

EiP Statement

St Helens Delivery and Allocations Local Plan

Tritax Symmetry Ltd

Representator ID RO1965

Our ref 41962/06/SPM/MG
Date 21 May 2021

Subject **Matter 4 - Allocations, Safeguarded Land and Green Belt Boundaries**

1.0 Introduction

- 1.1 Lichfields is instructed by Tritax Symmetry Ltd [Tritax] to make representations on its behalf to the St Helens Borough Local Plan 2020-2035 [SHLP].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions [MIQs] raised by the Inspector for the Matter 4 Examination in Public [EiP] hearing session which relates to allocations, safeguarded land and Green Belt boundaries in the Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core areas. The Statement relates to Issue 1 and specifically to land to the west of Omega North, St Helens [Local Plan Site Reference: 1ES] which Tritax is promoting through the Local Plan process.
- 1.3 Site 1ES is currently located within the Green Belt but is proposed to be released from the Green Belt and safeguarded to meet future development needs for St Helens beyond the plan period (which is now proposed to end in 2037).
- 1.4 Our previous submission in 2019 (in response to the consultation on the SHLP Submission Draft document) argued that the site was suitable for development in the short term and should be allocated for development in the short term. Whilst we maintain that this is the case, it should be noted that Tritax supports the current strategy which seeks to release the site from the Green Belt and thus acknowledges its suitability for development and ability to meet employment land needs for the Borough of St Helens in the future.
- 1.5 This statement expands upon Tritax's previous representations made throughout the Local Plan preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the Planning Practice Guidance [PPG].

2.0 Issue 1: Omega South Western Extension (1EA) and Omega North Western Extension (1ES)

- 2.1 Issue one relates to both the Omega North [Site 1ES] which Tritax has an interest and the Omega South [Site 1EA]. The latter is proposed for allocation within the SHLP plan period and is subject to a live planning application (ref. P/2020/0061/HYBR) that has been called in for determination by the Secretary of State [SoS] following a resolution to grant from the Council's Planning Committee. Site 1EA is proposed for allocation to meet employment land needs arising

in Warrington whilst site 1ES is proposed to be safeguarded to meet long term needs arising in St Helens.

- 2.2 A number of the questions relate specifically to Site 1ES, whilst other questions relate to both sites. It should be noted that this representation relates only to Site 1ES and our responses to all questions should be read in that context. We do not provide any specific comments on Site 1EA.
- 2.3 Omitting the questions relating specifically to Site 1ES, the MIQs set out five relevant questions which are responded to in turn below.

Question 1: Do the Green Belt assessments support the allocation and safeguarded land and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

- 2.4 Tritax considers that exceptional circumstances have been robustly demonstrated by the Council to justify the alteration of the Green Belt in St Helens, including the proposed safeguarding of Site 1ES.
- 2.5 The Council has undertaken a comprehensive review of non-Green Belt sites to justify the exceptional circumstances case which can be briefly summarised as follows:
- There is an overriding need for the provision of large-scale logistics buildings in St Helens, to meet the needs of the Liverpool Superport, Northern Powerhouse and the objectives of the LEP and local authorities;
 - There are a lack of alternative sites that could accommodate large-scale industrial and logistics buildings outside of the Green Belt;
 - There are a lack of alternative options, other than the provision of large-scale logistics buildings, to meet the identified need; and,
 - The St Helens Core Strategy (2012) acknowledged that some Green Belt release would likely be required to meet development needs from 2022 onwards.
- 2.6 Tritax therefore considers that exceptional circumstances are present to release Site 1ES from the Green Belt. The proposed safeguarding of this site is necessary in order to provide greater certainty over Green Belt boundaries beyond the plan period in accordance with the Framework [§139]. The identification of this site for release also accords with the findings of the detailed Green Belt Review undertaken by the Council to inform their plan. The only reason the site was not proposed for allocation (over others) in the short term was due to perceived issues around gaining access to the site. However, as set out within our submissions to date, we do not consider any such issues to exist and believe that the site could be brought forward in the short terms, and thus allocated for development in the Plan Period.

Question 3: If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

- 2.7 As set out in detail in our response to Question 1, Tritax is of the opinion that exceptional circumstances exist in St Helens to justify the release of land from the Green Belt, including the proposed safeguarding of Site 1ES. The release of land from the Green Belt to accommodate future development needs both within and beyond the current plan period aligns with the spatial strategy of the plan and accords with the Framework. The evidence has been prepared and presented by St Helens Council in the evidence base underpinning the plan, particularly in Section 8 of Developing the Spatial Strategy Background Paper (October 2020).

Question 4: Are the configuration and scale of the allocation and safeguarded land justified taking into account development needs and the Green Belt assessments?

Development Needs

- 2.8 As set out within our response to Matter 3 and by the Council, the Framework nor the PPG provides guidance on how Local Planning Authorities [LPA] should determine the proportion of land to be safeguarded to meet future development needs beyond the plan period. In the absence of any specific national guidance, we concur with the Council's own conclusion that it is reasonable and necessary to safeguard Site 1ES and that the proposed configuration and scale of the allocation is logical and appropriate.

Green Belt Assessments

- 2.9 At Stage 1A of the Green Belt Review (2018), the Council divided the whole of the St Helens Green Belt into parcels of land for assessment. The parcels take account of the existence of recognisable visible boundaries; adjacent areas of similar land use or characteristics, and the relative degree to which areas are enclosed or confined by features such as urban areas, woodlands, roads or railways.
- 2.10 Site 1ES sits within Parcel GBP_075 which is split into four sub-parcels. The extent of Site 1ES was then specifically defined as Sub-Parcel GBP_075_D. The assessment of Sub-Parcel GBP_075_D concluded that the site makes only a moderate contribution to the purposes of Green Belt land and recommended that it was carried forwards to the stage 2 assessment.
- 2.11 Given that the Green Belt review specifically identified Site 1ES as a sub-parcel, the proposed configuration and scale of the site is considered to be wholly acceptable in this regard.

Land Ownership

- 2.12 Tritax controls the entirety of Site 1ES. However, as acknowledged within in the Council's response to the Inspector's Preliminary Questions, the Green Belt Review and elsewhere, third party land is required to achieve the most logical access into the site from Lockheed Road. This is the primary rationale used by the Council for proposing to safeguard the site as opposed to allocating it to meet development needs in the short term, arguing that there **could** be **potential** feasibility issues with access.
- 2.13 The Council's own choice of words on the matter acknowledge that issues are not definite and there is in fact no evidence to suggest that any issue exists. Tritax is confident that access to the site via Lockheed Road can and will be secured and that it is likely this could happen in the short term. It is simply a commercial matter between Tritax and Omega St Helens Ltd. It is envisaged that terms will be agreed following the resolution of their live planning application for Site 1EA (ref. P/2020/0061/HYBR) which, as set out above has been called in for determination by the SoS.
- 2.14 As such, there are not considered to be any insurmountable land ownership constraints that would prevent the site from coming forwards for development in the short term.

Question 7: Should Site 1ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?

- 2.15 Tritax's view has always been that the site is available for development in the short term and that it should be allocated to meet needs in the current plan period. This is reflected in the

evidence that has underpinned our previous submissions and this remains our view now. Site 1ES is not considered to be any less suitable for development in the short term than any of the proposed allocations. We have provided robust evidence, particularly in support of our representations to the SHLP Submission Draft consultation. At the same time, a number of the sites that are proposed for allocation in the short term [Sites 1EA, 7EA and 8EA] that were subject to early planning applications and resolutions to grant from the Council have been called in for determination by the Secretary of State [SoS]. At this time, decisions are awaited on all these applications which means there is some uncertainty around the Council's ability to deliver on their strategy in the short term. Obviously, these sites status within the SHLP is a material consideration.

- 2.16 The justification for the early release of sites from the Green Belt is that there are very special circumstances centred around the need for additional employment land to meet market demands now. The benefits arising from those developments are considered significant and the short term imperative outweighing Green Belt policy. These arguments are not contested and are similar to the arguments that Lichfields put forward on behalf of Bericote on the Florida Farm site. The question that must arise is one about the needs that are being met by those developments if they all come forward in the short term as the promoter of each and every site is indicating. The needs that are being identified are significant, and immediate. They are not needs that fit within the normal projections of need as evidenced by the Council in their employment evidence base. To some extent those needs are outwith that evidence base. However, the needs are so significant that they are being supported by the Council.
- 2.17 These facts point to historic suppression in the market caused by the inability of the planning system to keep up with the changing market demands for industrial accommodation. This suppression of the market has created the significant demand and high take up rates in recent years. There is no evidence to indicate those take up / delivery rates will change in the short term, which indicates that continued delivery at recent rates is necessary throughout the plan period.
- 2.18 The significant short term demands illustrated and evidenced by the other sites and accepted by the Council do not fit with planning to meet the needs arising across the entirety of the plan period. There is a real and significant danger that the needs that are being met now, result in an absence of supply in the second part of the plan period.
- 2.19 There are other issues as set out in our response to Matter 3. On this basis we are of the view that it would be prudent to introduce a policy mechanism into the SHLP which would allow for the early release of safeguarded employment sites to come forward as 'Plan B' sites, or in the second part of the plan period if there was continued and sustained demand. Furthermore, it would help protect the Council's employment land position in the event that their employment land supply position deteriorates, there are needs that cannot be met in the second part of the plan period, or if a fundamental economic or policy shift occurs before the end of the proposed plan period requiring additional employment land to come forwards in the short to medium term.
- 2.20 Our proposed update to Policy LPA06 is set out below. We would like to clarify that we are only proposing to introduce a policy mechanism into the SHLP which would allow for the early release of safeguarded employment sites to come forward as 'Plan B' sites. We are not suggesting that the same should be the case for housing sites. We have therefore updated the suggested wording to that proposed within our previous response to Matter 3. For the avoidance of doubt,

the suggestion made in that document should be disregarded and is superseded by the following:

Policy LPA06: Safeguarded Land

- 1 *The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs beyond the Plan period. Such Safeguarded Land is not allocated for development in the Plan period. The future uses that the sites are safeguarded for are listed in Tables 4.7 and 4.8.*
- 2 *Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development **or in the context of employment land, in the event that evidence is presented that overwhelmingly demonstrates that a safeguarded site should be released for development before the end of the current plan period. Such instances could include the failure of an existing allocation to come forward or new evidence indicating that land needs have increased.** In any other scenario proposals for housing and employment development of safeguarded sites in the Plan period will be refused.*
- 3 *Other forms of development on Safeguarded Land will only be permitted where the proposal is:*
 - a *necessary for the operation of existing permitted use(s) on the land; or*
 - b *for a temporary use that would retain the open nature of the land and would not prejudice the potential future development of the land for the purposes stated for each site in Tables 4.7 and 4.8.*
- 4 *Development on any other site that would prevent or limit development of Safeguarded Land for its potential future uses identified in Tables 4.7 and 4.8 will not be permitted.*

Question 8: Are the indicative site areas and appropriate uses for Sites 1EA and 1ES within Tables 4.1 and 4.7 justified and effective?

- 2.21 Table 4.1 relates to sites proposed for allocation within the current plan period and does not reference Site 1ES. Table 4.7 relates to sites proposed for safeguarding and includes Site 1ES.
- 2.22 Table 4.7 does not include any proposed appropriate uses for the safeguarded employment sites. However, it is considered that if specified in the final version of the SHLP that uses falling within use classes B2/B8 should be specified as appropriate. In terms of the proposed site area, which is specified as 29.98 hectares, we have calculated the site as being slightly larger at approximately 34 hectares. It is suggested that this is reviewed although we can confirm that the proposed Site 1ES boundary is consistent with area of land within Tritax's control.
- 2.23 In August 2017 we submitted a Delivery Statement [DS] to the Council which established that the site could deliver in the region of 1.4 million sqft of B2/B8 floorspace. The DS included two masterplan options for the site demonstrating that the identified quantum of floorspace could be delivered across either a two unit or a three unit scheme. It is therefore considered that the proposed indicative site area for Site 1ES is justified and effective.
- 2.24 The aforementioned DS also includes additional information and evidence which demonstrates that the site is available for development and deliverable in the short term. The DS is enclosed to

this representation at Enclosure 1. It is recommended that the Inspector reviews the DS in advance of the Matter 4 hearing session.

Enclosures

- Enclosure 1: Delivery Statement relating to Site 1ES



symmetry park

St Helens / M62 J8

OMEGA NORTH EXTENSION

DELIVERY STATEMENT

AUGUST 2017

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1.0

Introduction

1.0 Introduction

This Delivery Statement has been prepared by Lichfields on behalf of db symmetry with specialist input from technical consultants. It promotes the allocation of land at Omega North, St. Helens (Symmetry Park) for employment development in the emerging St. Helens Local Plan.

The Symmetry Park development 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 the region.

It presents an ideal opportunity to create a sustainable and attractive development. It is located where residents of St Helens will be able to access the job opportunities through improvements to cycling and bus infrastructure that will be provided, increasing the ability of local residents to work in the proposed 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.

This document has been prepared to demonstrate that the Symmetry Park, St. Helens site is suitable, available and deliverable now, and is in the control of a national commercial developer who is capable of delivering the development at the earliest opportunity. db symmetry has conducted initial technical assessments of the site to frame and shape the initial masterplan for the site.

db symmetry considers that the Symmetry Park, St. Helens site should be allocated for logistics development through the emerging Local Plan. This Delivery Statement will therefore:

- Outline the opportunity presented by the development of the site;
- Set out the vision for the Symmetry Park site;
- Demonstrate that the vision for the Symmetry Park site can be delivered; and,
- Show that the proposed development will deliver the Council's objectives for the area and the socio-economic benefits it will deliver, including the creation of c.2,000 local jobs.



Figure 1: Site Location Plan





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Site and Surroundings

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Site and Surroundings

The Site

The Symmetry Park site extends to approximately 34 hectares and comprises undeveloped agricultural land. The site is located immediately to the north of the M62 and adjacent to the Travis Perkins Distribution Centre that forms part of the 'Omega North' development; an office, manufacturing and distribution hub that is set to become one of Europe's largest business parks.

The site is well contained within defined boundaries and existing mature landscaping and is bound by:

1 North by a hedgerow that demarks the edge of the site with agricultural fields beyond. To the north east of the boundary is a public footpath that links the site to Gorsey Lane, a single-carriageway highway connecting Burtonwood with Clock Face. The footpath ends just beyond the north east corner of the site where it intersects with Joy Lane; an adopted single lane road that provides access to the footpath from Clay Lane. There are 2 residential properties located on Joy Lane.

- 2 East by the 700,000 sq. ft. Travis Perkins building beyond which lies the 200,000 sq. ft. BRAKES Distribution Centre and the 153,500 sq. ft. Hermes depot. These sites are all accessed from Lockheed Road located to the south of the developments adjacent to the M62.
- 3 South by the M62; a 107 miles west-east trans-Pennine motorway connecting Liverpool to Hull via Manchester and Leeds. To the south of the motorway lie several industrial buildings that form part of the Omega South development.
- 4 West by a hedgerow, with a dense grouping of trees along the north western boundary with agricultural fields beyond. Some of these trees are the subject of a Tree Protection Order.

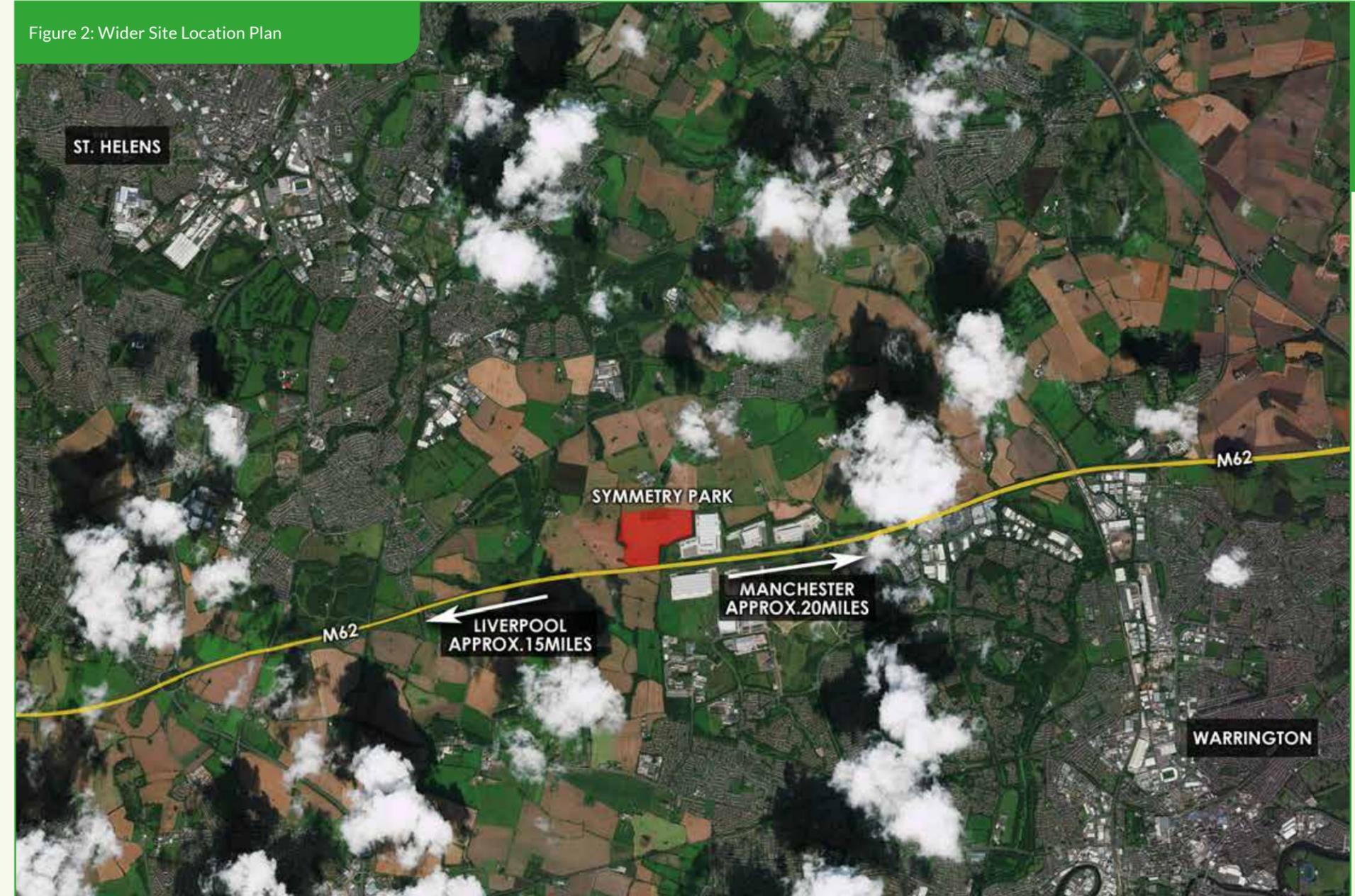
Surroundings and Context

The site is located on the southern side of the Borough of St. Helens in the ward of Bold, around 19 miles from Manchester and 16 miles from Liverpool. It lies on the edge of Warrington Borough.

The town of St Helens is located to the north and west of the site with the Clock Face Country Park separating the site from the town. The urban areas of Sutton and Clock Face are the closest parts of the town, and comprise mainly residential development with some small scale employment parks situated on their outskirts (Reginald Road Industrial Estate and the Bold Industrial Park). The town centre of St. Helens is located 6 miles to the north of the site. From the site, the town centre can be accessed via the B5204 and A58 with an off-peak drive time of around 15 minutes.

The Warrington urban area is located principally to the south of the M62. However a large area of commercial and logistics development (Omega Park) straddles the M62 with modern residential development further to the west and south. The town centre of Warrington is located around 3.5 miles to the south of the site.

Figure 2: Wider Site Location Plan





3.0

What is the Opportunity?

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What is the Opportunity?

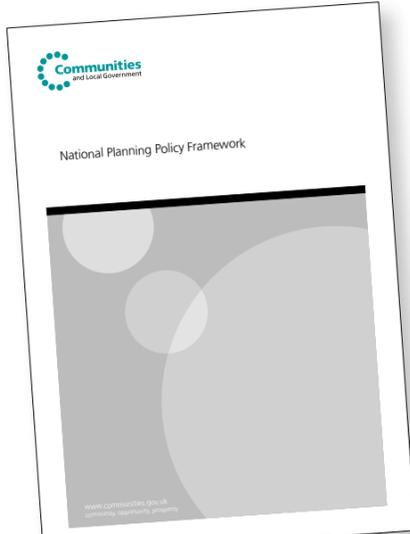
St. Helens has a vision to provide high quality employment land to meet modern employment needs, making use of St. Helens excellent transport links and location between the two biggest economies in the North West.

The National Planning Policy Framework [the Framework] outlines the Government's commitment to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. In these circumstances, the Framework indicates that significant weight should be placed on the need to support economic growth through the planning system.

St. Helens is currently preparing a new Local Plan for the Borough to deliver the objectives of the Framework and particularly sustainable economic growth.

The St. Helens Local Plan Preferred Options proposes to allocate a minimum of 306 hectares of employment land up to 2038, and to safeguard a further 53 hectares of employment land to meet longer term development needs (after 2033). This employment land cannot be met through sites that are located within the urban area. As a consequence, St. Helens has concluded that 'exceptional circumstances' exist to justify the release of land from the Green Belt.

The emerging Local Plan will allocate land to meet the employment land targets and the Symmetry Park site is one of the sites proposed for Green Belt release.



What is the Need for Logistics Development in St Helens?

The logistics industry plays a vital role in the UK's economy. It generates £72.8bn and employs 1.5m people nationally. The logistics industry also enables growth in other business sectors across the economy by moving materials for manufacturing and connecting people with goods in shops and to their homes.

As part of the Liverpool City Region [LCR] Combined Authority, the Council is driving the growth agenda of the city region and beyond building on the SuperPort investment. Logistics is identified as one of the 'innovative and globally competitive' sectors in which the LCR has significant strengths and huge potential. One of the Key Strategic Visions of the LCR Growth Strategy is to be "the Global Logistics Hub for Northern UK and Ireland, and a globally significant Maritime Knowledge Hub, with a thriving cluster of industries and services involved in international trade."

St. Helens has economic activity rates, employment rates, skills levels and average wages below national averages. To tackle this issue, the Council is aiming to achieve significantly higher levels of economic and employment growth than is

currently being achieved. St. Helens needs to build on the sectors where the Borough enjoys a competitive advantage.

The St. Helens Employment Land Needs Study concluded there are "very limited" opportunities for larger industrial operations within the Borough, particularly large-scale logistics businesses. It went on to note that this is "particularly pertinent in the current property market [because of the region's] strong level of interest from major logistics operators."

Large, flat sites with excellent motorway access and proximity to markets / supply chains are highly sought after. St Helens' key location on the M6 (north-south) and M62 (east-west) motorways mean that it is ideally positioned in the UK and North West to provide a critical role in the large-scale logistics sector. Being located close to the M62 Junction 8 means that occupants' of the Symmetry Park development will have direct access to the motorway network and beyond.

To exploit this locational benefit and strengthen the local economy, the Council has pledged to provide a large amount of employment land on a variety of sites to meet the needs of modern

businesses. This will encourage developer investment, allow businesses to expand, attract inward investment, create jobs, increase business rates and enable the residents of St. Helens to work closer to home.

The logistics sector is growing in the Liverpool City Region building on the investment in the Liverpool SuperPort. There is a need for land to be made available in attractive locations in St Helens to facilitate the growth of the local economy.



Is there a Need for Development in the Green Belt?

The St. Helens Core Strategy (2012) indicates that there will be a need to remove land from the Green Belt to meet the Borough's development needs.

The emerging St Helens Local Plan, based on the latest assessment of employment land needs, confirms that Green Belt land will be required to meet the Borough's development needs. The emerging Local Plan and supporting evidence demonstrates that:

- 1 The amount and type of land required to meet the employment land needs is not available within the existing urban area of St Helens or outwith the Green Belt. If the needs are to be met, which is vital for the future sustainable growth of the Borough, Green Belt land is required.
- 2 Employment development should be focussed on sites capable of accommodating large employment opportunities in close proximity to the strategic road network of the M6 and M62

- 3 The sites being removed from the Green Belt have been selected following a comprehensive Green Belt Assessment to identify land that can be removed from the Green Belt without harming the overall function of the Green Belt.

The emerging Local Plan is clear in that Green Belt land release is required to accommodate the Council's full employment land requirement and achieve its economic growth ambitions



M6 EPIC



M6 EPIC



VENTURE FIELDS



SYMMETRY PARK, DONCASTER



Will db symmetry Invest in St Helens?

db symmetry has an expanding portfolio with a development value in excess of £1.4 billion and expects to receive planning permission for over 20 million sq. ft. of industrial and logistics property over the next four years.

db symmetry wishes to invest in St Helens because:

- 1 St. Helens recognises the need to provide the right sites in the right locations and has demonstrated its pro-growth stance through seeking to allocate significant amounts of logistics land.
- 2 It has excellent motorway access. It occupies a key location on the M6 (north-south) and M62 (east-west) motorways and is ideally positioned between the two biggest economies in the North West to provide a critical role in the large-scale logistics sector.

- 3 St Helens has an established position as a focus of logistics, with a huge catchment of workers and customers and an existing concentration of logistics operations. St. Helens therefore already has a 'critical mass' as a logistics location and a competitive advantage as one of the most accessible Boroughs in England.
- 4 It has a huge catchment of workers and customers and is a Borough primed for growth. The population increased 1.5% from 2007-2015 and is projected to rise by 6.4% between 2014 and 2039.

The experienced db symmetry development team has been involved in some of the most dynamic and successful speculative and client led schemes throughout the country, having overseen the delivery of over 15,000,000 sq. ft. of commercial space to customers including Aston Martin, Prodrive, Matalan, TJ Morris and Bunzl.

The Manchester office was established in 2012 and has built an enviable reputation for flexibility and honesty in all aspects of the development process. Over the last three years the Manchester team has secured the following:

- 1 A 35 acre brownfield site in Wigan, which has now been fully developed in partnership with Legal & General, to provide over 500,000 sq. ft. of space and delivering circa 1,000 jobs. This has included the development of a fully fitted banana ripening facility for Compagnie Fruitiere UK to service its contract with a major UK supermarket.
- 2 A joint venture with Halton Borough Council to bring forward a redundant 10-acre site in Widnes for Leisure and Commercial development. db symmetry has successfully delivered an 18,000 sq. ft. gym and are building a 70,000 sq. ft. advanced manufacturing facility, creating 200 jobs.

- 3 The comprehensive reconfiguration and refurbishment of a 10 acre manufacturing facility in Huyton, Merseyside to provide 120,000 sq. ft. of Grade A accommodation. This has now been let to Grupo Antolin, a Tier 1 Jaguar Land Rover supplier.
- 4 db symmetry acquired 50 acres of land adjacent to Junction 34 of the A1(M) in late 2015 and successfully secured planning permission for 720,000 sq. ft. of B2 /B8 development within 12 months. A 150,000 sq. ft. unit will be built speculatively and a start on site is expected in September 2017.

db symmetry wish 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 are required to operate successful logistics hubs.



4.0

What is the Vision for the Site?

4.0

What is the Vision for the site?

The creation of a development which meets the needs of logistics operators and provides an attractive and accessible place to work.

What is the Proposed Approach?

db symmetry has developed a vision for the site which meets this objective. The design and form of development will meet the needs of commercial operators whilst responding to the characteristics of the site and the wider area, with improved cycling and bus infrastructure to ensure the ability of local residents to access the job opportunities created. It is intended that the vision for the site will evolve further in consultation with the local community and key stakeholders at the appropriate time.

What are the Site Constraints and Opportunities?

The vision for the site derives from an analysis of the characteristics for the site, its context, and the opportunities and constraints which arise. These opportunities and constraints are:

- There are no designated or non-designated heritage assets located on or adjacent to the site.
- No public rights of way cross the site.
- No trees on the site are subject of a Tree Preservation Order. However a number of trees in the landscape belt located to the west of the site are understood to be protected.
- It is a relatively flat site with no significant level changes.
- It is located within Flood Zone 1 and has less than a 1 in 1,000 annual probability of river or sea flooding.
- It is partially enclosed by built development; the M62 bounds the south of the site and existing logistics development bounds the east.
- Joy Lane is located adjacent to the boundary of the north of the site. This provides pedestrian / cycle access from the site onto Gorsey Lane, St. Helens.

The key principles of development arising from the site opportunities and constraints are:

- Providing state of the art industrial and logistics buildings, with efficient external servicing and parking areas.
- Achieving a development that utilises contemporary materials which creates a sense of place and provides visual interest.
- Providing vehicular, cyclist and pedestrian connectivity into the site from Lockheed Road.
- Providing improved cyclist and pedestrian connectivity to and from the site via Joy Lane
- Creating connections into St. Helens through linkages with public transport infrastructure.
- Retaining landscape features and provide new soft landscaping that will visually integrate the development with the surrounding landscape and screen the buildings.
- Creating a high-quality and sustainable business park type setting that will be attractive for occupiers, staff and visitors.

Figure 3: Constraints and Opportunities Plan



What is the Vision for the Symmetry Park Site?

Indicative masterplan options have been prepared to demonstrate how the development will integrate into the existing landscape and have regard to the visual characteristics of the site.

Opportunities for additional landscape screening have been identified, which will reduce the visual impact of the scheme. The locations of vehicular and pedestrian / cyclist routes have also been identified to demonstrate how surrounding areas will connect with the site.

Two masterplan options have been prepared using these principles. The final layout of the site will be led by occupier / market requirements at the time of the submission of a planning application.



Figure 4: Masterplan – 2 Unit Option



The masterplan options demonstrate the following principles:

- The main access will be at the south east corner of the site approaching from Junction 8 of the M62 side. A new estate road will efficiently serve the plots and create a legible landscape and movement structure through the site. Wider pedestrian and cyclist connections will be provided to maximise accessibility by all modes of transport.
- The layout of buildings, service areas and car parking will create a sense of place with more functional areas concealed to the side / rear of the units and vehicle and personnel entrances located for legibility. Active office and welfare area frontages are located facing the internal roads, which reduces necessarily large building masses to a more human scale.
- Existing landscape and ecological features are to be retained wherever practical and integrated into the scheme. These are to be enhanced with additional features along the site boundaries.
- Existing and proposed landscape and ecological features will seek to include additional functionality. New ponds to provide habitat enhancement may also serve to attenuate surface water run-off, and landscape screening and bunding to mitigate visual impact should also serve to connect currently fragmented and isolated habitats.

We have taken into account the constraints of the site when developing both of the preliminary masterplan options. The masterplans demonstrate how the development will respond sensitively to the characteristics of the site and deliver much needed employment development.



Figure 5: Masterplan – 3 Unit Option





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Can the Vision be Delivered?

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Can the Vision be Delivered?

Is the Site Available?

The proposed development will make a valuable contribution to meeting the quantitative and qualitative needs of the community for jobs. It could deliver up to 1.4m sq. ft. of logistics floorspace.

The site is within the control of one landowner. db symmetry have an option agreement in place to purchase the land and will develop the site at the earliest opportunity following the grant of planning permission.

There are no legal impediments or known constraints that would impede deliverability and agreement will be shortly reached to secure access directly from Lockheed Road. As a result, Symmetry Park is fully deliverable for logistics development.

db symmetry recently announced a 'Spec Build' programme of 4 logistics warehouse units between 110,000 and 217,000 sq. ft. across the country. This demonstrates the financial strength of the businesses and its commitment to the logistics sector. db symmetry are committed to the delivery of this site and may develop part of the site on a speculative basis.

Is the Site Suitable?

Proximity to Labour

The willingness of logistics operators to locate to St. Helens relies to a large extent on the availability of a suitably skilled workforce. St. Helens has a substantial workforce with just the right types of skills and qualifications that logistics operators will be seeking.

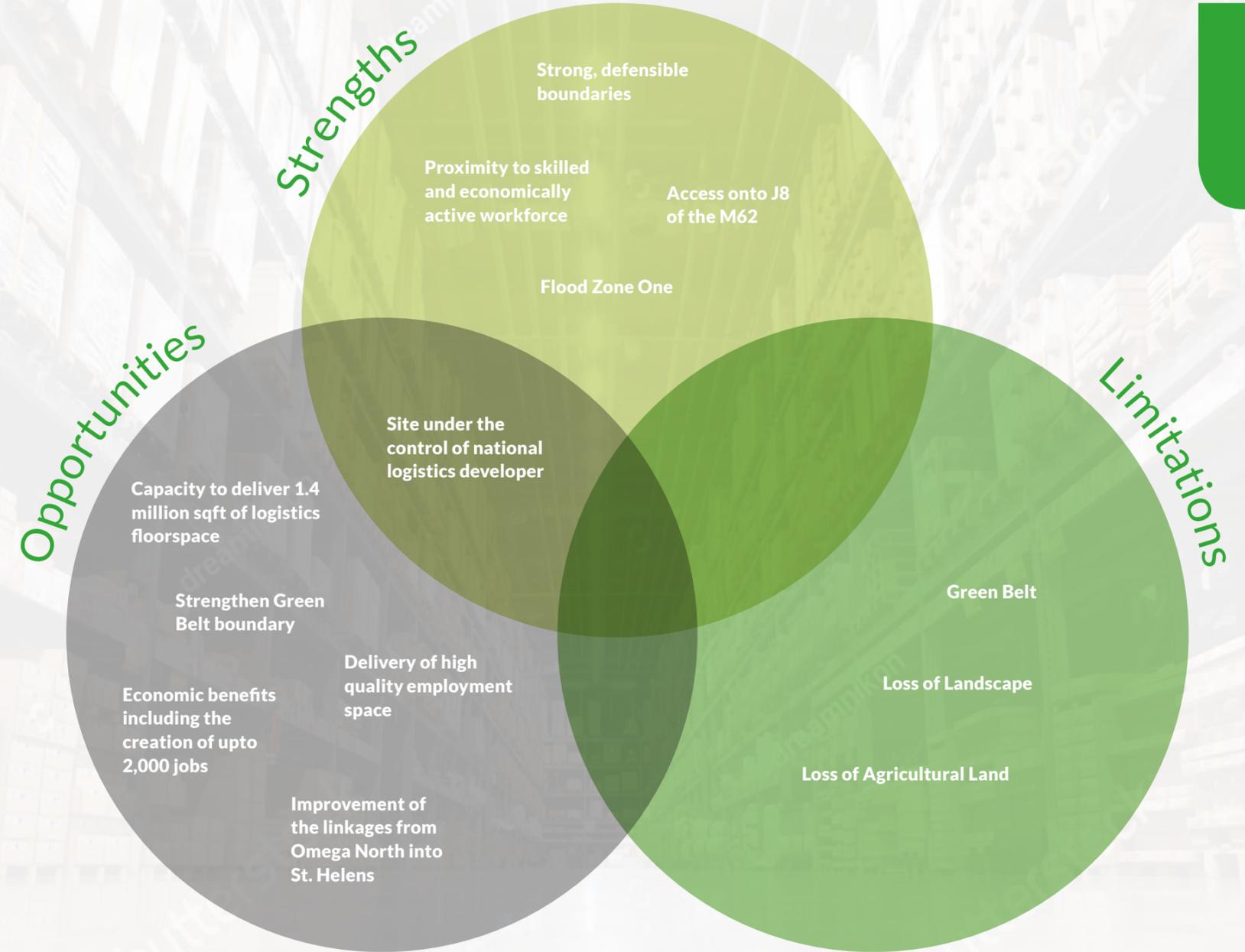
- 1 177,600 people live in St. Helens, of whom 110,100 are of working age (16-64). The potential labour force is therefore 62% of the total population.
- 2 St. Helens workforce has the skills necessary to take advantage of the job opportunities that would be provided by operators of logistics buildings at Symmetry Park.
- 3 7,600 people currently work in the wholesale, logistics and distribution industries in St. Helens, which provides a good skill base for prospective operators.

Relationship to Surrounding Area

Due to the relationship of the site with Omega North, its development is unlikely to have a detrimental impact on the form and character of the settlement. Indeed it represents a continuation of this successful development.

There are no policy constraints (subject to the removal of the site from the Green Belt) or heritage, ecological, environmental or landscape designations.

db symmetry has analysed the site and produced a Strength, Opportunities and Limitations [SOL] Venn Diagram for the land. The SOL Venn Diagram demonstrates the suitability of the land for development.





Is the Development Achievable?

The Framework states that for a site to be achievable there should be a reasonable prospect that logistics development will be delivered on the land within five years. db symmetry has undertaken an evaluation of the technical and environmental constraints that could influence the development of the land. This work has identified that there are no overriding constraints that will impede its delivery. The reports relevant to each of the identified constraints are referenced below and should be read alongside this statement. db symmetry is committed to bringing the site forward at the earliest opportunity.

Highways

Croft has assessed the transport issues for the site. Access to the site can be provided from the existing adopted highway network via the signalised roundabout at Junction 8 of the M62. The site is accessible on foot and by cycle, but access could be enhanced, further improving the accessibility of the site by non-car modes.

The development will generate a modest number of additional vehicular trips onto the highway network and will not result significant transport issues on the M62 Junction 8 during peak times.

The note concludes that "Symmetry Park" development can be accessed from the local highway network and that there are no highways constraints that would prevent the future allocation and development of the site.

Heritage

CgMs consulting has considered the potential impacts of the proposed development on the historic environment.

There are no designated heritage assets within the site. Designated heritage assets identified within the 1km study area comprise one Scheduled Monument (Old Moat House Medieval Moat, Bold) and three Grade II Listed Buildings (Farmhouse at Former Bold Hall Estate and associated structures). However, due to the flat topography of the site, and vegetation that screens it, no significant impacts are identified.

Based on the available evidence, there is low potential for significant below ground archaeological remains. It is acknowledged that the Council may require further investigation prior to development commencing.

However, there "...is no evidence to suggest that the site is likely to contain nationally important archaeological remains that would prohibit development or require preservation in situ. There are not considered to be any heritage constraints to development of the site." Heritage constraints would not prevent the proposed development being delivered.

Landscape

The landscape and visual effects have been assessed by Enzygo. The site does not lie within or adjacent to any locally or nationally designated landscape but lies within the Bold Forest Park Area Action Plan (AAP) boundary. The AAP objectives include enhancing the natural environment and the securing the positive use of green space.

Whilst there are a number of visual receptors, mitigation would substantially reduce the visual impact ensuring no significant harm would arise. Indeed there are opportunities to secure environmental benefits including increasing tree cover within the Bold Forest Action Plan Area and new and enhanced landscape planting within and along the edge of the site to reinforce the existing landscape pattern. This would strengthen the existing defensible boundary to the site and provide visual interest.

The site and its environs ("the receiving environment") has the capacity to accommodate the change proposed by this development, whilst protecting the openness of the Green Belt, Bold Forest Park and the landscape character of the wider area. The proposed development could therefore be delivered without

significant harm to the landscape character or visual environment.

Noise

Hepworth Acoustics have undertaken a preliminary noise assessment.

The assessment concludes that: "taking into account the results of the computerised noise modelling and all pertinent factors, we consider that, subject to appropriate mitigation measures, the proposed development will not result in any significant adverse impact by reason of noise and therefore be in line with the NPPF." As such noise impact is not considered to constrain delivery of the proposed development.

Ecology

TEP have identified potential ecological constraints that could affect the deliverability of the site, and undertook a desktop study, an extended Phase 1 habitat assessment, an assessment of the two on site ponds, and a badger survey.

Whilst further surveys will necessarily need to be undertaken overall it is "anticipated that all adverse effects upon valued ecological features can be

satisfactorily avoided, mitigated or compensated and that biodiversity enhancement can be delivered within the proposed development. There are therefore no ecological considerations that would prevent the proposed development at this site."

Air Quality

A baseline air quality assessment has been undertaken by AQ Consultants having regard to the fact that a nearby Air Quality Management Area [AQMA] 'Warrington Borough Council's Motorway AQMA' includes land to the south east of the site. Despite this, existing conditions within the study area show good air quality, with concentrations of nitrogen dioxide well below the annual mean objectives.

Traffic emissions generated by the development present the main air quality issues associated with the development. However, this impact is unlikely to be significant and mitigation measures could be introduced (if required). It is therefore concluded that subject to any necessary mitigation there should be no air quality constraints that would prevent delivery of the site.



Flooding and Drainage

A Flood Risk Assessment [FRA] has been prepared by Tier Consult Ltd. The site is located within Flood Zone 1 where 'less vulnerable' uses are deemed appropriate and the proposed development site satisfies the sequential approach.

There are no flood risk issues arising from consideration of the proposed development on this site and as such no mitigation would be required. In terms of surface water drainage it is considered that a surface water drainage strategy could apply Sustainable Urban Drainage (SUD) principles. No issues arising from discharge of foul drainage have been highlighted; the intention is that this will be discharged into a nearby private foul sewer.

Overall there are no flooding or drainage issues on the site and no significant adverse impacts envisaged with regards to flood risk that would prevent the proposed development being delivered.

Ground Conditions

A desk based ground conditions assessment has been undertaken by Tier Consult Ltd. There is no significant risk of on or off-site contamination sources.

Further investigations will be required as part of a gas risk assessment. Risks associated with ground instability are considered to be low.

The site is located within a Zone 3 Groundwater Source Protection Zone but based on previous nearby site investigations, hydrogeology is not anticipated to present any constraints for development.

Overall, the summary report identifies further survey work that needs to be undertaken but suggests no significant constraints subject to deliverable mitigation measures to enable development of the site.

Is the Development Viable?

db symmetry has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, and level of potential market demand; as well as the cost factors associated with the site including site preparation costs and site constraints. Where potential constraints have been identified, db symmetry has considered the necessary mitigation measures

and required investment in order to overcome any deliverability barriers.

db symmetry can confirm that the development of the site is economically viable and is confident that employment development can be achieved within the first five years of the plan period.

The site is available and in the control of one willing landowner, who has partnered with an experienced and respected developer to bring the site forward. It is suitable for logistic 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.





6.0

Does the Vision meet Planning Objectives?

6.0

Does the Vision meet Planning Objectives?

The Framework explains that the purpose of planning is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles

- Economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available.
- Social role – supporting strong, vibrant and healthy communities.
- Environmental role – contributing to protecting and enhancing our natural, built and historic environment.

In delivering sustainable development, the Framework attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Would the Development Harm Green Belt Purposes?

The emerging Local Plan proposes to remove the Symmetry Park site from the Green Belt to meet the need for future employment development.

The Council have preliminarily suggested that the site be safeguarded as opposed to allocated for immediate release for employment development. In terms of this site, it is understood that this was because the site had not been promoted by the landowner or a developer, and there was some uncertainty regarding the availability of a suitable access. These issues have been addressed in full in this Delivery Statement.

This Statement provides the Council with the evidence that the Symmetry Park site is suitable for employment development. It is a logical extension to an existing logistics hub and is within the ownership of one landowner. It is available for development now and should be allocated for employment development accordingly. It has

also been demonstrated that a suitable access is available through the immediately adjacent development directly onto the strategic road network.

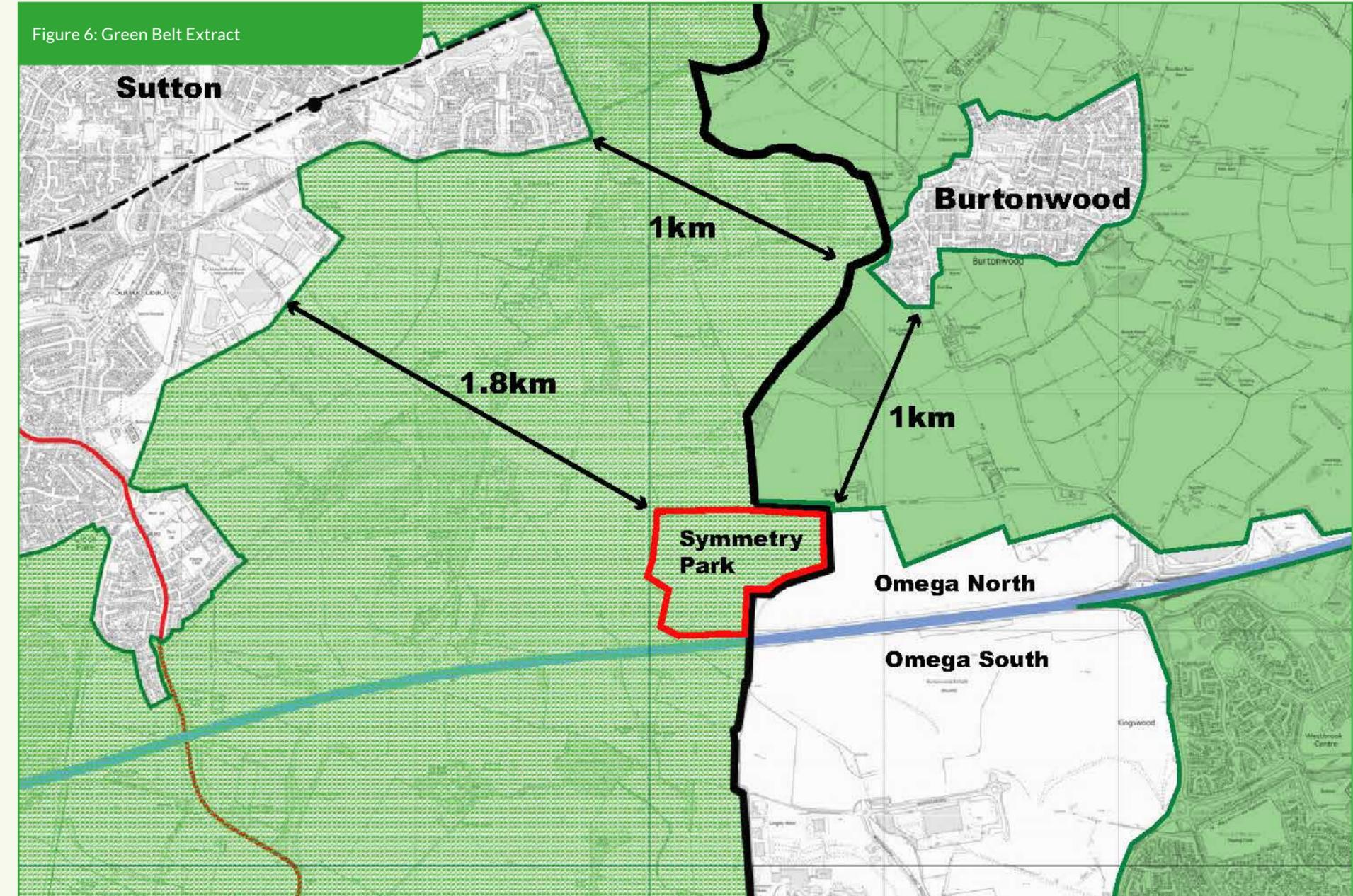
There are no constraints to the delivery of the site. db symmetry considers it should be allocated for employment development to enable it to come forward for development in this Plan Period. If allocated db symmetry would seek to deliver the site over the next 5 years.

The site was assessed as part of a wider parcel of land (parcel reference GBP_075) within the Green Belt Review. This assessment concluded that the wider site makes a high contribution to the purposes of the Green Belt. It is however clear that the part of parcel 75 to which this Delivery Statement relates (Symmetry Park) makes a low contribution to the purposes of the Green Belt, being strongly influenced by existing development at Omega North to the east, and the M62 to the south.

The Framework [§80] states there are five purposes of including land in Green Belts:

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

Figure 6: Green Belt Extract



To check the unrestricted sprawl of large built-up areas

The Symmetry Park site has strong defensible boundaries. The site is enclosed to the east by existing logistics development, the south by the M62 and to the west by a dense tree belt. A number of these trees are protected and would be retained. The site is more open to the north, although is partially enclosed by a footpath and an existing hedgerow. However there is an opportunity to reinforce this edge to create a strong defensible landscaped boundary.

To prevent neighbouring towns from merging into one another

The site is not essential in preventing the neighbouring towns of Sutton and Burtonwood merging into one another. The site does not comprise an essential parcel of land that needs to be kept open for any strategic reason. The site is already bound to the south by the M62 and east by existing logistics buildings. The resultant gap between the north side of the site and Sutton would be 1.8km, greater than the existing narrowest point of separation between Sutton and

Burtonwood. Therefore the development of the site would not result in the narrowing of the gap nor would it result in the two towns merging.

To assist in safeguarding the countryside from encroachment

The site is strongly defined by existing durable boundaries including motorways (M62) and existing industrial development. The release of the site would result in the delivery of a natural extension to the adjacent Omega North development.

To preserve the setting and special character of historic towns

St Helens is not a nationally recognised historic town. There are no Listed Buildings or Conservation Areas in close proximity to the site. There is a Listed Moat; the 'Old Moat House Medieval Moat' (list entry number 1017582) located 500m to the north of the site on Joy Lane. The moat has been partially filled at its northwest corner and along its northern side. There is a small collection of Grade II Listed Buildings that relate to the former Bold Hall (now demolished) located

700m to the west of the site. None of these designated heritage assets or their settings will be significantly impacted by the development of the Symmetry Park site.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The adopted Core Strategy and emerging Local Plan state that Green Belt release will be required to ensure that sufficient land is identified to meet the needs of the community.

In particular, land will be removed from the Green Belt to meet employment land targets, provide opportunities for longer term development and ensure that changes to the Green Belt endure beyond the plan period.

The release of the Symmetry Park site from the Green Belt and its allocation for employment development would not harm Green Belt purposes.



Does the Scheme Represent Sustainable Development?

The release of the site from the Green Belt followed by delivery of employment development performs a positive economic, social and environmental role.

Economic

The development of the Symmetry Park site accords with, and will help to deliver the regional objectives of the Government's Northern Powerhouse Agenda and the Liverpool City Regional Local Enterprise Partnership support for logistics development.

The economic benefits of the proposed development, both during the construction stages and the ongoing operation of an industrial

and warehousing development are identified in the infographic (right). The Council support the regional objectives and aspirations to increase employment and attract new businesses into St. Helens. db symmetry can assist in achieving this through significant levels of private investment and job creation.

The delivery of employment development on the Symmetry Park site will create new job opportunities for local people and help businesses to grow. These opportunities will assist in improving the skills of local people, enabling them to take greater advantage of employment opportunities both on Symmetry Park and Omega.

The proposal



1.39 million sq ft of new logistics space in a prime location adjacent the M62, with infrastructure improvements to Joy Lane and Lockheed Road

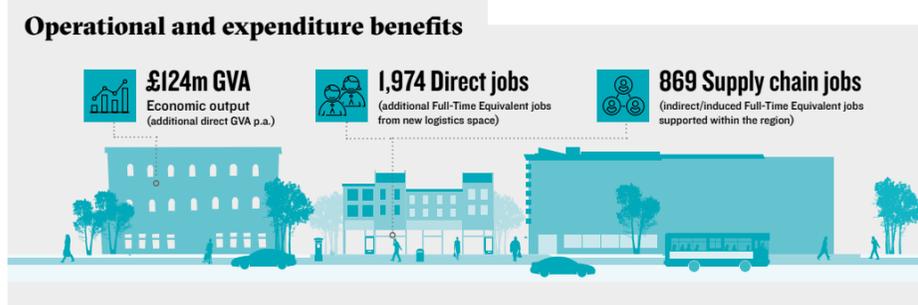
Construction benefits

- £70m** Construction value (total construction cost)
- £34.8m GVA** Economic output (additional GVA p.a.)
- 320 Jobs** Construction jobs (temporary jobs per year of construction)
- 322 Jobs** Supply chain jobs (indirect/induced temporary 'spin-off' jobs supported per year of construction)



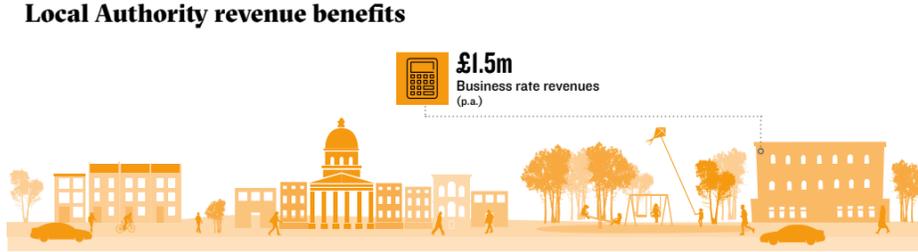
Operational and expenditure benefits

- £124m GVA** Economic output (additional direct GVA p.a.)
- 1,974 Direct jobs** (additional Full-Time Equivalent jobs from new logistics space)
- 869 Supply chain jobs** (indirect/induced Full-Time Equivalent jobs supported within the region)



Local Authority revenue benefits

- £1.5m** Business rate revenues (p.a.)



Social

The allocation of the Symmetry Park site will result in significant social benefits through the extension of the Omega North site. The provision of further employment opportunities in an already established location will meet the needs of the community in providing jobs for present and future generations.

It is envisaged that the scheme will deliver a high quality designed development which is accessible to the existing community. Multiple Deprivation Levels in St Helens are amongst the highest in the country. One of the key challenges for the Borough is to deliver large developer-ready sites and other employment land.

The allocation and subsequent development of the site will facilitate the creation of over 2,000 direct jobs which could be resourced through people in the local area and provide new jobs for industrial and warehouse operatives, office staff, clerical and managers. St. Helens residents will be able to access the site through the improved footpath / cycle way that is located to the north of the site.

db symmetry will participate in a Local Employment Scheme to promote the use of local construction firms and suppliers during the construction period of the site.

In order to tackle social deprivation, Core Strategy Strategic Objective 5.1 seeks to "provide and protect sufficient land and premises to meet local employment needs and support the implementation of the City Growth Strategy."

The creation of jobs will inevitably meet the community's needs and support the Borough's

health and social well-being. The allocation and future development of the Symmetry Park site will help to tackle social deprivation in the Borough by providing land for employment and jobs.

Environmental

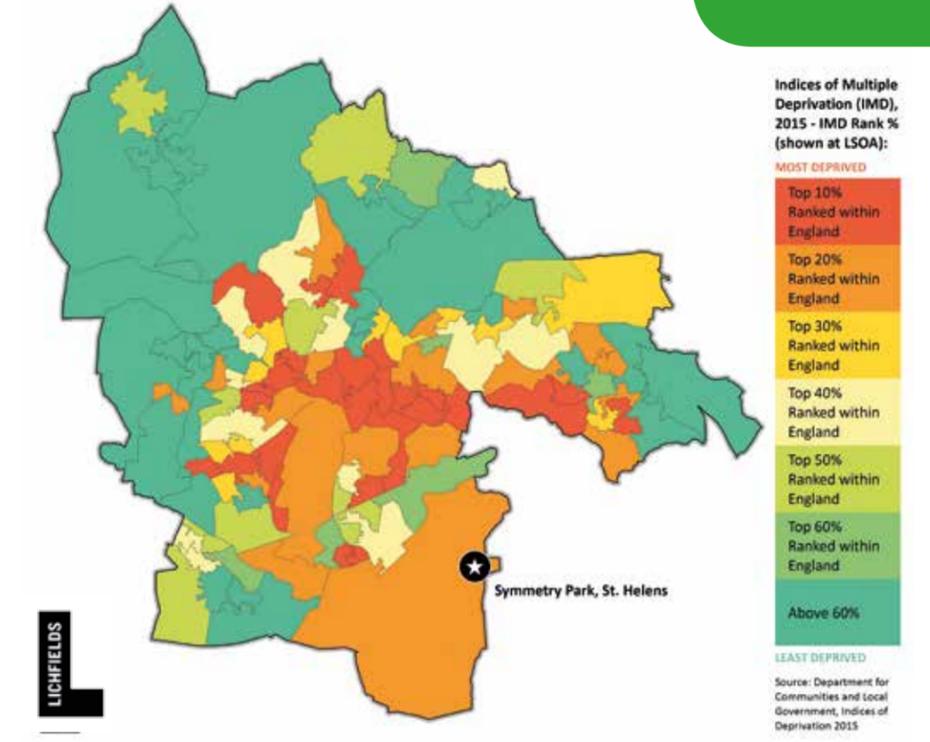
The development of the Symmetry Park site will not have any significant adverse impacts on identified heritage assets, or on any designated sites of special or ecological value.

The visual impacts of the proposed development will be minimised by increasing tree cover within the Bold Forest Action Plan Area as well as new and enhanced landscape planting within and along the edge of the site to reinforce the existing landscape pattern.

Any noise impacts of the development will be minimised by incorporating noise mitigation measures into the development. Based on current estimates these are most likely to comprise a proprietary acoustic fencing or an earth bund, or a combination of the two, with a height of up to 4m, located along the northern boundary of the site.

The site is excellently located in relation to the Strategic Highway Network. The scheme will take access from Lockheed Road. There is also potential for pedestrian and cycle access to the site to be enhanced, further improving the accessibility of the site by non-car modes.

As well as the provision of a Sustainable Urban Drainage System [SuDS] which will minimise waste and support new habitats and ecosystems, the development will incorporate energy efficiency systems to reduce the energy demand of the buildings.



The proposed development will meet the Government's objectives for sustainable development by providing significant economic, social and environmental benefits



7.0

Summary

7.0 Summary

Overall, it is considered that the Symmetry Park site should be removed from the Green Belt and allocated to provide 34 hectares of employment development at the earliest opportunity. This Delivery Statement has clearly demonstrated that the site represents an excellent opportunity to deliver a sustainable employment development for St. Helens.

Suitable

The Council has concluded that exceptional circumstances exist to justify the release of land from the Green Belt. When adopted, the Local Plan will remove sites from the Green Belt to meet employment land targets. Land will also be removed from the Green Belt and safeguarded from development to meet development need beyond the plan period, ensuring that changes to the Green Belt endure beyond the plan period. The Symmetry Park site should be allocated to be brought forward for employment development in this Plan Period.

The site is contained by development on two sides and benefits from well-defined boundaries. The allocation and development of the site provides an opportunity to create a long term defensible boundary to the site and the provision of employment development for the Borough.

Sustainable

The proposed development will offer significant economic, social and environmental benefits to the residents of St. Helens and meets the Government's objective for creating sustainable development through the creation of c.2,000 additional jobs, with improved pedestrian, cycle and public transport connectivity to existing residents of St Helens.

Exceptional circumstances exist to justify the sites release from the Green Belt. The site no longer serves the purposes of the Green Belt as set out in the National Planning Policy Framework. Removing the site from the Green Belt will have limited impact on the urban form and landscape character of St. Helens. The site should be allocated for employment development in the emerging Local Plan to deliver high quality employment development that will help meet the needs of local residents

Deliverable

The Symmetry Park site is not subject of any technical or environmental constraints that would prevent it coming forward for employment development. It is under the control of one major logistics developer. If the site is allocated for logistics development, db symmetry will make a commitment to St. Helens to bring forward development on the site in the next 5 years.





symmetry park

St Helens / M62 J8

Further Information



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