0	0	-	-
03 : Fishing and aquaculture	0	0	0	0	0	-	-
05 : Mining of coal and lignite	0	0	0	0	0	-	-
06 : Extraction of crude petroleum and natural gas	0	0	0	0	0	-	-
07 : Mining of metal ores	0	0	0	0	0	-	-
08 : Other mining and quarrying	0	0	0	0	0	-9.4%	0.0%
09 : Mining support service activities	0	0	0	0	0	-	-
10 : Manufacture of food products	400	500	400	0	-100	0.9%	-2.3%
11 : Manufacture of beverages	0	0	0	0	0	-	0.0%
12 : Manufacture of tobacco products	0	0	0	0	0	-	-
13 : Manufacture of textiles	300	200	300	-100	0	-2.6%	2.6%
14 : Manufacture of wearing apparel	0	100	0	0	0	-14.5%	-27.5%
15: Manufacture of leather and related products	0	0	0	0	0	2.00/	
16: Manufacture of wood and of products	300	300	200	-100	-100	-3.8%	-6.9%
17: Manufacture of paper and paper products	100	100	200	100	100	16.2%	20.1%
18: Printing and reproduction of recorded media	200	300	200	0	-100 0	-1.7%	-8.5%
19 : Manufacture of coke and refined petroleum products	500	300	200	-300	-100	11.00/	E 20/
20 : Manufacture of chemicals and chemical products 21 : Manufacture of basic pharmaceutical products preparations	0	300	200	-300	-100	-11.0% -100.0%	-5.3%
22 : Manufacture of rubber and plastic products preparations	400	400	500	100	100	1.7%	2.4%
23 : Manufacture of other non-metallic mineral products	1,400	2,300	1,500	100	-800	1.7%	-7.8%
24 : Manufacture of basic metals	200	400	200	0	-200	-1.2%	-11.3%
25 : Manufacture of fabricated metal products	1,100	1,100	800	-400	-400	-5.6%	-7.8%
26 : Manufacture of computer, electronic and optical products	100	100	100	-400	-100	-0.9%	-11.7%
27 : Manufacture of electrical equipment	200	300	300	200	0	9.7%	1.6%
28 : Manufacture of machinery and equipment n.e.c.	400	400	400	0	-100	0.0%	-2.5%
29 : Manufacture of motor vehicles, trailers and semi-trailers	100	100	100	0	0	-4.4%	9.9%
30 : Manufacture of other transport equipment	0	100	100	100	0	-	5.9%
31 : Manufacture of furniture	200	100	100	-200	0	-18.0%	-6.5%
32 : Other manufacturing	300	100	100	-200	0		4.6%
33 : Repair and installation of machinery and equipment	100	100	100	0	0	2.6%	5.9%
35 : Electricity, gas, steam and air conditioning supply	0	100	0	0	0	-6.5%	-12.9%
36: Water collection, treatment and supply	0	0	0	0	0	-	-
37 : Sewerage	100	200	100	0	-100	-3.5%	-14.1%
38: Waste collection, treatment and disposal activities	200	400	400	200	0	10.2%	1.4%
39: Remediation activities and other waste management services	0	0	100	100	100	-	-
41 : Construction of buildings	1,400	1,000	900	-500	-100	-6.6%	-2.2%
42 : Civil engineering	600	700	300	-300	-300	-8.4%	-12.9%
43 : Specialised construction activities	3,300	2,300	1,900	-1,400	-400	-7.6%	-3.6%
45 : Wholesale and retail trade and repair of motor vehicles and motorcycles	1,100	1,000	1,100	0	100	0.0%	2.4%
46: Wholesale trade, except of motor vehicles and motorcycles	2,100	2,300	3,300	1,100	1,000	6.3%	7.6%
47: Retail trade, except of motor vehicles and motorcycles	6,500	6,500	7,000	500	500	1.1%	1.5%
49: Land transport and transport via pipelines	2,300	2,500	1,900	-400	-600	-2.6%	-5.6%
50 : Water transport	0	0	0	0	0	-	-
51 : Air transport	0	0	0	0	0	-	-
52: Warehousing and support activities for transportation	2,000	2,100	2,800	800	600	4.7%	5.3%
53 : Postal and courier activities	700	600	500	-200	-100	-3.7%	-1.9%
55 : Accommodation	300	300	400	100	0	3.5%	1.5%
56 : Food and beverage service activities	3,800	3,000	3,300	-500	300	-2.0%	1.6%
58 : Publishing activities	0	400	200	200	-200	23.8%	-12.9%
59: Motion picture, video and television programme production,	100	100	100	0	0	-2.6%	0.0%
sound recording and music publishing activities		0	0				
60 : Programming and broadcasting activities	100	200	200	200	100	0.407	40.007
61 : Telecommunications	400	300	200	-200	-100	-8.4%	-10.2%
62 : Computer programming, consultancy and related activities	400	500	700	300	300	8.3%	9.2%
63 : Information service activities	100	0	0	-100	0	-25.0%	-19.7%
64 : Financial service activities	900	600	400	-500	-200	-10.9%	-6.2%
65 : Insurance, reinsurance and pension funding	200	100	200	0	0	-100.0%	-100.0%
66 : Activities auxiliary to financial services and insurance activities	200	100	200	0	200	-3.3%	4.6%
68 : Real estate activities	1,000	800	1,000	100	300		5.9%
69 : Legal and accounting activities 70 : Activities of head offices; management consultancy activities	800 700	900 800	800 500	-200	-100 -300	-3.7%	-2.3% -9.0%

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009- 2015		Annual growth rate 7-year 2009-2015	Annual growth rate 5- year 2011- 2015
71 : Architectural and engineering activities; technical testing and	800	800	700	-100	-100		-1.4%
analysis	800	800	700	-100	-100	-1.9/0	-1.4/0
72 : Scientific research and development	0	100	0	0	-100	-100.0%	-100.0%
73 : Advertising and market research	200	200	100	0	-100	-3.1%	-11.4%
74 : Other professional, scientific and technical activities	100	200	200	100	0		3.5%
75 : Veterinary activities	100	100	200	0	100	2.8%	27.7%
77 : Rental and leasing activities	1,000	1,500	1,600	600	100	7.2%	1.6%
78 : Employment activities	1,300	600	1,800	500	1,200	4.9%	26.0%
79: Travel agency, tour operator and other reservation service and related activities	100	100	100	0	0		0.0%
80 : Security and investigation activities	1,100	1,300	1,900	800	600	7.6%	8.4%
81 : Services to buildings and landscape activities	800	2,300	800	0	-1,500	0.0%	-19.7%
82 : Office administrative, office support and other business	300	300	700	300	300	10.4%	14.9%
support activities 84 : Public administration and defence; compulsory social security	3,800	2,800	2,800	-1,000	0	-4.3%	0.0%
85 : Education	5,500	5,000	5,000	-1,000	0		0.0%
86 : Human health activities	3,000	3,000	3,000	-300	0	0.0%	0.0%
87 : Residential care activities	2,300	2,500	2,500	300	0		0.0%
88 : Social work activities without accommodation	2,500	2,300	1,900	-600	-400	-4.0%	-3.6%
90 : Creative, arts and entertainment activities	2,300	2,500	100	000	100	21.9%	43.1%
91 : Libraries, archives, museums and other cultural activities	100	200	200	100	-100	6.0%	-5.6%
92 : Gambling and betting activities	300	300	300	100	100	3.8%	3.4%
93 : Sports activities and amusement and recreation activities	1,000	600	1,100	100	600	1.7%	15.4%
94 : Activities of membership organisations	600	700	400	-200	-300	-4.4%	-9.3%
95 : Repair of computers and personal and household goods	200	100	0	-200	0	-24.3%	-15.6%
96 : Other personal service activities	600	500	700	100	200	1.2%	5.4%
97 : Activities of households as employers of domestic personnel	0	0	0	0	0	-	-
98: Undifferentiated goods- and services-producing activities of	0	0	0	0	0	-	-
private households for own use							
99 : Activities of extraterritorial organisations and bodies	0	0	0	0	0	-	-
Column Total	60,500	59,500	59,000	-1,500	-500	-0.4%	-0.2%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 13: COMPARING NATIONAL EMPLOYMENT GROWTH RATES WITH LCR AND LOCAL GROWTH RATES

GROWTH RATES	_	ı			0 1	I
	Annual growth rate	growth rate	growth	Annual growth rate 5-	growth rate 7-	Annual growth
ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY	7-year 2009-	5-year 2011-	year		year 2009-	
(2-DIGIT SIC) 01: Crop and animal production, hunting etc	2015 0.0%	0.8%	2009-2015 0.0%	3.5%	2015 1.5%	2011-2015 4.6%
02 : Forestry and logging	7.6%	9.0%	25.8%	38.0%	1.3/0	4.0 / 0
03 : Fishing and aquaculture	10.4%	9.9%		21.7%	_	_
05 : Mining of coal and lignite	-16.0%	-21.7%	_	- 21.770	_	-
06: Extraction of crude petroleum and natural gas	0.8%	-2.9%	-	-	-	_
07 : Mining of metal ores	-	-	_	-	-	_
08 : Other mining and quarrying	0.5%	2.1%	8.3%	32.0%	-9.4%	0.0%
09 : Mining support service activities	1.8%	-5.0%	-	-	-	-
10 : Manufacture of food products	0.9%	0.8%	-2.2%	-1.6%	0.9%	-2.3%
11 : Manufacture of beverages	-0.6%	0.8%	-1.5%	-2.1%	-	0.0%
12: Manufacture of tobacco products	-18.6%	-10.4%	-	-	-	-
13 : Manufacture of textiles	-1.6%	-0.2%	-0.9%	4.2%	-2.6%	2.6%
14 : Manufacture of wearing apparel	-1.1%	0.8%	-11.2%	-18.1%	-14.5%	-27.5%
15 : Manufacture of leather and related products	-1.1%	0.0%	21.9%	21.7%	2.00/	
16: Manufacture of wood and of products	0.8%	3.8%	-10.2%	-13.9%	-3.8%	-6.9%
17 : Manufacture of paper and paper products 18 : Printing and reproduction of recorded media	1.3% -1.9%	1.3% -1.6%	6.3% -5.3%	5.9% -7.4%	16.2% -1.7%	20.1% -8.5%
19: Manufacture of coke and refined petroleum products	-1.9%	-5.2%		-11.3%	-1./%	-8.5%
20 : Manufacture of coke and refined petroleum products	-2.9%	-3.2%	-8.2% -4.8%	-11.3% -6.7%	-11.0%	-5.3%
21 : Manufacture of basic pharmaceutical products preparations	-2.1 /0	-3.7%	-2.8%	0.0%	-100.0%	-3.370
22 : Manufacture of basic pharmaceutear products preparations 22 : Manufacture of rubber and plastic products	0.7%	1.6%	0.0%	1.0%	1.7%	2.4%
23 : Manufacture of other non-metallic mineral products	-2.6%	-2.5%	0.0%	-9.4%	1.3%	-7.8%
24 : Manufacture of basic metals	-2.0%	-2.0%	-6.5%	-11.1%	-1.2%	-11.3%
25 : Manufacture of fabricated metal products	0.0%	1.2%	-2.6%	-1.9%	-5.6%	-7.8%
26 : Manufacture of computer, electronic and optical products	-2.3%	-3.4%	1.7%	-7.1%	-0.9%	-11.7%
27 : Manufacture of electrical equipment	1.8%	-0.5%	6.8%	0.0%	9.7%	1.6%
28 : Manufacture of machinery and equipment n.e.c.	0.0%	-1.4%	-1.6%	-1.1%	0.0%	-2.5%
29: Manufacture of motor vehicles, trailers and semi-trailers	1.9%	4.5%	7.2%	13.2%	-4.4%	9.9%
30 : Manufacture of other transport equipment	-0.8%	-0.3%	-0.8%	-1.1%	-	5.9%
31 : Manufacture of furniture	-1.1%	1.0%	-7.4%	-1.0%	-18.0%	-6.5%
32 : Other manufacturing	-2.8%	-3.7%	-13.1%	7.1%	-12.3%	4.6%
33 : Repair and installation of machinery and equipment	2.0%	4.5%	0.0%	8.4%	2.6%	5.9%
35 : Electricity, gas, steam and air conditioning supply	1.0%	1.3%	2.3%	2.1%	-6.5%	-12.9%
36: Water collection, treatment and supply	1.6%	4.0%	-11.2%	3.7%		-
37 : Sewerage	4.3%			-1.9%	-3.5% 10.2%	
38: Waste collection, treatment and disposal activities 39: Remediation activities and other waste management services	2.6% 10.4%	-1.2% 10.8%	6.9%	1.8%	10.2%	1.4%
41 : Construction of buildings	0.4%	2.6%	-6.0%	1.9%	-6.6%	-2.2%
42 : Civil engineering	-1.8%	-0.8%		-9.7%	-8.4%	-12.9%
43 : Specialised construction activities	-0.2%	1.6%		0.0%	-7.6%	-3.6%
45: Wholesale and retail trade and repair of motor vehicles and	1.9%	1.5%		0.0%	0.0%	2.4%
motorcycles	11,5 / 5	11070	2.070	0.075	0.075	2.170
46: Wholesale trade, except of motor vehicles and motorcycles	0.7%	1.0%	4.2%	4.1%	6.3%	7.6%
47 : Retail trade, except of motor vehicles and motorcycles	0.2%	0.9%	0.4%	0.8%	1.1%	1.5%
49: Land transport and transport via pipelines	0.7%	1.6%	4.0%	2.2%	-2.6%	-5.6%
50 : Water transport	2.3%	7.3%	-9.4%	-16.1%	-	-
51 : Air transport	-0.1%	1.5%	1.2%	0.0%	-	-
52: Warehousing and support activities for transportation	4.5%	3.1%	5.7%	5.6%	4.7%	5.3%
53 : Postal and courier activities	-2.3%	0.3%		2.7%	-3.7%	-1.9%
55 : Accommodation	2.6%	1.2%		1.5%	3.5%	1.5%
56 : Food and beverage service activities	1.9%	2.5%	0.8%	3.1%	-2.0%	1.6%
58 : Publishing activities	-1.3%	0.4%	3.5%	-23.1%	23.8%	-12.9%
59: Motion picture, video and television programme production,	1.7%	1.6%	-3.8%	-1.0%	-2.6%	0.0%
sound recording and music publishing activities 60: Programming and broadcasting activities	7.9%	7.00/	15 00/	-19.7%		
61 : Telecommunications	0.0%	7.0% 1.5%		1.1%	-8.4%	-10.2%
62 : Computer programming, consultancy and related activities	4.0%	3.1%	2.2%	4.9%	8.3%	9.2%
63 : Information service activities	4.4%	7.5%	6.3%	4.6%	-25.0%	-19.7%
64 : Financial service activities	-1.3%	-1.2%		-4.1%	-10.9%	-6.2%
65: Insurance, reinsurance and pension funding	-0.5%	-1.5%		-6.7%	-100.0%	-100.0%
66 : Activities auxiliary to financial services and insurance activities	0.6%	0.1%	-3.6%	-1.1%	-3.3%	4.6%
68 : Real estate activities	1.6%	3.6%	-0.8%	1.1%	0.7%	5.9%
69 : Legal and accounting activities	3.3%	3.2%	3.9%	2.1%	0.0%	-2.3%

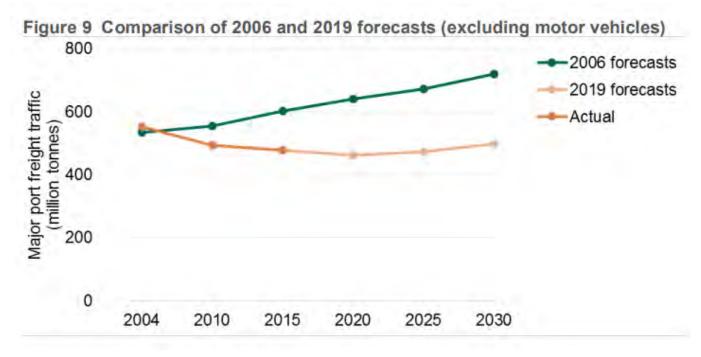
			LCR	LCR	St Helens	
	ENGLAND	ENGLAND	Annual	Annual	Annual	St Helens
	Annual	Annual	growth	growth	growth	Annual
	growth rate	growth rate	rate 7-	rate 5-		growth
ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY	7-year 2009-	5-year 2011-	year	year	year 2009-	
(2-DIGIT SIC)	2015		2009-2015			
70 : Activities of head offices; management consultancy activities	4.6%	6.4%	2.2%	1.5%		-9.0%
71 : Architectural and engineering activities; technical testing and	2.8%	4.5%	0.0%	1.5%	-1.9%	-1.4%
analysis						
72 : Scientific research and development	1.7%	1.8%	6.7%	-5.6%	-100.0%	-100.0%
73 : Advertising and market research	3.6%	3.9%	1.5%	0.0%	-3.1%	-11.4%
74 : Other professional, scientific and technical activities	1.9%	3.9%	4.8%	8.4%	8.1%	3.5%
75 : Veterinary activities	4.0%	4.0%	0.7%	20.1%	2.8%	27.7%
77 : Rental and leasing activities	3.2%	3.9%	7.9%	1.2%	7.2%	1.6%
78 : Employment activities	3.2%	3.6%	8.0%	4.4%	4.9%	26.0%
79: Travel agency, tour operator and other reservation service and	1.4%	0.2%	4.5%	-3.3%	3.7%	0.0%
related activities						
80 : Security and investigation activities	1.0%	0.1%	9.0%	6.6%	7.6%	8.4%
81 : Services to buildings and landscape activities	2.5%	3.3%	4.8%	2.6%	0.0%	-19.7%
82 : Office administrative, office support and other business	6.3%	5.2%	7.6%	5.9%	10.4%	14.9%
support activities						
84 : Public administration and defence; compulsory social security	-2.6%	-2.1%	-4.3%	-4.3%	-4.3%	0.0%
85 : Education	0.7%	0.8%	-0.7%	1.1%	-1.4%	0.0%
86 : Human health activities	1.6%	2.2%	1.3%	2.0%	0.0%	0.0%
87 : Residential care activities	2.3%	0.3%	1.1%	-0.5%	1.5%	0.0%
88 : Social work activities without accommodation	0.6%	0.9%	0.0%	-1.2%	-4.0%	-3.6%
90 : Creative, arts and entertainment activities	2.4%	5.0%	8.0%	15.2%	21.9%	43.1%
91 : Libraries, archives, museums and other cultural activities	-1.3%	-0.9%	-4.0%	-6.7%	6.0%	-5.6%
92 : Gambling and betting activities	1.7%	-0.4%	1.0%	1.4%	3.8%	3.4%
93 : Sports activities and amusement and recreation activities	1.0%	1.8%	-4.0%	2.9%	1.7%	15.4%
94 : Activities of membership organisations	1.8%	1.0%	0.9%	-2.3%	-4.4%	-9.3%
95 : Repair of computers and personal and household goods	3.0%	0.9%	-4.4%	0.0%	-24.3%	-15.6%
96 : Other personal service activities	-1.3%	0.4%	0.0%	3.4%	1.2%	5.4%
97 : Activities of households as employers of domestic personnel	-	-	-	-	-	-
98: Undifferentiated goods- and services-producing activities of	-	-	-	-	-	-
private households for own use						
99 : Activities of extraterritorial organisations and bodies	-	-	-	-	-	-
Column Total	1.1%	1.5%	0.4%	0.6%	-0.4%	-0.2%

Source: Business Register and Employment Survey, Office for National Statistics.

PORT STATISTICS

- 3.21. The analysis used in the SHELMA (p122. Mersey Ports Forecasts, Peel Ports 2011) is significantly outdated. The 2006 Government forecasts for freight at ports has now been superseded by a 2019 forecast. The previous port freight traffic forecasts produced in 2006 were based on 2004 data and forecast in 5-year intervals out to 2030. As these forecasts were produced shortly before the 2008/09 drop in port freight caused by the global recession, they overestimated freight and consequently the new forecasts start at a lower level. As **Figure 14** indicates, the 2006 freight forecasts which have informed the LCR SHELMA and subsequent district Local Plans have been found to be far too optimistic in terms of total volume of port freight traffic in the UK. Therefore the updated 2019 forecasts project far lower traffic in tonnes, with an actual slight decrease from 2015 to 2020.
- 3.22. Since port traffic will drive the need for storage and distribution facilities, this lower forecast for port freight will have significant implications for land use demand, and renders the assumptions behind the LCR SHELMA and St Helens Local Plan questionable.

FIGURE 14: ACTUAL AND FORECAST PORT FREIGHT TRAFFIC



Source: Department of Transport) (2019) UK Port Freight Traffic 2019 Forecasts.

3.23. Looking at the forecasted percentage changes, the 2006 forecasts had many cargo categories relatively flat for the period 2020-2030. These new forecasts have clearer directions for each cargo category during this period, reflecting the fact that as it is closer there is less uncertainty about the direction of travel. Some noticeable differences are the more negative forecasts for liquid bulk, coal and general cargo, in line with the large decreases which were seen 2004-2015. At the other end of the spectrum, the 2019 forecasts have a more positive forecast for other dry bulk.

FIGURE 15: COMPARING 2006 AND 2019 FORECASTS OF PORT FREIGHT TRAFFIC BY COMMODITY TYPE

Table 3 Comparison of percentage changes in 2006 and 2019 forecasts

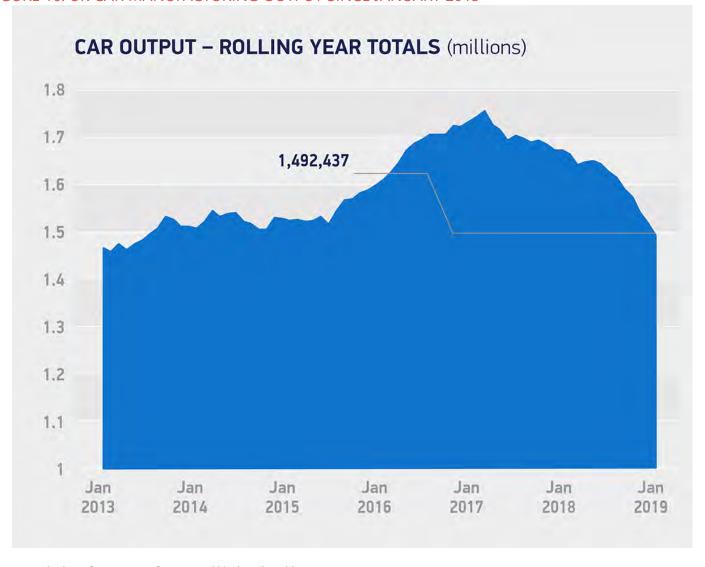
	Percentage char	ge 2004-2015	Percentage chan	Percentage change 2020-2030			
	2006 forecasts	Actual	2006 forecasts	2019 forecasts			
Lo-Lo & Ro-Ro	45%	11%	30%	28%			
Liquefied gas	320%	105%	0%	58%			
Crude oil	-18%	-44%	0%	-20%			
Oil products	11%	-9%	14%	-1%			
Other liquid bulk	10%	-16%	0%	-16%			
Liquid bulk	2%	-27%	5%	-8%			
Agriproducts	-1%	2%	-2%	2%			
Coal	-3%	-39%	-2%	-14%			
Ores	5%	-1%	3%	1%			
Other dry bulk	5%	13%	0%	10%			
Dry bulk	2%	-9%	-1%	5%			
Forestry products	13%	-44%	5%	-11%			
Iron/steel	1%	-12%	3%	5%			
Other general cargo	1%	-17%	0%	-17%			
General cargo	6%	-26%	3%	-6%			
Total	12%	-13%	12%	8%			

Source: Department of Transport) (2019) UK Port Freight Traffic 2019 Forecasts.

VEHICLE PRODUCTION

- 3.24. In the SHELMA Consultation Draft Appendices, significant weight is given to the storage need of Trade Cars on pages 118-119. The plan suggests that trade cars represents a significant growth opportunity for the Mersey Ports and forecasts a growth of 8.11% CAGR, compared with the 0.6% for the Government forecasts. The forecasted growth is dependent on improved marine capability for car carriers and the associated storage land being available.
- 3.25. However, this outlook for the UK automotive sector is out-dated, with car manufacturing actually in decline over the past two years. In its latest analysis, the UK Society of Motor Manufacturers and Traders (SMMT) statistics on car manufacturing stated that car factories turned out 120,649 units in January 2019, down -18.2% on the previous year and marking the eighth successive month of decline. Demand dropped at home and overseas but it was the latter that fell most, with exports down -21.4% to 93,781 units. As noted in **Figure 16**, car manufacturing output has declined significantly since January 2017.

FIGURE 16: UK CAR MANUFACTURING OUTPUT SINCE JANUARY 2013



Source: UK Society of Motor Manufacturers and Traders (SMMT).

DEMAND FOR PREMISES

- 3.26. Evidence on property eligible for business rates (**Figure 17 and 18**) shows that industrial floorspace (including warehousing) has declined significantly by 202,000 square metres in St Helens Borough, with a significant decrease in LCR, of 404,000 square metres. **Figure 18** shows hardly any change in rateable values for industrial premises between 2005/06 and 2015/16 this indicates either sluggish demand, or the condition of existing premises.
- 3.27. This would indicate a low level of market demand for industrial premises, or reflects on the condition of industrial premises that so many of them have been withdrawn from market use and rateable values are static. It also points to the need to understand how old industrial premises / land has been repurposed? is it still vacant? can it be redeveloped for new industrial or office premises? This is not clear from the evidence presented as part of the draft local plan.
- 3.28. The assertion that growth in warehousing, logistics and industrial activities has been muted due to a lack of suitable premises (in the 2019 Employment Land Needs Study) may be weakened by the statistics on declining industrial floorspace and static rateable values this demonstrates a lack of demand, rather than pent-up demand.

FIGURE 17: DATA ON PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS) – TOTAL FLOOR SPACE BY TYPE OF USE IN 2005/06 AND 2015/16, THOUSANDS OF SQUARE METRES

	2005/06:	Floorspa	ace, thousa	ands of square i	metres	2015/16: I	Floorspace	, thousand	ds of square me	tres
Area	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	2,076	185	219	1,392	280	2,094	217	241	1,356	280
Knowsley	1,937	162	74	1,421	280	2,082	168	98	1,436	380
Liverpool	5,324	1,042	969	2,173	1,140	5,747	1,173	1,068	2,176	1,330
Sefton	2,611	583	259	979	790	2,535	619	262	904	750
St. Helens	2,669	296	135	1,808	430	2,525	325	144	1,606	450
Wirral	2,875	553	216	1,336	770	2,855	583	225	1,227	820
LCR	17,492	2,821	1,872	9,109	3,690	17,838	3,085	2,038	8,705	4,010
ENGLAND AND WALES	710,579	98,346	83,421	339,302	189,510	726,953	105,031	89,037	321,855	211,030

Source: Valuation Office Agency.

FIGURE 18: DATA ON PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS) – CHANGE IN TOTAL FLOORSPACE BETWEEN 2005/06 AND 2015/16

		_	loorspace are metres	2005/06 to 2015	/16,	Percentage change in floorspace 2005/06 to 2015/16				
Area	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	18	32	22	-36	0	0.9%	17.3%	10.0%	-2.6%	0.0%
Knowsley	145	6	24	15	100	7.5%	3.7%	32.4%	1.1%	35.7%
Liverpool	423	131	99	3	190	7.9%	12.6%	10.2%	0.1%	16.7%
Sefton	-76	36	3	-75	-40	-2.9%	6.2%	1.2%	-7.7%	-5.1%
St. Helens	-144	29	9	-202	20	-5.4%	9.8%	6.7%	-11.2%	4.7%
Wirral	-20	30	9	-109	50	-0.7%	5.4%	4.2%	-8.2%	6.5%
LCR	346	264	166	-404	320	2.0%	9.4%	8.9%	-4.4%	8.7%
ENGLAND AND WALES	16,374	6,685	5,616	-17,447	21,520	2.3%	6.8%	6.7%	-5.1%	11.4%

Source: Valuation Office Agency.

FIGURE 19: DATA ON AVERAGE RATEABLE VALUES OF PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS)

	2005/06	: Rateable	value per square metre £	· ·	2015/16: I	Rateable va	alue per square metre £	
Area	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	98	77	30	55	117	91	33	56
Knowsley	94	54	26	48	115	71	28	48
Liverpool	104	84	23	55	142	101	30	69
Sefton	111	63	25	58	120	67	29	62
St. Helens	108	66	29	50	122	78	30	55
Wirral	93	54	28	50	111	70	30	57
LCR								
ENGLAND AND WALES	128	130	33	69	151	153	37	78

Source: Valuation Office Agency.

4. The agricultural industry in St Helens

- 4.1. This section briefly provides details about the agricultural industry in St Helens Borough. The latest available data is for 2013, after which, DEFRA statistics have been provided for the local authority areas of Knowsley, St Helens and Halton combined.
- 4.2. In 2013, there were 84 agricultural holdings in St Helens Borough, comprising 7,294 hectares of agricultural land in use in 2013 an increase on the 2010 total of 5,578 hectares. St Helen's agricultural land represented 0.8 per cent of the North West total, and 0.08 per cent of the England total. Of this total area of land in 2013:
 - > 3,305 hectares were used for cereals production
 - > 859 hectares were used for other arable crops
 - > 610 hectares were used for fruit and vegetables
 - > 2,102 hectares were grassland in agricultural use
- 4.3. Agricultural land supported 1,124 cattle, 6,178 sheep, 1,362 pigs, and 1439 poultry in 2013. The number of cattle has declined significantly by 47 per cent between 2010 and 2013
- 4.4. 349 people were employed in agriculture in St Helens Borough in 2013, up from 324 in 2010. This represented 1.09 per cent of agricultural employment in the North West, and 0.12 per cent of agricultural employment in England. Of these, 168 were regular workers in full time jobs, and 12 worked part-time. 102 people were employed as full-time Farmers, partners, directors and spouses in St Helens Borough in 2013, which had increased by 21 per cent since 2010. This 49 people were employed part-time as Farmers, partners, directors and spouses in St Helens Borough in agriculture in 2013.

5. Are the economic aspirations of the Liverpool City Region reasonable? Looking at the evidence

BACKGROUND

- 5.1. The Liverpool City Region LEP Growth Strategy (2016) sets out a series of bold ambitions and aspirations for the economy, which feed through to further LCRCA policy documents such as the SHELMA. These in turn, inform the new draft Local Plans. The ambitions in the LEP Growth Strategy are "policy-on" forecasts which set out a desired end point for the economy, presuming a variety of policies, interventions and investments are made to enable this. The Employment Land Needs Study– Addendum Report outlines in paragraph 2.16 the aspirations of the LEP, based upon the Oxford Economics forecasting work:
 - The Liverpool City Region is forecast to have an additional 109,200 jobs by 2040 over 2016 levels in the growth scenario, compared to 34,100 additional jobs in the baseline scenario.
 - St Helens is projected to have the second highest additional employment (behind only Liverpool City) in the growth scenario, with an additional 18,700 jobs projected for the borough. This compares to an additional 4,700 jobs over the same period for the baseline scenario. This took account of the large amount of potential B1/2/8 employment sites in St. Helens (see below).
 - Significantly, the growth scenario assumes strong growth in the 2016-26 period before tapering off, reflecting the development activity anticipated over the coming decade.
 - The growth scenario assumes a higher in-migration to the City Region.
 - It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through the transformational developments.
 - The largest growth sectors by employment numbers in St Helens in the growth scenario are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200 jobs) reflecting the key drivers of employment in the market [from the SHELMA it is noted that "data provided in spreadsheets supporting this document" but this data is not provided].
 - Manufacturing in St Helens is anticipated to grow by 2,000 jobs, a significant change from the
 baseline scenario which assumed declining employment in this sector. This is driven by the
 increasing availability of strategic industrial land in St Helens in coming years that would
 encourage manufacturers to locate to the borough, with further logistics infrastructure and
 warehousing capacity allowing for improved conditions to deliver goods to markets.
 - Displacement was assumed to be 33 percent (i.e. 33% of the jobs are coming from elsewhere in the City Region).

Source: BE Group for St Helens Borough Council: Employment Land Needs Study, Addendum Report, Amended January 2019, p.10.

- 5.2. What we know is that Oxford Economics produced a "transformational scenario" based upon some assumptions about build-out of employment land and designation of more employment land, that is assumed would be built-out and occupied. This "transformational scenario" seems to have driven LEP Growth Strategy ambitions, and spatial plans through the SHELMA.
- 5.3. These 'assumptions' used to develop the "transformational" scenario are unknown, and are not published anywhere, nor are the details of the baseline and transformational forecasts.
- 5.4. The big question is is this objectively based need? If it is a set of economic ambitions based upon a land-use scenario derived from assumptions about build out, and additional employment land designations then it is a supply-side policy, that follows a subjective land designation and build-out scenario and could not be said to reflect the inherent market demand trends.
- 5.5. In my own professional experience I would argue that historical trends plus well advanced development commitments and spending commitments (e.g. in new infrastructure) represent objectively-based need. Transformational growth and policy-on forecasts based on development aspirations, where there is no certainty of investment, build out, or occupation are subjectively-based need.
- 5.6. The problem with "policy-on" forecasts is that, over a 25-year period, the electoral cycle can shift policies significantly and quickly make them irrelevant for planning purposes. For example, between 1996 and 2019, over 25 years (the timeline of the LCR economic strategy), England has had Training and Enterprise Councils, Government Offices, Single Regeneration Partnerships, Regional Development Agencies, City Region Partnerships, Local Enterprise Partnerships, Combined Authorities, and the Brexit vote. It has had five different UK governments (Conservative, Labour, Conservative-Lib Dem, Conservative, Conservative supported by confidence and supply agreement). Policies and agencies for local regeneration, planning, and economic development have changed frequently.

EXAMINING THE POLICY RESPONSE TO ENABLING TRANSFORMATIONAL GROWTH

- 5.7. The LCR LEP Growth Strategy is highly aspirational. The critical questions concerning this approach are:
 - I. Is there a historic growth trend to suggest that this new higher rate of economic growth is within reach?
 - II. Are there trends that indicate dynamic new industries, technologies, investment is occurring to lead to this step-change?
 - III. Does the LCR economy have the capability to attract high productivity growth industries, or develop these endogenously (from existing local resources, talent, business acumen and capital?)
 - IV. Is there a set of policies that can realistically transform the LCR economy?.... are they / do they....
 - Have a coherent, realistic strategy
 - Have the resources to deliver such transformational change over the long-term?

In this section, we examine how the evidence stacks up for I. and II. The questions of III and IV are very relevant, but would require a comprehensive audit and analysis of the LCR economy and the policies and expenditure plans of all public authorities and major private businesses.

- 5.8. Examining I. the economic growth ambitions in terms of GVA growth seem highly unrealistic as discussed in **paragraph 3.10**. Oxford Economics's 2016 baseline projections of economic growth for the Liverpool City Region do not credibly related to historical trends, and the transformational growth scenario seems incredibly optimistic. Examining the (official) ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area for small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum.
- 5.9. And then, as **Figures 2 to 4** show the Oxford Economics Forecasts have consistently been much more optimistic than actual evidence about the GVA performance of the UK economy. It does not help that the 2016 forecasts are dated and date quickly in the face of the uncertainties brought by Brexit.
- 5.10. Comparing these headline growth ambitions and forecasts to actual data trends (**Figure 20**) is interesting, as the Oxford Economic baseline and transformative forecast annual growth rates are below the trend growth rates from actual performance (from Office for National Statistics data). However, Oxford Economics, like other forecasting specialists uses a dynamic economic model which incorporates industrial decline as well as growth. It is therefore difficult to reconcile the two as it is not known what dynamics, industry changes or productivity assumptions underline the Oxford Economics model.

FIGURE 20: COMPARING THE ECONOMIC STRATEGY AMBITIONS TO ACTUAL DATA TRENDS

JURE 20. COMPARING	J THE ECO	MOMIC 211	RAILGYA	MAIRITION	S IO ACI	UAL DATA TR	EIND2	
	FORECAS	ST	HISTORIC TRENDS (OFFICE FOR NATIONAL					
	(OXFORI)	STATIST	ICS)				
	ECONOM	IICS)		•				
	2016-	Annual	Trend gro	wth rate WI	∃jobs	Trend rate: emp	oloyee jobs	
	2040	growth	(Workford	e Jobs Serie	es)	(BRES)		
		rate 2016-						
		2040						
		CAGR 25-	CAGR	CAGR	CAGR	CAGR 5-year	CAGR 3-year	
		year	18-year	10-year	5-year	2011-2015	2015-2017	
LCR		-			-			
Jobs baseline	+75,100	0.20%	0.89%	0.95%	1.97%	0.6%	1.2%	
Jobs transformational	+109,200	0.60%	0.89%	0.95%	1.97%	0.6%	1.2%	
St Helens								
Jobs baseline	+18,700	0.98%	0.76%	0.58%	1.47%	-0.2%	1.4%	
Jobs transformational	+4,700	0.27%	0.76%	0.58%	1.47%	-0.2%	1.4%	

Source: Business Register and Employment Survey, Office for National Statistics.

ASSESSING THE LEP GROWTH SECTORS

5.11. The LEP Growth Sectors are:

Advanced manufacturing – particularly automotive, consumer goods, chemicals, and rail manufacturing.

Digital and creative – focussing in all sub-sectors but particularly in high performance and cognitive computing and sensor technology;

Financial and professional services – with particular strengths in private clients, maritime and business services;

Health and life sciences – focussing on precision medicine, infectious disease, children's health, independent living and eHealth;

Low carbon energy and marine energy;

Maritime and logistics;

Visitor economy – including high-value activities such as conferences and business visits; the cruise market; special sporting and other events.

Jobs data has been collated for each of these LEP Growth Sectors, apart from Low carbon energy and marine energy (as standard industrial classifications are not easily applied to this sector). As can be seen from **Figure 21** below, comparing employment growth between 2011 and 2015 shows that, compared to the national (England) average, Liverpool City Region and St Helens only perform at or above the national average in Maritime and logistics and Visitor economy. Strong growth is evident in financial and professional services for LCR, but at a rate well below the national average. In Health and life sciences, growth in LCR is at the same rate as nationally.

- 5.12. It is noted in the Local Plan documents that the largest growth sectors by employment numbers in St Helens in the growth scenario 2016-2040 are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200 jobs) reflecting the key drivers of employment in the market. The trend analysis would tend to bear this out.
- 5.13. The assertion that Manufacturing in St Helens is anticipated to grow by 2,000 jobs, an assumption based on the increasing availability of strategic industrial land, seems inaccurate. The overall trend from 2011 to 2015 was for a loss of 1,500 jobs, or -4.7 per cent per annum. In the LCR the loss was less, at -1.6 per cent per annum (-3,900 jobs).
- 5.14. Overall, there is the conundrum of how the 'demand-side' generation of high value added industries such as Advanced manufacturing, Digital and Creative, and Financial and professional services will take place, and therefore how the requisite demand for higher skills will come about given that there is no evidence of a strong historical trend to suggest that this is a source of comparative advantage or a an existing trend in the economic evidence.

FIGURE 21: JOBS TRENDS IN LEP "GROWTH SECTORS"

	LCR		St Helens		England	
	Jobs growth 2011-2015	% annual jobs growth 2011-2015	Jobs growth 2011-2015	% annual jobs growth 2011-2015	Jobs growth 2011-2015	% annual jobs growth 2011-2015
Advanced manufacturing	0	0.0%	-500	-4.3%	3,000	0.1%
Digital and Creative	-2,200	-2.4%	-100	-0.9%	153,500	2.8%
Financial and professional services	9,400	1.8%	300	0.6%	795,500	3.1%
Health and life sciences	6,600	2.1%	100	0.8%	188,000	2.1%
Maritime and logistics	7,200	4.1%	1,600	5.7%	120,500	1.4%
Visitor economy	5,700	2.4%	800	3.6%	211,500	2.0%
(all manufacturing)	-3,900	-1.6%	-1,500	-4.7%	-1,500	0.0%

Source: Business Register and Employment Survey, Office for National Statistics.

6. Summary of main findings and conclusions from the analysis

INTRODUCTION

- 6.1. This section presents a summary of the data, information and analysis presented in Chapters 1 to 4. There is, by implication, a degree of repetition of points previously made in order to focus on the critical issues and points of importance.
- 6.2. There is a lack of transparency over the role that the Oxford Economics Forecasts have played in determining joint (LCRCA) and borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date along with a number of other assumptions underpinning employment land policies, including forecasts of port freight.

QUESTIONING THE "OBJECTIVELY ASSESSED NEED" THAT HAS INFORMED EMPLOYMENT LAND ALLOCATIONS

- 6.3. The Employment Land Needs Study Addendum Report, January 2019 refers to the role of economic forecasts in informing employment land policy proposals (Quoting from p.10.) "Oxford Economics prepared a jobs growth scenario forecast for the LEP which took account of transformational developments that are intended for the region in coming years. This work has informed the SHELMA. The key findings of this study suggest an additional 18,700 jobs in St Helens between 2016 and 2040, including +3,600 jobs in warehousing and support services and +3,200 jobs in land transport.
- 6.4. Further quoting from p10-11. Of the Employment Land Needs Study Addendum Report, January 2019: "This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt sites around Haydock, west of Omega and Parkside West and East."
- 6.5. What is clear is that if this statement is valid, that St Helens Borough Council itself set the criteria for the "Transformational Growth" Scenario including use of green belt land. This is a subjective policy scenario, and not an objectively based needs assessment of economic and market trends.
- 6.6. What is perhaps clear is that St Helens Borough Council have directly informed a set of economic aspirations, that have now become joint planning policy that endorses allocating new employment sites on green belt land and assuming these are built and occupied
- 6.7. Overall, what is not clear is the detail, method and relevance of this "Transformational Growth" scenario and whether it passes the test of being Objectively Assessed Need.

THE EVIDENCE BASE IS OUT-OF-DATE

- 6.8. A number of datasets and analysis used to inform the LCR SHELMA and St Helens Borough Council Local Plan are out of date.
- 6.9. It is clear that the Oxford Economics Forecasts made in 2016 are out of date. Compared to the evidence on economic growth over recent years (2015 to 2017), they are overly optimistic in terms

of UK economic growth rates – which in this model are used to inform forecast local growth rates. For example, Oxford Economics has projected the UK rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018). Looking Forward, in 2016, Oxford Economics forecast 2.1 per cent growth for 2019 and 2.4 per cent growth for 2020 in its baseline scenario, and 2.7 per cent and 3.7 per cent growth in 2019 and 2020 respectively in its Transformational Growth Scenario. Both scenario forecasts are very optimistic compared to recent forecasts by the Office for Budget Responsibility (in October 2019) of 1.6 per cent growth in 2019 and 1.4 per cent growth in 2020. The 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context. By contrast, Oxford Economics's 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs and employee jobs. This further undermines their perceived accuracy.

- 6.10. Research shows that the accuracy of economic forecast is significantly dependent upon the accuracy and relevance of the data they are based on. As the Office for Budget responsibility states about its own economic forecasts, which contain over 500 variables: "The first step in evaluating our economy forecasts is to understand and account for revisions and other changes to the ONS outturn data... The ONS 'outturns' will always be an estimate of this true underlying activity. They are revised over time as new information and new methodologies are used." Office for Budget Responsibility, (2017) Briefing Paper No 7: Evaluating Forecast Accuracy, pp. 5. The Bank of England, in its evaluation of its own economic forecasts notes that "Errors in two year ahead GDP forecasts were positively and significantly related to data outturns [published data] known when the forecasts were made." Bank of England (2015) Evaluating forecast performance, Independent Evaluation Office.
- 6.11. In other words economic forecasts become out of date quickly, as new data emerges, and old datasets get revised. In particular, in times of significant economic change and uncertainty relying on forecasts a few years old to make major policy decisions is not considered to be appropriate.
- 6.12. The UK port freight forecasts used in the LCR SHELMA are well out of date, published in 2006 and have been replaced by 2019 forecast by the Department of Transport which project a much lower growth in freight volumes than the 2006 forecasts. In total, the 2006 forecasts projected a 12 per cent growth in UK port freight compared to an actual contraction of -13 per cent. 2006 forecasts projected a growth of 12 per cent in port freight between 2020 and 2030, compared to the 2019 forecasts projecting an 8 per cent growth rate.
- 6.13. Assumptions about the growth of UK vehicle production are also out of date, with vehicle production in steep decline since January 2017, and render the assumptions in the SHELMA and Local Plan about the growth of port freight movements and storage requirements for motor vehicles redundant.
- 6.14. The assertion that growth in warehousing, logistics and industrial activities has been muted due to a lack of suitable premises (in the 2019 Employment Land Needs Study) is also undermined by data on premises registered for business rates. Between 2005/06 and 2015/16 Industrial floorspace (including warehousing) has declined significantly by 202,000 square metres in St Helens Borough, with a significant decrease in LCR, of 404,000 square metres. There has hardly any change in rateable values for industrial premises between 2005/06 and 2015/16. This indicates either sluggish demand, or the condition of existing premises demonstrating a lack of demand, rather than pent-up demand.

LACK OF TRANSPARENCY IN THE EVIDENCE BASE SUPPORTING THE ST HELENS LOCAL PLAN

- 6.15. The Oxford Economics "Transformational Growth" forecasts (2016) are all quoted as being critical in informing assumptions about industry growth, jobs growth and the demand for employment land but are nowhere to be accessed. Formal enquiries made to SHBC and Liverpool City Region LEP have not resulted in the Oxford Economics forecasts or data being provided or made public. This document is not publicly available, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available.
- 6.16. For other non-statutory spatial strategies and local plans, forecasts are usually made publicly available. For example:
 - 6.16.1. Joint Core Strategy Cheltenham, Tewkesbury and Gloucester https://www.jointcorestrategy.org/examination see Assessment of updated economic forecasts, Nathaniel Lichfield and Partners, April 2014
 - 6.16.2. Cambridgeshire and Peterborough Joint Strategic Planning Unity http://cambridgeshire.wpengine.com/document-library/ see under "Economy and Employment (this has now been superseded by development of non-statutory spatial strategy for the GC Combined Authority area)
- 6.17. Overall this gives the impression that the LCR forecasts are a "black box" where the assumptions, and details are unknown, yet they give a very ambitions outlook for growth and for certain sectors to grow. Without the detailed evidence the best word to describe these is "ambitions" rather than "facts".
- 6.18. This is also further confused by the apparent land use scenarios, including the allocation of green belt land to employment use that have derived a "Transformational Growth" scenario which is driving the SHELMA and local plans. There is no way to transparently verify these forecasts and to understand their relevance today, three years after they were published.

THE FORECASTS ARE TOO OPTIMISTIC – SHOULD POLICY ASPIRATIONS DRIVE LAND USE POLICIES?

6.19. The economic growth ambitions of the LCR LEP and SHELMA in terms of GVA growth seem highly unrealistic. Oxford Economics's 2016 baseline projections of economic growth for the Liverpool City Region do not credibly related to historical trends, and the transformational growth scenario seems incredibly optimistic. Examining the (official) ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area - for small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent - zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum. Even the baseline forecasts seems to significantly stretch credibility - being twice the rate of growth of the most recent 5-year period.

PO1031



St. Helens borough local plan Keith Roughsedge to: planningpolicy 13/03/2019 16:38

D-LPA04 2)-LPA06

Dear Sir

I wish to voice my objections to the proposed local plans as follows

- 1. 2 ES Land to the East of M6 junction 23 Haydock.
- 2. 4 EA Land South of Penny Lane, Haydock.
- 3. 6 EA Land West of Millfield Lane and South of Liverpool Road.
- 4. 5 EA Land West of Haydock Estate.

The proposed plans will have a negative effect on the roads in Ashton In Makerfield, impacting on the quality of life for local residents.

Junction 23 of the M6 at the A580 is already a traffic black spot and the A49 along Warrington Road and through Ashton town centre is very often gridlocked. The added traffic generated by these developments will make a bad situation even worse.

Another concern is local air quality. The Greater Manchester Clean Air Plan has identified the A49 as a road of concern. This will only be made worse if the proposed developments go ahead and will impact on the health and well being of local residents.

Using the building of these developments as a means of increasing employment in the local area is a farce. There is no guarantee that these jobs would benefit local people. In fact it would please me greatly that should these plans go ahead, all the jobs were taken by people living in St Helens, as maybe St Helens Council would wake up to the problems of traffic congestion and air pollution if their roads were constantly gridlocked.

There must be plenty of brownfield sites available in the St Helens area that the council could use for these developments, if they are so desperate for the revenue. I feel however that the council will take the easier and cheaper option of using Greenbelt Land. What happens when we have no Greenbelt Land left? People are more important than profit.

I consider that using the local Green Belt Land is morally wrong and I appeal to St Helens council to consider how the decisions they make now could have disastrous consequences for future generations.

Yours sincerely

Keith Roughsedge 1berrington Grove Ashton in Makerfield





PO1032

EL0245



Local Plan Submission Consultation David Walton to:

Sme SEA

planningpolicy@sthelens.gov.uk 13/03/2019 16:40

0- LPA02 2- LPA03 (1)- LPA04

1 Attachment



St Helens LP Submission Version - PBA Representation for Oak Tree Developments 13.03.19 inc apps.pdf

Dear Sirs

Please find attached our representation report which includes the standard form at Appendix B. The report provides context to our response.

Kind regards, David Walton Associate Planner



PBA has joined the Stantec family, find out more at peterbrett.com.



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Oak Tree Developments



St Helens Local Plan Submission Version Consultation Representations in Relation to Soundness of the Plan

Peter Brett Associates March 2019



Policy LPA03: Development Principles

- 3.7 Policy LPA03 at point 5 identifies that new development in St Helens will 'contribute to a high quality built and natural environment by...c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments.'
- Our client's site off Newton Park Drive lies within the boundary of draft allocation 8EA Parkside West, which comprises 79.57ha of land proposed for B2 and B8 uses. Whilst our client's land is within this proposed allocation, it is clearly identified within the evidence base for the plan (Figures 8.1, 8.2, 8.3 and 8.4 Parkside Study, Aecom 2016), and subsequent planning applications, that it is not required to deliver the envisaged rail linked employment development.
- 3.9 Our client's land will effectively be surrounded by employment development with limited thought given to the encroachment and potential loss of the two nationally important Grade II listed buildings. A Heritage Assessment which forms part of our client's current planning application identifies that the buildings are clearly at risk and, without intervention, will ultimately be lost. Enabling development is required in order to prevent the loss of these two buildings from total loss which would need to meet the test identified in Policy LPA03.
- 3.10 Whilst draft Policy LPA03 is generally considered sound, we question how the employment allocation 8EA can effectively be brought forward in compliance with Policy LPA03 when no consideration has been given to the negative impact of the employment allocations upon designated heritage assets which will in effect need to meet the policy test identified in LPA03. The extant planning policy in relation to development at Parkside, CAS3.2, acknowledged the desirability of preserving the Listed Buildings at Newton Park Farm.
- 3.11 The matter referred to above links to the consideration of whether draft Policies LPA04 and LPA04.01 are justified, effective and consistent with national planning policy. In this regard, we draw particular attention to NPPF paragraph 185 which identifies that 'plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.'

Policy LPA04: A Strong and Sustainable Economy

- 3.12 Draft Policy LPA04 of the emerging Local Plan identifies sites allocated for employment development use. The sites are shown in Table 4.1. Parkside West is identified as Policies Map Site Reference Number 8EA with appropriate land uses identified as B2 and B8.
- 3.13 St Helens Council has an expectation that Parkside West will come forward in two phases, with an application for Phase 1 currently in the planning system. Application ref. P/2018/0048/OUP was validated on 16 January 2018 and a decision is awaited. The application is described as follows:

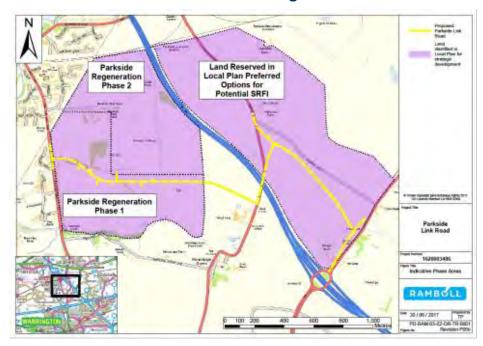




'Outline application (all matters reserved except for access) for the construction of up to 92,900 m2 of employment floorspace (Use Class B8 with ancillary B1(a)) and associated servicing and infrastructure including car parking; vehicle and pedestrian circulation space; alteration of existing access road including works to existing A49 junction; noise mitigation; earthworks to create development platforms and bunds; landscaping including buffers; works to existing spoil heap; creation of drainage features; substations and ecological works.'

- 3.14 The Council's website contains almost 600 documents relating to the application. We have reviewed key documents from the application, our key observation being that the proposed development wholly excludes our client's site at Newton Park Drive.
- 3.15 The delivery of Phases 2 and 3, including the Strategic Rail Freight Interchange (SRFI), is reliant on the creation of a link road between the A49 Winwick Road and the A579 Winwick Lane connecting to Junction 22 of the M6.
- 3.16 The Parkside Link Road (PLR) application, which was validated on 11 April 2018 and given the LPA ref. P/2018/0249/FUL, is described on the Council's website as:
 - 'Land Between A49 Winwick Road To A573 Parkside Road, Including A Portion Of The Former Parkside Colliery Site And Then Land From A573 Parkside Road To A579 Winwick Lane Connecting To M6 Junction 22.'
- 3.17 A high-level phasing plan is provided in the Planning Statement supporting the aforementioned application which identifies the proposed PLR route in relation to Phases 1 and 2 as well as the land for the SRFI which is known as Phase 3 and comprises Parkside East (emerging plan allocation 9EA, Parkside East). Figure 3.1 below is reproduced from the PLR application planning statement.

Figure 3.1: Parkside West and East Phasing



(Source: Figure 3, Parkside Link Road Planning Statement, application ref. 2018/0249/FUL)

March 2019 8



3.18 The Phase 1 application (ref. P/2018/0048/OUP) includes an illustrative masterplan (reproduced below as Figure 3.2) that shows how both Phases 1 and 2 may be delivered.

Figure 3.2: Illustrative Masterplan for Parkside West



Source: Phase 1 Planning Application, Illustrative Masterplan Revision E, Fletcher Rae Architects

- 3.19 Figure 3.2 expressly shows our client's land as undeveloped and thus not required to deliver the employment allocation. This is consistent with the evidence base that supports the emerging Local Plan. It is concluded that our client's land is not required for the Parkside West proposals and there can no longer be any question that its proposed development will prejudice the SRFI/Parkside scheme.
- 3.20 The extant St Helens Core Strategy Policy CAS 3.2 at point 11 states:

'Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St.Helens local authority area.'

3.21 In the intervening years since the formulation of Policy CAS3.2, the evidence base informing the emerging Local Plan has changed and it is clear that if the SRFI is

3)



delivered, it will be situated on Parkside East as opposed to Parkside West. While the evidence base has changed and clearly Parkside West does not require our client's land for delivery, the importance and desirability of preserving the Listed Buildings at our client's Newton Park Drive site has been lost within the policy context.

- 3.22 As identified in Policy CAS3.2, there is a policy desire to preserve these buildings, which was further evidenced through the Council's own support for the previous scheme to preserve the Listed Buildings through enabling development (LPA reference: P/2005/0586). We consider that this desire existed irrespective of Newton Park Farm being required as part of the Parkside West and SRFI scheme.
- 3.23 Clearly the emerging employment allocation should consider the future context of Newton Park Farm as part of allocation 8EA and how it could preserve a heritage asset of national importance through establishing the principle of enabling development as part of the allocation. This removes ambiguity between extant Policy CAS3.2 and its replacement by emerging Policies LPA04 and LPA10.
- 3.24 Emerging Policy LPA04 and associated Table 4.1 should include the potential acceptability of C3 use specific to Newton Park Farm to enable the preservation of the nationally significant grade II listed buildings. An amendment of the policy wording to that effect would be consistent with the view provided at the time of the previous planning applications that the two Grade II listed buildings at Newton Park Farm are worth preserving subject to an acceptable scheme coming forward.
- 3.25 The evidence base for the Local Plan confirms, unequivocally, that the employment allocation does not require our client's land to deliver the B2, B8 development and SRFI. In strategic terms consideration of the land at Newton Park Farm is absent. The allocation has the effect of eroding the setting of the two Grade II listed buildings and it will condemn the asset to be subject of further decay and eventual loss.
- 3.26 The approach described above is not justified, effective or consistent with national policy as identified in paragraph 185 of the NPPF, which states:

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.'
- 3.27 To ensure that Policy LPA04 satisfies the soundness tests, it should be amended to acknowledge our client's land as a residential development allocation. Table 4.1

10

St Helens Local Plan Submission Version Consultation Representations in Relation to Soundness of the Plan



should be updated to include an allowance for C3 use as part of 8EA Parkside West. This would be through an enabling scheme to be subject of a suitable planning application that preserves the Grade II listed buildings as desired in the currently adopted Core Strategy and enhances the setting of the Newton Park Farm site.



- 3.28 Our client's proposal will help to create a more viable mixed-use development area by introducing residential uses into a location described as 'a reasonable sustainable location and is accessible by means of transport other than the car' in paragraph 14 of the SoS's decision (18 October 2007).
- 3.29 Our client's residential development will facilitate the restoration of the two Grade II listed buildings *in situ*, thereby securing their long-term presence. It is extremely unlikely that an employment-only scheme would provide sufficient proceeds to fund the restoration of the listed buildings, which in any event are within private ownership.
- 3.30 With suitable landscaping utilising and improving existing tree and shrub cover, incorporated into both the residential scheme at Newton Park Drive and the intended employment development at Parkside West we consider that both schemes (employment and residential) can be implemented without detriment to each other.
- 3.31 The suggested amendment to allocate Newton Park Farm for residential use as opposed to the site being subsumed within an employment allocation, despite the Council's evidence expressly confirming that our client's site is not need for employment use will ensure the preservation of a nationally important heritage asset.
- 3.32 Furthermore, the allocation of our client's site for residential use will ensure that the emerging Local Plan is capable of being found sound.

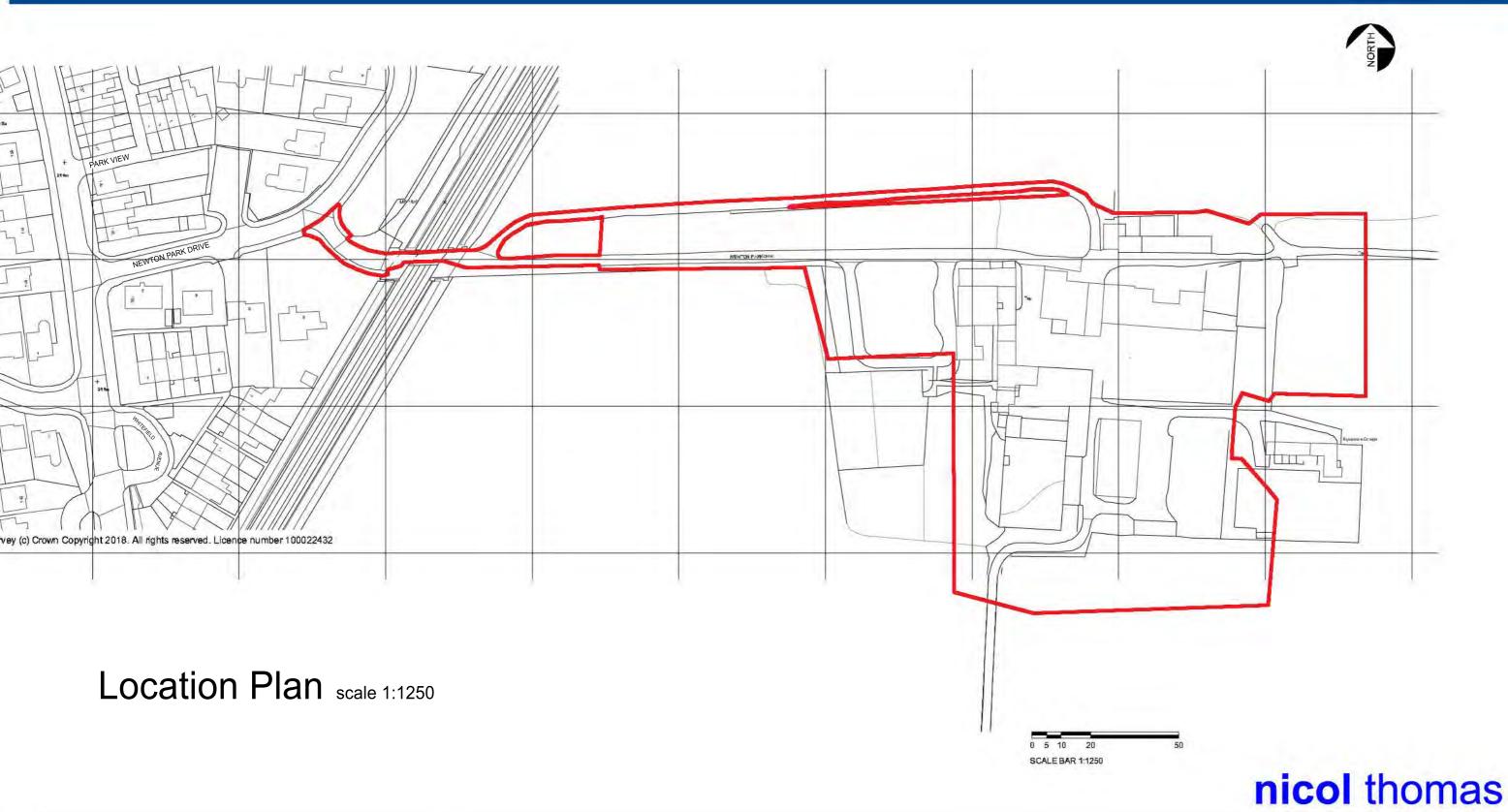
March 2019

St Helens Local Plan Submission Version Consultation Representations in Relation to Soundness of the Plan



APPENDIX A RED-LINE SITE BOUNDARY OF OUR CLIENT'S LAND AT NEWTON PARK DRIVE

Proposed residential development at land off Newton Park Drive Newton-le-Willows



Revision	Date	Details
а	August 18	right of access added
b	Sept 18	Extra context, scale bar, north arrow added
С	Sept 18	Red line revised. Road coloured yellow
d	Sept 18	Amendments to clients requirements
е	Sept 18	Red line amended
f	Sept 18	Amendments to Land Registry
g	Feb 18	Planning red line
h	March 19	Red Line amended

Job: Land off			e	
Drawing title: LOCa				
Drawing Number: (Job number)	M4150	sk	103	Revision:
Scale: 1:1250 a	at A3		•	
Date: August 2	2018			
Drawn by/ checked by	CRE			

APPENDIX B LOCAL PLAN SUBMISSION DRAFT REPRESENTATIONS FORM



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: David	First name: Bernard
Last Name: Lloyd	Last Name: Greep
Organisation/company: Oak Tree Developments	Organisation/company: Peter Brett Associates LLP
Address: c/o agent Postcode:	Address: 61 Oxford Street Manchester
	Destante MA 050
	Postcode: M1 6EQ

Signatur te:	13/03/2019	

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Counc	il's preferred method of communication. If no e-mail

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it

Policy	X	Paragraph / diagram / table	X	Policies Map	Х	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment		
	ent and	ents (please na l relevant	ime						
4. Do yo	ou cons	sider the St He	elens E	Borough Lo	cal Pl	an 2020-2035 is: al Compliance and the 7	Tests of Soundhoss		
Legally	Compl	iant?	Y	es 🗆	n Loge	No X	No X□		
Sound?			_	es 🗆		No X□			
Complie		the Duty to	_	es □ No □					
Please tic	k as ap	propriate					1		
Please r	ead the	Guidance note	for ex	planations of	is it be	ecause it is not: Tests of Soundness	LED		
Positive		pared?		XΠ					
Justified				Χ□					
Effective Consiste		h National Pol		X□ X□					
6. Pleas	e give	details of why	you c	onsider the	Loca	l Plan is <u>not legally co</u> be as precise as pos	impliant or is unsou		

box to set out your comments

Please refer to our attached submission '44807 - Representation on behalf of Oak Tree Developments as to the Soundness of the Submission Draft Local Plan' This provides context on why we believe the policies LPA04, LPA04.1, Table 4.1 and Employment Allocation EA9 are unsound as they have not properly considered NPPF

aragraph 185 in the context of the	he Parkside West Employment Allocation.
aragraphi 100 in are content or a	
	Please continue on a separate sheet if necessar
	Flease continue on a separate sheet if hesessar
	and was consider passessant to make the Local Plan legally
Please set out what modification	on(s) you consider necessary to make the Local Plan legally rd to the matter you have identified at 6. above where this
elates to soundness (NR please	note that any non-compliance with the duty to cooperate is
ncapable of modification at exam	nination). You will need to say why this modification will make
he Local Plan legally compliant	or sound. It will be helpful if you are able to put forward your
suggested revised wording of an	y policy or text. Please be as precise as possible.
Please refer to our attached sub-	mission of which a summary is provided below.
To ensure that policy I PA04 med	ets the test of soundness it should be amended to acknowledge
our client's land as a residential	development allocation. Table 4.1 should be updated to include
an allowance for C3 use as part	of 8EA Parkside West. This would be through an enabling
scheme to be subject of a suitab	le planning application that preserves the Grade II listed
	ntly adopted Core Strategy and enhances the setting of the
Newton Park Farm site.	
Housing policy may need undati	ng to account for this allocation albeit given its size it may be
considered as a windfall site.	ng to docount for time discount in the grant gra
Solitora de a minaren ener	
	Please continue on a separate sheet if necessa

modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; the oral part of the examination? (the hearings in	do you consider it necessary to participate at oublic)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination,	please outline why	you consider
this to be necessary:		

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1033

Page 1 of 1 ELOZ46

(4)- LPAO4-1 (5)- Appendix 5 Site profiles

Sites SEAR BEA

O-LPAOZ

-LPAO3

- LPAO4



Representation to the Local Plan Consultation - Sites 5EA and 6EA Matthew Thomas

planningpolicy@sthelens.gov.uk 13/03/2019 16:41

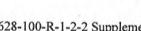


2 Attachments



31020 - Local Plan Letter to St Helens - 13.03.19.pdf





WIE15628-100-R-1-2-2 Supplementary Transport and Access Review.pdf

Hi,

Please find attached a letter of representation to the St Helens Borough Local Plan 2020-2035 that has been made on behalf of Canmoor Developments Ltd.

The representations specifically support the proposed allocation of sites 5EA and 6EA.

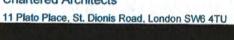
I trust that this will be taken into account in the preparation of the plan.

Regards,

Matthew

Matthew Thomas MPlan MRTPI **Principal Planner**

Michael Sparks Associates Chartered Architects



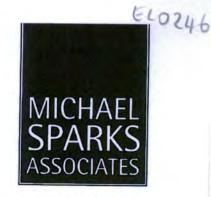


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MSA/31020/1/001

13 March 2019

Planning Policy Local Plan St Helens Council Town Hall Victoria Square St Helens Merseyside WA10 1HP



CHARTERED ARCHITECTS

11 PLATO PLACE ST. DIONIS ROAD LONDON SW6 4TU

Dear Sir / Madam,

NEW ST HELENS LOCAL PLAN 2020-2035 SUBMISSION DRAFT CONSULTATION

Further to the Council's publication of the draft new St Helens Local Plan 2020-2035 please find representations made below on behalf of Canmoor Developments Ltd in respect of sites 5EA and 6EA that have draft allocations for employment development within the Draft Local Plan.

Canmoor Developments are a pre-eminent warehouse and industrial developer with offices in London and Manchester, who have developed a significant portfolio of employment floorspace across the UK. They have made considerable investment across the north-west region to provide modern employment units for business that support the creation of jobs and are working with the respective landowners of sites 5EA and 6EA with the intention of developing these sites to add to their pipeline of warehouse and industrial development.

It is the intention that these sites will be developed to provide high quality, modern employment units that meet the high levels of occupational demand in this part of the UK and it is on this basis that these representations are made.

Sites 5EA and 6EA have been promoted for development as they are seen to be ideally placed to meet the demands of the occupational market, due to their location in close proximity to the Haydock Lane Industrial Estate, junctions 23 and 24 of the M6 as well as the East Lancashire Road/A580.

Whilst the sites are labelled as 5EA and 6EA in the emerging Local Plan, they are referred to by Canmoor as Link 23 and Millfield Park respectively.



Policy LPA02: Spatial Strategy

Policy LPA02 of the emerging Local Plan sets out the general policy approach to the provision of new development in St Helens over the period of the new Local Plan. The policy identifies that there is a specific need to accommodate growth across the logistics and warehousing sector. There is a particular demand for large scale units of over 9,000 sq m, which follows overall economic trends for larger employment units and demand in the north west is supported by investment into the port of Liverpool and Manchester Airport. The Link 23 and Millfield Park sites are both capable of accommodating units of 9,000 sq m and above and their allocation would meet an identified need.

The Council's evidence base identifies that additional land is required to meet the employment needs of St Helens across the plan period and the Council's approach to allocating sites EA5 and EA6 to meet this need is considered to be in accordance with the requirements of paragraph 23 of the NPPF that states the following:

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 in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...

The objectives of this policy are considered to be sound and in accordance with National Policy.

Policy LPA03: Development Principles

The principles for new development set out within Policy LPA03 are supported. This policy should be read in conjunction with draft Policies LPA02 and LPA04, as the allocation of further employment land to meet the defined need will contribute to job creation and increase opportunities for residents within St Helens., particularly those that live near to Haydock.

The objectives of this policy are considered to be sound and in accordance with National Policy.

Policy LPA04: A Strong and Sustainable Economy

Policy LPA04 recognises that there is a requirement for the delivery of a minimum of 215.4 hectares of land for employment development over the plan period. Our client is supportive of this assertion, and the allocations identified within the draft Policies Map, as noted in the draft policy, are similarly supported.

These allocations, including the Millfield Park and Link 23 sites, will contribute to meeting the economic needs of St Helens Borough and the Liverpool City Region over the next plan period and allow for the continued investment into St Helens to provide jobs and economic growth. As noted through the Green Belt review and evidence base that supports the preparation of the emerging plan these sites are considered suitable to be removed from the Green Belt for employment development.









In considering whether this amount of land should be allocated and removed from the Green Belt, the approach to preparing the Local Plan has been based on a robust methodology that takes account of local and regional economic factors as well as consideration of other alternative development scenarios.

The objectives of this policy are therefore considered to be sound and in accordance with National Policy.

Policy LPA04.1 Strategic Employment Sites

This policy provides additional detail to the proposed allocation of the Millfield Park site south of Liverpool Road (6EA) as a Strategic Employment Site. It is noted that any planning application for such a site must be supported by a comprehensive masterplan, which must set out details of the type of development and phasing, indicative layout and design for the whole site to secure an attractive built form and high quality landscaping.

Furthermore, measures to provide good levels of accessibility by sustainable transport methods are also required, as well as a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way. The policy also requires any application to include information in respect of how energy efficiency and the use of renewable or low carbon energy will be promoted and to ensure that sufficient infrastructure is provided to serve the development. These points would generally be considered under any planning application for the site, would be in the interests of good planning and are therefore supported by our client.

It is further noted that any masterplan for a Strategic Employment Site should address the site specific requirements as noted in Appendix 5. In respect of the Millfield Park, site, these requirements include:

- appropriate highways access via Millfield Lane and allocated 2EA site,
- the implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network,
- the design and layout of the development must integrate well with that of any existing or approved development within allocated 4EA and 6EA,
- the provision of effective flood management measures for the Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.

Highways Access

It is welcomed that Appendix 5 identifies that access should be taken from Millfield Lane, however the requirement that access should also be provided from Site 2EA is not supported as it is considered that using this alternative access point is unnecessary. The requirement for access from the allocated 2EA site is inappropriate and unnecessary as an appropriate means of access is available from Millfield Lane, using either land that is public highway or within the





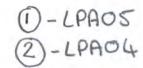


PO1034

EL0252



Local Plan Thomas Fenton-Brown to: planningpolicy 13/03/2019 16:48





Thomas Fenton-Brown 9Arnian Road Rainford St Helens WA11 8BU

13th March 2019

The industrial estate itself has a lot of derelict or empty space which can be used for the employment — site mentioned in the plan - have the Council been on this estate to see this for themselves?

The use of Brownfield sites for housing purposes should be the priority over and above using greenbelt land, thus helping to regenerate and helping to sustain a vital core to our town centre. The Council has used inflated housing need in their Local Plan and this can be supported with evidence.

Environmental issues should be taken seriously e.g., the extensive wildlife in the area, any increase in housing will result in unacceptable and severe impacts on our road networks. Extra traffic brings more pollution, noise and health concerns.

The local infrastructure can barely cope at the moment- Rainford High School has little or no further capacity for pupils

The local GP service are bursting at the seams, and it is equally difficult to access local hospitals with inadequate and expensive local bus services

The release of greenbelt land is only allowed under <u>exceptional circumstances</u> and St Helens Council at no time has demonstrated or provided evidence for this, neither have they given clarity on why they have inflated the housing numbers under national planning framework guidelines

Sent from my iPhone

PO1035



Email 1/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]
Matt Grant

to:

'planningpolicy@sthelens.gov.uk' 13/03/2019 16:48

13/03/2019 10.46

3 Attachments





41962_05 db symmetry Representations to SHBLP 13-03-19.pdf 41962_05 Appendix 1 - Location Plan.pdf



41962_05 Appendix 2 - Site Assessments Report.pdf

Dear Sir/Madam,

On behalf of db symmetry management Ltd, Lichfields is pleased to submit the attached representations to the St Helens Local Plan Submission Draft.

Please note that due to size restrictions this is email 1 of 6, with 5 further emails to follow.

I would be grateful if you could receipt of the representations by return.

Kind regards,

Matt Grant Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU



RE: Email 2/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:50

5 Attachments





41962_05 Appendix 5c - FRA & Drainage.pdf 41962_05 Appendix 3 - Delivery Statement.pdf





41962_05 Appendix 4 - SHELMA Rep 30-10-17.pdf 41962_05 Appendix 5a - Air Quality.pdf



41962_05 Appendix 5b - Noise.pdf

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Sent: 13 March 2019 16:48

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Matt Grant

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:51



4 Attachments



41962_05 Appendix 5e2 - Ground Conditions Risk Table.pdf



41962_05 Appendix 5d1 - Historic Environment.pdf





41962_05 Appendix 5d2 - Historic Environment Figure 1.pdf 41962_05 Appendix 5e1 - Ground Conditions.pdf

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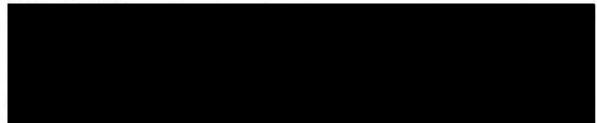






RE: Email 4/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530] Matt Grant

'planningpolicy@sthelens.gov.uk' 13/03/2019 16:52



1 Attachment



41962_05 Appendix 5f - Landscape & Visual.pdf

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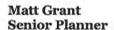
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RE: Email 5/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530] Matt Grant

'planningpolicy@sthelens.gov.uk' 13/03/2019 16:53



1 Attachment



41962 05 Appendix 5g - Preliminary Traffic & Transport Statement.pdf

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RE: Email 6/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:54

1 Attachment



41962_05 Appendix 5h - Ecological Assessment.pdf

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Ship Canal House 98 King Street Manchester M2 4WU

Planning Policy Department St. Helens Council Town Hall Victoria Square St. Helens Merseyside WA10 1HP

Date: 13 March 2019

Our ref: 41962/05/SPM/MG/17228018v3

Your ref:

Dear Sir / Madam

Representations to the St Helens Submission Draft Local Plan: Omega North Western Extension, Bold

On behalf of db symmetry management Ltd [db symmetry] please find enclosed representations prepared by Nathaniel Lichfield & Partners [Lichfields] in response to the current consultation on the Submission Draft of the emerging St Helens Borough Local Plan [the SHBLP].

db symmetry is a specialist industrial and logistics development company majority owned by Tritax Big Box REIT Plc who control £3.4 billion of assets. db symmetry focuses on land promotion and development delivery and has one of the largest programmes of speculative commercial building in the UK.

Background

These representations are made in the context of db symmetry's interest in land to the west of Omega North, St Helens which is currently located within the Green Belt. A site location plan is enclosed with this letter. db symmetry has previously submitted a Delivery Statement to St Helens Borough Council [the Council] and Warrington Borough Council [WBC] in August 2017. Representations were also submitted to the Liverpool City Regional Strategic Housing and Employment Land Market Assessment [SHELMA] in October 2017 promoting the proposed Omega North Western Extension for logistics development.

The previous representations were supported by a Delivery Statement which clearly demonstrated that the site is suitable, available and that a logistics development at the site is viable/achievable within the next five years. However, under draft Policy LPAo6 of the emerging SHBLP, the Omega North Western Extension is proposed to be safeguarded for future development beyond the current plan period (i.e. post 2035).

These representations are supported by a Sites Assessment Report (enclosed with this representation) which considers all of the strategic employment sites that are proposed to be allocated for development under draft Policy LPO4.1 of the SHBLP, as well as the other proposed safeguarded sites. The details of the methodology we have used to undertake this assessment is set out within the report. The previously submitted Delivery Statement (also enclosed) is resubmitted to support this representation, along with the comprehensive suite of technical reports and the previous SHELMA reps. These collectively demonstrate that there no environmental issues affecting the site that would prevent it from being allocated within the emerging Local Plan and brought forward for development now.



Submission Draft Local Plan

The Council published the SHBLP for consultation on 16th January 2019 for 8 weeks. The consultation closed on 13th March 2019. Once adopted, the SHBLP will set out the framework for achieving sustainable growth and development across the borough between the plan period of 1st April 2020 and 31st March 2035.

The purpose of the SHBLP can be summarised as follows:

- Sets out the vision and objectives for the development of the Borough up to and beyond 2035;
- · Sets strategic policies guiding the amount, form and location of new development;
- · Identifies site allocations for new housing, employment and other forms of development; and,
- Provides local policies with additional requirements to guide the consideration of planning applications for new development, and details of where these will apply.

These representations consider the SHBLP in the context of the identified strategy for securing economic growth and the sites proposed for allocation.

Employment Requirement

The Council's strategy for Economic Development is set out in Policy LPA04 (A Strong and Sustainable Economy) of the SHBLP. The policy sets out the borough's main aspirations in respect of economic growth. Of particular relevance to these representations are the following:

- 1 To help meet the Liverpool City Region's needs for economic growth, job creation and skills development; and,
- 2 To maximise the economic opportunities presented by St Helens Borough's location in relation to strategic road and rail routes.

In order to achieve the above, the SHBLP proposes the delivery of a minimum of 215.4 hectares of employment land between 1 April 2018 and 31 March 2035 to meet the needs of St Helens Borough. The supporting table (Table 4.1) goes on to identify 11 sites that are proposed to be allocated for employment development. The proposed site allocations include a mix of strategic (sites in excess of 20 hectares in size) and non-strategic sites. Table 4.1 states that the cumulative indicative capacity of the 11 proposed allocations is 265.3 hectares which exceeds the minimum requirement. This can be largely attributed to the fact that the Omega South Western Extension is proposed to meet the employment needs of Warrington as opposed to St Helens. When discounting the Omega South site, the supply for St Helens equates to 234 hectares, leaving a more modest oversupply of approximately 20 hectares.

Policy LPAo4.1 (Strategic Employment Sites) goes onto provide further detail in respect of the development principles for the strategic employment sites which we have not repeated here.

In respect of the borough's future growth requirements beyond 2035, Policy LPA06 (Safeguarded Sites) identifies sites to be removed from the Green Belt but protected from permanent forms of development for the duration of the current plan period in order to provide a reserve of potential sites to meet longer term employment and housing development needs after 2035. This includes the proposed Omega North Western Extension.

It is acknowledged that the strategy proposed within the SHBLP is 'pro-growth'. It reflects the fact that the warehousing and logistics market is performing well and that there is significant demand for further growth across the Liverpool City Region [LCR] and indeed within St Helens itself. As such, we have not interrogated the identified employment requirement in detail. However, given that it is a key policy aspiration to help the LCR meet what has been identified as a substantial growth requirement in the region of between 400-500





hectares of logistics development over 25 years¹, we believe that there is scope to allocate further land in St Helens now to ensure that the growth aspirations of Borough are met. The borough's access to the strategic road network is unparalleled when compared to any of the other LCR boroughs and substantial demand exists for well-connected sites within the M62 and M6 corridors. Allocating enough land for employment development in well-connected locations is crucial to unlocking the full potential of the LCR in the coming years and fulfilling the growth agenda driven by the Liverpool Superport.

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Sites Identified to Meet Employment Need

To meet the identified need, the SHBLP proposes to allocate the following sites:

- Site Ref. 1EA Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington) (31.22 hectares);
- 2 Site Ref. 2EA Florida Farm North, Slag Lane, Haydock (36.67 hectares);
- 3 Site Ref. 3EA Land North of Penny Lane, Haydock (11.05 hectares);
- 4 Site Ref. 4EA Land South of Penny Lane, Haydock (2.16 hectares);
- 5 Site Ref. 5EA Land to the West of Haydock Industrial Estate, Haydock (7.75 hectares);
- 6 Site Ref. 6EA Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (20.58 hectares);
- 7 Site Ref. 7EA Parkside East, Newton-le-Willows (64.55 hectares);
- 8 Site Ref. 8EA Parkside West, Newton-le-Willows (79.57 hectares);
- 9 Site Ref. 9EA Land to the West of Sandwash Close, Rainford (6.96 hectares);
- 10 Site Ref. 10EA Land at Lea Green Farm West, Thatto Heath (3.84 hectares); and,
- 11 Sire Ref. 11EA Gerards Park, College Street, St. Helens Town Centre (0.95 hectares).

It proposes to safeguard the following sites for future employment development:

- 1 Site Ref. Omega North Western Extension, Bold (29.98 hectares); and,
- 2 Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (55.90 hectares).

Assessment of Sites Proposed to be Allocated

In order to test the strategy proposed in the SHBLP, we have undertaken a Sites Assessment exercise which considers all of the strategic employment sites (which are defined as sites greater than 20 hectares) proposed for allocation under draft Policy LPo4.1 of the SHBLP (excluding site ref. 2EA which has planning permission) and safeguarded through draft Policy LPA06 of the SHBLP. The following sites have been assessed as part of this process:

The following sites have been assessed as part of this process:

- Omega North Western Extension, Bold (Ref. 1ES);
- 2 Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA):
- 3 Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
- 4 Parkside East, Newton-le-Willows (Ref. 7EA);

¹ Liverpool City Region Growth Strategy (2016)

LICHFIELDS

- 5 Parkside West, Newton-le-Willows (Ref. 8EA); and,
- 6 Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).

We have not assessed the Florida Farm site (Ref. 2EA). It is important to note that this scheme benefits from planning permission (ref. P/2016/0608/HYBR) and is currently under construction. This scheme therefore forms part of the baseline conditions in respect of highways capacity and Green Belt, amongst all other technical matters. The application for the Florida Farm scheme was accompanied by detailed evidence that supported the ability of the highway to accommodate that quantum of development. This was tested and accepted by the Council. Therefore, the consented quantum of floorspace on the Florida Farm site up to the previously consented quantum of floorspace is a commitment. The assessment of other sites does not seek to suggest otherwise than full consented floorspace at Florida Farm can be brought forward without any highways constraints.

For each site, the assessment methodology considered the following:

- · Environmental constraints;
- The ability to deliver sustainable development (particularly in the context of proximity/connectivity with the strategic road network);
- · The contribution to the Green Belt;
- · Other policy constraint; and,
- Deliverability and developability.

For each criterion, the site was assigned a score using a traffic light system of green, amber and red to assess each sites performance. Green means that the site is considered to perform well, amber that it performs moderately well with some issues and red that it performs poorly. The Sites Assessment Report is supported by detailed site assessment proformas which consider all of the issues in detail. Both the report and the proformas should be read in conjunction with this representation.

Table 1 (below) sets out the findings of our assessment when considering each of the criteria using the traffic light scoring system.

Table 1 Site Assessment Findings

	Site							
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse		
Environmental Constraints								
Vehicular Access				L				
Traffic Impact								
Landscape Impact								
Flood Risk								
Ground Conditions								
Ecology								
Heritage								
Air Quality								



	Site							
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse		
Noise								
Other								
Sustainable Development								
Access to Strategic Road Network	No.							
Access to Services/Public Transport								
Green Belt Contribution								
Policy Constraints			10000		1			
Deliverability and Developability								
Suitability					1	1		
Availability								
Achievability/Viability								

Source: Lichfields

The detailed analysis relating to each criterion for each site is located within the Site Assessment proformas and is not repeated here.

We are aware that a number of the proposed strategic allocations (and proposed safeguarded land) are subject to pending planning applications relating to proposals for B2/B8 development, the details of which are set out within the Site Assessment Proformas.

To date, these applications remain pending. It is understood that significant issues exist in terms of their cumulative impacts on highways capacity and traffic impact in respect of Junction 22 and Junction 23 of the M6. Highways England's position remains that planning permission should not be granted for these schemes. It is clear that an acceptable mitigatory solution to allow for all of the proposed strategic developments in the M6 corridor to come forwards is not readily forthcoming and that significant issues remain. Furthermore, we understand that Highways England have recently removed their objection to proposals for employment development on a non-strategic site (site ref. 5EA) adjoining land west of Millfield Lane and that this application will likely be approved in due course. If approved, this scheme will have further implications on the available highways capacity within the M6 corridor.

Whilst we understand that work is ongoing to find a solution to the wider issues, it is unclear if such a solution exists at this time. Furthermore, the issues exist in respect of the planning applications that have been submitted to date. That is before considering the further implications that the development of site 6EA (land west of Millfield Lane) would incur on the M6 corridor (and indeed the local road network). Even if an acceptable mitigatory solution was agreed in respect of all of the current proposals, it is unlikely that it would increase capacity to the level necessary to accommodate any future development on site 6EA.

In light of the above, it is our contention that the strategy to deliver significant clusters of employment development to the east of the borough within the M6 corridor is flawed in respect of highways capacity and traffic impact. It would clearly make sense to redistribute some of the land proposed to be allocated away from the M6 corridor. The strategy that is currently proposed within the SHBLP is already being tested and



there are clearly significant challenges to overcome. Whilst it is possible that a solution will be found, there is a reasonable prospect that this will not be achievable in the short term and therefore it would make sense to unlock more sites as part of the strategy.

Omega North Western Extension

This section sets out why we consider that the proposed Omega North Western Extension should be allocated for development now and not safeguarded for future development.

The proposed Omega North Western Extension is located on the south-eastern boundary of St Helens borough, its eastern boundary adjoining the existing Omega North Development which is located in Warrington. The development of the site will create a sustainable employment extension to Omega North. The site is capable of accommodating up to 1.4 million sq. ft. of logistics floorspace and its development will bring significant job creation and socio-economic benefits to both St Helens and Warrington Borough.

The site is available and in the control of one willing landowner, who has partnered with db symmetry to bring the site forward. It is suitable for logistics development and will form a natural extension to the Omega North site. St Helens has a substantial workforce that can resource the future occupiers of the buildings. Development on the site is achievable and there are no technical constraints that will prevent the site coming forward. The site is economically viable and the developer is confident that employment development can be achieved within the next 5 years. The supporting Delivery Statement clearly sets out the substantial economic, social and environmental benefits the development of the site would achieve and demonstrates that it is suitable, sustainable and deliverable in the short term.

In the context of the sites location in the Green Belt, the St Helens Green Belt Review 2018 acknowledges that it would make sense to remove the site from the Green Belt. Indeed, this is reflected in the proposals to safeguard the site as this does secure the sites release from the Green Belt, albeit restricts development within the current plan period (or at the least until a review takes place). Nevertheless, given that the principle for the sites release from the Green Belt is clearly established, it comes down to a matter of delivery. This representation and the associated documentation clearly demonstrates that the site is deliverable in the immediate short term.

In respect of access, it is proposed that the site will be accessed via Lockheed Road which runs adjacent to the M62 and would connect with the sites south-eastern boundary. It is important to note that Lockheed Road is purpose built to accommodate heavy goods vehicles [HGV's] and serves the existing units at Omega North which are occupied by Travis Perkins, Haydock Commercial Vehicles and Brakes, before connecting with Junction 8 of the M62. db symmetry are in advanced discussions with the Omega North Management Company (who manage the entire Omega North Development) and we understand that there are no constraints in respect of access. It should also be noted that there is potential to deliver an emergency access along Joy Lane to the north of the site. Whilst efforts are not being made at present to secure a secondary access, this is something that could be considered in the short term. Unlocking this access would provide a secondary access to serve the entire Omega North development, offering significant betterment for both existing and future occupiers.

db symmetry wishes to invest in St Helens because it is a pro-growth district with a very strong existing logistics cluster offering critical mass and the supply chains needed to sustain successful operations. Occupiers will have access to a large, highly skilled, very productive and growing workforce that is required to operate successful logistics hubs.

It is important to note that, whilst it is acknowledged that the proposed Omega North Western Extension would have a close relationship with the adjoining Warrington borough, db symmetry are clear that the

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development would meet the needs of St Helens and the wider LCR. St Helens should seek to meet their own employment needs and those of the wider LCR and vice versa in respect of Warrington. There is sufficient land in both St Helens and Warrington to meet their own employment land needs and therefore we do not consider there to be reasoned justification for land in St Helens to be allocated to meet Warrington's needs. The fact that the proposed western extensions to both Omega North and South adjoin Warrington does not mean that they should be considered as part of that borough's supply. Indeed, the St Helens Employment Land Needs Assessment (January 2019 Addendum) [ELNA], acknowledges that the Omega South site will create jobs for St Helens Residents:

"Omega South Extension could form part of Warrington's employment land supply in the forthcoming revised Warrington Local Plan. St. Helens and Warrington Council officers both agree that the site would form an expansion to the existing Omega South strategic employment location and therefore would have a direct relationship with Warrington, although it would continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does" [ELNA, Paragraph 13.4]

Whilst there is an obvious relationship between the proposed extensions at both Omega North and South with Warrington Borough, the developments are equally important for St Helens and will provide significant employment opportunities to residents of St Helens. Significant highways and accessibility improvements would be delivered as part of the Omega North development would significantly improve connectivity and access with Bold and the wider St Helens borough.

Conclusion

This representation, the Sites Assessment Report (and associated proformas), along with the Delivery Statement and submitted technical evidence clearly demonstrates that the land to the west of Omega North is suitable, available and deliverable for development in the short term (5-year period). The wider Omega development is proven to attract national operators and db symmetry have already received a number of enquiries in respect of the site.

The site is not subject to any significant environmental constraints that would prevent its immediate development in the short term. It is therefore our view that the strategy set out within draft Policy LPA04.1 of the SHBLP should be revisited to allocate the Omega North Extension for industrial, logistics and warehousing.

Furthermore, the Sites Assessment exercise has identified what we consider to be fundamental issues in respect of the current strategy's ability to deliver sustainable development. We are concerned that the strategy has failed to take account of significant issues in respect of the ability for addition highways capacity to be delivered within the M6 corridor to unlock the development of sites proposed for allocation. The capacity was able to accommodate Florida Farm, which is consented and under construction, but the delivery of any further development over and above that which has already been committed is questionable. On this basis we object to the current SHBLP and believe it fails to meet the tests of soundness set out in the Framework [§35]. In this regard the SHBLP:

- a Is not **positively prepared**. Whilst we believe that efforts have been made to prepare a strategy which seeks to meet the areas objectively assessed needs, it is our contention that either the deliverability of the proposed strategy has not been fully considered or the constraints have been ignored.
- b Cannot be justified in that the SHBLP disregards evidence which clearly demonstrates that major constraints exist in respect of the pursued strategy which cast significant doubts on whether or not it is actually deliverable. The strategy is already being tested by virtue of live planning applications



relating to sites within the M6 Corridor. We have established that considerable issues exist in respect of the cumulative effects of these developments on highways capacity and we have noted that Highways England's advice to date maintains that planning permissions should not be granted. This clearly casts doubt as to whether the strategy proposed is an appropriate strategy. As such, consideration should be given to reasonable alternatives which could assist with taking pressure off the M6 Corridor.



- c Is not **effective** in that the identified constraints raise doubts as to whether the proposed strategy could actually be delivered over the plan period.
- d Is not consistent with National Policy in that the strategy fails secure the overarching objectives of sustainable development set out in the Framework, particularly in respect of environmental objectives.

For the reasons set out above, db symmetry do not consider the strategy currently pursued in the SHBLP tobe sound.

The proposed Omega North Western Extension is unconstrainted in nature and available to come forward for development immediately. The allocation this site clearly represents a reasonable and justified alternative to the current strategy. It is therefore concluded that the strategy should be revisited and the proposed Omega North Western Extension allocated for industrial and logistics development within the emerging Local Plan.



We look forward to receiving confirmation of the receipt of these representations and ask that they are given full consideration in preparing the next stage of the Local Plan.

Should you have any questions or wish to discuss these representations further please do not hesitate to contact me. We welcome the opportunity to engage with St Helens during the iterative process of the Local Plan.

Yours sincerely



Matt Grant Senior Planner

Copy: Matt Claxton (db symmetry)

Enc.

- 1. Site Location Plan
- 2. Sites Assessment Report
- 3. Omega North Western Extension Delivery Statement
- SHELMA Reps
- Technical Reports

Omega North Extension, Bold Site Assessments Report

In Support of Representations to the St Helens Local Plan Submission Draft

db symmetry

13 March 2019



1.0 Introduction

- 1.1 The following assessment has been undertaken by Nathaniel Lichfield & Partners [Lichfields] on behalf of db symmetry management Ltd [db symmetry]. It has been prepared in order to assist St Helens Metropolitan Borough Council [the Council] in their further consideration of the proposed strategic allocations for employment land within the submission draft of the emerging St Helens Borough Local Plan [SHBLP].
- Draft Policy LPA04.1 of the SHBLP identifies the sites proposed for allocation as Strategic Employment Sites:
 - Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA);
 - Land at Florida Farm North, Slag Lane, Haydock (Ref. 2EA);
 - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
 - Parkside East, Newton-le-Willows (Ref. 7EA); and,
 - Parkside West, Newton-le-Willows (Ref. 8EA).
- 1.3 These sites are considered to be strategic due to their size, which in all cases exceeds 20 hectares. There are a number of smaller 'non-strategic' employment sites also proposed for allocation although these are not considered in this report.
- Draft Policy LPA06 relates to 'Safeguarded Land' and proposes to release two further 'Strategic Employment Sites' from the Green Belt:
 - Omega North Western Extension, Bold (Ref. 1ES); and,
 - Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).
- 1.5 The draft policy states that Safeguarded Land will be removed from the Green Belt but protected from permanent forms of development for the duration of the current plan period in order to provide a reserve of potential sites to meet longer term development needs after 2035.
- This assessment considers all of the sites identified by the Council as proposed strategic employment sites allocations or safeguarded land as part of the emerging Local Plan process. To secure sustainable development and to meet the identified housing needs, the Council should allocate the most appropriate strategic sites for Green Belt release in the Local Plan. In identifying potential sites, the Council will need to have regard to policy and technical opportunities and constraints, as well as other material considerations, and apply the approach in presumption in favour of sustainable development as required by the National Planning Policy Framework [the Framework] [§11].
- 1.7 For the reasons set out in this assessment, it is considered that the proposed Omega North Western Extension, Bold is the most suitable site for removal from the Green Belt and should be allocated as a strategic employment site. It is considered that site should be allocated for economic development rather than identified for safeguarded land as it is the most sustainable, suitable and deliverable site in the borough. The site is capable of being delivered within five years and will provide a high-quality development which will create significant employment opportunities and further enhance the wider Omega development as a nationally significant warehousing, industrial and logistics destination.

Assessment Methodology

Sites Assessed

- 2.1 The following sites have been assessed as part of this process:
 - Omega North Western Extension, Bold (Ref. 1ES);
 - Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA):
 - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
 - Parkside East, Newton-le-Willows (Ref. 7EA);
 - Parkside West, Newton-le-Willows (Ref. 8EA); and,
 - Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).
 - We have not assessed the Florida Farm site (Ref. 2EA). It is important to note that this scheme benefits from planning permission (ref. P/2016/0608/HYBR) and is currently under construction. This scheme therefore forms part of the baseline conditions in respect of highways capacity and Green Belt, amongst all other technical matters. The application for the Florida Farm scheme was accompanied by detailed evidence that supported the ability of the highway to accommodate that quantum of development. This was tested and accepted by the Council. Therefore, the consented quantum of floorspace on the Florida Farm site up to the previously consented quantum of floorspace is a commitment. The assessment of other sites does not seek to suggest otherwise than full consented floorspace at Florida Farm can be brought forward without any highways constraints.
- 2.2 All of the sites that have been assessed are sites that have been identified for allocation as strategic employment sites or land safeguarded for future strategic employment development.

Evidence Used

2.3 The evidence used in this assessment has been taken from a number of sources including the SHBLP, the supporting evidence base, representations submitted at the Preferred Options stage of the Local Plan and information submitted to support currently pending planning applications.

Approach to Assessment

A proforma for each site has been prepared. The proforma considers each site against a series of key criteria as follows:

1 Environmental Constraints:

- a Vehicular Access;
- b Traffic Impact;
- c Landscape Impact;
- d Flood Risk;
- e Ground Conditions;
- f Ecology;
- g Heritage;
- h Air Quality;

- i Noise; and,
- i Other.

2 Sustainable Development:

- a Access to Strategic Road Network; and,
- b Access to Services/Public Transport.
- 3 **Green Belt Contribution** (based on the St Helens Green Belt Review 2018).
- 4 **Policy Constraints** (As all of the sites lie within the Green Belt, Green Belt policy has not been considered as a constraint for the purposes of this assessment).
- 5 Deliverability and Developability:
 - a Suitability;
 - b Availability; and,
 - c Achievability/Viability.
- 2.5 Following the assessment process, a traffic light system has been used to assess each site against the criteria identified:
 - Green Performs well:
 - Amber Performs moderately well with some issues; and,
 - Red Performs poorly.
- 2.6 It is important that economic, social and environmental factors are balanced when undertaking this kind of assessment. We consider that the hierarchy below sets out a suitable approach to balancing these factors and identifying the most appropriate sites:
 - 1 The general deliverability and developability of each site;
 - 2 The sites proximity and connectivity to the Strategic Road Network;
 - 3 The contribution of the site to the Green Belt; and,
 - 4 Consideration of the environmental and policy constraints.
- 2.7 When assessing the sites, consideration has also been given to whether there are any potential issues ('showstoppers') which would prevent development coming forward on the site (e.g. flood risk, lack of access etc.).
- 2.8 The outcome of the assessment is detailed in the following section.

3.0 Findings

Introduction

- 3.1 Attached at Appendix 1 are the assessment proformas for each site.
- 3.2 Using the information provided in the proformas, table 3.1 assess each site using the traffic light scoring process referred to in the previous section of this report.

Table 3.1 Site Assessment Table

	Site							
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse		
Environmental Constraints								
Vehicular Access								
Traffic Impact								
Landscape Impact								
Flood Risk								
Ground Conditions								
Ecology								
Heritage								
Air Quality								
Noise								
Other								
Sustainable Development								
Access to Strategic Road Network								
Access to Services/Public Transport								
Green Belt Contribution								
Policy Constraints								
Deliverability and Developability								
Suitability								
Availability								
Achievability/Viability								

Source: Lichfields

Commentary on Sites

Environmental Constraints

3.3 As Table 3.1 shows, both the Omega North and Omega South Extensions perform best when considering the cumulative environmental constraints for each site.

- Of particular relevance is the poor performance of land west of Millfield Lane (Ref. 6EA) and land south of Haydock Golf Course in respect of traffic impact. In respect of land West of Millfield Lane, we are aware that the live planning applications for industrial, logistics and distribution developments on the adjoining non-strategic site (Ref. 5EA) and on Land South of Haydock Golf Course (Ref. 2ES) are experiencing significant issues in respect of highways capacity. It is unclear at this time if an acceptable solution can be found but we understand that the current position is that the applicant has been unable to submit additional information to date which satisfies Highways England's concerns in respect of the developments impacts on J23 of the M6. It is clear however that evidence submitted in respect of these schemes has not considered the development of Land West of Millfield Lane and therefore, even if an acceptable solution is found in respect of the current schemes, additional capacity issues would exist in respect of site Ref. 6EA.
- There is also a discrepancy between the access location proposed within the SHBLP and that promoted by Canmoor Developments Ltd [Canmoor]. The site proforma contained at appendix 7 of the SHBLP states that access should be achieved through the existing industrial estate and site 5EA. However, the current planning application on site 5EA does not allow for access to be facilitated through this scheme and Canmoor are promoting access from the adopted highway further north on Millfield Lane or from Liverpool Road. We understand that this is unlikely to be an acceptable solution to the Council.
- There are also significant highways issues in respect of the proposals at Parkside West and East. Highways England's latest consultation response in respect of the outline planning application (dated 31st January 2019) raised a number of significant concerns in respect of the proposals. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission for the first phase of the development should not be granted at this time. Notably, in respect all of the schemes subject to live planning applications, Highways England's advice to date is that planning permission should not be granted.
- 3.7 In terms of wider environmental constraints, the Omega North sites scores the most greens of all the sites. Land at Omega South also performs well with 7 greens and 3 ambers. Land to the South of Haydock Racecourse is the next best performing site with 7 greens, 1 amber and 2 reds. The worst performing sites are land west of Millfield Lane and Parkside West which score 4 greens, 4 ambers and 2 reds respectively.
- In respect of landscape impact, the two omega sites, land west of Millfield Lane and Parkside east scored amber due to the relatively contained nature of the sites. Both Parkside East and land south of Haydock Race course scored red. This is linked to their high scores in respect of impact on Green Belt purposes and by virtue of this, it is considered that the development of these two sites would have a greater impact on landscape.
- In terms of Flood Risk, all of the sites are located within Flood Zone 1 and therefore are considered to perform well. Likewise, all sites are considered to perform well in respect of ground conditions, albeit the Parkside West site scores amber due to the elements of previously developed land on the site, with the site investigation report submitted in support of the Phase 1 planning application acknowledging that plausible sources of contamination exist within the site.
- Both Omega North and land west of Millfield Lane are considered to perform best in respect of ecology. This is because the technical evidence we have reviewed has not identified the presence of any protected species on these sites. The technical evidence associated with the other four

sites identify the presence of or potential for the presence of protected species and therefore a greater deal of mitigation will likely be required at these sites.

In terms of heritage, land to the south of Haydock Racecourse performed best as there are no heritage assets identified within the defined area of search that are likely to be impacted by the development. Four of the sites, including Omega North were found to perform reasonably well although some mitigation is likely to be required in respect of heritage assets located outside of but within reasonably close proximity to the sites. Parkside West is the worst performing site in respect of heritage as there are a number of listed buildings and a designated battlefield located within the site.

All six sites are considered to perform well in respect of air quality. In terms of noise, both Omega sites and land to the south of Haydock Racecourse were found to perform best. Land to the west of Millfield Lane was found to perform reasonably well but a greater degree of mitigation will likely be required due to the sites close proximity to residential properties on the Fairways/Liverpool Road. Noise was considered to be a bigger issue at Parkside East and West also due to the proposed Strategic Freight Rail Interchange.

The only other technical constraint identified across all of the six sites was in respect of land to the west of Millfield Lane (Ref. 6EA). The 'West East Link Main' is a 55km water pipeline operated by United Utilities [UU], connecting Prescot Reservoir near Liverpool to Woodgate Hill Reservoir North of Manchester. The pipeline has the capacity to carry up to 100 million litres of water a day. It runs through the north-eastern part of the site. It is clearly reasonable to assume that this cannot be diverted and therefore any subsequent layout will be constrained by the pipelines location and the associated easements that will be required by UU.

The assessment demonstrates that there are clearly no environmental constraints that should prevent the allocation of the Omega North site within the SHBLP.

Sustainable Development

In the context of achieving sustainable development for industrial, logistics and distribution, we have considered the principal factor to be the sites connectivity with the strategic road network. To a lesser extent we have considered the sites access to services/public transport for employees to access. In respect of the sites connectivity with the strategic road network, all sites score green except for land West of Millfield Lane which scores amber. In respect of Omega North and South, land south of Haydock Racecourse and Parkside East and West, proposals exist that demonstrate direct access could be facilitated from the sites onto the M6 or M62. In respect of land west of Millfield Lane, access to Junction 23 of the M6 can only be achieved via Millfield Lane and the A580 and this route is already constrained by considerable traffic from the existing industrial estate. Therefore, land west of Millfield Lane is scored amber.

In terms of connectivity with services/public transport, all of the sites are located within the region of 3 kilometres from some form of retail facility. For all of the sites, we have identified bus stops located on roads abutting one or more of the site boundaries or in close proximity to a specific part of the site. The sites at Omega North and South benefit from a new bus service that has been instated which serves the adjacent plots for both sites.

Green Belt Contribution

The assessment of sites in respect of Green Belt contribution is based on the St Helens Green Belt Review 2018 and we have not undertaken our own assessment. It should however be noted that we do not necessarily endorse the Council's findings set out within this report.

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As none of the sites have been assessed as making 'No Contribution' in the Council's Green Belt Review 2018 in respect of Green Belt purposes, the maximum score allotted to the sites is Amber. All sites have been given a score of amber or red against this criterion dependent on whether the Council's assessment scores them as making a medium or high contribution to the Green Belt. Both Omega North and South, land west of Millfield Lane and Parkside West score amber as they are found to have a medium contribution to Green Belt purposes. Both land south of Haydock Racecourse and Parkside East score red as they are found to have a high contribution to Green Belt purposes. Therefore, in the context of Green Belt contribution, the other sites, including Omega North should be considered more favourably for allocation.

Policy Constraints

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As Table 3.1 shows, in terms of policy constraints, all of the sites score Green as we have not identified any additional policy constraints beyond the existing Green Belt allocations.

Deliverability and Developability

- When assessed in regard to Suitability, Availability and Achievability, the assessment found both Omega North and Omega South to perform best, both scoring green across all three criteria. We have found that all six sites can be considered to be available for development.
- In terms of suitability, the proposals at Parkside (both at the eastern and western sites) are long established and it is considered that the sites are suitable for development in this regard. Likewise, land to the west of Millfield Lane and land south of Haydock Racecourse, are considered to be suitable for development in the context of the majority of environmental constraints. However, the assessment has identified highways capacity/traffic impact issues of a significant nature exist at all of these sites and there is potential for significant cumulative impacts in respect of Junctions 22 and 23 of the M6. It is yet to be established if suitable mitigation can be delivered to accommodate all four of the strategic developments (and indeed a number of smaller non-strategic developments that are proposed) and therefore all four sites score amber for suitability at this time until further clarity is established in respect of highways capacity.
- In respect of achievability, Omega North and Omega South both score green and have been found to be achievable and viable. Both land to the west of Millfield Lane and land south of Haydock Racecourse score amber due to the identified highways constraints. This is also the case for Parkside East and West which both score amber. In addition, it is considered that achievability of the both Parkside East and West is interlinked and that neither site will come forwards without the other. This is acknowledged within the Parkside Logistics and Rail Freight Interchange Study (2016) which states that it is crucial for the delivery of a viable SRFI that land on the west and east sides of the M6 is included for future development. The project recently experienced a setback as potential SRFI operator Talgo opted for a site in Longannet, Scotland, the Parkside SRFI losing out.

Comparative Assessments

- Applying the hierarchy identified at paragraph 2.7 to the above findings, an overall traffic light rating has been assigned to each site based on performance against the hierarchy, as follows:
 - 1 Proposed Extension to Omega North Green.
 - 2 Proposed Extension to Omega South Green.
 - 3 Parkside West Amber.
 - 4 Parkside East Amber.

- 5 Land South of Haydock Racecourse Amber.
- 6 Land West of Millfield Lane Red.
- As the ratings indicate, the proposed extensions to Omega North and Omega South perform best against the assessment methodology applied. The sites at Parkside West, Parkside East and land south of Haydock Racecourse are considered to perform reasonably well subject to whether or not a satisfactory solution is found to deal with highways capacity issues. The site at land west of Millfield Lane is considered to perform poorest of all of the sites assessed.r

4.0 Conclusion

- 4.1 Based on the results of this assessment process it is considered that, of all the sites considered, the proposed Omega North Western Extension is the most suitable site for removal from the Green Belt and employment allocation in St Helens. The site assessment (and associated technical reports commissioned by db symmetry) clearly demonstrate that the site is not subject to any environmental constraints that would prevent it coming forwards for development immediately. We have demonstrated that the site is clearly deliverable, viable and available to come forward for development immediately. Therefore, the allocation of the proposed Omega North Western Extension clearly represents a reasonable and justified alternative to the current strategy.
- Furthermore, the site assessment exercise has raised fundamental concerns in respect of the current strategy, casting considerable doubts on whether or not it can be delivered without leading to significant adverse environmental impacts in respect of highways capacity within the M6 corridor. It is our contention that the conclusions of the assessment warrants consideration to be given to alternative options which could reduce such impacts.
- The proposed Omega North Western Extension represents a natural extension to a regionally significant, established employment site which is situated in a highly accessible location and is easily accessible by car and public transport. The site is also well contacted with nearby residential suburbs at Bold, Clock Face and Burtonwood. Overall, the proposed development will offer significant economic, social and environmental benefits to the residents of St. Helens and its allocation for development now would allow these significant benefits to be unlocked.
- It is therefore considered that there is an overwhelming case to allocate the proposed Omega North Western Extension for an industrial, logistics and warehousing development now rather than safeguarding the site to meet future development needs. We have presented significant evidence to demonstrate that the site is the most sustainable, suitable and deliverable site in St Helens. The site is capable of being delivered within five years and will provide a high-quality development which will further bolster Omega North as a premier employment destination in the North-West.

Appendix 1: Site Assessment Proformas

Site Assessment Proforma St. Helens Local Plan Ref: 1E5 – Omega North Western Extension | Site Area: 29.98 ha | Location: Omega North Western Extension, Bold (Draft Safeguard Allocation) Planning History: The site has no planning history.

Environmental Constraints	Comment
Vehicular Access	The access into the site can be taken from Lockheed Road. This road serves the existing warehousing and distribution uses associated with the Omega North development. It has been designed to specifically accommodate high-volumes of Heavy Goods Vehicle [HGV] traffic.
Traffic Impact	Curtins have prepared a Preliminary Transport Assessment [PTA] for the site. The PTA concludes that the development's impact on the operation of junction 8 of the M62 can be mitigated. The document suggests that improvements could be made to the roundabout to mitigate any impacts to the Burtonwood Road (south) arm. Whilst additional assessments would be required for any planning application, the PTA concludes that the initial findings suggest that there are no traffic and transport reasons that should prevent allocation of the site.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Clock Face Farming Character Area. By virtue of the sites location within the Green Belt, development will clearly have an impact on landscape. However, Enzygo have undertaken a Landscape & Visual Appraisal in respect of the proposed development which concluded that the proposals would not result in any significant harm to the landscape character or visual environment and could be well integrated into the proposed location. Therefore, the development of the site would be considered to have a moderate impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.

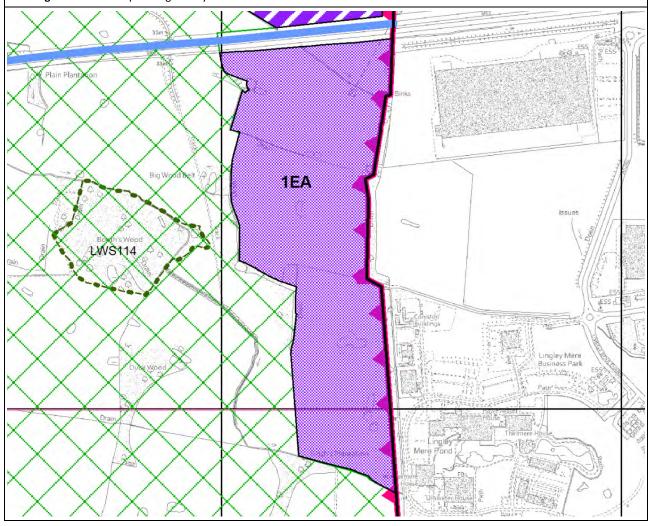
Ground Conditions	Tier UK have prepared a desk-based ground conditions assessment in respect of the proposed development which concluded there is no significant risk of on or off-site contamination sources and risks associated with ground instability are considered to be low. Therefore, it is unlikely the development of the site would be constrained by adverse ground conditions.
Ecology	TEP has prepared an Ecology Technical Note for the site. The survey didn't identify any evidence of protected species within the site and the assessment concluded that there are unlikely to be any adverse ecological issues that would prevent the sites allocation.
Heritage	There are no designated or non-designated heritage assets within the site and the available evidence suggests that there is low potential for significant archaeological remains of all periods. A Scheduled Monument, (Old Moat House Medieval Moat, Bold) is located approximately 700m to the north of the site. Three Listed Buildings (Farmhouse at
	Former Bold Hall Estate and associated structures) are located approximately 700m to the west of the site. The report concluded that whilst there is some potential for minor impacts on the heritage significance of four designated heritage assets within the 1km study area, this is not considered to be in conflict with national or local planning policy.
Air Quality	Air Quality consultants have undertaken a baseline Air Quality Assessment [AQA] in respect of the proposed development. There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington BC's Motorway AQMA located adjacent to the proposed development site to the southeast, which ends at the borough boundary. St Helens have not declared an AQMA alongside the M62. The AQA concluded the existing conditions within the study area show good air quality.
	Therefore, no air quality issues are anticipated.
Noise	An initial noise assessment has been undertaken by Hepworth Acoustics and is submitted with this report. The assessment demonstrated that the proposal will not introduce noise sources with any new or distinguishing features. Therefore, no negative noise quality impacts are anticipated.
Other	We are not aware of any other environmental constraints associated with the site.
Other	we are not aware or any other environmental constraints associated with the site.
Sustainable Development	Comment Comment
Sustainable Development	Comment
Sustainable Development Access to the strategic road network	Comment The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range
Sustainable Development Access to the strategic road network	Comment The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding
Access to the strategic road network Access to services/public transport	Comment The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site.
Sustainable Development Access to the strategic road network Access to services/public transport Green Belt	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution
Access to the strategic road network Access to services/public transport Green Belt Contribution to Green Belt Purposes	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'.
Sustainable Development Access to the strategic road network Access to services/public transport Green Belt Contribution to Green Belt Purposes Policy Constraints	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'. Comment Beyond the sites designation as Green Belt, we are not aware of any other policy
Sustainable Development Access to the strategic road network Access to services/public transport Green Belt Contribution to Green Belt Purposes Policy Constraints Planning Policy	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'. Comment Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Sustainable Development Access to the strategic road network Access to services/public transport Green Belt Contribution to Green Belt Purposes Policy Constraints Planning Policy Deliverability and Developability	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'. Comment Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site. Comment The extensive detailed technical assessment work carried out on the site to date confirms that there are no barriers to delivering warehousing, industrial and logistics at the site. The site is within the control of db symmetry who have an exclusive option agreement
Sustainable Development Access to the strategic road network Access to services/public transport Green Belt Contribution to Green Belt Purposes Policy Constraints Planning Policy Deliverability and Developability Suitability	The site has excellent connections with Junction 8 of the M62. The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site. Comment St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'. Comment Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site. Comment The extensive detailed technical assessment work carried out on the site to date confirms that there are no barriers to delivering warehousing, industrial and logistics at the site. The site is within the control of db symmetry who have an exclusive option agreement with the landowner. The site has been actively promoted through the Local Plan process and is considered available for development. db symmetry are also in exclusive talks with the landowners and are close to securing access from Lockheed Road into the site.

industrial and logistics development. db symmetry is a specialist industrial and logistics development company focused on land promotion and development delivery throughout the UK. The development team has been involved in some of the most successful speculative and client led schemes in the country. db symmetry are currently delivering one of the largest programmes of speculative commercial building in the UK. The developer has the opportunity, finance and expertise to bring the Symmetry Park, St. Helens site forward, bringing hundreds of jobs to the region over the next 5 years. db symmetry have reviewed the economic viability of the proposals in terms of land value, attractiveness of the location and level of potential market demand. They have confirmed that significant market demand exists at the site and have already received a number of initial enquiries. db symmetry can therefore confirm that the development of the site is economically viable and are confident that warehousing, industrial and logistics development can be delivered within five years.

St. Helens Local Plan Ref: 1EA – Omega South Western Extension Site Area: 31.22 ha

Location: Omega South Western Extension, Land north of Finches Plantation, Bold (Draft Allocation)

Planning The site has no planning history.



Environmental Constraints	Comment
Vehicular Access	St Helens Sustainable Transport Impact Assessment (2019) [STIA] identifies that access can be achieved from Skyline Drive, a purpose-built access road from Junction 8 of the M62. However, it is also stated that this junction suffers from high demand and often operates at capacity. Representations submitted by GVA on behalf of Miller Developments propose the delivery of a new exit slip road onto the M62 westbound at the northern boundary of the site although the rep acknowledged that further work needed to be undertaken to establish the feasibility of this.
Traffic Impact	St Helens STIA (2019) acknowledges existing traffic issues on the current Omega South site. Whilst is acknowledged that the southern extension can integrate well with the existing site, the STIA suggests that significant intervention is likely needed to address the current issues. Miller Developments suggest that the delivery of the westbound slip road onto the M62 will reduce the pressure on the junction 8 roundabout although there is no technical evidence to support this at this stage.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Bold Hall Character Area. By virtue of the sites location within the Green Belt, development will clearly have an impact on landscape. However, representations submitted on behalf of Miller Developments state that the development of the site would not negatively impact the surrounding

	landscape and Green Belt designation. Therefore, the development of the site would be considered to have a moderate impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	There is no evidence to suggest that the site is subject to any adverse ground conditions although this would need to be verified by a ground conditions assessment.
Ecology	There is a Woodland Priority Habitat Network located within the southern part of the site. The eastern site boundary and a small strip of the western site boundary lie within Woodland Improvement Areas.
	The representations submitted by GVA on behalf of Miller Developments also state that the pond to the south of the site has potential for Great Crested Newt Habitats. It is recognised that surveys for water voles, breeding birds and bats will need to be undertaken.
Heritage	There are no designated heritage assets within the site.
	A Scheduled Monument (Old Bold Hall) is located approximately 350m to the west of the site. There are 6 Grade II listed buildings within Old Bold Hall. The representations propose an ecological/heritage/landscape buffer area to mitigate the impact on the heritage assets.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site although the M62 AQMA adjoins the sites northern boundary.
Noise	Given the sites location adjoining an existing employment area, the sites development for employment is unlikely to create any issues in respect of noise.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to the strategic road network	The site has excellent connections with Junction 8 of the M62.
Access to services/public transport	The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services.
	A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at The Hut Group/Asda adjacent to the site.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Deliverability and Developability	Comment
Suitability	The information available within the Council's evidence base, along with the representations submitted by GVA on behalf of Miller Developments does not suggest there are any issues that represent significant barriers to employment development at the site.
Availability	The site is a proposed strategic employment allocation (Ref. 1EA). It is controlled by Miller Developments wo are actively promoting it through the Local Plan Process for B2/B8. The site is therefore considered to be available for development.
Achievahility / Viahility	
Achievability / Viability	The site is being promoted by a major developer (Miller Developments). The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable and the wider location is established as a viable

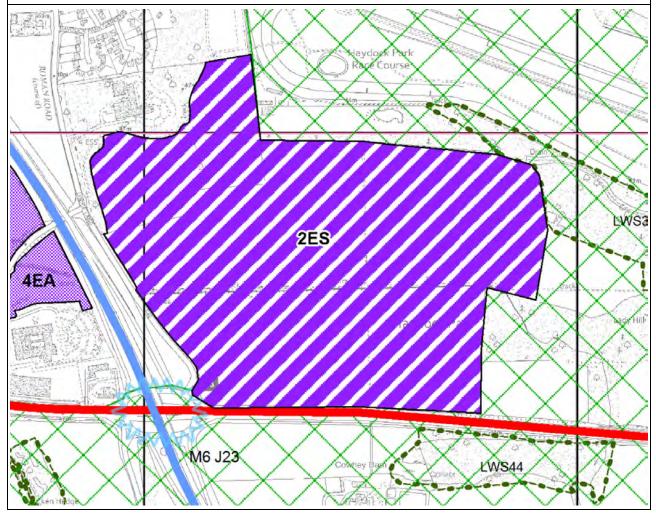
St. Helens Local Plan Ref: 2ES – Land North East of Junction 23 M6

Site Area: 55.90 ha

Location: Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Draft Safeguard Allocation)

Planning History

The site is subject to a pending outline planning application (ref. P/2017/0254/OUP) for the development of up to 167,225m2 of B8/B2 (up to 20% B2 floor space) which was submitted 13th March 2017 and remains pending. The applicant is Peel Investments Limited. The application boundary predominately sits within the allocation boundary, with a parcel of land to the east extending beyond the allocation boundary.



Environmental Constraints	Comment
Vehicular Access	St Helens STIA considered that access is to be taken from Lodge Lane and/or the East Lancashire Road. It is noted that Junction 23 can be particularly difficult to cross for pedestrians as the crossings are currently uncontrolled. It is recommended that it will be essential to provide sustainable and active travel interventions as part of any development that comes forward.
	The Transport Assessment Addendum (2017) prepared by Vectos on behalf of Peel Investments stated that the site will be accessed by a newly constructed controlled junction from the A580 for the development proposed. The Transport Assessment (March 2017) submitted with the application states that the proposed site access junction will operate within capacity.
Traffic Impact	The Transport Assessment Addendum (2017) submitted with the outline application concluded that the proposed development would not have a material impact on any junction located on the local highway within St Helens and that all junctions will continue to operate within capacity. However, the site has had ongoing issues with highways and as of 27th November 2018, Highways England recommended that

	planning permission should not be granted as further assessment is required. It is
	unclear at this stage if an acceptable solution can be found in respect of traffic impact.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Wooded Former Estate Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. Whilst the site is to a degree contained by existing urban areas, the development of the site will clearly have a relatively significant impact on landscape, particularly in respect of Haydock Racecourse which is identified as an important part of the borough's cultural offer which should be recognised and valued within the Spatial Vision of the Submission Draft Local Plan.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding. There are no flood risk issues arising from the proposed development on this site and as such no mitigation would be required.
Ground Conditions	The Environmental Statement (2017) submitted with the outline application confirmed that site is not subject to any known issues related to ground conditions.
Ecology	The Environmental Statement (2017) submitted with the outline application confirmed the following- There are no national or international designated sites within 2km of the site. The site lies within the Impact Risk Zone for Abram Flashes SSSI and Highfield Moss SSSI. There are also seven Local Wildlife Sites (LWS) within 1km of the site. Haydock Park Woodland LWS immediately bounds the site to the north and east. This contains priority deciduous woodland.
	The woodlands on the periphery of the site are a habitat for bats. The site is also an area for a number of the priority bird species. Evidence of water voles were found at central the ditch which passes east-west through the site.
	There was no evidence of badgers or Great Crested Newts within the site.
	With the application of embedded mitigation, Peel considers that the net residual effect of the Proposed Development on ecological features important in the context of the Liverpool City Region will be positive.
Heritage	There are no designated heritage assets within or in close proximity to the site.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is M6 AQMA to the south of the site. The Environmental Statement submitted with the outline application confirmed that site is not subject to or will contribute to any known issues related to air quality.
Noise	The Environmental Statement (2017) submitted with the outline application confirmed that site is not subject to or will contribute any known issues related to noise.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is located adjacent to J23 of the M6 and therefore has excellent connections with the strategic road network.
Access to services/public transport	Bus stops are located on the A49 Lodge Lane to the north of the site. These provide connections between Wigan and St Helens. The closest settlements are Golborne and Ashton-in-Makefield, both approximately 3km from the site and offering a range of services.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a high contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt land, there are no known policy constraints on the site.
Deliverability and Developability	Comment

Suitability	It is currently unclear if a development can be delivered at the site which is acceptable in terms of traffic impact and thus whether the site is suitable to accommodate a development of the scale proposed. Whilst the applicant has argued that the proposed development would be acceptable in terms of traffic impact subject to mitigation, the site is subject to ongoing issues and as of 27th November 2018, Highways England recommended that planning permission not be granted as further assessment is required and it is unclear at this stage if an acceptable solution can be found in respect of traffic impact.
Availability	The site is controlled by Peel Investments Ltd who are actively promoting it through the Local Plan Process for B2/B8. Access to the site can be achieved from the adopted highway from either the A580 or Lodge Lane. The site is therefore considered to be available for development.
Achievability / Viability	The site is being promoted by a major developer (Peel Investments Ltd). The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable. However, it is considered that there is evidence to suggest that the development of this site is significantly constrained in respect of highways impact. Significant mitigation is likely required to achieve acceptable development on this site.

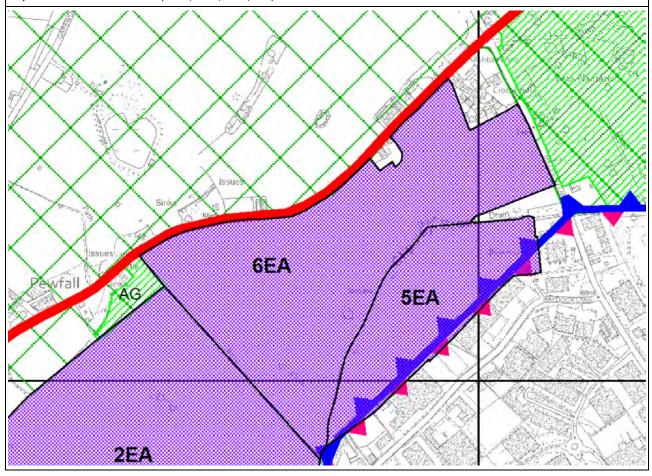
St. Helens Local Plan Ref: 6EA – Land West of Millfield Lane Site Area: 20.58ha

Location: Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock (Draft Allocation)

Planning History

There are no live or previous planning applications related to the site.

The site adjoins two further sites it is proposed to allocate for employment in the draft local plan. 2EA (Land at Florida Farm) is currently under construction for the erection of 2no. commercial/industrial buildings (ref. P/2016/0608/HYBR). A full planning application for the construction of 4 industrial units (total 27,873sqm GEA) is currently pending in relation to site ref. 5EA land at Haydock Lane Industrial Estate (ref. P/2017/0920/FUL).



Environmental Constraints	Comment
Vehicular Access	St Helens Sustainable Transport Impact Assessment (2019) [STIA] suggests that access should be taken from Haydock Lane through the existing industrial estate. However, it also notes that the site boundary is better placed for access from Liverpool Road but acknowledges that this is a residential street. The STIA also raised concerns around connectivity between sites 2EA, 5EA and 6EA and the need for a comprehensive masterplan in order to ensure the neighbouring sites don't block pedestrian and cycling routes to Haydock.
	Representations were submitted by Michael Sparks Associates on behalf of Canmoor Developments Ltd [Canmoor] to the Local Plan Preferred Options consultation. These representations contend that suitable access can be provided via Millfield Lane (off the adopted highway). However, to achieve this in an acceptable manner would likely require significant road widening/mitigation and no evidence is provided as to how this could be deliverable. Furthermore, this is contrary to the site-specific requirements for 6EA (set out in Appendix 5 of the SDLP) which state that access should be delivered through the existing industrial estate and site 5EA.
Traffic Impact	The live planning application associated with site 5EA (ref. P/2017/0920/FUL) has been

	subject to considerable objections and concerns in respect of highways matters, particularly in respect of cumulative impacts when considered with the Florida Farm site (ref. 2EA) which is under construction and the proposed safeguarded site land north east of Junction 23 (ref. 2EF) which is subject to a live planning application for up to 167,225m2 of B8/B2 (ref. P/2017/0254/OUP). These issues exist without considering the cumulative impacts of site 6EA coming forwards as well. Whilst it is understood that Highways England has recently withdrawn its objection in respect of the proposals for site ref. 5EA and that this planning application will likely be approved in due course, it is reasonable to assume that significant constraints will exist in respect of capacity on the existing road network and impacts on J23 of the M6 when considering the cumulative impacts of any forthcoming proposals on site ref. 6EA.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. However, given the sites relatively contained nature, it is considered that its development would result in moderate impacts in respect of landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding. There are no flood risk issues arising from the proposed development on this site and as such no mitigation would be required.
Ground Conditions	There is no evidence to suggest that site is not subject to any known issues related to ground conditions.
Ecology	The site is an area for the priority bird species Lapwing. Priority Broadleaved woodland and priority Deciduous woodland are located adjacent to Millfield Lane to the east.
Heritage	There are no designated heritage assets within the site. Two Grade II Listed Buildings (Gate Piers, Gates and Flanking Walls at Ashton Cross and Le Chateau) are located adjacent to the site on Millfield Lane to the east.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Greater Manchester's AQMA along the M6 located east of the site.
Noise	The site is not subject to any known noise constraints.
Other	An Ethylene pipeline runs through the centre of the site from the south to the north.
Sustainable Development	Comment
Access to strategic road network	J24 of the M6 to travel northbound is approximately 1 km from the site. Junction 23 of the M6 is approximately 3km from the site. The site is therefore relatively well connected with the strategic motorway network. However, HGV's will need to travel down Millfield Lane/A580 before accessing the M6 which reduces the overall scoring in respect of accessibility.
Access to services/public transport	There are a number of bus stops located on Liverpool Road adjacent to the site although pedestrian access would need to be provided to the north of the site, on Liverpool Road to provide a practical route. Haydock is the nearest urban area, with the Piele Road services located approximately 3
	km from the site.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt land, there are no known policy constraints on the site.
Deliverability and Developability	Comment
Suitability	It is currently unclear if a development can be delivered at the site which is acceptable in terms of traffic impact. Furthermore, the Local Plan (6EA site specific requirements at Appendix 5) states that access should be taken from Millfield Lane, through the existing industrial estate and site 5EA. However, the current proposals on site 5EA (subject to

	live planning application ref. P/2017/0920/FUL do not allow for access to be facilitated through this site and Canmoor is promoting access to be taken from the adopted highway on Millfield Lane. The evidence and rationale for this is not available. However, it suggests that there are suitability issues in the context of the Local Plan requirements, particularly as we understand that Canmoor have secured access rights into site 5EA through the existing industrial estate so theoretically access could be facilitated.
Availability	The site is a proposed strategic employment allocation (Ref. 6EA). It is controlled by Canmoor who are actively promoting it through the Local Plan Process for B2/B8. Canmoor also control the adjacent non-strategic site (Ref. 5EA) and have secured access rights to this land through the existing industrial estate. The site is therefore considered to be available for development.
Achievability / Viability	The site is being promoted by a major developer (Canmoor). The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable. However, it is considered that there is evidence to suggest that the development of this site, when considered in the context of other committed developments is significantly constrained in respect of highways impact. Significant mitigation is likely required to achieve acceptable development on this site. Notwithstanding this, the wider location is established as a viable location for employment development.

St. Helens Local Plan Ref: 7EA – Parkside East Site Area: 64.55 ha

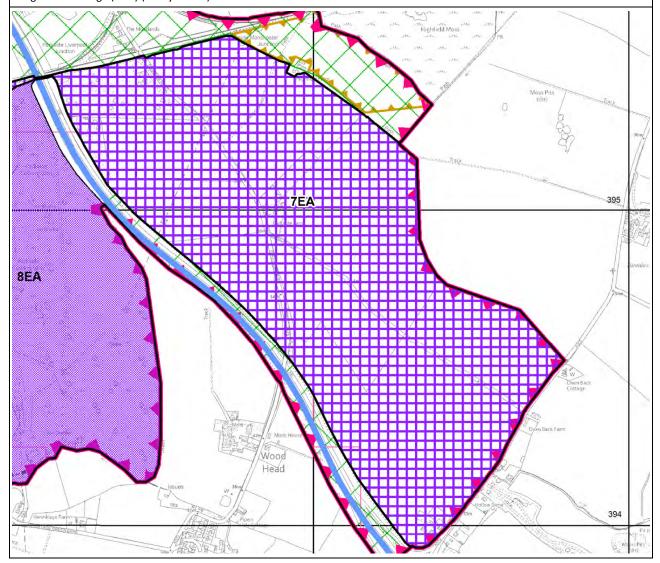
Location: Parkside East, Newton-le-Willows (Draft Allocation)

Planning History

There are no live or historic planning applications for employment uses on to the site.

A planning application (ref. P/2018/0249/FUL) for the formation of a new link road between A49 and M6 junction 22 was submitted on 23rd March 2018. The application is currently pending a decision. The proposed link road will connect sites Parkside East and West with Junction 22 of the M6 and runs from east to west through the sites.

In addition to the employment use draft allocation, the site is considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) (Policy LPA10).



Environmental Constraints	Comment
Vehicular Access	St Helens STIA (2019) states that the main site entrance to Parkside East would ideally be off the A579 around 0.5km to the north east of Junction 22 on the M6. Wider strategic access is proposed via the link road connecting Parkside East and West with J22 of the M6.
Traffic Impact	St Helens STIA (2019) recommends that it will be essential to provide sustainable and active travel interventions as part of any development that comes forward. Highways England's latest consultation response in respect of the outline planning application (dated 31st January 2019) on the adjacent site continues to raise a number of significant concerns in respect of the proposals. It is also recommended that planning permission is

	not granted for the associated link road. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission should not be granted at this time. Given the intrinsic link between Parkside East and West, and the fact that the objections relate merely to the first phase of the wider development, it is concluded that Parkside East is also likely to be subject to severe issues in respect of traffic impact.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. Given the sites dislocation from the urban area and its lack of enclosure to the east, the development of the site would be considered to have a high impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	The site is not subject to any known issues related to the ground conditions.
Ecology	The site lies with the Highfield Moss SSSI Impact Risk Zone. Areas of priority woodland are found to the north of the site. The site is an area for a number of priority bird species.
Heritage	A grade II listed building (Huskisson Memorial on South Side Of Railway) is located on the sites northern boundary.
	A grade II listed building (Holly House) lies approximately 600m north of the site off Newton Road. A grade II listed building (Wall, gates and gate peris to front of Kenyon Hall) to the west of the site beyond Winwick Lane. Three Grade II listed buildings lie to the south east of the site.
	A designated battlefield (Battle of Winwick, Entry No. 1412878) lies on the south east of the site.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington's AQMA along the M6 located south east to the site.
Noise	The Parkside Logistics and Rail Freight Interchange Study (AECOM Study) acknowledged that the development of the site would result in noise levels exceeding the Noise Insulation Regulations (1975) by 2030 at the majority of receptors on the site. The precise effects of any development ultimately depend upon the scale, design and operation of the site. Noise pollution is likely during construction and operations, but mitigation measures could be secured.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is well connected with J22 of the M6 and therefore is considered to be well connected with the strategic road network.
Access to services/public transport	There are a number of bus stops located on Newton Road along the sites northern boundary. Newton-le-Willows town centre is, in broad terms located less than 2km to the northwest of the site and provides a range of shops and services.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a high+ contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	We are not aware of any planning policy constraints beyond the sites designation as Green Belt.
Deliverability and Developability	Comment
Suitability	There is a longstanding history of organisations wishing to bring forward the former colliery site for development and the Council has most recently entered into a joint venture with Langtree. Given the history of the proposals across the wider site, the suitability of Parkside West for an industrial, warehousing and logistics development is considered to be well established. Notwithstanding this, there are issues associated

	with the traffic impact that are yet to be overcome.
Availability	We understand that Parkside East is under the same control as the majority landowner of Parkside West. There are established aspirations to bring both sites forwards. It is therefore considered that the site is available for development.
Achievability / Viability	Previous proposals by Astral Developments/Prologis dating back to 2006 were withdrawn in 2010 (ref. P/2006/1296) as a result of the recession. This demonstrates the site has been subject to historic viability constraints. The site is now being brought forwards in a joint venture between the Council and Langtree. The site was allocated in the Core Strategy, although was not actually released from the Green Belt. It is however proposed for release from the Green Belt in the emerging SDLP. This follows the publication of the Parkside Logistics and Rail Freight Interchange Study (AECOM Study) in 2016 which recommended a more flexible policy approach to assist with the schemes delivery. A planning application has been submitted for a logistics development on the adjacent Parkside West, along with an application for a link road connecting Parkside East and West with the M6. This represents the first phase of proposals in the delivery of the wider SRFI (including both Parkside East and West). The AECOM study concluded that the market attractiveness of this site for logistics activity remains as strong as and arguably stronger than in 2006 when the previous application for the site was put forward. However, it should be noted that the development of the SRFI recently faced a setback as it failed to secure potential Spanish operator Talgo for the site, losing out to a site in Longannet, Scotland which suggests there are alternative sites that are more viable than Parkside East.

St. Helens Local Plan Ref: 8EA – Parkside West Site Area: 79.57 ha

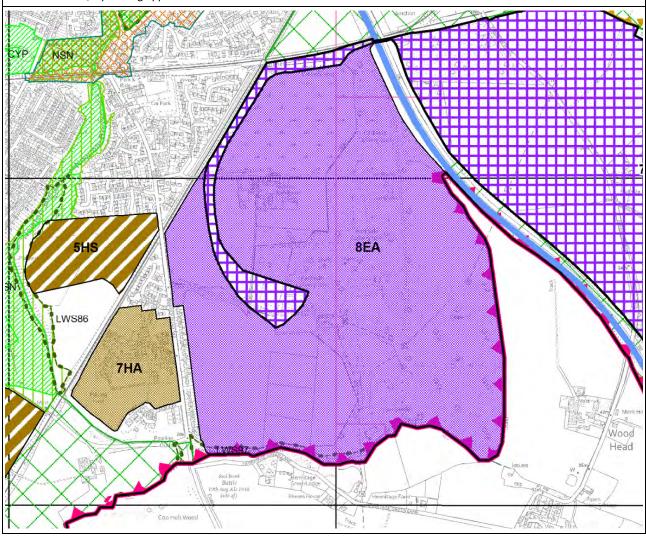
Location: Parkside West, Newton-le-Willows (Draft Allocation)

Planning History

An outline planning application with all matters reserved except for access (ref. P/2018/0048/OUP) was submitted on 16th January 2018 for the construction of up to 92,900 m2 of employment floorspace (Use Class B8/ancillary B1). The application relates to approximately half of the wider allocation to the south. The application has been under consideration for over a year and has not gone to committee. We understand this is due to highways issues.

A planning application (ref. P/2018/0249/FUL) for the formation of a new link road between A49 and M6 junction 22 was submitted on 23rd March 2018. The application is currently pending a decision. The proposed link road will connect sites Parkside East and West with Junction 22 of the M6 and runs from east to west through the sites.

Representations were submitted by Peter Brett Associates on behalf of Smith Property Developments Limited and Interland UK Limited who jointly own a parcel of land that falls within the Parkside West allocation in January 2017. The representations are in respect of proposals for 40 residential dwellings. However, it is unclear whether this residential development will be brought forward. To date, a planning application has not been submitted.



Environmental Constraints	Comment
Vehicular Access	St Helens Sustainable Transport Impact Assessment (2019) [STIA] confirms that the site is currently accessed via the existing former colliery access route from the A49, located to the west of the site. It is proposed that the link road/site will utilise the existing access from the adopted highway. The proposed link road will connect Parkside East and West
Traffic Impact	St Helens STIA (2019) recommends that it will be essential to provide sustainable and

	active travel interventions as part of any development that comes forward. Highways England's latest consultation response in respect of the outline planning application (dated 31st January 2019) continues to raise a number of significant concerns in respect of the proposals. It is also recommended that planning permission is not granted for the associated link road. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission should not be granted at this time.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. The planning statement submitted with the outline application concludes that the proposed development will result in moderate harm to the landscape character and visual amenity.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	The planning statement submitted with the outline application highlights that contamination is present but is considered to be localised to areas around the former colliery buildings.
Ecology	The site lies with the Highfield Moss SSSI Impact Risk Zone. Areas of priority woodland are found throughout the site. The Environmental Statement submitted with the outline application concluded significant impact to the loss of nesting and foraging habitat for breeding birds; loss of foraging/commuting habitat for bats; loss of invertebrate habitat; and disturbance of bats, birds and invertebrate will occur without mitigation.
Heritage	A designated battlefield (Battle of Winwick, Entry No. 1412878) within the southern part of the site and extends beyond the allocation boundary to the south. Paragraph 194 of the NPPF requires clear and convincing justification to be made in respect of any harm to, or loss of, the significance of registered battlefields.
	Two Grade II listed buildings (Newton Park Farmhouse and the barn to the east of Newton Park Farmhouse) are located to the west of the site, adjacent to Newton Park Drive.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington's AQMA along the M6 located south east to the site.
Noise	The Noise Assessment which was submitted with the outline application concluded that any potential impact on residential amenity can be mitigated.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is well connected with J22 of the M6 and therefore is considered to be well connected with the strategic road network.
Access to services/public transport.	Parkside West benefits from a number of bus stops located adjacent to the proposed site access point on Mill Lane. In broad terms, the site is also located less than 1km from Newton-le-Willows Railway Station and Newton-le-Willows town centre is in broad terms located less than 2km to the west of the site and provides a range of shops and services.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Deliverability and Developability	Comment
Suitability	There is a longstanding history of organisations wishing to bring forward the former colliery site for development and the Council has most recently entered into a joint venture with Langtree. Given the history of the proposals across the wider site, the

	suitability of Parkside West for an industrial, warehousing and logistics development is considered to be well established. Notwithstanding this, there are issues associated with the traffic impact that are yet to be overcome.
Availability	The majority of the site, excluding the small parcel of land controlled by Smith Property Developments Limited and Interland UK Limited is in single ownership and the southern area is subject to a live planning application for a logistics development and link road connecting with site 7EA and the M62. It is therefore considered that the site is available for development.
Achievability / Viability	Previous proposals by Astral Developments/Prologis dating back to 2006 were withdrawn in 2010 (ref. P/2006/1296) as a result of the recession. The site is now being brought forwards in a joint venture between the Council and Langtree. The site was allocated in the Core Strategy, although was not actually released from the Green Belt. It is however proposed for release from the Green Belt in the emerging SDLP. This follows the publication of the Parkside Logistics and Rail Freight Interchange Study (AECOM Study) in 2016 which recommended a more flexible policy approach to assist with the schemes delivery. A planning application has been submitted for a logistics development across the southern part of Parkside West, along with an application for a link road connecting Parkside East and West with the M6. This represents the first phase of proposals in the delivery of the wider SRFI (including both Parkside East and West). The AECOM study concluded that the market attractiveness of this site for logistics activity remains as strong as and arguably stronger than in 2006 when the previous application for the site was put forward. Therefore, based on the evidence available, the site is considered to be achievable/viable.

PO1036

EL0255



Fwd: St Helens Borough Local Plan 2020-2035: Submission Draft Anne-Marie Cunliffe

to:

planningpolicy 13/03/2019 16:50 Hide Details

From: Anne-Marie Cunliffe

To: planningpolicy@sthelens.gov.uk

Forwarded message

From: "Anne-Marie Cunliffe" Date: 13 Mar 2019 16:46

Subject: St Helens Borough Local Plan 2020-2035: Submission Draft

To: <planningpolicy@st.helens.gov.uk>

Cc:

Further to earlier comments on the warehousing being erected at Florida Farm North, having seen at first hand how enormous these units are in reality and how close to existing residences I am duty bound to express my dismay at the prospect of further development. Local residents aredealing daily with travel delay, noise and light pollution and the warehousing is not yet finished nor has the attendent heavy goods traffic begun to operate. There appears to be no concerted attempt to negate any of the considerable impact on the environment or welfare of those of us whose lives are being blighted by this development. Therefore, the prospect of further units in the area existing without proper infrastructure in place is horrifying to contemplate. We have a suggestion of 522 houses being sited at Vicarage Road in an area already congested with traffic, close to a flooding area, with inadequate health centres and school provision. How can any of this improve things? We should use the thousands of empty properties before building residences on greenbelt land. Are homeowners, who have paid a premium to reside in a greenbelt area, going to be financially compensated for the consequent reduction in house values and moved into a lower council tax band? May I respectfully remind councillors that they are elected to represent the wishes of the people and not their own agenda!

AM Cunliffe Lifelong Resident of the (badly) affected area D - LPAOK

PO1037

EL0258



Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

SITE GBP 0924

Graham Lamb

planningpolicy@sthelens.gov.uk 13/03/2019 17:01



4 Attachments



L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf



Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

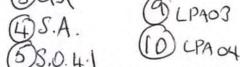


LPAOZHPARA 3

PA02 - PARA 4

Appendix 4a- Interim Housing Neeeds Assessment.pdf

Dear Sir/Madam,



I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

ensured that these وطريز I look forward to receiving receipt of these representations in due course and please can غط الله ensured that these are formally considered as part of this consultation. CPC02

Thanks and kind regards,

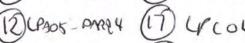
Graham Lamb

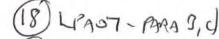
Associate Planner

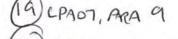
Pegasus Group

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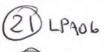
Suite 4b | 113 Portland Street | Manchester | M1 6DW

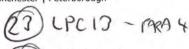




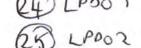


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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)

Graham Lamb

to:

planningpolicy@sthelens.gov.uk

13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb Associate Planner

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Please consider the environment before printing this email message.

From: Graham Lamb Sent: 13 March 2019 17:01

Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb

Associate Planner

Pegasus Group

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)

Graham Lamb

to:

planningpolicy@sthelens.gov.uk

13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb

Associate Planner

Pegasus Group

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Please consider the environment before printing this email message.

From: Graham Lamb Sent: 13 March 2019 17:01

To: planningpolicy@sthelens.gov.uk

Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

××

Graham Lamb

Associate Planner

Pegasus Group

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KW/GL/P17-0098/L004



13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

Dear Sir/Madam,

Land North of St Helens Road, Eccleston Park, St Helens
St Helens Local Plan Submission Draft (January-March 2019 Consultation)

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1.** As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (Appendix 2)
- Agricultural Land Report (Appendix 3)

The need to allocate additional sites

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4.**

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.



- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.



To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.



I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,

Graham Lamb

Associate Planner

Encs.





ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

Pegasus Group

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insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

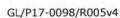
- 4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.
- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this.
- 4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within section 7.

Policy LPA03 - Development Principles

4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

Policy LPA04 - A Strong and Sustainable Economy

4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.



PO1038



ECRA Response to SHLPSD(2018) barton su to: planningpolicy



1 Attachment



ECRA Final Submission May 19.docx

On behalf of Eccleston Community Residents Association, together with Windle (ECRA), I am attaching a copy of our Response to the SHLPSD (2018) for the attention of the Planning Inspectorate. ECRA have worked hard to ensure our report represents the facts as we know them.

The question was asked, during the Council Information Sessions, as to whether the SHLPSD (2018) can be changed and we were given a variety of responses. We would hope that some small changes could be made, such as reducing the aspirational number of housing units and building on more Brownfield and Contaminated land. The reasoning and support for this is detailed in our report, the consequence would be to eliminate much, if not all, of the Green Belt land required by the plan, which, I am sure you agree, would be beneficial for St. Helens Council, Councillors and Residents alike.

ECRA would like to participate at the Oral Examination. We would also request an acknowledgement for the receipt of this comprehensive report.

A hard copy of this response will be posted by hand later today

regards

Su Barton

ECRA Communication Lead

c/o 19 Brooklands Road, WA10 5HE

2-LAAOT 3-GANGRAL 4-LAAO6 5-ARA 1.72 DEC 6-LPAO4 7-GBR 8-10P 9-TABLE 4-6



Response to
ST HELENS LOCAL PLAN
SUBMISSION DRAFT (SHLPSD)
December 2018

May 3rd 2019 Page 1 of 34

10. The LPSD fails to meet the duty to co-operate.



Report from Dr Athey, Independent Economist

In 2018, St. Helens Green Belt Association, of which ECRA are a main partner, engaged Dr Glenn Athey to review the Economic data used by St Helens Council and the Liverpool City Region (LCR) to inform the St Helens Proposed Local Plan.

ECRA fully support the findings of Dr Athey which include

- 1. The forecasts for employment growth are far too optimistic, the baseline forecasts are twice the rate of growth of the most recent five-year period.
- 2. In St Helens, jobs growth in Storage and Distribution has been more than offset by loss in Light Industrial jobs.
- The use of outdated statistics (2006) for the increase in Port Traffic from Liverpool City Region is questionable. The latest statistics (2019) indicate a lower forecast for port freight, which has significant implications for land use demand.
- 4. The assumption that jobs in manufacturing will increase through the increased availability of employment land seems unjustifiable. The trend over 2011 2015 was a loss of 1500 jobs. The credibility of the Oxford Economic Model is questionable. Documentation would suggest that the forecasts are "policy led" and not "objectively assessed."
- 5. There has been a lack of transparency in the LCR documentation base availability.

ECRA will not reproduce the discussion contained in Dr Athey's report but fully endorse his findings and recommendations.

Report from Piers Elias, Independent Demographer

This report was commissioned in 2018 by SHGBA, of which ECRA is a main partner. It provides a review of the St Helens Local Plan Submission Draft (SHLPSD) and updated St Helens Strategic Housing Market Assessment (SHMA), giving full consideration to the demographic factors that have gone into calculation of housing need with a view to assessing the integrity of the inputs and the plausibility and consistency of the outputs from a demographic viewpoint.

ECRA considers that the analysis documented by Mr Elias reveals that the SHLPSD and St Helens SHMA are flawed. ECRA endorses these findings and recommendations:

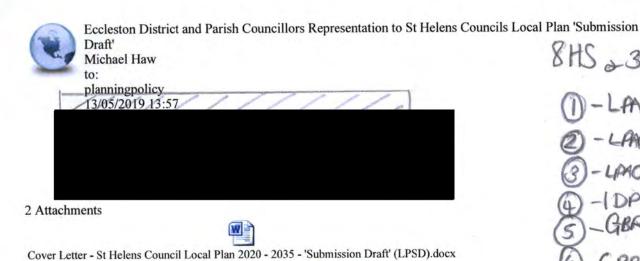
- 1. St Helens housing need should be 360 dwellings per annum (Appendix 3)
- SHMBC should aim to reduce unemployment rates as a sustainable way to improve the economy without any additional infrastructure.
- SHMBC should develop policies to reduce commuting. Increasing local jobs for residents would reduce the number of new dwellings needed and reduce traffic emissions and congestion.
- 4. SHMBC should aim to reduce housing vacancy rates as part of a sustainable housing policy.
- Annual Migration within the UK must balance. Local and strategic plans need to be compared to test for consistency and realistic assumptions on the use of UK migrants to satisfy dwelling and economic growth aspirations.
- New housing phasing is too ambitious and should be slowed down due to building industry capacity and skill shortage issues.







PO1039



Eccleston District & Parish Councillors Representation - St Helens Council Local Plan 2020 - 2035 'Submission Draft' (LPSD).pdf

Dear Sir or Madam,

Please find attached the Eccleston District and Parish councillors representation to St Helens Council's Local Plan 'Submission Draft'.

If you could please confirm receipt that would be appreciated.

Kind regards,

Michael

Cllr Michael Haw
Eccleston District and Parish Councillor
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) Planning Department Victoria Square St Helens WA10 1HP

Date: 13 May 2019

Dear Sir or Madam,

RE: Representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD)

Please find enclosed our detailed representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD).

We understand and support the production of a Local Plan in coordinating future investment across St Helens, however, we do not support the LPSD in its current form. There has been a great deal of public backlash against the proposals and site allocations (and "safeguarding") and we strongly urge St Helens Council to review its evidence base and forecasts which has led to the encroachment into Green Belt land.



- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites and remediate contaminated land for housing development;
- Whilst we welcome the proposed reduction of Green Belt land to be released within the Local Plan, it
 remains our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for entirely
 by those developers and house builders that have land interests within the Borough;
- We have major concerns about the scale of growth being aspired to within the Local Plan and the
 infrastructure required to support it. The IDP highlights quite well the projects currently underway in
 the Borough to try to alleviate the problems of today, however seems to lack any substance on what
 will be done to solve the issues of the future. This needs to be urgently addressed;
- The proposals represent a significant over development of Eccleston and Eccleston Park, which will
 change the very character of our local area forever.

Yours sincerely,

Michael Haw, Teresa Sims and Geoff Pearl

Eccleston District & parish councillors
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 *'Submission Draft'* (LPSD)

Representation by Eccleston
District and Parish councillors Michael Haw, Teresa Sims and
Geoff Pearl

13 May 2019

Consistent with National Policy?

The Plan does not comply with NPPF (2018) as it was written prior to publication. Neither does it consider the more accurate and up-to-date housing and employment statistics in ONS (2016) figures. Furthermore, SHMBC has not provided any evidence to date that they have satisfied their 'duty to cooperate', which is essential, especially within the context of neighbouring local authorities, who are also bringing forward their own Local Plan's, such as Warrington, West Lancs and the Wirral.

The Local Plan is unsound because it is not consistent with National Policy.

Conclusion

Taking all of the above cumulatively, we believe that the local plan in its current form — when examined by the Planning Inspector, cannot be justified, effective, consistent with national policy or positively prepared and as a consequence, it would surely follow that it is therefore unsound.

Policy specific comments

LPA04 - A Strong and Sustainable Economy

We believe the economic growth scenario outlined in the LPSD is not achievable or sustainable.

SHMBC's planning policies for the economy are extremely aspirational. These are based on data derived from the Oxford Economics Forecasts. These forecasts are themselves optimistic and contain a circular argument in that they are impacted upon by the input of supply side i.e. land allocations from SHMBC planners. Assumptions that have not been tested at examination, namely the release of Green Belt land. This is not an objectively assessed need, rather, it is a weighted, self-fulfilling circular argument.

Modification:

The economic analysis is flawed and based on over-optimistic assumptions, which mean that the level of land needed is therefore not as high as set out in the Local Plan. Therefore, there are no exceptional circumstances to change Green Belt boundaries. As such, SHMBC should bring forward more realistic economic growth predictions that are line with neighbouring local authorities which in turn will have less impact on the environment, lead to less need for new infrastructure and protect Green Belt land from unnecessary development.

LPA05 - Meeting St. Helens Borough's Housing Needs

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The Housing Need assessment does not use Standard Methodology and therefore there is no case for "exceptional circumstances" for Green Belt land such as 3HS and 8HS to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Why, for instance, are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15-year plan. When making important decisions the best available data should be used and SHMBC's decision to use this 2014 based data is fundamentally flawed.

2



PO1040

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Dear Sir/N	Madam,		(10) - LPAO4	
represent	ation (R005) to the Local Plan Submissi	v Homes North West, to submit the attache on Draft Consultation. Redrow have land in sed in detail in the attached representation	terests in relation to	
The repre	sentation includes the following appen	dices which, owing to file size, will be email	led separately:	
	pendix 1 - Site Location Plan (attached t		(1) - LPAOK-PARA3	
	pendix 2 - Delivery Statement (Part 1 at		9	
 App 	pendix 3 - Accessibility Statement		(12) - LPAOS - PARA 4	
 Apj 	pendix 4 - Phase 1 Ecology Survey		(13) - APPENDIX 4	
 Apj 	pendix 5 - Agricultural Land Assessment		(13) - APPRADIX 4	
	pendix 6 - Detailed Site Pro Formas		× .	
	pendix 7 - Review of Employment-Led L	ocal Plan Housing Requirement	(14) - TABUC 4.6	
	pendix 8 - Council's Housing Trajectory		(B) - UPAD&5.1	
7.0	pendix 9 - Pegasus Housing Trajectory		(P) A4082.1	
• Ap	pendix 10 - Spatial Distribution of Sites		(16) - LPAOG	
We will fo	llow up this submission by sending a CI	o in the post which contains the entirety of	0	
to the Loc	al Plan consultation.		B-LPCOI	
We look f	orward to receiving receipt of these rep	presentations in due course and please can	it be ensured that	
	formally considered as part of this cons		(8) - LPCO2	
		63) - LPC13-PARA 4		
Many tha	nks and kind regards,		(19) - 4004	
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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-Email 2 of 4 Rebecca Dennis

planningpolicy@sthelens.gov.uk 13/05/2019 16:06







Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-Email 3 of 4 Rebecca Dennis

planningpolicy@sthelens.gov.uk

13/05/2019 16:07







Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-Email 4 of 4

Rebecca Dennis

planningpolicy@sthelens.gov.uk

13/05/2019 16:07

1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

Suite 4b | 113 Portland Street | Manchester | M1 6DW

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insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

- 4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.
- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this.
- 4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within Section 7.

Policy LPA03 - Development Principles

4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

9

Policy LPA04 - A Strong and Sustainable Economy

4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.



PO1041

Sinc: Forma UPPO HSZ3 ELO290



	Representations to Local Plan Submission	n Draft Consultation-Wallace-I	Email 1 of 8
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Appendix 1-	Illustrative Masterplan-Wallace.pdf		(10) LPA04
Dear Sir/Ma	dam,		(1) LPAOK - PARA S
We are instr	ucted on behalf of our client, Wallace Land In	vestments to submit the attache	d form and
representati	on (R001) to the Local Plan Submission Draft	Consultation. Wallace have land in	nterests in relation to
the Mill Lane	e, Rainhill site, which is discussed in detail in t	he attached representation.	1 LPAOS - PARA 4
The represen	ntation includes the following appendices whi	ch, owing to file size, will be email	iled separately:
Apper	ndix 1 - Illustrative Masterplan (attached to th	is email)	(13) APPENDIX 4
Apper Apper	ndix 2 - Previously Submitted Documents and	Technical Information	
Apper Apper	ndix 3 - Additional Technical Documents (May ndix 4 - Detailed Site Pro Formas	2019)	(4) LPAOS - TABLE
	ndix 5 - Council's Stage 3 Green Belt Assessme	nt of Mill Lane Site	(5) LP905.1
Apper	ndix 6 - Review of Employment-Led Local Plan	1000	
 Apper 	ndix 7 - Council's Housing Trajectory		(16) LPAO6
	ndix 8 - Pegasus Housing Trajectory		
• Apper	ndix 9 - Spatial Distribution of Sites		(17) LPCOI
We will follow	w up this submission by sending a CD in the po	ost which contains the entirety of	Wallace's submission
to the Local F	Plan consultation.	or an additional state of the	(8) LPCO2
We look forw	vard to receiving receipt of these representati	ons in due course and please can	110
these are for	mally considered as part of this consultation.	(A)	
Many thanks	and kind assessed	(19) LPC 04	(23) LPC13-PARA4
ivially thanks	and kind regards,	6310, 70.0	60 1000
Rebecca D	Pennis	(20) LPAOT ARA 30) (24) LPDOT
Principal Plan	nner	60,000	(25) LPDO2
Pegasus G		(2) LPAOT-PAPA9	Co Live C
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		(22) LPC 10	CO 17002



Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8 Rebecca Dennis

planningpolicy@sthelens.gov.uk 13/05/2019 16:13



4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8 Rebecca Dennis

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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

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2 Attachments





Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8 Rebecca Dennis

planningpolicy@sthelens.gov.uk 13/05/2019 16:15

1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8 Rebecca Dennis

planningpolicy@sthelens.gov.uk 13/05/2019 16:15

1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

Email 6 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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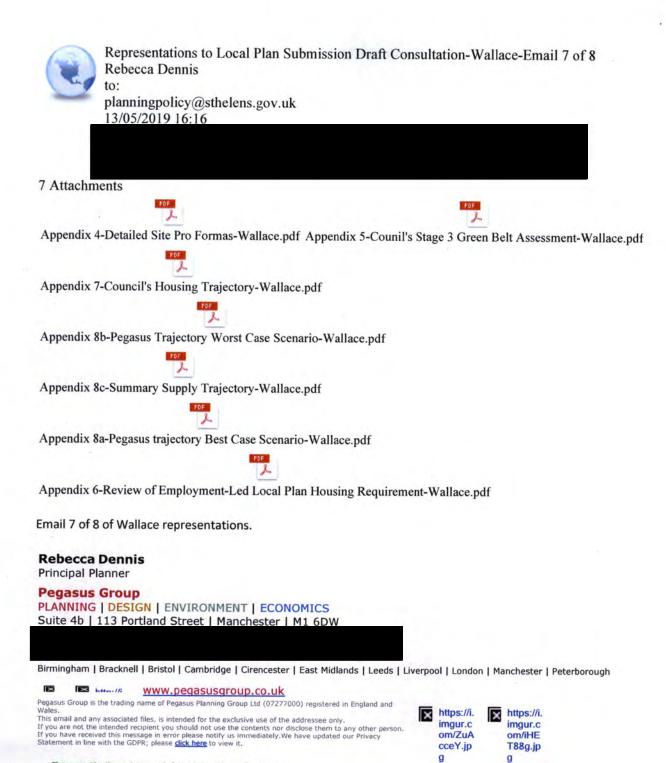
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04/06/2019



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planningpolicy@sthelens.gov.uk 13/05/2019 16:16



1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

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insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

- 4.8 We fully agree with the Council's Assessment and conclusions on this point. However, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.
- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens. We would recommend that this is made clear in the text to properly reflect the basis of releasing land from the Green Belt.
- 4.10 The principle of safeguarded land is also supported, however the quantum of land proposed for safeguarding is not accepted, and this is addressed in section 7.

Policy LPA03 - Development Principles

4.11 Wallace fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

Policy LPA04 - A Strong and Sustainable Economy

4.12 Wallace are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on the role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.





PO1042



Fw: Warrington Response to St Helens Local Plan NTLS

20/01/2020 10:55

Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

A: Town Hall Annexe, Victoria Square, St. Helens, WA10 1HP

T:I

W: www.sthelens.gov.uk/localplan

---- Forwarded by on 20/01/2020 10:54 ----

From: To: Cc:

Date: 16/04/2019 11:41

Subject: Fw: Warrington Response to St Helens Local Plan NTLS

I attach Warrington's comments.

They had sent them previously but only to and my in box and it was not clear at that stage if they were the final comments.

I have confirmed to them that we will log their letter as a formal response.

Best Regards,

Development Plans Manager, St Helens Council, Town Hall Annexe Corporation Street, St Helens WA10 1HF

--- Forwarded by on 16/04/2019 11:38 ----

From: "Bell, Michael"

To:

Date: 16/04/2019 11:25

Subject: FW: Warrington Response to St Helens Local Plan NTLS

I understand you wanted me to send our comments again.

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From: Bell, Michael

Sent: 13 March 2019 11:37

To:

Subject: Warrington Response to St Helens Local Plan NTLS

I have attached our response in the form of a letter. It identifies the site allocations we are providing comments on and includes some suggested wording to ensure the plan is sound.

In order to get lead Member sign off I have had to prepare a letter rather than use your on-line form.

Can you confirm this is an acceptable format for our response.

regards

Michael Bell

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH



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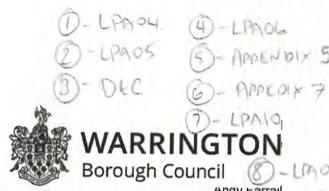
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EL0298



St Helens Council Town Hall Victoria Square St. Helens Merseyside WA10 1HP

Andy Farrail
Executive Director
Economic Regeneration, Growth and Environment

Town Hall Sankey Street Warrington WA1 1UH

13 March 2019

Dear

RE: St. Helens Local Plan 2020-2035 Submission Draft

Scale of housing and employment growth

Warrington is supportive of St. Helens' overall growth ambitions and its commitment to meet its own housing and employment needs.

(1) o(2)

Warrington and St Helens, together with Halton, form the mid-Mersey Housing Market Area. All three Councils have worked closely around housing need and supply issues as part of our respective 'duty to cooperate' obligations.

Site 1EA - Omega South Western Extension

Warrington agrees that the site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington, although it will continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does.

As stated in Warrington Borough Council's response to the Preferred Development Option consultation, Warrington does therefore agree to Site 1EA1: Omega South Western Extension forming part of Warrington Borough Council's employment land supply. This will be confirmed in the forthcoming Proposed Submission Version of the Warrington Local Plan.

It is noted that the intention is for the extension to use the existing access arrangements for the wider Omega site. It should also be noted that working closely with Omega Warrington Limited, the Council has developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega as a strategic employment and housing location. This work has highlighted that both the local and strategic road

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network will be placed under considerable pressure when the current extent of the Omega site is fully developed.

Therefore it would be for any future planning application for this extension to Omega to demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8. Any highway mitigation measures shown necessary would require appropriate contributions payable towards either the Council's programme of transport improvements and / or to Highways England.

If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- a future planning application for this extension to Omega must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.
- If it is not possible to mitigate the additional traffic generation through the
 existing access arrangements, then this would potentially require a new
 access onto the M62 to be constructed either catering for all traffic
 movements or as a minimum with west facing slip roads

Site 1ES - Omega North Western Extension

Warrington does not believe that this scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62 will be required.

The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington and the Council therefore does not consider that this future extension could contribute to Warrington's future employment land supply.

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

 Any development of this site will require major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England. D& D SUGGESTIED

PO1043



Fw: Warrington Response to St Helens Local Plan NTLS

20/01/2020 10:55

Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

A: Town Hall Annexe, Victoria Square, St. Helens, WA10 1HP

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regards

Michael Bell

Planning Policy and Programmes Manager

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Site 8EA - Parkside West

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requests the following addition to the site requirements in Appendix 5 to ensure that the Local Plan is sound:

 the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England.

Site EA9 - Parkside East EA9

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requested the following additions to Policy LPA10 to ensure that the Local Plan is sound:

 the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England

and the following addition to paragraph 4.36.8 of the Reasoned Justification:

 Part of the proposed link-road runs through the administrative area of Warrington Borough Council.

Site - LHA4 Bold Forest Garden Suburb

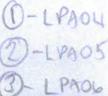
There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from the proposed Garden Suburb uses Warrington's local road network through the village of Burtonwood to access

SULLLIND

Warrington.gov.uk



St.Helens Council



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 2 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

PLUS	29	RESIDENT
(SEE NT	TACHED !
	SHE	ETS

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Leslie	First name:
Last Name: Hughes	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 19 Ryder Court, Rainhill, Merseyside, Postcode: L35 4PW	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature;	ite: 1/3/3/5///

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes (Via Email)

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy	LPA04 LPA05 LPA06 LPA08 LPA11 LPC05 LPC06 LPC12	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
		s (please nan elevant part/s				

4. Do you consider the St He Please read the Guidance note		Plan 2020-2035 is: gal Compliance and the Tests of Soundness
Legally Compliant?	Yes	No X
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No X

Please tick as appropriate

	Plan is <u>unsound</u> , is it because it is not: for explanations of the Tests of Soundness
Positively Prepared?	X No - Plan does not consider Brownfield sites.
Justified?	X No - Plan based on flawed methodology.
Effective?	X No - Plan is not deliverable.
Consistent with National Policy?	X No – Plan does not comply with NPPF 2018.

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

LPA04 - A Strong and Sustainable Economy

We believe the economic growth scenario outlined in the LPSD is not achievable or sustainable. The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan.

Whilst on the one hand this Local Plan promotes new employment opportunities, St. Helens town centre market share of goods expenditure has declined from 28.2% in 2011 to 20.4% in 2017. 15.8% of retail units in the town centre are vacant compared to the national average of 11.2%. The last major store in the town centre (M&S) has relocated to an out of town retail park on 14/03/2019, leaving another significant empty unit in the town centre. The regeneration of the town centre must surely be a key priority for the Borough.

73



K Marr - St Helens LPSD representation form . Ken Marr to: planningpolicy

13/05/2019 14:20

2 attachments





Chapel Lane Petition Signatures.pdf St Helens LPSD response - final - 13 May 2019.pdf

Dear Planning Policy Unit

Attached is my response to the Local Plan Submission Draft dated today. It is also made on behalf of other residents on Chapel Lane Eccleston WA10 5DA & 5DB.

A copy of Petition Signature schedule giving permission for this is also attached.

Please confirm receipt.

kind regards

Ken Marr

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3-LPAOS
4-GENERAL
5-LPAOS
6-LPAOS
6-LPAOS
9-GER-GENERAL
9-GER-3HS
10-GER-3HS
10-LPAO7-8HS
13-IDP
10-LPCOI



Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD (For official use only)

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Marr	Last Name:
Organisation/company:	Organisation/company:
Address: Beech Lea 7 Chapel Lane Eccleston St Helens Merseyside Postcode: WA10 5DA	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13th May 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of Borough Local Plan 2020-2035? (na examination, publication of the Inspect the Plan)	of future stages of the St Helens mely submission of the Plan for tor's recommendations and adoption of
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Council's pre-mail address is provided, we will con	referred method of communication. If no stact you by your postal address.

PART B – YOUR REPRESENTATION B2- ECONOMY (LPA04)

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

	h part of the Loc	al Plan does th	is representation rela	ite?
Policy LPA04	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
name docu	uments (please ument and art/section)	Economic	Evidence.	
Please read Soundness	d the Guidance no	te for explanation	Local Plan 2020-203	e and the Tests of
egally Co	mpliant?	Yes 🗆		X Not sure
Sound?		Yes 🗆	No 🗆	
Complies v Cooperate	with the Duty to	Yes 🗆	No 🗆	X
	appropriate			
	the Guidance no	te for explanation	nd, is it because it is r	dness
Please read Positively I Justified? Effective?	Prepared? with National	□ X □ X □ X		



economic data and trends.

consistent with National Policy.

trend that is not achievable or sustainable.

3. As such it is argued that the it has not been positively prepared, or is justified, effective or

4. It is also questionable as to whether the Duty to Cooperate obligations have been satisfied if all Regional Authorities as well as St Helens are following a simultaneous and competing growth

Economy (LPA04)

- 5. The Local Plan Submission Draft (LPSD) economic proposals are set out in LPA04.
- 6. The following observations have been made with reference to with the following reports
- St Helens Borough Local Plan 2020-2035 Proposed Submission Draft December 2018. Economic Appraisal Paper – evidence prepared by Dr Glenn Athey of My Local Economy – Athey Consulting Ltd dated – 1st March 2019
- St Helens Local Plan Submission Draft and update of St Helens Strategic Housing Market Assessment (SHMA) – Demographic Appraisal – prepared by Piers Elias an Independent demographer of Demographer Support.
- 7. These reports were submitted separately as part of the St Helens Green Bel Association (SHGBA) submission on the 13th March 2019 by Kirkwells Planning Consultants of Burnley.
- 8. It should be noted that Dr Glenn Athey economic evidence is compromised as he was unable, despite requests to SHMBC Planning to gain access to the input made by St Helens Council to the Liverpool City Region Combined Authority (LCRCA) Strategic Housing & Employment Land Market Assessment (SHELMA). This SHMBC input is viewed to be material to the St Helens Local Plan. It should be publicly available. A lack of transparency is perceived on this issue.
- A review of the St Helens LPSD suggests that the St Helens growth trends are significantly higher than historic annual growth trends and indicate employment growth is highly aspirational and optimistic. Employment Growth is almost entirely dependent on significant growth of logistic warehousing.
- 10. The policy is considered 'supply side'- acquire sites and build the B8 warehouse units in the hope the units are let and employment generated. It is based on a subjective land requirement scenario that bucks the trend where the take up of logistics warehousing is sluggish. As such it is argued that it is not an objectively assessed need. There is a clear impression that the outcome has been prejudged with data presented to justify this outcome.
- 11. The Liverpool City Region growth is also acknowledged to be considered as highly aspirational relying on a continuation of the strongest periods of growth over the next 25 years assuming no major downturns or recessions. This must be considered optimistic.
- 12. There is no obvious evidence to support dynamic growth trend in value added or productivity as regards employment across the Liverpool City Region nor is there evidence to suggest a trend for higher paid jobs. Analysis suggests higher paid jobs are being lost and lower paid jobs have gained.
- 13. There is also a concern that the region has a declining working age population and much lower level of immigration into the area than in other areas of the country. The growth assumes that mass UK immigration will need to occur to meet the employment growth predictions of the LPSD.
- 14. Moreover, this trend is repeated across the whole of the Northwest with Greater Manchester Combined Authority (GMCA), Chester & Cheshire West (C&CW), Warrington and West Lancashire all having similar aspirational accelerated employment growth scenarios. All are reliant on UK or International immigration to meet employment growth forecasts.
- 15. The resident population of across England is finite, so if St Helens gains one resident it has to be offset by a resident loss in another authority. All Regional combined and local authorities are therefore competing for residents to supplement their workforce in order to implement their aspirational accelerated employment growth scenarios.
- 16. This is barely credible and not achievable nor sustainable. The LPSD does not indicate where the increase in population is to come from. Simultaneous above-trend growth can only be achieved by international immigration and that is currently not government policy. This situation calls





- into question what strategic decisions have been made under the statutory Duty to Co-operate and the Statements of Common Ground with neighbouring authorities in developing the LPSD.
- 17. The economic scenarios for most authorities and St Helens are wholly dependent on the growth of B8 logistics warehousing. The employment land need is driven by this policy, particularly in St Helens. This is viewed as very highly aspirational even in the LCRCA SHELMA draft executive summary para 5.3. The Employment Land need assessment is viewed to be excessive.
- 18. An Employment Land Need assessment based on such flawed economic data is questionable and cannot be considered as prepared as objectively assessed need. Aspirational growth cannot also be used to inflate housing need or the need to inflate Housing Land supply. Although, now governed by the Standard Method, it is argued that the real housing need for St Helens is around 383 indicated by the ONS 2016 Household figures (or 360 from Piers Elias report). It is hoped, the decision by Ministry of Housing Communities and Local Government (MHCLG) to use their 2014 figures household figures for the Standard Method is overturned before this Local Plan process is completed.
- 19. The LPDS has been based on data prepared before the Brexit referendum and is overly optimistic given the uncertainty generated by negotiations. The economic evidence fails therefore to factor in the uncertainty resulting from Brexit. The government's own impact assessment indicating economic impact of 2, 5 or 8% downturn dependent on the success of negotiations. More recently the economic assessment has predicted a 3.9% downturn over 15 years for the agreed withdrawal deal and a 9.3 % reduction for a no deal.
- 20. A recent report by the Centre for Cities report in September 2018 has indicated that automation is predicted to impact heavily on national and regional jobs. This report estimated that up a fifth of jobs in the Northwest could be at risk because of automation over the coming 30 years due the technological advances particularly in respect logistic warehousing. There is clearly a trend by large organisations to reduce workforce numbers in the coming years that is contrary to the LPSD predications and not justified of achievable.
- 21. Adding to the uncertainty, a government inquiry in 2017 raised concerns about whether the Construction Industry had sufficient capacity to deliver the homes required particularly where there is no incentive for volume housebuilders to increase supply that may impact on profits or their share of the market.
- 22. The LPSD does not pay sufficient attention to the Farming community. The Local farming industry is considered successful in the region and should be supported. With the huge increases in population proposed in St Helens, food security must part of regional strategy influencing Local Plans.
- 7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
 - The economic data is not sound or justified and requires review to reflect up to date information particularly on Aspirational Accelerated Growth Employment Scenarios.
 - Employment Land Needs Assessment appears excessive and requires review as a result.
 - Housing Need should not be inflated as a result of flawed accelerated growth scenarios.
 - A more robust Agricultural policy at Regional and local level is needed to ensure Food Security for the significant population increases predicted.

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2 1 FEB 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part B - Your Representation(s)

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we will contact you by your postal address.

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name;
	Organisation/company:
	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 20 Feb 2019
	Date: 20 عدام عدام عدام عدام عدام عدام المعالم عدام المعالم ا
Would you like to be kept updated of futur	re stages of the St Helens Borough Local Plan 2020-203 tion, publication of the Inspector's recommendations and
✓ Yes (via email) post	☐ No
이 경우를 마친 때문에 가장 아니는 그 아이들은 살이 그렇게 되었다.	ed method of communication. If no email address is provided

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich pa	rt of the Local Pla	an does this repre	sentation relate?	
Policy	LPA O4 Siles 2EA 5EA GEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/secti	on)		
				Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally	Compli	ant?	V	Yes No	
Sound	?			Yes 🗸 No	
Compl	ies with t	he Duty to Cooper	rate	Yes 🔽 No	
Please	tick as a	appropriate			
Positive Justifie Effective		ared?			
Consis	tent with	National Policy?			
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1)-LPA04 PF0089 2)-Stalement of Common Grownol \



Council

St Helens Borough Local Plan 11 MAR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD (For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mc.	Title:
First Name: Clifford	First name:
Last Name: Picton	Last Name:
Organisation/company:	Organisation/company:
Brocstedes Road	Address:
Ashton-in-Makesheld wig	CM
Postcode: WN 4 ONK	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2319 FGB 7019
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	e accepted and that in order for your comments to be
Yould you like to be kept updated of future sta namely submission of the Plan for examination, proportion of the Plan)	iges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	DA By Post Please.
lease note - email is the Council's preferred met e will contact you by your postal address.	had of access to the

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Policy Paragraph/	Policies	sentation relate?	11
LPA 04 diagram table	Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
tered Livespool reads.			
Other documents (please name document and relevant part/section)			
4. Do you consider the St Helens B	orough Local P	lan 2020-2035 is:	
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①-LPA04 PF0090 ②-Statement of Common Ground.

St Helens Borough Local Plan 2020-2035 (Submission Draft)

Ref: LPSD

0 1 MAR 2019

(For official use only)

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Sherla	First name:
Last Name: Picton.	Last Name:
Organisation/company:	Organisation/company:
Bracktodos Goad	Address:
Postcode: WN4 ONR	Postcode:
	Tel No:
	Mobile No:
	Email:
78(14)	
Signature:	Date: 2xth FEB 2014
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
(namely submission of the Plan for examination, padoption of the Plan)	iges of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	1 B. Post Please
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

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3. To which part of the Local Pla	an does this repre	sentation relate?	
Policy Bether Paragraph/ LA04 Cond diagram table REA GEA LIVERTON TOTAL	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note	s Borough Local P	Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Compliant?		es No	
Sound?		es PNo	
Complies with the Duty to Coopera	ate Y	es PNo	
Please tick as appropriate			
Positively Prepared? Justified? Effective? Consistent with National Policy?			
6. Please give details of why you or fails to comply with the duty lf you wish to support the legal use this box to set out your co	compliance or so	ase be as precise as pos	ssible.
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Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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()-LPAO4 PF0091 2)-Statement of Commun Ground

St Helens Borough Local Plan 0 1 MAR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Jann	First name:
	Last Name:
	Organisation/company:
Address: 2 Rushy Park Catta	Address:
Postcode: WA 71 9PN	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23rd FEB 2014
Please be aware that anonymous forms cannot b considered you MUST include your details above	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	MAD By Post please
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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Policy LifeOd. Paragraphy diagram lable SEA SEA Habitats Regulations Assessment Asse	3. To which part of the Local Pl	lan does this repre	sentation relate?	
4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No No Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. Nor Justified — the council Shands be put to Shack parts of the council of the purpose of the Local Plan, please also we for the purpose of the greenbelt of the council has already gardenny forms for the purpose of the greenbelt in respect of 2eA — Florida tan orth. Rush of Floriding farmed down the Clipsley Broon multiple state orth. Rush of Floriding farmed down the Clipsley Broon multiple state of the state of the purpose of the council of the state of the purpose of the council of the council of the state of the purpose of the council	Policy LIAO4 SITE 2EA 6EA) Paragraph/ diagram table Betman Handocula	Policies	Sustainability Appraisal/ Strategic Environmental	Regulations
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Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



(1)-LPAO4 2) - Statement of Common Ground

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Vendy	First name:
Last Name: Pucton	Last Name:
	Organisation/company:
Brocstedes Road Arhton	BungalonAddress: n-7n-
Mahasheld, ingan.	
Postcode: WNY ANK	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 24 th FEB 2014
Please be aware that anonymous forms can considered you MUST include your details a	not be accepted and that in order for your comments to be above.
Would you like to be kept updated of futu (namely submission of the Plan for examinat adoption of the Plan)	re stages of the St Helens Borough Local Plan 2020-2035? tion, publication of the Inspector's recommendations and
Yes (via email)	MAO Bylost Reall.
Please note - email is the Council's preferre	ed method of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Policy Range Paragraph/ diagram	Map	Sustainability Appraisal/	Habitats Regulations
ITE there table		Strategic	Assessment
REA, SEALCOOK		Environmental	
GEAT 1		Assessment	
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helen	s Borough Local F	Plan 2020-2035 is:	
Please read the Guidance note	1		e Tests of Soundness
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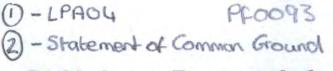
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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

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This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

Title: Mr. Storce	Title:
First Name: Prota Sina	First name:
Last Name: Picton	Last Name:
Organisation/company:	Organisation/company:
Brocsledes Road	Address:
	Postcode:
, source of the same of the sa	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2xt FEB 2019
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	
Yes (via email)	WMO By Post please
Please note - email is the Council's preferred methowe will contact you by your postal address.	d of communication. If no email address is provided,

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local P	an does this repres	sentation relate?	
Policy Remain Paragraph/ LAO4 diagram table SEA Liverent Remains the Remains	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/sect	ion)		
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Sound?	Y	es No	
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

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Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mRS.	Title:
First Name: GEORGINA	First name:
Last Name: ROBERTS	Last Name:
Organisation/company:	Organisation/company:
Address: 389 GARSWOOD ROAD GARSWOOD	Address:
Postcode: WN4 0 TY	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 20.2.19.
lease be aware that anonymous forms cannomments to be considered you MUST included would you like to be kept updated of fut	de your details above. Ture stages of the St Helens Borough Local
Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	
Yes 📈 (Via Email)	No 🗌
Please note - e-mail is the Council's preferraddress is provided, we will contact you by	

RETURN DETAILS

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Local Plan

St.Helens Council

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Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

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3. To which part of the Local Pla	n does this repr	esentation relate?	
Policy LPA04 / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)			
4. Do you consider the St Helens Please read the Guidance note for			Tests of Soundness
Legally Compliant?	Yes 🗹	No 🗆	
Sound?	Yes 🗆	No ⊡	
Complies with the Duty to Cooperate	Yes 🗆	No 🗗	
Please tick as appropriate			
5. If you consider the Local Plan Please read the Guidance note for Positively Prepared? Justified?			
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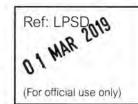
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

who have indicated that they wish to participate at the oral part of the examination



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: PAUL WIE	First name:
	Last Name:
Organisation/company:	Organisation/company
Address: 36 GRUM CROSCOWT	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signa	Date: 20 2-19
Please be aware that anonymous forms cannot be considered you MUST include your details above	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? bublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me	thod of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. 10 Which	part of the Local Pla	an does this repre	sentation relate?	
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	ments (please name and relevant part/section	on)		
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Sound?			Yes No	
Complies w	ith the Duty to Cooper	ate	Yes \square No	
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Please keep a copy for future reference.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

An MAR 2049

(An official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title
First Name: Pallale	Title:First name:
	Last Name:
	Organisation/company:
	Address:
ST HELENS	
Postcode: WALL OXA	Postcode:
Tel No:	
Mobile	£
Email:	
Signature:	Date: 20/2/19
Please be aware that anonymous forms cannot considered you MUST include your details about	be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future sometimes (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? In publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred rewe will contact you by your postal address. † view at http://www.legislation.gov.uk/ukpga/200	method of communication. If no email address is provided, 04/5/contents

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Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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PART B - YOUR REPRESENTATION

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Policy P P4	2EA SEA GEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please name relevant part/section	on)		
4. Do y Plea	ou cons	ider the St Helen he Guidance note	s Borough Local for explanations o	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally	/ Complia	ant?	V	Yes No	
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Compl	ies with t	he Duty to Cooper	rate	Yes No	
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Effecti	ve?				
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yo	No, I do not wish to at the oral examinat	ination? (the hea participate ion		Yes, I wish to participate at the oral examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M



St Helens Borough Local Plan (MAR 2013) 2020-2035 (Submission Draft) (For official use) Representation (i.e. Comment) Form

Ref: LPSD

NAR

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title:
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First Name: TATICIA	First name:
Last Name: WHTTLE	Last Name:
Organisation/company:	Organisation/company:
Address: 2 FALKLAND A	RIVE Address:
MIGAN	
Postcode: WNY OSQ	Postcode:
Tel No:	Tel No:
	Mobile No:
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considered you MUST include your det	s cannot be accepted and that in order for your comments to be ails above.
Would you like to be kept updated of (namely submission of the Plan for example adoption of the Plan)	future stages of the St Helens Borough Local Plan 2020-2035 mination, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's pre we will contact you by your postal addr	eferred method of communication. If no email address is provide ress.

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

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Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you

3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy PAO4 REA SEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other docu	ments (please name and relevant part/sect	ion)		
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Legally Cor	mpliant?		=	
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Complies v	vith the Duty to Coope	rate	Yes No	
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Please continue on a separate sheet if necessary
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Yes, I wish to participate at the oral examination
the examination, please outline why you consider

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 0 1 MAR 2019 (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Please note that you must complete Parts A and B of this form.

I. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	T.W.
Title: M 15S	Title:
First Name: GAIL	First name:
Last Name: 2 IMMER	Last Name:
Organisation/company:	Organisation/company:
Address: 3ZH LIVERPOOL	RO Address:
HAYDOCK, ST. HELENS	
Postcode: USAII 9RY	Postcode:
Tel No:	76! No:
Mobile N	Mobile No:
Email:	Emajl
	Date: Z5 Z 19.
Signature:	Date: <u>CS</u>

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

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St Helens WA10 1HP

or by hand delivery to:

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. 10 Willer	h part of the Local Pla	an does this repre	Sentation relate:	
Policy Po4 NES EA, EA,	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)		
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Complies v	vith the Duty to Cooper	rate	Yes No)
Please tick	as appropriate			
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Effective?			3	
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ormation necessary to support/justify the repre- l not normally be a subsequent opportunity to presentation at the publication stage. For this stage, further submissions will be of d issues he/she identifies for examination. If your representation is seeking a modification.	uccinctly all the information, evidence and supporting esentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters cation; do you consider it necessary to participate at

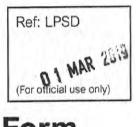
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



2 - Statement of Common Ground St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title:
First Name: MARIAN	First name:
Last Name: PRESCOTT	Last Name:
Organisation/company: RACCED	Organisation/company:
HAYDOCK	Address:
Postcode:WAII 91RX	Postcode:
	Møbile No:
	Email:
Signature:	Date: 25/2/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred method we will contact you by your postal address.	nod of communication. If no email address is provided,

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NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Sound? Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Dang KNDW Yes No Sound? Yes No Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	Palicy PAOS SITE ZHA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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(1) - LPAO4 PFOISS (2) - Statement of Common Ground /75

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 0 1 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[- 12] - 12 [전 : 12] 전 : 12 [T : 12] T :	Title:
First Name: ゴレルミ	First name:
Last Name: THOMPSON	Last Name:
Organisation/company: RAFFD.	Organisation/company:
Address: 211 LIVERTOOL RD.	Address:
	Postcode:
Postcode: WAII 982	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 2 10
considered you MUST include your details ab	
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich part of the Local Pl	an does this repre	sentation relate?	
Policy LPA 6H	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	documents (please name ent and relevant part/sect	ion)		
	rou consider the St Heler se read the Guidance note			ne Tests of Soundness
Legally	Compliant? DONT K	Now	Yes No	
Sound	?		res No	
Compli	ies with the Duty to Coope	rate .	Yes No	
Please	tick as appropriate			
Justifie Effectiv	T D	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		
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7	Please set out what modification(s) you consider necessary to make the Local Plan legally
9	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM
THE GREENBELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

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PO1059



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

01 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
Last Name: HARRISON	Last Name:
Organisation/company:	Organisation/company:
Address: HI, VICARAGE DRIVE HAYDOCK	Address:
ST HOLOUS	Postcode:
Posicode: WAIL DIGG	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 - 2 - 1 9
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be ve.
Nould you like to be kept updated of future s	stages of the St Helens Borough Local Plan 2020-2035, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred r we will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/200	nethod of communication. If no email address is provided 04/5/contents

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St. Helens Council

Town Hall Victoria Square St Helens

WA10 1HP

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Policy PA OH OH EA EA	Paragraph/ diagram table	Policies Map	Y	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)			
	consider the St Helens ad the Guidance note				e Tests of Soundness
Legally Con	npliant?		Yes	□ No Do	N'T KNOW
Sound?		0.0	Yes	₽ No	
Complies w	rith the Duty to Cooper	ate	Yes	No	
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/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

). If you wis this to be	h to participat necessary:	te at the oral pa	rt of the examina	ition, please outline	why you conside

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PO1060



2)-Statement of Common Ground

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mes	Title:
First Name: QILLIAN	
Last Name: HARRISON	Last Name:
Organisation/company:	Organisation/company:
	Address:
Postcode: WAIL OUG	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 - 2 - (9

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

□ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

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Legally Con	mpliant?		Yes 🗆 No D	on't know
Sound?			Yes 📈 No	
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PO1061



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Date: 25/2/19
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of the St Helens Borough Local Plan 2020-2039 ration of the Inspector's recommendations and

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post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

. To which	part of the Local Pla	n does this repre	sentation relate?	
Policy PA PA PA PA PA PA PA PA PA PA PA PA PA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	iments (please name and relevant part/secti	on)		
4. Do you o Please re	consider the St Helen ead the Guidance note	s Borough Local l	Legal Compliance and tr	
Legally Co	mpliant?		Yes No	DON'T KNOW
Sound?			Yes No	
Complies v	with the Duty to Coope	rate	Yes No	
	as appropriate			
Positively F Justified? Effective? Consistent	Prepared? with National Policy?			
or fails	to comply with the di sish to support the leg s box to set out your	uty to cooperate. I gal compliance or comments.	cal Plan is not legally corplease be as precise as prec	Plan, please also
dove	dopment i	in this pooding b	urther down	is scale
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compliant or sound, having regard to the relates to soundness (NB please note that incapable of modification at examination). the Local Plan legally compliant or sound. suggested revised wording of any policy of	1 0
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	Please continue on a separate sheet if necessary
After this stage, further submissions will be on and issues he/she identifies for examination. 8. If your representation is seeking a modifica	make further representations based on the original only at the request of the Inspector, based on matters ation; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

Thank you for taking the time to complete and return this response form.

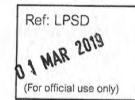
Please keep a copy for future reference.

PO1062



(1)-LPAOS PROIS9 (2)-LPAOS St Helens Borough Local Plan

2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name:	First name:
Last Name: ALLCOCK	Last Name:
Organisation/company:	Organisation/company:
Address: 1 CANNOS NOS	Address:
Postcode: WAII OBU	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 th FEB 2519
lease be aware that anonymous forms canno onsidered you MUST include your details ab	ot be accepted and that in order for your comments to be ove.
ould you like to be kept updated of future	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
lease note - email is the Council's preferred e will contact you by your postal address.	method of communication. If no email address is provided,

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Policy Paragraph/ diagram table Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan Please read the Guidance note for explanations of Leg Legally Compliant? Yes Sound? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it becan please read the Guidance note for explanations of the Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan or fails to comply with the duty to cooperate. Please If you wish to support the legal compliance or sound.	al Compliance and ☐ No ☐ No ☐ No ☐ No ☐ No	DONT KWOW
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED REMOVAL FROM GREEN BELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) Yes, I wish to participate at the oral No. I do not wish to participate NO

examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

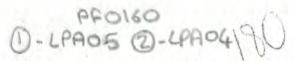
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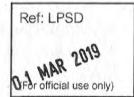
at the oral examination

PO1063





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
Title: MCS	_ Title:
FIRST Name: KINTAT	First name:
Last Name: SMITH	Last Name:
Organisation/company:	Organisation/company:
Address: 20 SPRINGRIEUD PARK	Address:
	Postcode:
Complete the Compl	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 · 2 · 20 · 9
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Nould you like to be kept updated of future stage namely submission of the Plan for examination, pubadoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred methove will contact you by your postal address.	d of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

3. To which part of the Local Plan does this representation relate?

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy LPA 04 SITES	Paragraph/ diagram table		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
other docum	ments (please nar and relevant part/s	ne ection)			
4. Do you c	onsider the St He	elens Bo	rough Local P	lan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Con	mpliant?			es 🖸 No 🖒	ON'T KNOW
Sound?			□ Y	es 🕡 No	
Complies w	ith the Duty to Coo	perate		es No	
Please tick	as appropriate				, h
				because it is not: the Tests of Soundness	
Positively Pr	repared?				
Justified?					
Effective?					
Consistent v	with National Polic	y?			
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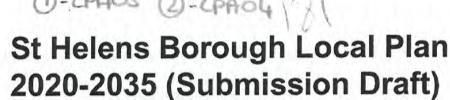
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PO1064







Representation (i.e. Comment) Form

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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	First name:
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Organisation/company:	Organisation/company:
Address: 80 SPRINGFIELD PARIC	Address:
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	Tel No:
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Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	d of communication. If no email address is provided,

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the St Helens uidance note fo	Borough Lo	ocal Plan 202	0-2035 is:	
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		Yes	☑ No	
Sound? Complies with the Duty to Cooperate			☑ No	
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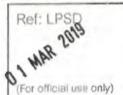
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PO1065



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) F



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Title: MRS	Title:
First Name: DE&24	First name:
Last Name: CLTSHAM	/
Organisation/company:	Organisation/company:
	Address:Postcode:
	Mobile No:
	Email:
Signature:	Date: 27(2)19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

1 No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

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or by hand delivery to:

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Policy Lp Ao 4	SITES DEA SEA GEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/sec			
4. Do y	rou cons	sider the St Held the Guidance no	ens Borough Local l	Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
Legally	/ Compli	ant?	Denit Know	Yes No	
Sound	?			Yes No	
Compl	ies with	the Duty to Coop	perate	Yes No	
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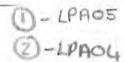
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

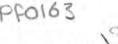
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1066









St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

NAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)				
(we will correspond via your agent)	Title: 41 A :				
	Title: 14 A				
	First name:				
Last Name: JONES.	Last Name:				
Organisation/company:	Organisation/company:				
	Address:				
Postcode: WAN 048	Postcode:				
	Tel No:				
	Mobile No:				
	Email:				
Signature:	Date: 25/2/19				
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be e.				
Would you like to be kept updated of future so (namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and				
Yes (via email)	☐ No				
Please note - email is the Council's preferred m we will contact you by your postal address.	ethod of communication. If no email address is provided,				

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1067



- Statement of Common Ground

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)				
First Namo: SHEU A	First name:				
Last Name: CREHAN	Last Name:				
Organisation/company:	Organisation/company:				
Address: 5, SLAG LAME PEWFALL HAYDOCK	Address:				
Poetcode: WAII 9R4	Postcode:				
Posicode.	Tel No:				
	Mobile No:				
	Email:				
Signature:	Date: 21/2/2019				
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Yes (via email)	□ No				
Please note - email is the Council's preferrance we will contact you by your postal address.	ed method of communication. If no email address is provided,				

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Pla	n does this repre	sentation relate?	
Policy Paragraph/ diagram table LPACH TEA 3 6 EA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helen Please read the Guidance note	s Borough Local for explanations o	Plan 2020-2035 is: f Legal Compliance and	the Tests of Soundness
Legally Compliant?	2	Yes No	
Sound?		Yes □√No	
Complies with the Duty to Coope	rate	Yes No	
Please tick as appropriate			
Justified? Effective? Consistent with National Policy?			*
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Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

/

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

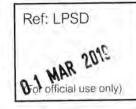
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1068



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)		
	Title:		
First Name: MICHAEL	First name:		
Last Name: CREHAN	Last Name:		
Organisation/company:	Organisation/company:		
Address: 5, SLAG LAN	Address:		
PEWFALL HAYDOCK			
ST. HELENS			
Postcode: WAII 9RU	Postcode:		
	Tel No:		
	Mobile No:		
	Email:		
Signature:	Date: 21/2/19		
considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.		
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and		
Yes (via email)	□ No		
Please note - email is the Council's preferred we will contact you by your postal address.	d method of communication. If no email address is provided		

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	n does this repr	esentation	relate?	
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4. Do you c	consider the St Helens ead the Guidance note	Borough Local	Plan 2020 of Legal C	0-2035 is: ompliance and th	e Tests of Soundness
Legally Cor	mpliant?	V	Yes	☐ No	
Sound?			Yes	☑ No	
Complies w	ith the Duty to Cooper	ate 🗌	Yes	☑ No	
Please tick	as appropriate				
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Justified?		~			
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Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

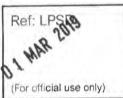
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1069



()-LPAO4 (2)-Statement of Common Ground) St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

. Your Details	2. Your Agent's Details (if applicable)
we will correspond via your agent)	
itle: MK	Title:
First Name: 16NN (S	Title:
ast Name: DKIEKS	Last Name:
Organisation/company:	Organisation/company:
	Address:
PONFALL	
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Postcode: WAIL DRX	Postcode:
	Tel No:
	Mobile No:
	Email:
	Date: 25/2/19
Signature:	Date.
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Yes (via email)	□ No

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

193

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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	ments (please name and relevant part/secti	on)			
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Sound?			Yes 🛮 No		
Complies w	with the Duty to Coope	ate 🔲 `	Yes No.		
Please tick	as appropriate				
5. If you co Please re	ensider the Local Plan ead the Guidance note	is <u>unsound</u> , is it for explanations of	because it is not: the Tests of Soundnes	s	
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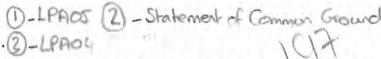
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1070







St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

O 1 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: 7/85	Title:
First Name: Marcene	First name:
Last Name: Downey	Last Name:
Organisation/company:	Organisation/company:
Address: 261, LIVERPOOL	Ro Address:
MISIDE	
Postcode: WAN aRT	Postcode:
	Tel No:
	Mobile No:
	Email:
Cierratura	Date
Signature:	Date 25/2/19
ease be aware that anonymous forms o onsidered you MUST include your detai	cannot be accepted and that in order for your comments to be its above.
ould you like to be kept updated of for amely submission of the Plan for examination of the Plan)	uture stages of the St Helens Borough Local Plan 2020-2035 ination, publication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

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post to:

Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1071



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: 1) ENET	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 261 LIVER Poor RD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/20/9
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Yould you like to be kept updated of future stage namely submission of the Plan for examination, public doption of the Plan)	es of the St Helens Borough Local Plan 2020-2035 olication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred metho	od of communication. If no email address is provided

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

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Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy	Paragraph/	Policies	Sustainability	Habitats
A04	diagram	Мар	Appraisal/ Strategic	Regulations Assessment
TES	table		Environmental	Assessment
E A			Assessment	
EA EA				
Other docu	iments (please name and relevant part/secti	ion)		
4. Do you o	consider the St Helen	ns Borough Local e for explanations o	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
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Sound?	CHESTYTH	ā	Yes No	DONT
	with the Duty to Coope	erate	Yes 🛮 No	DONT
	as appropriate			
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Justified?	Selection of the select			
Effective?		F		
Consistent	with National Policy?			
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Please keep a copy for future reference.

PO1072



St Helens Borough Local Plan 2020-2035 (Submission Draft) (For official us Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2L

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

First Name: JOHN

Title: MR

Part A - Personal Details

Part B - Your Representation(s)

First name:

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Last Name: DAVIES	Last Name:
Organisation/company:	Organisation/company:
Address: 25 WHITEHOUSE CLOSE	Address:
HAYDOCK	
ST. HELENS	
Postcode: WAII OTW	Postcode:
	Tel No:
	Mobile No:
	Email:
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	Date: 25 - 2 - 19 accepted and that in order for your comments to be
considered you MUST include your details above.	
Would you like to be kept updated of future sta (namely submission of the Plan for examination, p adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
adoption of the Flan)	
Yes (via email)	□ No

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Sound?			Yes No	
Complies v	vith the Duty to Cooper	ate 🔲	Yes No	
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Consistent	with National Policy?	Y		
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

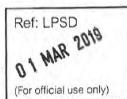
Please keep a copy for future reference.

PO1073



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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
First Name Only S. M.	First name:
First Name:	_ Last Name:
Last Name: (17.7.201)	Crashisation/company:
Organisation/company:	Organisation/company:
Address & SPRINGFIELD PARK	Address:
Address: W P Dock	
5.11.000-11	
	Postcode:
Postcode: Writing	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 /2 /19
Places be aware that anonymous forms cannot be a	accepted and that in order for your comments to be
considered you MUST include your details above.	
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pulsadoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred meth we will contact you by your postal address.	od of communication. If no email address is provided

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Other o	documer ent and	nts (please name relevant part/sect	ion)		
4. Do y	ou cons	sider the St Heler the Guidance note	ns Borough Local e for explanations o	Plan 2020-2035 is: If Legal Compliance and th	ne Tests of Soundness
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Please	tick as	appropriate			
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Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
suggested revised wording of any policy or text. Please be as precise as possible.

DIELETH THIS LAND FROM THE PROPOSED REMOVAL FROM THE CREEK BELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PO1074



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

Title: M2S	Title:
First Name: CLERCDING	First name:
Last Name: PEPLOW	Last Name:
Organisation/company:	Organisation/company:
Address: 71 SPRINGFIELD F	Aek Address:
	Postcode
	Tel No: Mobile No: Email:
Signature:	Date: 25 2119
Please be aware that anonymous forms ca considered you MUST include your details	annot be accepted and that in order for your comments to be above.
Nould you like to be kept updated of fur	ture stages of the St Helens Borough Local Plan 2020-2035? nation, publication of the Inspector's recommendations and
Yes (v ia ema il)	□ No
Please note - email is the Council's prefer	red method of communication. If no email address is provided,

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy	267 56A 66A	Paragraph/ diagram table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/section	on) a Em	SEA	GEA	
		sider the St Helens the Guidance note				ne Tests of Soundness
Legally	Compli	ant? Pows K	∞w.	☐ Yes	☐ No	
Sound?				☐ Yes	☑ No	
Compli	es with t	the Duty to Cooper	ate	☐ Yes	No	
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7	7. Please set out what modification(s) you consider necessary to make the Local Plan legally
	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL OF THE GREENBELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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19

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE COONCIL HA

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1075



Ref: LPSD 01 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent) Title: Mrs	2. Your Agent's Details (if applicable) Title:
First Name: Sarah	First name:
Last Name: Daniel	Last Name:
Organisation/company:	Organisation/company://
Asniva Goss, Asnion-in-	Address:
Postcode: WN4 04V	Postcode:
Signature:	Date: 25 th Feb 2019
ease be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
ould you like to be kept updated of future stages amely submission of the Plan for examination, public doption of the Plan)	of the St Helens Borough Local Plan 2020-2035? cation of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferred method	of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall

Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

planningpolicy@sthelens.gov.uk

or by email to:

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Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	n part of the Local Pla	in does this repres	sentation relate?		
	Paragraph/ diagram table EA, 5 FA, 6FA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
	iments (please name and relevant part/section	on)			
4. Do you o	consider the St Helense ad the Guidance note	s Borough Local P for explanations of	Plan 2020-2035 is: Legal Compliance and	I the Tests of Soundnes	s
Legally Cor	mpliant?		/es □ No	Don't know	
Sound?	110000000		res No		
Complies w	vith the Duty to Cooper	ate \(\sqrt{1}\)	res □ Mo		
Please tick	as appropriate				
Effective? Consistent	with National Policy?				
or fails to If you wis use this	o comply with the dut sh to support the lega box to set out your co	y to cooperate. PI al compliance or s omments.	eal Plan is not legally of ease be as precise as oundness of the Loca	possible. Il Plan, please also	
in us	cling of	erban lan	ne Greenbe encourages d. Using s	greenbelt fa	
10 e			dy granted	planning ospect of	

relates to soundness (NB please note that incapable of modification at examination).	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your rext. Please be as precise as possible.
Deletethis land -	from the proposed
Deletethis land - remaind from the	- greenbelt!
	Please continue on a separate sheet if necessary
presentation at the publication stage. fter this stage, further submissions will be on	
nd issues he/she identifies for examination.	ation; do you consider it necessary to participate at
nd issues he/she identifies for examination. 8. If your representation is seeking a modifica	ation; do you consider it necessary to participate at
8. If your representation is seeking a modificathe oral part of the examination? (the heari	ation; do you consider it necessary to participate at ngs in public) Yes, I wish to participate at the ora
8. If your representation is seeking a modification the oral part of the examination? (the hearing No, I do not wish to participate at the oral examination) 9. If you wish to participate at the oral part of	Ation; do you consider it necessary to participate at ings in public) Yes, I wish to participate at the ora examination
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8. If your representation is seeking a modification the oral part of the examination? (the hearing No, I do not wish to participate at the oral examination) 9. If you wish to participate at the oral part of	ation; do you consider it necessary to participate at ngs in public) Yes, I wish to participate at the oral examination
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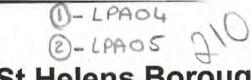
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

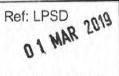
Please keep a copy for future reference.

PO1076





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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PFOIGO

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
Title: M/2 ·	Title:
First Name: PAUL	First name:
Last Name: DANIEL	Last Name:
Or sation/company:	Organisation/company:
HSHTON CROSS	P Address:
	Postcode:
	rel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/19.
considered you MUST include your details above.	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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3. To which pa	rt of the Local Pla	n does this repre	sentation relate?	×
Policy LPA SITES 09 EADS		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please name relevant part/section	on)		
4. Do you cons Please read t	sider the St Helens the Guidance note	Borough Local F for explanations of	Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Complia	ant?		′es □ No C	DONT KNOW
Sound?			es PNo	
Complies with t	he Duty to Coopera	ate 🔲 Y	es No	
Please tick as a	ppropriate	THE STATE OF THE S	1 3000000000000000000000000000000000000	NATIONAL STATES
Please read to Positively Preparation Properties Preparation Prepa	- Grande	for explanations of	the Tests of Soundness	
i. Please give o	letails of why you nply with the duty	consider the Loc	al Plan is not legally com	pliant or is unsound
If you wish to		compliance or so	oundness of the Local Pl	
NOT PUT	TO SIMO	THOOK DEVE	FFIC F COUNCIC S FORMENT ,	SHOULD BE VEDD OF IN THIS

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PO1077



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

LPA 0 5

5/16 2HA

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0 1 MAR 2019

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: 17-4.	Title:
First Name: 13 04/	First name:
Last Name: 17 1/25 H	Last Name:
Organization/company:	Organisation/company:
Local Resident Fr	Organisation/company:
11-9 41 112001 1000	Address:
Address: 147 Handards	
C- 11 - 1 - 1	
SE HELEAS	Destando
Postcode: WAII 9AT	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/F68/2019.
considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035 blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred method we will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/2004/5	nod of communication. If no email address is provided contents

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. To which part of the Local	Plan does this repre	sentation relate?	
Policy Paragraph/diagram table PA 0 4 PA 5 EA \$ 6	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please nam document and relevant part/se	ection)		
4. Do you consider the St Hell Please read the Guidance n	lens Borough Local ote for explanations o	Plan 2020-2035 is: f Legal Compliance and the	ne Tests of Soundness
Legally Compliant?		Yes / No	
Sound?		Yes No	
Complies with the Duty to Coo	perate	Yes V No	
Please tick as appropriate			
5. If you consider the Local Find Please read the Guidance n	Plan is <u>unsound,</u> is it note for explanations of	t because it is not: If the Tests of Soundness	
Positively Prepared?	\square		
Justified?	\square		
Effective?	\checkmark	,	
Consistent with National Police	y? 🗹		
6. Please give details of why or fails to comply with the lf you wish to support the use this box to set out you	y you consider the Lo e duty to cooperate. legal compliance or	Please be as precise as p	ossible.
		fofulation nu	ember.
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	sound. It will be helpful if you are able to put forward you policy or text. Please be as precise as possible.
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	Please continue on a separate sheet if necess
ease note: your representation should	cover succinctly all the information, evidence and supporting
ormation necessary to support/justify the	ne representation and suggested modification, as there unity to make further representations based on the original
presentation at the publication stage.	and to make further representations based on the original
ter this stage, further submissions w	ill be only at the request of the Inspector, based on matter
d issues he/she identifies for examin	ation.
. If your representation is seeking a r the oral part of the examination? (the	modification; do you consider it necessary to participate a ne hearings in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
4	
If you wish to participate at the oral this to be necessary:	part of the examination, please outline why you consider
If you wish to participate at the oral this to be necessary:	part of the examination, please outline why you consider
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PO1078



()-LPA05 PF0192 (2)-LPA04 Ref: LPS St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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(we will correspond via your agent)	Title
Title: MK	Title:
Last Name: WOODWARD	Last Name:
Organisation/company:	Organisation/company:
HAYDOCK WITHOUT	Address:
Postcode: WAII OXP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25-2-19
considered you MUST include your details al	not be accepted and that in order for your comments to be bove.
Manual way like to be kent undated of futur	re stages of the St Helens Borough Local Plan 2020-2035? ion, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferre we will contact you by your postal address.	ed method of communication. If no email address is provided,

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Policy PACH SITES ZEA SEA GEA	Paragraph/ diagram table	Po Ma	licies ap	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please namend relevant part/s		a mandre de la constante de la	Department of the second	
4. Do you o	consider the St He	lens Boro	ugh Local Plan	2020-2035 is: gal Compliance and	I the Tests of Soundness
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Legally Cor			☐ Yes	□ No :	DONT KNOW
			☐ Yes ☐ Yes	□ No :	
Legally Cor Sound?			☐ Yes	□ No :	
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Legally Con Sound? Complies v Please tick	mpliant? with the Duty to Coo as appropriate	operate	☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes	□ No :	DONT KNOW
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Legally Cor Sound? Complies v Please tick 5. If you co	mpliant? with the Duty to Coo as appropriate onsider the Local lead the Guidance r	operate	☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes	No No	DONT KNOW
Legally Con Sound? Complies v Please tick 5. If you con Please re	mpliant? with the Duty to Coo as appropriate onsider the Local lead the Guidance r	operate	☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes	No No	DONT KNOW

 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS
POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE
SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?
SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?
ONE OF THE PURPOSES OF THE GREENBELT ISTO ASSIST IN URBAN REGENERATION
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GREENBELT FRILS TO ENCOWRAGE THIS.
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HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE USE OF CARS IS
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DOCTORS SURGERIES, BUS POUTES AND OTHER SERVICES. THE USE OF CARS IS
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BEING ENCOURAGED BECAUSE OF THE WACK OF FACILITIES,
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CROWDED WHEN THE FLORIDA FARM NORTH WAREHOUSES AR OPEN. THE EXTRA
TRAFFIC FROM THIS DEVELOPMENT WILL ONLY MAKE WATTERS WORSE.

i	Please set out what modification(s) you consider necessary to make the Local Plan leg- compliant or sound, having regard to the matter you have identified at 6. above where the relates to soundness (NB please note that any non-compliance with the duty to cooperate the compliance with the duty to cooperate the compliant of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward suggested revised wording of any policy or text. Please be as precise as possible.	his ate is
-	DELETE THIS LAND FROM THE PROPERTY REMOVALES	

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PO1079



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Title:	
	First name:
Last Name: MARSH	Last Name:
	Organisation/company:
Address: 149 LIVERPOO	ALBOCK
# 1 A 1 A 1 A 1 A 1 A 1 A 1 A 1 A 1 A 1	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/FEB/2019
Please be aware that anonymous form considered you MUST include your d	ms cannot be accepted and that in order for your comments to be etails above.
Vould you like to be kept updated	of future stages of the St Helens Borough Local Plan 2020-2035? camination, publication of the Inspector's recommendations and
Yes (via email)	, No
Please note - email is the Council's p	preferred method of communication. If no email address is provided,

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-20 Please read the Guidance note for explanations of Legal Complete Legally Compliant?	oliance and the Tests of Soundness
Legally Compliant? Yes Sound? Yes	oliance and the Tests of Soundness
Sound? Yes	
Sound? Yes	☑, No
Complies with the Duty to Cooperate Yes	
	☑ No
Please tick as appropriate	
Positively Prepared? Justified? Effective? Consistent with National Policy?	
6. Please give details of why you consider the Local Plan is nor fails to comply with the duty to cooperate. Please be as lf you wish to support the legal compliance or soundness of use this box to set out your comments.	orecise as possible.
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	is stage, further submissions will be dues he/she identifies for examination.	only at the request of the Inspector, based on matters
	our representation is seeking a modifioral part of the examination? (the hea	ication; do you consider it necessary to participate at arings in public)
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	ou wish to participate at the oral part to be necessary:	of the examination, please outline why you consider
ease r	note the Inspector will determine the mo	ost appropriate procedure to adopt to hear those who have
	d that they wish to participate at the ora	

Please keep a copy for future reference.

PO1080



St Helens Borough Local Plan 2020-2035 (Submission Draft) (For official Le Representation (i.e. Comment) Form

Ref: LPSD

O 1 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: MARION	First name:
Last Name: MARSH	Last Name:
	Organisation/company:
Address: 149 LIVERPOOL TOAD	Address:
ST. HELENS	
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25th February 2019
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035 apublication of the Inspector's recommendations and
Yes (via email)	No
lease note - email is the Council's preferred me	ethod of communication. If no email address is provided

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Please continue on a separate sheet if necessary

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Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

Please continue on a separate sheet if necessary

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1081



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company:
Address: 22 SCRINGIFIELD POPLE	Address:
S, FIELENS	Postcode:
Postcode: NA II OXIX	Tel No:
	Mobile No:
	Email:
Signature: ,	Date: 25.3.19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

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St. Helens Council

Town Hall

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PART B - YOUR REPRESENTATION

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3. To which	part of the Local Pla	n does this repre	sentation relate?	
Policy Pao+ EA EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)		
Please re		for explanations o	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
egally Co	mpliant? Do~		Yes No	
Sound?	KNE	D □	Yes No	
Complies v	with the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
Positively Foundation Justified? Effective? Consistent	Prepared? t with National Policy?			
or fails If you w use this	to comply with the divish to support the legs box to set out your	uty to cooperate. I gal compliance or comments.	ocal Plan is not legally co Please be as precise as p soundness of the Local	Plan, please also
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1	7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1082



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

LPA04 (2) Statement of Common Ground PF0198

Ref: LPSD 0 1 MAR 2019 (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: PNU	First name:
Last Name: MORRIS	Last Name:
Organisation/company:	Organisation/company:
HANDOCK	the state of the s
Postcode: WAILOXA	
	Tel No: Mobile No: Email:
Signature:	Date: 25th Felo. 19
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ease be aware that anonymous forms canno	t be accepted and that in order for your comments to be
onsidered you MUST include your details abo	

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy LPAOH Sileo ZEA 5EA 6EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)		
4. Do you co	onsider the St Helens ad the Guidance note	s Borough Local F for explanations of	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Com	npliant?		res □ No ⊅	onit. Know
Sound?			es No	
Complies wi	ith the Duty to Cooper	ate 🔲 Y	es No	
Please tick a	as appropriate			
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Consistent w	vith National Policy?			
or fails to If you wisl	comply with the duty	y to cooperate. <u>Ple</u> I compliance or so	al Plan is <u>not legally con</u> ease be as precise as po oundness of the Local P	ssible.
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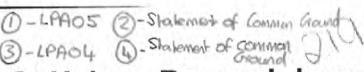
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1083





3-LPAGE Q-Statement of Common Ground Ground Statement of Government Quantity Statement of Government Ground Quantity Statement of Government Quantity Statement Quantity S 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: 54LIE	First name:
Last Name: WOCOWARD	Last Name:
Organisation/company:	Organisation/company:
Address: 49 SPRINGFIELD PARK HAYDOCK	Address:
ST HELENS	
Postcode: WAII OXP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 - 3 - 2019
considered you MUST include your details above	e accepted and that in order for your comments to be
Novid you like to be kent undated of future st	ages of the St Helens Borough Local Plan 2020-2035 oublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided

RETURN DETAILS

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St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	an does this re	present	ation relate?	
Policy LPA 04 SITES: QEA SEA GEA	Paragraph/ diagram table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)			
4. Do you c	onsider the St Helen ad the Guidance note	s Borough Lo	cal Plan ns of Leg	2020-2035 is: gal Compliance and	the Tests of Soundness
Legally Con	npliant?		☐ Yes	□ No	DONT KNOW
Sound?			Yes	₩ No	
Complies w	ith the Duty to Cooper	ate	☐ Yes	☑ No	
Please tick	as appropriate				
Positively Pr Justified? Effective?	ad the Guidance note repared? with National Policy?	TOT EXPLANATION	N N N N N N N N N N N N N N N N N N N		
or fails to If you wis use this	comply with the du sh to support the leg box to set out your c	ty to cooperat al compliance omments.	e. <u>Pleas</u> or soun	e be as precise as dness of the Loca	al Plan, please also
	UMES OF PREDI				
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THE RISK	OF FLOODING FUTUR	RE DEVE	WN TH LOPME	HE CLIPSLEY ENT AT THIS	BROOK WILL BE LOCATION.

7	Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8	. If your representation is seeking a modification; do you consider it necessary to participate at
	the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

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PO1084



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019 (For official use only)

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1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title;
First Name: SosaN	First name:
Last Name: ScALISBUICL	Last Name:
Organisation/company:	Organisation/company:
Address: 21 SPRINGFIELD CARK	Address:
Postcode: WAII O+R	Postcode:
	Tel No:
	Mobile No:
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lease be aware that anonymous forms cannot be a onsidered you MUST include your details above.	ccepted and that in order for your comments to be
것이 가니다 그는 그리고 있는데 그리고 있다면 그녀를 보지 않는데 이번 생각했다. 네트	es of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	☑ No
lease note - email is the Council's preferred metho	ed of communication. If no email address is provided,

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planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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7	. Please set out what modification(s) you consider necessary to make the Local Plan legally
•	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED REMOVAL FROM GREENBELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

/

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I would like to voice my concerns as
this development will have a massive
impact on my life and that of future
generations in an area already southward
with treffic.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1085



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

1. Your Details

Title 15

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

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Please be aware that anonymous forms cannot be accepted and that in order for your comments to loonsidered you MUST include your details above.		
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Yes (via email)	Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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Policy SITE	LPA04 SEA SEA GEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/secti	on)		
4. Do y Plea	ou cons	sider the St Helen the Guidance note	s Borough Local for explanations o	Plan 2020-2035 is: f Legal Compliance and	the Tests of Soundness
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indicated that they wish to participate at the oral part of the examination

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Thank you for taking the time to complete and return this response form.

1800756M

PO1086



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 MAR 2019

(For official use only)

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
Title: MRD	Title:
First Name: RESECCA	First name:
Last Name: LEEMING.	Last Name:
Organisation/company:	Organisation/company:
Address: 28, AVERY ROAD	Address:
HAYDO CIC	
STHELENS	
Postcode: WAIIOXA	Postcode:
Tel No	No:
Mobile	ile No:
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

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3. To which	part of the Local Pla	an does this repr	esentation	relate?		
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	Please continue on a separate sheet if necessary
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indicated that they wish to participate at the oral part of the examination

Please keep a copy for future reference.

Thank you for taking the time to complete and return this response form.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
Last Name: LEEMING	Last Name:
Organisation/company:	Organisation/company:
	Address:
Postcode: WAII OXA	Postcode:
	Tel No:
	Mobile No:
	Email:
	Date: 26 HFES 2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, puradoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred met we will contact you by your postal address.	hod of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No Den'T KNON Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also	Policy LPA04 STES 2 EA 5 EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	Justified? Effective?		2 2		
	or fails t	o comply with the du	ty to cooperate. P	lease be as precise as p	ossible.
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for this type of development, in this position and on this scale. High volumes of predicted traffic will add to the already over capacion the highways around the site.	Land.	ald the fill ha	· maxively in	in already at ca	development. pacity-further
High volumes of predicted traffic will add to the already over capacity on the highways around the site. Tocal wild life will be massively impacted by this development. Infrastructure of existing food plain already at capacity-further development will drastically impact Clipsey lane brook all the way to Black brook a known food risk area.	developm	est will draste	cally impact	risk apa	ook all the wa

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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D 1 MAR 2019

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	Title:
First Name: MARINA	First name:
Last Name: CuniffE	Last Name:
Organisation/company:	Organisation/company:
	Address:
THIOSEYS	
Postcode WALL OXD	Postcode:
Tel No:	ć
Mobile	e No;
Email:	
Signature:	Date: 25/1/19
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
Would you like to be kent undated of future st	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy PA O 4 TES EA EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)		
4. Do you o	consider the St Helen ead the Guidance note	s Borough Local e for explanations o	f Legal Compliance and th	ne Tests of Soundness
Legally Co	mpliant?	- 1	Yes No F	SONT KNOW
Sound?	O. Care (et)	Ē	Yes No	
	with the Duty to Coope	rate	Yes No	
	as appropriate			
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(we will correspond via your agent)	2. Your Agent's Details (if applicable)			
Title: M.E.	Title:			
First Name: DEREK	First name:			
Last Name: WH VTLE	Last Name:			
Organisation/company:				
Address: 2 FALKLAND PRIVE,	Address:			
WIGAN				
Postcode: WN4 OSQ	Postcode:			
Tel No:	Tel No:			
Mobile_No:	Mobile No:			
Ema	nail:			
Signature:	Date: 20-2-2019			
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be			
Would you like to be kept updated of future stages (namely submission of the Plan for examination, publicadoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? ication of the Inspector's recommendations and			
Yes (via email)	☐ No			
Please note - email is the Council's preferred method we will contact you by your postal address.	d of communication. If no email address is provided,			

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	I do not wish to participate he oral examination	Yes, I wish to participate at the oral examination
	sh to participate at the oral pare	rt of the examination, please outline why you consider

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we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:\
First Name: SHIRLEY	First name:
Last Name: BIRCHALL	Last Names
Organisation/company:	Organisation/company:
Address: 227 LIVERBOL ROAD	Address:
PEWFALL HAYDOCK	
ST HELENS	
Postcode: WAII 9RT	Postcode:
Tel No:	
Mobile No:	Mobile No:
Email:	Email:
	25/2/10
Signature	Date: 25/2/19
considered you MUST include your details about	be accepted and that in order for your comments to be ve.
Nould you like to be kept updated of future standard submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035 in, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred r	method of communication. If no email address is provided

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3. To which part of the Local	Plan does this repre	sentation relate?	
Policy Paragraph/ diagram table SITES 2 EA 5 EA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/se	e ction)		
4. Do you consider the St Held Please read the Guidance no	ens Borough Local Pote for explanations of	lan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
	of talou	es □ No	- veste or obtaining
Sound?	_ Y	es No	
Complies with the Duty to Coop	perate Y	es No	
Please tick as appropriate			
5. If you consider the Local PI Please read the Guidance no Positively Prepared?	an is <u>unsound</u> , is it to te for explanations of	the Tests of Soundness	
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Effective?			
Consistent with National Policy?	\square		
6. Please give details of why your fails to comply with the did not be supported the leguse this box to set out your DEVELOPMENT OF THE	uty to cooperate. Ple gal compliance or so comments.	ase be as precise as pos undness of the Local Pl	ssible. an, please also
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OMPLETELY GRIDLA	CKED '		

7. Please set out what modification(s) you consider necessary to make the Local Plan compliant or sound, having regard to the matter you have identified at 6. above whe relates to soundness (NB please note that any non-compliance with the duty to continuous incapable of modification at examination). You will need to say why this modification the Local Plan legally compliant or sound. It will be helpful if you are able to put for suggested revised wording of any policy or text. Please be as precise as possible.	operate is on will make ward your
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DELETE THIS LAND FROM THE PROPOSED.
REMOVAL FROM THE EXEENBELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

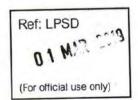
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Part B - Your Representation(s)

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itle: LIR	HCQC/ First name:
First Name: JAMES FUWARD UN	Last Name:
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Organisation/company:	Organisation/company:
	Address:
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	0310000
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Signature:	Date: 20/2/2019
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Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

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3. To which part of the Local Pla	n does this repres	sentation relate?	
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Other documents (please name document and relevant part/section	n)		
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

O 1 MAR 2019

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name:	First name:
Last Name: METCALE	Last Name:
Organisation/company:	Organisation/company:
	Postcode: Tel No:
	Mobile No: / Email:
Signature:	ate: 20/1/9

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated Plan 2020-2035? (namely submission Inspector's recommendations and ad	on of the Plan for examination, publica	Borough Local ation of the
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Please note - e-mail is the Council's address is provided, we will contact y	preferred method of communication.	If no e-mail
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3. To which part of the l		epresentation relate?	Univitate
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Other documents (pleasedocument and relevant part/section)	se name	3.46	
4. Do you consider the	St Helens Borough Lo	ocal Plan 2020-2035 is:	ALTERNATIVE STATE STATE OF THE
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Legally Compliant?	Yes ⊡	No □	_
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deleve this land from the proposed renovae from the Greenbeek,

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

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() - LPA04 3-Statement of Common Ground



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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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	First name:
	Last Name:
	Organisation/company:
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onsidered you MUST include your details ab	
	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
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Council

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	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No

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PART B - YOUR REPRESENTATION

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Title: MR	Title:
First Name: Thomas	First name:
Last Name: ANDERS	Last Name:
Organisation/company:	Organisation/company:
Address: 207 LIVER POOL ROAD	Address:
	Postcode:
	el No:
	Nobile No:
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Signature:	Date:
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Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? bublication of the Inspector's recommendations and
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The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Policy	ch part of the Local PI		Toluto:	
LPA 2 04 5	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other doc document	uments (please name and relevant part/secti	on)		
4. Do you Please r	consider the St Helensead the Guidance note	s Borough Local P	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Co				DONT KNOW
Sound?		Y	es Mo	
Complies v	with the Duty to Coopera	ate Y	es No	
Please tick	as appropriate			
Please re Positively P		for explanations of	the Tests of Soundness	
Effective?		g		
	with National Policy?			
If you wis	with the duty	compliance or so	al Plan is <u>not legally com</u> ase be as precise as pos oundness of the Local Pla	ssible.
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	Local Plan legally compliant or sound.	You will need to say why this modification will mak It will be helpful if you are able to put forward your or text. Please be as precise as possible.
		Please continue on a separate sheet if necessar
prese fter th	ntation at the publication stage. is stage, further submissions will be or ues he/she identifies for examination.	make further representations based on the original
8. If yo	oral part of the examination? (the heari	ation; do you consider it necessary to participate a
8. If yo	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If yo	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral
the 9. If yo	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
the 9. If yo	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1096





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 7 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[] - [[[[[[[[[[[[[[[[[Title:
	First name:
	Last Name:
	Organisation/company:
Address: 2 SLACLANG	Address:
HONDOCK	
ST HELEUS	
Postcode: QALL 9RU	Postcode:
	Tel Nó:
	Mobile No:
	Email:
Signature:	Date: 2/3/19
Please be aware that anonymous forms canno considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Policy			riali does tills	representation	relate?	
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Legally	Complia	ant?		Yes	☐ No	DON'T KNOW
Sound?				Yes	No	
Complies with the Duty to Cooperate			erate	Yes	No	
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Justified	4?					
Effective	e?					
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relates to soundness (NB please note that a incapable of modification at examination). Y	sider necessary to make the Local Plan legally atter you have identified at 6. above where this my non-compliance with the duty to cooperate is fou will need to say why this modification will make will be helpful if you are able to put forward your text. Please be as precise as possible.
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d issues he/she identifies for examination.	ly at the request of the Inspector, based on matters
. If your representation is seeking a modificathe the oral part of the examination? (the hearing	
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

PO1097





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

PF 030

Ref: LPSD

0 7 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: 1/4.	Title:
First Name: FANK	First name:
Last Name: BURCESS	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SLAC LANG H MY DOCK	Address:
Postcode: WAII9/4	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2.3.79.
Please be aware that anonymous forms can considered you MUST include your details a	not be accepted and that in order for your comments to be above.
	re stages of the St Helens Borough Local Plan 2020-2035? tion, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferre we will contact you by your postal address.	ed method of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

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Policy	LPAOR SITES 2EA 5 EA 6 EA	Paragraph/ diagram table		Policies Map	Ap Str En	estainability opraisal/ rategic evironmental esessment	F	Habitats Regulations Assessment
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Sound?] Yes	√ No		
Complies with the Duty to Cooperate			perate] Yes	V No		
Please	tick as a	ppropriate				y		
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or fai	ils to co u wish to	letails of why mply with the support the to set out you	duty to c	ooperate. pliance o	Please be	as precise as	possible	
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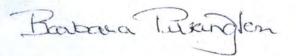
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7	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
	wish to participate at the oral par be necessary:	rt of the examination, please outline why you consider
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

PO1098







St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
// 0 -	Title:
First Name: BARBARA	First name:
Last Name: PINKINGTON	Last Name:
Organisation/company:	Organisation/company:
Address: U/S, ///ERPOOL KA	Address:
STUCKENS	
Postcode: 4 JAII 9RY	D-4-4
	Postcode:
1	Tel No:
Email:	Mobile No: Email:
Signature	Date: 5 3/19.
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	e accepted and that in order for your comments to be
ould you like to be kept updated of future sta	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	TV No
lease note - email is the Council's preferred med e will contact you by your postal address.	thod of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

Bostona Takingkn.

PART B - YOUR REPRESENTATION

3. To which	part of the Local Plan	an does this repre	sentation relate?	:
Policy LPA SITES SERA BERA BERA BERA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other docur document a	ments (please name and relevant part/section	on)		
4. Do you co	onsider the St Helens ad the Guidance note	s Borough Local P for explanations of	Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Com				ONT RNOW
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Please tick a	is appropriate			- Andreadon
5. If you con Please rea Positively Pre		is <u>unsound</u> , is it be for explanations of	pecause it is not: the Tests of Soundness	
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ffective?		4		
	ith National Policy?	G G		
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esentation at the publication stage. In this stage, further submissions will be only at the request of the Inspector, based on making issues he/she identifies for examination.	your representation should cover succi	Please continue on a separate sheet if nec notly all the information, evidence and supportin tation and suggested modification, as there to further representations based on the original
the oral part of the examination (n at the publication stage. age, further submissions will be only ne/she identifies for examination.	at the request of the Inspector, based on mat
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. If you wish to participate at the oral part of the examination, please outline why you con this to be necessary:		ne examination, please outline why you consi

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1099





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 7 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Warf	First name:
Last Name: Puragian	Last Name:
Organisation/company:	Organisation/company:
Address: 318 dues of Rai	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 543-19
Please be aware that anonymous forms c considered you MUST include your detail	annot be accepted and that in order for your comments to be s above.
Would you like to be kept updated of fu (namely submission of the Plan for exami- adoption of the Plan)	nation, publication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's prefe	rred method of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Policy	Paragraph/	Policies	Contain 1 121	T	11.1.1.
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Other docum	nents (please name nd relevant part/section	on)			
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Complies with	h the Duty to Cooper	ate \(\sqrt{1}\)			
Please tick as	s appropriate				
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or falls to	comply with the dut	y to cooperate. <u>Pl</u> Il compliance or s	eal Plan is not legally ease be as precise a oundness of the Loc	s possib	le.
If you wish use this bo					

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Detek this land from the proposal from the Green Bell

Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to partic	ipate at
the oral part of the examination? (the hearings in public)	

 \checkmark

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO1100





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0.7 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: ANNE	First name:
Last Name: MARTIN	_ Last Name:
Organisation/company:	Organisation/company:
PEWFALL ST HELENS	Address:
Postcode: WALL GRV	
Tel No:	Postcode:Tel No:
Mobile No:	lei No:
Email:	Mobile No
Signature:	Date: 5 3 19
ease be aware that anonymous forms cannot be ac nsidered you MUST include your details above.	ccepted and that in order for your comments to be
option of the Plan)	or the inspector's recommendations and
Yes (via email)	No
ease note - email is the Council's preferred method will contact you by your postal address.	d of communication. If no email address is provided

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MRS ANNE MARTIN

PART B - YOUR REPRESENTATION

I work W I Deserve to I		sentation relate?	
Policy PAO+ diagram table EA EA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
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PELETE THIS LAWD FROM THE PROPOSED REMOVAL
FROM THE GREENBELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.