

Rt Hon Robert Jenrick,
Communities Secretary
c/o The Planning Inspectorate
Rm 3/J Kite Wing, Temple Quay House
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Bristol, BS1 6PN

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23 March 2021

Dear Mr Jenrick,

St Helens application: P/2020/0061/HYBR Omega 8 your ref PCU/CONS/H4315/3262458

1. I am writing on behalf of the Bold and Clock Face Action Group with a written representation for planning matters, leading to conclusion of an arising negative planning balance and subsequent recommendation that the abovementioned application for development be refused.
2. Below, I set out the local community background, my qualifications, professional experience, and the material planning considerations, which I am of the opinion necessitate a refusal.

Local Community Background

3. The Bold and Clock Face Village Action Group (The Group) was established in 2019 by local residents in Bold, which includes the area of Clock Face, to coordinate engagement with St Helens Council concerning local plan matters. The emerging Local Plan, once adopted, will steer deliver development over the next 15 years, and the Group is committed to a sustainable long term future for the area in terms of economic development, social inclusion and a protected and enhanced natural and built environment.
4. The Group considers that some of the proposed policies and allocations in the local plan that fall within the Bold Forest Park boundary are not legally compliant, and fail to meet the test of soundness, required by the National Planning Policy Framework, Feb 2019 (NPPF) Paragraph 35. The Group

supports more brownfield sites being reused, which are plentiful in St Helens in advance of greenfields being needlessly bulldozed.

5. There is local opposition to the principle of expansion of the existing Omega site of 31 hectares for B8 Warehousing, and the community felt its voice was not being heard. Requests for information and questions were not satisfied. Local people felt frustrated at not being listened to concerning material planning matters. In May 2019 the Group active members joined the Bold Parish Council with the intention of providing a coordinated, representative and accountable voice.
6. Since then The Group has attracted 1,400 members who have registered (requiring signing up) to a closed group on Facebook, and a clear mandate is the opposition of the proposed local plan allocation and speculative application at Omega. Although The Group is not yet formally a constituted, it is commencing the process to help unlock funding to support the implementation of the Bold Forest Park Area Action Plan (BFPAAP), which was formally adopted as part of the development plan by St Helens Council in 2017. The BFPAAP sets out an area vision and aims and objectives for the area to guide future planning decisions. Local people are keen to ensure neighbourhood level planning leads to agreed outcomes and in so doing so ensures the local area is an amenable and sustainable place in the future.
7. I am instructed by The Group to provide expert opinion relating to the extent of harm to Green Belt planning policy and other harms that combine to outweigh claimed very special circumstances.

My Qualifications and Professional Expertise

8. My name is Ms Jackie Copley, MRTPI, MA, BA (Hons), PgCERT (urban design). I have worked as a planner for more than 27 years in the public, private and voluntary sectors. I became a chartered member of the Royal Town Planning Institute in November 2001. I have the following qualifications:
 - a Masters in Town and Regional Planning from Leeds Metropolitan University (1999);
 - a BA (Hons) Degree in Town and County Planning from University of Manchester (1992); and,
 - a Postgraduate Certificate in Urban Design from the University of Salford, 2012.
9. Between 1992 and 2001, I worked on large scale, partnership-led, brownfield regeneration initiatives in Hulme, Manchester, and The Quays, Salford. My roles covered a wide range of physical, environmental, economic, and social projects. I was the area planning officer during the planning and delivery of The Lowry, Metrolink and the Watersports Centre at Salford Quays.

10. In consultancy, Envision, Atkins, Roger Tym & Partners 2002 - 2012, I contributed and managed a variety of multi-disciplinary projects. I prepared numerous local plan evidence bases, including Green Belt Reviews, Economic Development and Employment Land Reviews, Strategic Housing Land Availability Assessments, Brownfield Strategies, Retail Heath-checks, and Multi-Modal Transport studies making recommendations to local authorities.
11. Since September 2012, I have been the planning manager for the Campaign to Protect Rural England (CPRE) covering the Cheshire, Lancashire, Liverpool City Region and Greater Manchester areas. The countryside charity champions the value of rural areas, as new development is planned. During my time with CPRE, I have developed considerable experience of Green Belt planning policy. I have assessed landscape character for the purpose of Neighbourhood Plans and have also gained relevant landscape character and visual impact appraisal experience employing Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3).
12. The information I provide in this written representation for the Call-In Inquiry is true and has been prepared, and is given, in accordance with the Code of Professional Conduct of the Royal Town Planning Institute and its Guidance on Ethics and Professional Standards. I confirm that my opinion is separate from my role at CPRE.

Site Description

13. The site shown by the red boundary on the GoogleEarth extract below is very large in scale at 75.4 hectares, and this is a factor which increases the development impacts as set out below.
14. The land is currently used for agriculture and woodland, and it has an attractive, rural, open and green character. There are trees and hedgerows along the field boundaries, which are home to an abundance of wildlife. Many birds were visible and birdsong could be heard, along with tractor and background traffic noise of the M62, during my site visits.
15. The 'Whittle Brook River' flows north to south through the middle of the site, and a second watercourse 'Barrow Brook' crosses the north east corner. There are scattered areas of deciduous wood land priority habitats, including Booth's Wood s designated Local Wildlife Site, which lie immediately next to the south west boundary, and the two plantations of Duck Wood and Finch are located to the south.
16. The site is entirely surrounded by further arable land, including to that north of the M62, except the land to the east which is occupied by the recently developed Omega warehousing and distribution

development. It is worth emphasising that the current Omega development involved the reuse of a previously developed, brownfield site.

Annotated Extract from GoogleEarth, 2021



17. In terms of heritage there are five Scheduled Monuments and ten Grade II Listed buildings within a 2km radius of the site. There are also non-designated assets, including:

- Possible Watermill;
- Medieval /Post Medieval park; and
- Medieval field boundaries and ridge and furrow earthworks.

18. There is a Public Right of Way (PROW 102) which allows access across the application site in the northwest and runs north to south via a footbridge over the M62 past Bold Old Hall Farm connecting Dog Kennel Plantation and Home Farm to the A57. This footpath forms part of the Bold Loop.

19. The site lies within an area covered by the Bold Forest Park Area Action Plan, which is a statutory document which sets out detailed policies and actions to develop and sustain the Forest Park. Bold Forest Park is seen as a place for outdoor recreation and activity providing a platform for economic growth and rural entrepreneurship, principally in the visitor economy, whilst providing leisure opportunities for the community and wider region.

Photo: Taken from the PROW footbridge facing east towards Booth's Wood.



20. The site is in a prominent location to the south of the M62, which has its west bound carriageway raised at between 0.5m and 2.5m above the site, forming the northern boundary. Vehicles travelling along the M62 between Junctions 8 and 7 have good views into the site.
21. There is an overhead electricity distribution line that runs about 150m into the site from the northeast corner to a pylon, which then splits into two overhead lines. One travels south along the site boundary and the other travels south east passing Booth's Wood to the south.

Proposed Development

22. The proposed warehousing and distribution development would be immense in scale. In total 201,014 m² of permanent large shed format floorspace is proposed in four units.
23. To fully appreciate the unit mass, Unit 1 will be 77,084 m² of floorspace at a very high 41,6m to the ridge, much higher than nearby sheds to the east, which are very large built forms. A service yard that will wrap around the periphery of the site, and there is to be a car park for 576 cars, to the south of the site. In addition, there is a vehicle fuel-island and HGV wash facility with pump house and water storage. The exterior of the building will be clad in horizontal white, grey and blue colours and a cut and fill operation to the levels is proposed with an area of landscape and ecology mitigation proposed in the north-west corner.

Extract from the updated Environmental Statement Vol/4 Application documents of the site plan and Unit 1 visualisation



24. The outline application is for the southern part of the site for a further 123,930 m² of floorspace in Units 2, 3 and 4 for B2 manufacturing and B8 warehousing. The heights are not confirmed at this stage, but for the purpose of the Environmental Impact Assessment are considered at 19m to the ridge.

25. The Whittle Brook River is to be diverted from the centre of the site to the south-west boundary. There is concern over the flood risk to the local area.
26. The entire site will induce an incredible amount of vehicle movements servicing the site on a 24 hour/7 day a week basis. The high level of activity would require night lighting and other physical intrusions. The additional activity must be adequately considered when assessing the extent of impact to Green Belt, including night glow from this giant facility. The site access would be from the service road to the west. The view of the site from the west is shown below.

Photo: Site access from west



Material Planning Considerations

27. To aid the Secretary of State's decision I set out information on where The Group disagrees with the Council's decision and the findings of the Planning Committee Report (PCR) on the following matters:
- a) The extent to which the proposed development is consistent with Government policies for protecting Green Belt land (NPPF Chapter 13);
 - b) The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy (NPPF Chapter 6);
 - c) The extent to which the proposed development is consistent with the development plan for the area, including any emerging plan;
 - d) Any other matters the Inspector considers relevant

a) The extent to which the proposed development is consistent with Government policies for protecting Green Belt land (NPPF Chapter 13);

28. The proposed development would be entirely located in the Green Belt, in a prominent rural location south of the M62 (between junctions 7 and 8) in the Bold area of St Helens. I agree with both the applicant and the Council that the proposals would form 'inappropriate development' in Green Belt land, which in NPPF para 133 the Government attaches great importance.
29. I am of the opinion that the site performs a high level of contribution in keeping land permanently open, as opposed to only a 'medium contribution' assessed by the applicant and accepted by the Council. Openness is a clear feature of the site, illustrated well by the GoogleEarth extracts and the site photos at the end of the PCR. The images give a good visual impression of how the site is open, and a site visit will reveal to true extent of harm to be very large adverse.
30. Since its designation in 1983, The Merseyside Green Belt has been robustly defended by St Helens Council, so I completely disagree with the PCR 2.26 calling into question the permanence of the Green Belt due to the proposed allocation of 31 hectares for employment use to be released from the Green Belt in the emerging local plan. The proposed development is more than double the size of the proposed allocation, which is in any case the subject of strong opposition by the local community. The Green Belt Review 2018 identified a high+ contribution. The Examination in Public is due in June 2021.
31. I have considered the impact of the proposals in both a spatial and a visual sense against NPPF Para 134, and I am of the opinion that four out of the five Green Belt purposes are served to a high or very high degree:

a) to check the unrestricted sprawl of large built-up areas – I believe that the land does check unrestricted sprawl to a very high level. The proposals would have a large adverse impact on the spatial and visual context. The applicants assertion that the landscape mitigation area will check unrestricted sprawl is flawed as it, or the land to the east of Clock Faced Road could easily be put forward for development in the future in the same way as this application has been made;

b) to prevent neighbouring towns merging into one another– The site is located between St Helens, areas of Bold and Clock Face at 1km to the north and west, and Warrington's Omega warehousing to the east and the Lingley Green residential area to the south east at 0.35km. The land does provide the purpose of preventing neighbourhood towns from merging into one another to a high level. If developed the buildings and service areas would have the adverse consequence of merging the two

areas in different local authority areas. In a spatial sense the buildings would reduce the distance of separation between the houses on A569 Clock Face Road and the north-western corner of Unit 1. These are different parishes of St Helens and Warrington. In a visual sense it will feel to people in the area that the built up form is continuous when travelling along the M62 and PROW 102;

c) to assist in safeguarding the countryside from encroachment– I believe that the land does provide this purpose and the proposals would have an adverse impact on encroaching into the rural part of the Bold area. The applicant agrees. We do not accept the comments in PCR 2.31 about flat, featureless and limited ecology and biodiversity value, and argue the countryside character is a fact and cannot be assessed as ‘moderate’;

d) to preserve the setting and special character of historic towns – I accept that this Green Belt function is not served by the proposal site; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land– I believe **that the** land does provide this purpose and the proposals would have an adverse impact. In terms of Alternative Site Assessment the public needs assurance that they have been thoroughly assessed. Consideration of alternative sites, particularly brownfield sites is an important part of the planning process. St Helens and Warrington have large brownfield sites in proximity that could be the focus of new development. There are other large scale brownfield sites with suitable accessibility in neighbouring authorities such as Knowsley, which have similar levels of deprivation, including the former Cronton Colliery site. Otherwise valuable land resources are wasted.

Annotated Extract from GoogleEarth, 2021



Cumulative Green Belt Harm

32. The in combination and cumulative impact on Green Belt purpose must be fully considered. This includes the recently completed large scale employment developments of Omega and Florida Farm, other submitted planning applications and allocations in the pipeline, including major residential developments (2,9880 Gorsey Lane and 569 Garstosn Lane) to the south of Omega. The site to the east is already developed for a cluster of large B8 sheds and there is a danger of a 'shedscape' dominating the Green Belt of St Helens and Warrington.
33. Countryside loss and encroachment by large sheds has accelerated in a largely unplanned fashion due to the flurry of ad hoc speculative applications for very large scale road based logistics, warehousing and distribution developments in proximity to the motorway network that threaten urban sprawl, the merging of distinct places, especially the places of St Helens, Warrington and Wigan. Many of these large applications are also the subject of call inquiry, such as Parkside Strategic Rail Freight Interchange site, and Haydock Point in St Helens, Wingates in Bolton and Junction 25 of the M6 Motorway, Wigan.
34. Urban regeneration is important for St Helens and the wider Liverpool and Greater Manchester City Regions as they both have very high levels of previously developed, commonly referred to as brownfield land, identified on the Brownfield Registers that should be prioritised for delivering new employment development.

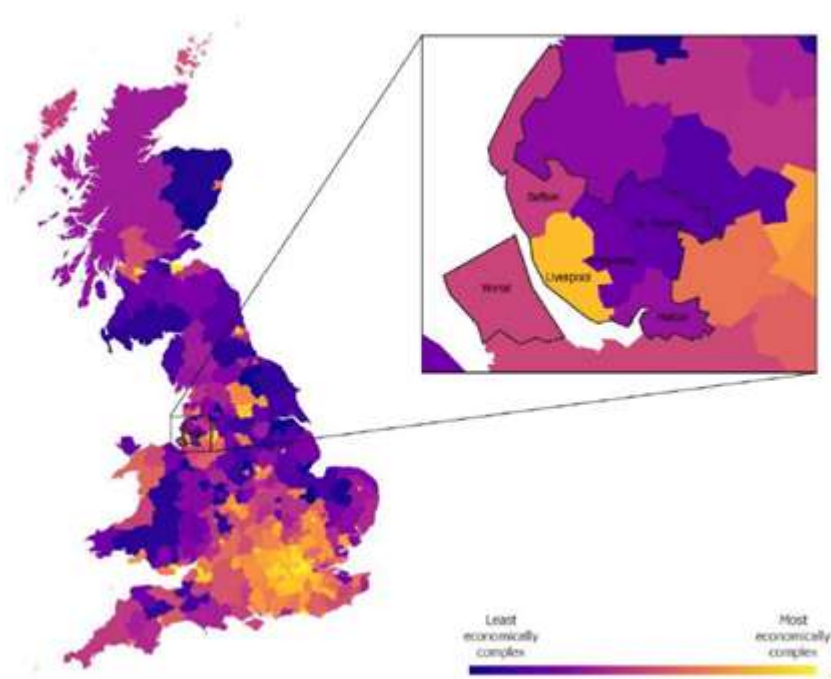
b) The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy (NPPF Chapter 6);

35. The Government policies for building a strong, competitive economy are set out in NPPF Section 6. Below I comment on the economic need evidence and employment land supply situation. I show there has been a need for logistics stemming from the expansion at Liverpool Port and change in retail needs, albeit at a lower rate of growth than assumed in the evidence base. That considerable employment land has come forward recently in order to satisfy demand, and how the land, which is the subject of the proposals already supports the local business base and the harm to operations need to be weighed when understanding the extent to which the proposals would support building a strong competitive economy,. In my view it is less than that claimed by the applicant, and agreed by the Council.

Economic Need

36. The NPPF, Paragraph 80 states that “planning decisions should help create the conditions in which businesses can invest, expand and adapt and that 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”.
37. NPPF Paragraph 81 sets out the requirements of Development Plan policies. The adopted St Helens’ Local Plan Core Strategy, responds well as it has a clear economic vision, referring to the Liverpool Local Industrial Strategy. Policy CE1 sets out a need for 37 hectares of employment land between 2012 and 2027. Of this requirement, 32 hectares is identified as being for B8 warehouse and distribution floorspace. A preference for reusing previously developed sites is set out along with other criteria for identifying strategic sites, for local and inward investment. It seeks to address potential barriers to investment; and in my view it is flexible enough to accommodate needs not anticipated in the plan to enable a rapid response to changes in economic circumstances.
38. The Strategic Housing and Employment Land Market Assessment (SHELMA) (March 2018) has been critically reviewed by independent economists for being based on too high growth scenarios and assumption, that will not be borne out in reality and it importantly does not consider environmental capacity, or has not been independently examined.
39. The SHELMA has informed both the Liverpool City Region Spatial Development Strategy and the emerging local plan. Publication was then followed by the Assessment of the Supply of Large-Scale B8 sites (ACLCB8) in June 2018. The SHELMA Assessment identified a shortfall of between 43.4 ha and 141.4 ha across the City Region. The later Addendum Report to the Employment Land Needs Study (ARELNS) 2019 increased this and said the revised OAN for the Borough in the period 2012 to 2037 is between 190 – 239 ha of employment land with between 165 – 225 ha of this land for logistics. These figures should be treated with caution.
40. The Liverpool Local Industrial Strategy (LIS) Draft March 2020 Note (logistics and automation) refers to logistics as an important business cluster. However, it draws attention in Figure 9 that St Helens is the least economically complex area of the Liverpool City Region, and locally there is concern at the saturation from speculative road dependent developments.

LIS Figure 9:Economic Complexity by local authority in Liverpool City Region



41. It is my opinion that the St Helens Local Plan has provided for warehousing and distribution at a variety of scales and in suitably accessible locations. However, I am concerned about the dominance of a single sector, as already in excess of a quarter (25.7%) of the St Helens jobs are within the three sectors of Wholesale, Retail and Transport & Storage. I am of the opinion that to support a sustainable and robust economy there should be a diverse mix of businesses, otherwise the economy will become extremely narrow and vulnerable to economic shocks. Furthermore, whilst the national and regional economy has evolved, with the rise of online retailing, and expansion of Liverpool Port, Brexit, combined with Covid in the past 12 months, has had a significant impact on traditional retail and office take up, including out of town premises, leading to significant change in market requirements.
42. NPPF Paragraphs 83 and 84 of Section 6 relates to supporting a prosperous rural economy, which has relevance to the decision taking, particularly with not having an unacceptable impact on agriculture or on Best and Most Versatile Land, or the visitor economy. The economic need identified in the Bold Forest Park Action Plan Policy BFP ECON1: Supporting Economic Growth is not delivered by the proposal, indeed will be harmed in the future due to the loss of 75.4 hectares of farmland suitable for equestrian uses.
43. This is of particular relevance to the decision due to the rural nature of the area, and the type of existing businesses, specifically local equestrian businesses, which the separate Value of the Equestrian Sector Report shows to contribute significantly to the economy, and bring other local benefits. The

proposals will undoubtedly cause the loss of agricultural land and amenity associated with using bridleways for operations, and would displace them out of the area to the detriment of the availability of local stables and riding facilities.

Photo: There is evidence of horse businesses and activity in the local area.



Employment land supply

44. I understand that since the adoption of the Core Strategy, many of the sites identified have been delivered.
45. In identifying future sites the National Planning Practice Guidance (PPG) sets out a five stage approach including assessment, windfall assessment, review and final evidence base for land supply. Land should be suitable, available and achievable for economic development use over the plan period. Land on brownfield registers should be considered.
46. A range of sites to meet the local planning authority's requirements should be assessed, but it is for the development plan itself to determine which of those sites are most suitable for meeting those needs. There are allocations in the emerging local plan, and in addition there has been a lot of floorspace already approved on a speculative basis that should be accounted for when judging whether this proposal is in fact necessary.

Economic Benefits

47. . The applicant asserts that the construction and operation of the full element of the development would result in an estimated investment of £141.5 m Gross Value Added (GVA), which includes jobs, expenditure and income for the economy within St. Helens and £47.1m GVA to the economy within the North West. They claim there will be approximately 845 gross FTE jobs through the construction of the full element and 2,679 with FTE jobs for the outline element. The applicant states the full element, when operational, would provide an estimated 980 FTE jobs. The applicant has also provided a further breakdown of job figures based on current operations. There would be an approximate peak of 766 FTE jobs at 40% capacity and a peak of 1431 FTE jobs when 100% capacity. The outline development would generate approximately 3,014 FTE net warehouse and industrial jobs.
48. The Council's assessment is in terms of investment into the local economy is broadly that although it is difficult to assess the precise level of investment that would be brought about by the proposed development, however, it is likely to be significant. It adds that each application has to be assessed on its own individual basis.

Reality check

49. I recommend the claimed economic benefits are reality checked, as the economic impact of the recent large format warehouse and distribution developments, including at Omega are not as high as claimed. It certainly cannot be evidenced that they have supported an improvement in the local IMD data as there has been a downward trend.
50. There is concern locally that the logistics sector is based on low skill and employment based on insecure zero-hours contracts and low pay. This concern was confirmed by the publication on 18 February 2021 by the Mirror newspaper highlighted an investigation with the Bureau of Investigative Journalism and ITV News found how online giant Amazon broke its own rules by using agency workers on zero-hour contracts as it's '£20bn for Amazon... and peanuts for s' for more information see here:
<https://www.mirror.co.uk/news/uk-news/amazon-uk-profits-soar-20bn-23526418T>
51. The area is deprived and needs a sustainable local economy based on a broad range of employment, not focused narrowly on low density, poorer quality of jobs, as warehouse staff or drivers. Over dependence on low wage economic sectors could lead to vulnerability, especially due to global economic trends. The existence of Omega and Florida Farm has not significantly addressed the deprivation in local areas.

Job density

52. The Homes and Community Agency, Employment Density Guide 3rd Edition, 2015 is what decision makers are to rely upon. However, even this indicates a job density of 1 FTE job per 70sqm for a 'final mile' distribution centre, not 1 FTE job per 55sqm as claimed by the applicant. In reality, at the scale of building format and type of operation proposed it is my opinion that it should be treated as a National Distribution Centre with 1FTE per 95 sqm.
53. Recent experience tests the robustness of the HCA Guide. At, other recent nearby warehouse and distribution examples, like Florida Farm, very low job numbers of 320 FTE have occurred in reality, rather than the estimated 2,500 FTE at the time of the application being decided, equal to a very low job density of 1 FTE job per 400sqm. Therefore, the HCA Guide is somewhat out of date in light of the above. What is more it is no secret that the logistics sector has modernised significantly in recent years harnessing more technology. There is a commitment to improve productivity will further automation. Even trucks may be automated and several containers pulled together, like road train in the future, so the real benefits to people has to be scrutinised.
54. Therefore, the benefits claimed by the applicant in support of the application are in my view overstated.

c) The extent to which the proposed development is consistent with the development plan for the area, including any emerging plan;

St Helens Local Plan Core Strategy (2012)

55. In my view the development would be contrary to the following policies of the adopted local plan set out below. The adopted development plan for St Helens is the St Helens Local Plan Core Strategy (adopted 2012); saved policies in the St Helens Unitary Development Plan (adopted 1998); and the Joint Merseyside and Halton Waste Local Plan (adopted 2013).

CSS 1 - Overall Spatial Strategy

56. Policy CSS1 of the Core Strategy identifies the main focus for economic development to be on previously developed land in sustainable locations within the M62 Link Road Corridor in St. Helens and Haydock Industrial Estate. An area along the M62 Link Road Corridor has already been developed and there are other sites for consideration in advance of the Green Belt. Even accepting the additional demand for B8 Logistics arising from the Liverpool Port expansion there does need to be consideration of the existing local business interests and community aspirations as set out in the BFAAAP.

CSD 1 - National Planning Policy Framework - Presumption in Favour of Sustainable

57. I consider the application to be contrary to Policy CDS1, because the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole. The policies protecting Green Belt purpose, and the environment will be harmed and the benefits are not adequate to outweigh.

CP 1 - Ensuring Quality Development in St. Helens

58. It is my opinion that the application is contrary to Policy CP1 - Ensuring Quality Development in St. Helens. Although I acknowledge the design has been revised since the Environmental Impact Assessment to realign the Whittlebrook watercourse, and include an 8m watercourse, in my view the design does not respond well to part 2. *Protection of the Natural and Historic Environment i. Safeguard and enhance Green Infrastructure, biodiversity and geodiversity and bring these resources into positive management*; This is due to the loss of woodland that forms an important habitat for local ecology, particularly mammals and birds.

CP 2 - Creating an Accessible St. Helens

59. It is my opinion that the application is contrary to Policy CP2 - Creating an Accessible St Helens as employees, suppliers and customers would all be road based. When visiting the existing Omega site I suggest the Inspector walks or cycles to the nearest residential areas of St Helens and Warrington to understand just how the local network is dominated by large scale HGVs traveling at high speeds making it an unpleasant environment for pedestrians and cyclists. Local people refer to the fact that a bus service that was promised, indeed was initially put in place for the existing Omega site was cancelled, as it was never used. A question for the Inspector to ask is why would this service in St Helens be any different?

CAS5- Rural St Helens

60. It is my opinion that the application is contrary to Policy CAS5- Rural St Helens, as development should be restricted to within existing rural settlement boundaries, and outside of these areas development will comply with Green Belt policy. In bullet 6 of relevance to this decision, it says Green Infrastructure priorities will include: i. Bold Forest Park on the southern edge of the Borough, which will be the subject of an Area Action Plan. The Core Strategy states in explanatory text 11.11 "The area will be designated as a Bold Forest Park Area Action Plan, to be promoted for recreation in an attractive and accessible wooded outdoor setting". Therefore, I think it is relevant that questions are asked as to how well, if at all, the application complies with the policy contained in the Box. I do not believe that the application responds adequately to this policy requirement.

Bold Forest Park Area Action Plan

1. Create new economic opportunities through sustainable development within Bold Forest Park.
2. Create opportunities for tourism and leisure-related business, supported by the natural economy of the Bold Forest Park.
3. Create an easily understood and accessible network of linked open spaces within Bold Forest Park and with surrounding areas.
4. Promote the provision and positive use of green space for the benefit of local communities and visitors.
5. Enhance the natural environment through the targeted delivery of Green Infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park area.

61. In addition to Parish Councils of Bold, Culcheth and Glazebury, Rainhill, and Great Sankey are opposed to Omega 8, and a range of issues are raised, but in essence it is considered that the quality of life for local communities will be worse off if the development is allowed due to a range of harms including to economic development that would otherwise occur, loss of social benefits associated with the current land use and equestrian community, and due to harmful impacts to the environment arising from increased pollution from the logistics activity, particularly with regard to noise and air pollutions that have detrimental health and well-being impacts.
62. The Bold Forest Park Area Action Plan, which was adopted by St. Helens council in 2017 and the Vision is :
- “to provide a high-quality setting to stimulate tourism and provide a platform for local businesses to grow and develop and for the establishment of new businesses. The area will also provide opportunity for a diverse range of outdoor activities to create a critical mass of activity that the local economy will thrive upon. The Area Action Plan has been developed through a partnership making use of neighbourhood planning principles but in the context of a formal development plan. It is therefore breaking new ground on how areas should be planned in the future. This has been to such an extent, that it has drawn particular interest at the European level and is one exemplar project as part of the Pure Hubs Programme funded by European Union programme Interreg IVB.”
63. As a result of the applicant not acknowledging the Bold Forest Park Action Plan adequately it is contrary to relevant policies, Policy BFP1: A Sustainable Forest Park, and Policy BFP ECON1: Supporting Economic Growth.
64. Understandably, the local community is worried that even with an adopted Area Action Plan for the area, the application that does not acknowledge it might be allowed, and in being so will be to the detriment of the vision for supporting economic opportunities that will support tourism related

businesses, help to support an accessible network of open spaces and will enhance the green infrastructure. The application fails to deliver against the Bold Forest Park Action Plan.

CE 1 - A Strong and Sustainable Economy

65. The Core Strategy, Policy CE1 sets out a need for 37 hectares has delivered B8 warehouse and distribution floorspace. Like Government has set out in NPPF Section 11 there is a preference for reusing previously developed sites to make effective use of land. It is my view the proposal is contrary to Policy CE1.

CQL 2 - Trees and Woodlands

66. The applicant identifies in the Environmental Statement that the proposal will cause habitat loss, habitat fragmentation, pollution and disturbance of important species along with permanent loss of woodland and tree cover and damage to trees covered by Tree Preservation Orders.
67. The applicant then concludes that due to design, mitigation (including off site) planting and tree protection through a Construction Environmental Management Plan (CEMP) and additional pond and attenuation features, replacement hedgerow and bat boxes would result in “no significant adverse” effects during the operational stage. It leads to an overall assessment of ‘moderate harm’, however I disagree with this and believes it will be substantial and this is important when attributing weight in the planning balance. I echo the objection of St Helens’s Countryside and Woodlands Officer:

“due to the impacts on protected woodlands, as well as other associated habitats such as ponds and streams and believe there will be a detrimental impact on the area designated as Bold Forest Park, as well as greenbelt, including key landscape features such as the medieval deer park area. The proposals are therefore not in keeping with a number of the policies detailed in the Bold Forest Park Area Action Plan. We also believe that the application does not respect the proposals put forward for development in the locality within the St.Helens Local Plan 2020-2035 Submission Draft January 2019 and the extension of development beyond the limits shown in this plan are the primary reason for significant habitat loss, particularly the removal of protected woodlands.”

“Should we be made aware this application is being recommended for approval then we will provide information in relation to conditions (though our over-riding objection will remain).”

CQL 3 - Biodiversity and Geological Conservation

68. I note deficiencies from an ecological point of view, such as Unit 1 is intended to be sited 86m south of the M6 running parallel to it. Natural England recommends that wildlife corridors should have ‘a minimum width of 100m’.

69. The fact horses are kept in fields locally, and the type of ecology that this supports, means in future the area will have less insects, birds and mammals that are supported by horses kept in fields. This is not recorded adequately.
70. The ecological network is also being harmed in terms of movement of species north south due to severance by the M62 motorway and to the east with the existing Omega development. It should be considered where ecology displaced from recent development (albeit part of the site was previously developed site) is now in existence and it is little wonder if the proposal site has become home to wildlife that previously existed to the east. It is important not to hem in wildlife and to allow movement between places. The western and southern boundaries connect to open countryside.
71. A local farmer is of the view from his working knowledge of the area there are omissions from the ecological assessment.
72. It is also important to consider the Supplementary Planning Document for Biodiversity

CQL4 – Heritage and Landscape

73. The Environmental Statement Volume 4 concludes that during construction, **significant adverse effects** would arise to landscape and visual amenity. In paragraph 4.5.2 of the Non-Technical Summary it is confirmed that there will be a **significant adverse effect** arising to visual amenity due to the permanent effects upon the view for residential receptors, public rights of way, public open space and recreation area, commercial property and highway receptors during construction of the proposed development. No mitigation measures are proposed.
74. Furthermore, a **significant adverse effect** on a permanent basis to the landscape character will arise from the development during the operational phase, and a significant adverse effect permanently to residential, users of open space and recreational space, commercial, highway and public right of way receptors. No mitigations are proposed.
75. During operation of the proposed development would result in a permanent loss of landscape and characteristic features, including mature woodland, hedgerow, open fields and historic field pattern and ditches. The scale, form and operation of the proposed development and limited opportunities for the replacement of these landscape features in terms of mitigation would make a limited contribution. A **significant adverse effect** would arise to landscape character and visual amenity. The applicant ascribes significant harm to these impacts. I agree.

76. To illustrate, Unit 1 is intended to be sited 86m south of the M6 running parallel to it. This building is over 41m in height and will be extremely prominent in the same way The Hut Group building is on the landscape, but add another 50% of the building height to fully understand the impact. Units 2, 3 and 4 will be of a similar scale and also prominent. An extended 'shedscape' to that of the existing Omega logistics hub will have the effect of urbanising a very long stretch of the M62 and will completely change the current predominately rural landscape character.
77. The visual amenity afforded by open fields and farmland is currently high value and this value will be permanently lost. Although the site is in private ownership there is a Public Right of Way (PRoW number 102) and those using this and the network of local roads and the M62 motorway will experience an adverse impact on the visual amenity to a large magnitude of change.
78. I am concerned that the Environmental Statement appears to have omitted the impact of the development on the Bold Forest Park as there is a raised viewpoint for the public here looking towards the south and therefore the landscape and visual impact of the proposal is significant and negative from this important cultural and historical location.
79. Historic England raised concern over the insufficient information to allow the impact of the proposed development upon the settings of key designated heritage assets to be properly assessed, and issues with the photographic information. I echo these concerns. I note the applicant concedes that at construction stage with mitigation there are significant adverse effects to heritage both above and below ground. Also that at operation stage there would be significant adverse effects to the setting of non-designated asset of Old Bold Hall.

Saved Policies of the adopted St Helens Unitary Development Plan (1998)

S 1 - Green Belt, GB 1 - General Criteria for Development Control in the Green Belt, GB 2 - General Criteria for Development Control in the Green Belt

80. The application site lies within Green Belt and therefore saved policy GB1 in the Unitary Development Plan applies. It states that new buildings within the Green Belt will not be permitted, except in very special circumstances, unless it is for one of four identified purposes in GB2.

Table 1 GB2 General Criteria for Development Control in the Green Belt

GB2 General Criteria	OMEGA 8
a)it is appropriate in terms of its siting, scale, design, materials and landscaping and does not detract from the appearance and openness of the Green Belt;	The scale of the development will be inappropriate due to siting, scale, materials and landscaping and it would harm the openness of the Green Belt
b)it will not generate so much traffic as to cause nuisance or danger nor require any major improvements to rural roads;	The traffic generated is substantial and it will have an impact on the network of rural roads
c)it does not conflict with the purposes of including land in the Green Belt;	The proposed development will permanently prevent the land being open
d)it will not conflict with other objectives for the use of land within the Green Belt (see Policy S1A), and wherever appropriate, will make a positive contribution to their achievement	The proposed development does conflict with four of the five purposes
GB2 Acceptability	Contrary to 4

81. There is definitional harm and therefore in accordance with NPPF Para 143 and 144 it is necessary to see if Very Special Circumstances are demonstrable.

Emerging local plan

82. The St Helens Local Plan Submission Draft is “the emerging local plan” and it allocated 215.4 hectares for employment use. It was submitted to the Secretary of State for examination on 29 October 2020. The proposed Green Belt release of 31 hectares to the west of Omega, is vociferously opposed and it and the evidence base it relies upon is the subject of an independent examination.

d) Any other matters the Inspector considers relevant

83. Material considerations when considering the future employment land supply include:

Climate Emergency

84. At the national level the Government has international commitments on Climate Change as set out in the Climate Change Act 2008 and updated by Statutory Instrument 1056, which increased the target to

a reduction of 100% by 2050 on baseline figures. I do not accept that the road based logistics proposal will support a low carbon transition, and therefore it must be contrary to the Climate Change Act. In addition, Prime Minister Boris Johnson committed to a Green Economic Revolution with a ten point plan and the proposals do not relate well to any of the points.

85. The Government has committed to a Freeport at Liverpool Port and the logistics will be an important sector in developing trading relationships post Brexit, and the location of sites requires strategic planning a scrutiny of the economic, social and environmental impacts. But at the Liverpool City Region Combined Authority level ambitious targets to be net zero carbon by 2040 are agreed. The question of whether the application will support national, sub-regional and local targets for carbon change reductions must be posed, and in my opinion the application is entirely based on road for the operation of the warehousing and distribution, as there is no multi-modal possibility in the future.

Agricultural Best and Most Versatile Land Loss

86. Another material consideration is the significance of substantial loss of productive land for agricultural use. Future generations must be able to grow food. NPPF Section 15 sets out the Government's approach to conserving and enhancing the natural environment. Paragraph 70 says:

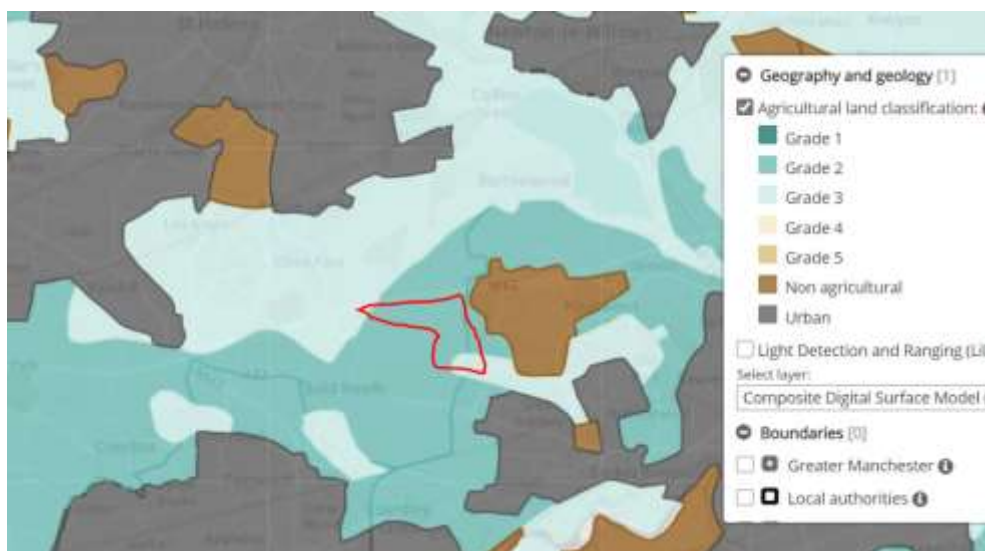
Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

87. It is my opinion that too much high grade farmland is being lost at an alarming rate for B8 employment development in St Helens. This should be attributed appropriate weight against the NPPF paragraph 112.

88. It is my view that validation of the grade of agricultural land is necessary as the applicant states there would be a permanent loss of 67.5 hectares of agricultural land, of which 17.2 hectares is best and most versatile agricultural land in subgrade 3a (good quality land). Whereas, Natural England's Agricultural Land Classification map shows the site to be of higher Grade 2 on the Greater Manchester Open Data Mapping. The ES Vol 4.0 Paragraph 2.1.10 also says Grade 2. See extract below, and link here: [GM Open Data Infrastructure Map | MappingGM](#)

Extract: Indicative site boundary on the GMODIN map



Benefits

Economic - Low Value

89. It is accepted that some economic benefits would be derived from the proposed development. However, it would not support the type of economic activity identified in the Bold Forest Park Action Plan *Policy BFP ECON1: Supporting Economic Growth*, indeed what exists will be harmed in the future due to the loss of 75.4 hectares of farmland suitable for equestrian uses. Please read the separate report on the value of the equestrian sector, which has been inputted to by the British Horse Society. Many of the riders come in from neighbouring areas as there is a shortage in the supply of riding schools and stables elsewhere. It amounts to inward investment into locally owned concerns.
90. This proposal will lead to a loss of existing local businesses and jobs, both direct and indirect from the supply and customer multipliers and it will expose St Helens to a narrower, lower value, business base for St Helens in the future. Once the land is lost to development of B8 it will never return to agricultural use, unless a condition requires this at decommissioning stage.
91. The applicant is understood to have large format premises elsewhere that are only half full, and there is concern that the claimed jobs density is unreliable.

Social - Low Value

92. It is accepted that some social benefits arising, but also dis-benefits to future social conditions if the proposed development is allowed. This is because at the moment there are a number of horse related

business providing jobs, apprenticeships, training, horse-riding and related activities at stables and from competitions etc. Loss of land for such equestrian activity will actually harm the social factors that exist currently.

93. It is understood that MoMo's local café is supporting groups with mental health issues to engage with the outdoors.
94. The Dream Run is a 5km route, which although relates to separate land is visually connected and the development would cause an adverse visual impact. The run attracts people from further afield due to the pleasant natural surroundings and people enjoy running there and engaging in fund raising activity. This will be harmed if the proposal is allowed.
95. There is a rewilding project in Forest Park being pursued by Bold Hall Nursery, which may expand into the Forest Park area. There is concern that the proposals will harm this project.

Environmental - Low Value

96. The logistics development is entirely road based for operations, except for the inclusion of a pavement and cycleway for employees. As previously mentioned the location is very road and HGV dominated making it a hostile place for people on foot or bike, which in my view necessitates a visit from the inspector. It has a high greenhouse gas implication for the lifecycle of the development.
97. The number of electric car charging points is inadequate. The Group is concerned that in the short to medium, indeed long term there will not be the level of environmental benefit achieved as claimed at +12.69 units biodiversity net gain as mature trees and woodland will be lost and it takes decades for new planted trees to grow and be of the same value of habitat as exists now. What happens to the wildlife in the meantime?
98. Below is a photograph to show the current condition of the environment of the existing Omega site from the road to the east. Habitat has already been lost and degraded due to the neighbouring Omega development. This is not a quality ecological or landscaped area.

Photo: The area of land surrounding the neighbouring Omega site taken from the Burtonwood Road



99. The grass verge adjacent to the existing Omega development opposite Domino's/ASDA is strewn with litter, in fact much of the Motorway verge is too, showing a failure of Highways England to keep the field side of the embankments free of litter. This is not a quality ecological or landscaped area.

Photo: There is evidence of a degraded environment due to litter on the grass verge on the access road to Junction 8 opposite the Omega development.



Planning Balance

100. I have found that this is a very large, currently 'off local plan', site. I accept while there would be some economic, social and environmental benefits, there would also be harm to these factors in the context of the town and country planning legislation. It leads to a finding that very special circumstances do not arise, particularly given the extent and nature of harm to the national planning designation of Green Belt, and other material harms. Therefore I conclude a negative planning balance, and recommend that the Inspector refuses permission.

Summary

101. In summary I have assessed that:

- a) The proposed development is inconsistent to a large extent with Government policies for protecting Green Belt land (NPPF Chapter 13). My opinion is that there is a high contribution to four of the five Green Belt purpose and that the level of harm to each ranges from high to very high. There is also the matter of cumulative impacts due to the earlier Omega phases completed, and other nearby developments coming through the planning pipeline. Green Belt harm is therefore high and significant;
- b) The proposed development although consistent with Government policies for building a strong, competitive economy (NPPF Chapter 6) to an extent, would narrow the local business base and limit the existing businesses, specifically equestrian uses. We highlight there is already other large scale logistics sites and hub clusters coming forward in proximity to this site. Furthermore, the economic evidence base should be reviewed in light of Brexit, Covid and the other proposals subject to the Secretary of State's call-in;
- c) The proposed development is inconsistent with a number of the policies of the adopted development plan for the area, in particular the adopted Bold & Forest park Area Action Plan. The development is more than double the site area of the proposed allocation, which is subject to considerable local opposition in the emerging local plan. The examination is scheduled for June 2021. Local people hope that suitable previously used land identified on the Council's Brownfield Register can be brought forward in advance of such a damaging green field development. The adopted Bold Forest Park Area Action Plan has been completely ignored by the applicant, much to the disappointment of the local communities as expressed by a number of local parish councils who are opposed;
- d) There are a range of other harms for the Secretary of State to consider, not least to the local landscape character and visual amenity, ecology, loss of Best and Most Versatile farmland. The

proposed development is entirely reliant on road-base haulage, which has a very high carbon lifecycle, which is incompatible with the Government's climate change commitments. The Government must be acutely aware of the decision it takes on the lead up to hosting COP26. The increase in HGVs would inevitably lead to more air and noise pollution causing harm to health and well-being of local people.

On the basis of the above, I find a negative planning balance and I recommend that the Secretary of State should refuse the application.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jackie Copley', with a stylized, cursive script.

Jackie Copley MRTPI MA BA(Hons) PgCERT