

Jones Lang LaSalle



**Rebuttal Proof of Evidence of ANDREW
PEXTON (for the Applicants) on DEMAND
FOR EMPLOYMENT LAND AND
PREMISES**

Call-in by the Secretary of State of an application made by
Omega St Helens Limited / TJ Morris Limited

Land To The West Of Omega South & South Of The M62, Bold,
St Helens

LPA REF: P/2020/0061/HYBR

PINS REF: APP/H4315/V/20/3265899

April 2021

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1 Introduction

1.1 This Rebuttal Proof of Evidence relates to the Bold and Clock Face Action Group: Written Representation prepared by Miss Jackie Copley. It should be read with reference to the above document.

2 **Bold and Clock Face Action Group: Written Representation**

- 2.1 The above written representation at paragraph 31e states that “*St Helens and Warrington have large brownfield sites in proximity that could be the focus of new development*”. Miss Copley does not confirm where these sites are, and the names of the individual sites. I am not aware of any sites of the size and scale that are relevant to the matters being considered at this inquiry.
- 2.2 In Miss Copley’s Economic Need section, paragraphs 36 to 43 of her proof, there is reference to paragraphs 80, 81, 83 and 84 of the NPPF. There is no reference to paragraph 82 which explicitly refers to the needs of storage and distribution industry and its locational requirements (*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 suitable accessible locations. Ref. Para 82 NPPF*)

3 Conclusions

3.1 Having reviewed the Bold and Clock Face Action Group: Written Representation I conclude that the conclusions of my Proof of Evidence remain unchanged.

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