

**St Helens Borough Local  
Plan 2020-2035 –  
Submission Draft  
Sustainability Appraisal: SA Report**

**January 2019**

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<b>QA</b>	Frank Hayes	Associate Director	Final SA Report Sign-off

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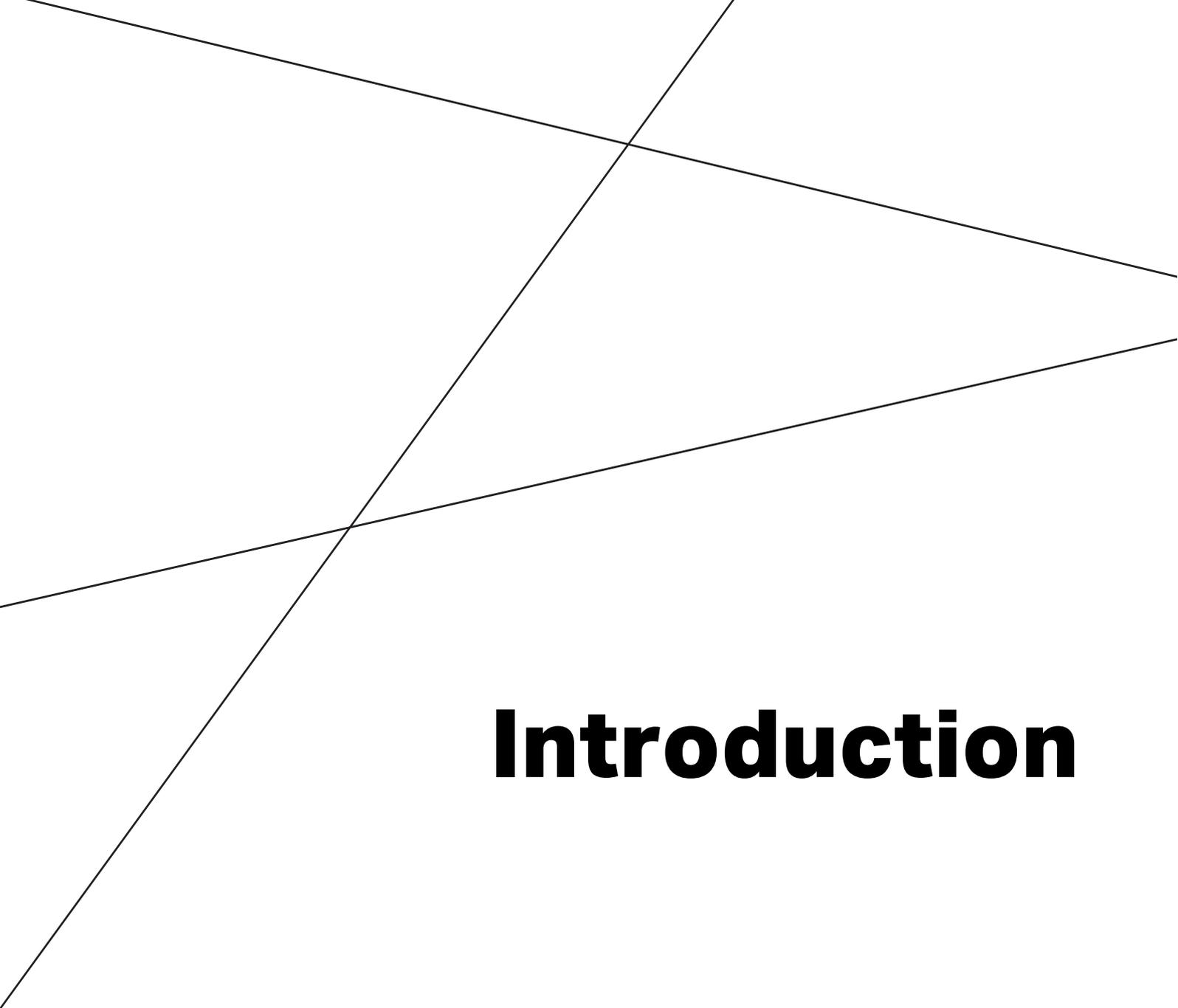
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# **Introduction**

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# 1 INTRODUCTION

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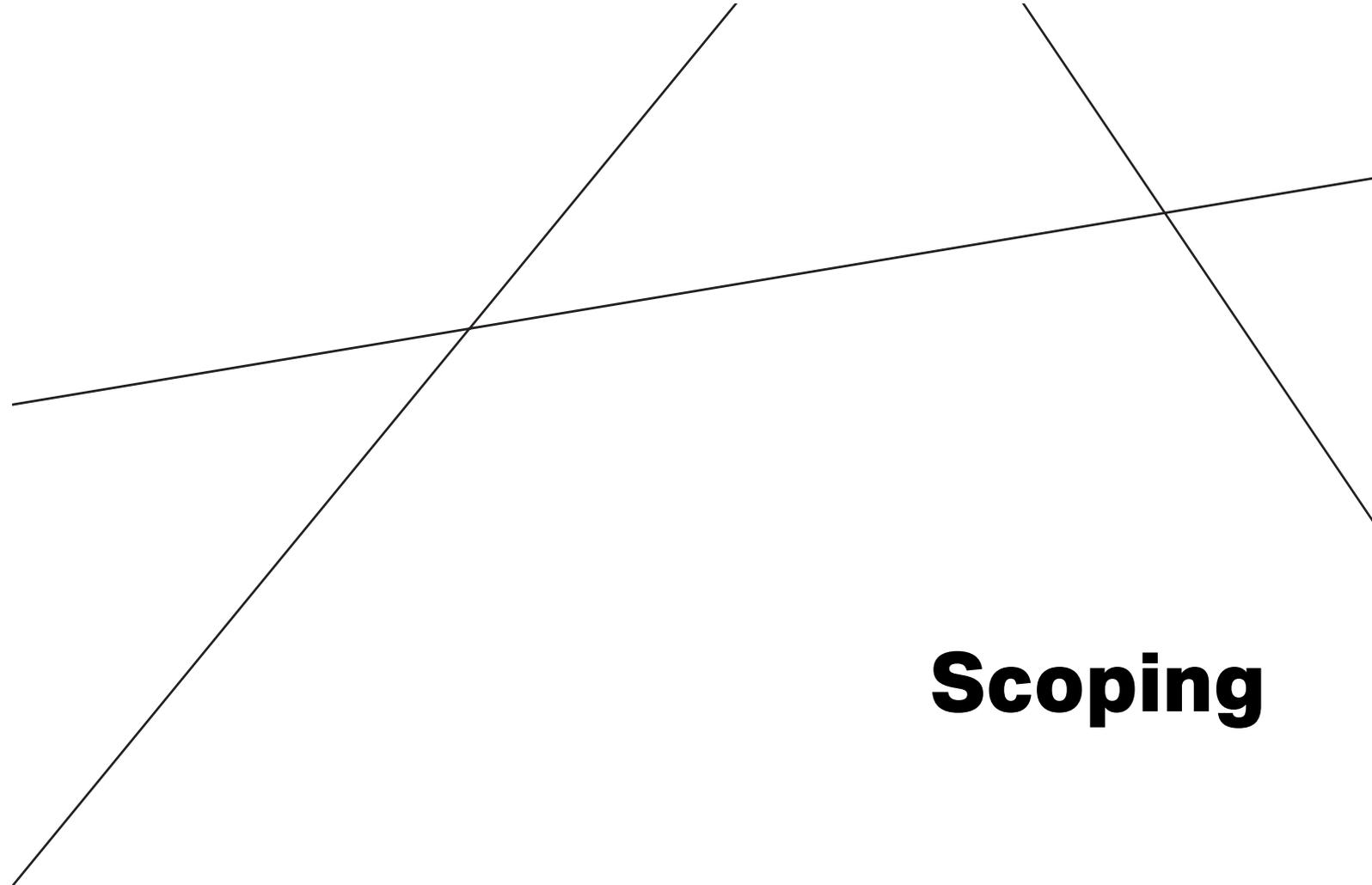
## 1.1 Introduction

- 1.1.1 AECOM has been commissioned by St Helens Borough Council (the 'Council') to undertake a sustainability appraisal (SA) in support of the new St Helens Local Plan (the 'Plan').
- 1.1.2 'The Environmental Assessment of Plans and Programmes Regulations 2004 require emerging Local Plans to be subject to a process of environmental assessment as they are prepared. This is normally carried out as part of the wider sustainability appraisal of the Plan. This report has been prepared in compliance with the 2004 Regulations
- 1.1.3 The new Local Plan will set out the amount of land for housing, employment and other forms of development that needs to be planned for, where it will and will not be acceptable in principle, and policies for assessing planning applications.
- 1.1.4 The St Helens Local Plan 2018-2033 'Preferred Options' (LPPO) document was prepared by the Council in 2016. This set out a preferred approach to many policy issues to be addressed in the Plan based upon the best available evidence at the time and was accompanied by an interim sustainability appraisal report.
- 1.1.5 Subsequently, the Council has prepared the Submission Draft of the Plan. This process has taken account of consultation responses, further evidence, and the findings of key studies such as the interim SA and Habitats Regulations Assessment. The Plan period has also been revised so that it will now cover the period 2020-2035.
- 1.1.6 This SA Report reports on the findings of the sustainability appraisal process at this point in time. It includes:
- An outline of the Plan;
  - The scope of the SA;
  - The appraisal methodologies;
  - Consideration of alternative approaches to the key issues of housing and employment provision/strategy;
  - Appraisal of reasonable site options; and
  - Appraisal of the Plan 'as a whole'.

## **1.2 Background to the Local Plan**

1.2.1 The new Local Plan will set out how the Borough and the places within it should develop. It should be locally distinctive, realistic and in the best interests of local people, businesses and the environment. There are seven strategic aims:

1. Supporting regeneration and balanced growth;
2. Ensuring quality development;
3. Promoting sustainable transport;
4. Meeting housing needs;
5. Ensuring a strong and sustainable economy;
6. Safeguarding and enhancing quality of life; and
7. Meeting resource and infrastructure needs.

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# Scoping

**02**

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## 2 SCOPING

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### 2.1 Background

- 2.1.1 The Scoping stage of the SA process is used to establish the key issues that should be the focus of the appraisal, as well as the assessment methodologies.
- 2.1.2 A Scoping Report was prepared and published for consultation in January 2016. Following consideration of the comments received, the scope of the SA has been determined and has provided the baseline position against which appraisals have been undertaken. The Scoping Report is available to view as Appendix V to this report.
- 2.1.3 It should be noted that the scope of the SA is fluid and has been updated throughout the plan making process as appropriate. Appendix V sets out the Scoping Report in full.

### 2.2 Key issues

- 2.2.1 The key issues identified through the scoping process so far are summarised in table 2.1 below.

*Table 2.1: Key sustainability issues identified through scoping*

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#### 1. Biodiversity, Flora and Fauna

Human use (e.g. recreation and disturbance) and climate change can pose a risk to the Borough's biodiversity interest and sites of nature conservation interest

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#### 2. Cultural Heritage

Pressure from new development not in keeping with the character of different areas may pose a risk to heritage assets.

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#### 3. Landscape

Landscape character across the Borough is varied. Development could contribute to an adverse change in landscape character.

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#### 4. Geodiversity

The Borough contains a number of Locally Important Geological Sites which could be vulnerable to development.

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#### 5. Soil

The Borough contains some of the highest grade agricultural land, which could be vulnerable to development pressure.

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#### 6. Contaminated Soils

Much of the Borough contains areas of historically contaminated land which could pose a risk to human health and the environment.

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*Table 2.1: Key sustainability issues identified through scoping*

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### **7. Air Quality**

There are four Air Quality Management Areas within the Borough which are exceeding annual mean objectives for Nitrogen Dioxide affecting local air pollution and human health.

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### **9. Climate Change**

Per capita emissions in St Helens are slightly higher than the North West average. The majority of CO<sub>2</sub> emissions originate from business, domestic use and transport.

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### **10. Water Resources – Water Quality**

Water resources, supply infrastructure and sewerage capacity are not a constraint on growth. However, the North West Region contains some of the poorest quality rivers in England

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### **11. Flood Risk**

The main sources of flood risk include surface water, groundwater, rivers and other watercourses. 336 residential properties have been identified to be within Flood Zone 3. Significant levels of fluvial flood risk are seen in the south and south eastern parts of the Borough.

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### **12. Open Space & Recreation**

St Helens has a large number of open spaces fulfilling a range of functions. Existing open spaces which serve communities should be protected and enhanced.

Access to open space and recreation is varied across the Borough, though there is no fundamental shortfall of open space in St Helens

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### **13. Population and Social Issues**

Population growth and an ageing population will place additional and changing demands on key services and facilities. The quantity and type of housing should meet identified needs, including affordable housing and suitable housing for an ageing population.

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### **14. Deprivation**

St Helens is ranked as the 36<sup>th</sup> most deprived local authority in England. The relative position of the Borough has deteriorated since the 2010 Index of Deprivation.

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### **15. Poor Health and Lower Life Expectancy**

The Borough suffers from a lower life expectancy than national averages.

Significant health conditions include cardiovascular diseases (including heart disease and strokes) and obesity. There are significant inequalities in health conditions depending on where residents live.

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*Table 2.1: Key sustainability issues identified through scoping*

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**16. High Unemployment Rate**

The unemployment rate in the Borough is higher than the regional and national averages. Take up of employment land is slow.

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**17. Educational Underachievement**

St Helens has a relatively low proportion of young people not in education, employment or training (compared to the national average).

However, there are low levels of educational attainment and skills.

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**18. Transport and Accessibility**

Although travel times by walking and public transport to key services are lower than regional and national averages, a significant proportion of people in St Helens do not have access to a car. When coupled within low levels of access to public transport provision (for example in the more rural areas) this can result in difficulties in accessing services and facilities.

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## 2.3 SA Framework

2.3.1 Table 2.2 sets out the twenty SA objectives that have been established as a result of the scoping process. The SA objectives have been grouped into eleven SA Topics to present the findings more succinctly and avoid duplication (where objectives are very similar or complimentary). Appendix I sets out the SA Framework in full, which contains a number of sub-criteria and indicators for each SA Objective. Appendix I also indicates how the SA objectives link to the environmental topics which are included within Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004).

*Table 2.2: SA topics and objectives*

SA Topic	SA ref	SA Objectives
1. Biodiversity and geodiversity	1	To protect and enhance biodiversity and geodiversity
2. Land quality	2	To protect and improve land quality in St Helens
3. Traffic, congestion and air quality	3	To improve air quality in St Helens
	19	To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.
4. Natural resources	4	To maintain and enhance the quality of controlled waters and to sustainably manage water resources.
	11	To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered
5. Climate change and energy	5	To mitigate and adapt to the impacts of climate change
	10	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources.
6. Flooding	6	To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.
7. landscape	7	To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.
8. Built and natural environment	8	To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment.
9. Health and wellbeing	9	Ensure access to and protection and enhancement of high quality public open space and natural greenspace.
	12	To improve health and reduce health inequalities.
	17	To reduce poverty and social exclusion.
	20	To improve access to and use of basic goods, services and amenities in town and local centres.
	18	To reduce crime, disorder and the fear of crime.
10. Economy and employment	13	To improve the education and skills levels of the population overall
	14	To ensure local residents have access to employment opportunities.
	15	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.
11. Housing	16	To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough.

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# **Consideration of alternatives**

**03**

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## 3 CONSIDERATION OF ALTERNATIVES

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### 3.1 Introduction

3.1.1 A critical stage of the SA process is the consideration of alternative approaches and options for delivering the objectives of the Plan.

3.1.2 Appraisal of reasonable alternatives allows for a fair comparison of different strategy, policy approaches and site allocations to be undertaken. The findings of the appraisal can then help to inform decisions about the preferred Plan approaches.

3.1.3 An important aspect of an effective SA is to help stakeholders (such as businesses, communities, developers and statutory bodies) understand the benefits, constraints and opportunities associated with different policy approaches / site options.

3.1.4 The Regulations<sup>1</sup> are not prescriptive in this respect, stating only that the SA Report should present an appraisal of the Plan and reasonable alternatives, taking into account the objectives and geographical scope of the Plan.

3.1.5 Alternatives have been explored for the following Plan elements:

- The spatial strategy (housing and employment growth and distribution);
- Alternative site options for housing and employment; and
- Consideration of other policy options

3.1.6 The following chapters deal with the alternative approaches that have been identified and assessed for each of the Plan elements listed above. Each of these chapters answer the following questions:

- **Background** - *This sets out the reasons alternatives have been considered.*
- **The reasonable alternatives** – *This describes the alternatives that have been considered and which are considered to be reasonable.*
- **What is the preferred approach and why has it been selected?** - *An explanation is provided as to why the preferred approach has been selected and why others have been rejected.*

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<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004



# **Alternatives appraisal: Spatial strategy**

**04**

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## **4 ALTERNATIVES APPRAISAL: SPATIAL STRATEGY**

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### **4.1 Introduction**

- 4.1.1 The need to prepare a new Local Plan has arisen in part due to by a lack of sufficient deliverable sites to meet the Borough's needs for employment and housing development.
- 4.1.2 An important part of the sustainability appraisal process has therefore been to explore reasonable alternative approaches by which these needs can be met. This has involved considering options covering both the overall quantum and distribution of employment and housing development.
- 4.1.3 The Interim Sustainability Appraisal which accompanied the Local Plan 'Preferred Options' (LPPO), published in December 2016, contained an initial appraisal of reasonable alternative strategic options. These options have subsequently been refined (as set out later in this section) as the Council has prepared the Local Plan Proposed Submission Draft (LPSD).

### **4.2 Identification of reasonable alternatives for employment**

- 4.2.1 A key driving factor behind the new Local Plan is to seek to meet the evidenced needs of St Helens for new employment development.
- 4.2.2 It has been calculated that St Helens has an objectively assessed need for at least 227.4 hectares of new employment development<sup>2</sup> to be delivered in the period 2012 to 2035. This figure is based upon evidence in the Employment Land Need Study Addendum Report (October 2017), adjusted so that it applies to the Plan period.
- 4.2.3 Taking in to account take up and losses of land since 2012, and an allowance of 9.3 ha for the existing supply of developable employment land; this leaves a residual plan requirement of 215.4 ha of employment land.
- 4.2.4 A further factor to be taken into account is the draft Strategic Housing and Employment Land Assessment (SHELMA) 2017. This identifies the substantial need for large scale B8 warehousing and logistics buildings (defined as over 9,000 square metres) for the City Region. It also identifies needs for other types of employment use within each of its constituent local authority areas.
- 4.2.5 Taking account of these factors, the need for flexibility in the site supply, and as one site in St Helens (at Omega South West) would contribute to meeting the needs of Warrington and not St Helens, the LPSD proposes to allocate 11 sites with a total combined area of 265.3 hectares for employment development..

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<sup>2</sup> Defined as uses falling within falling within Classes B1, B2 and/or B8 of the Town and Country (Use Classes) Order 1987 (as amended)

## Reasonable alternatives for employment growth

4.2.6 The Local Plan Preferred Options document (LPPO) (2016) proposed to allocate a total of 306.09 hectares of land for employment development i.e. a slightly higher provision than is now set out in the LPSD. No reasonable alternatives to this approach were identified at that stage. Therefore, only one option was tested in the interim SA published in 2016 - the provision of 306.09ha of employment land.

4.2.7 However, the Council has now re-considered this matter and identified the following 3 reasonable alternatives for the scale of employment land provision required, all of which have been appraised prior to the Plan being finalised for publication:

- Alternative 1 – ‘proposed approach’;
- Alternative 2 - ‘Low growth’ option; and
- Alternative 3 - ‘Higher growth’ option.

4.2.8 **Alternative 1** is the approach proposed in the LPSD (i.e. to deliver 265.3 ha of employment development). This includes allocations at the following sites:

1EA Omega South Western Extension, Land North of Finches Plantation, Bold (to meet employment land needs arising in Warrington)

2EA Florida Farm North, Slag Lane, Haydock

3EA Land North of Penny Lane, Haydock

4EA Land South of Penny Lane, Haydock

5EA Land to the West of Haydock Industrial Estate, Haydock

6EA Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock

7EA Parkside East, Newton-le-Willows

8EA Parkside West, Newton-le-Willows

9EA Land to the West of Sandwash Close, Rainford

10EA Land at Lea Green Farm West, Thatto Heath

11EA Gerards Park, College Street, St Helens Town Centre

4.2.9 **Alternative 2** is to plan for a lower level of growth (sufficient to deliver a minimum of 108.7ha of employment development). To calculate the scale of development required under this option, the following approach has been taken:

- Identify needs for employment uses other than large scale B8 in St Helens shown in the SHELMA (61.4 ha);
- Add in a seventh share of the sub-regional need (to reflect a notional share for St Helens as one of 7 constituent authorities within the SHELMA area) for large scale B8 identified in the SHELMA (397ha divided by 7 = 56.7ha); and
- Adjust the resultant figure to the Plan period (the SHELMA covers 2012 to 2037 whereas the employment needs figures in the Plan are for 2012-2035). This results in a minimum requirement of 108.7ha.

- 4.2.10 To assess the effects of alternative 2, assumptions have been made about which of the sites included in alternative 1 could be 'dropped' if alternative 2 were pursued, due to planning for a lower amount of employment growth.
- 4.2.11 Sites 7EA and 8EA ('Parkside East' and 'Parkside West') are related to the provision of a large scale employment site with the intention that it will support rail-enabled freight. This forms
- 4.2.12 which forms an important part of the overall strategy as it could deliver environmental benefits by diverting freight from road to rail. These sites are also of such size to make their delivery important even under this 'reduced growth' alternative. These sites have therefore been appraised as part of the second option, albeit to a smaller scale.
- 4.2.13 Sites 10EA and 11EA involve brownfield land in the urban area, and should therefore be included. Site 9EA is relatively small scale, has an extant planning permission and meets local needs to the north of the borough where there is little alternative growth. Therefore, this should also be included. Site 3EA is already under construction and Site 2EA has planning permission, and will therefore be included as a constant.
- 4.2.14 This leaves the following sites as locations where development could be scaled back.
- 4.2.15 Site 1EA (31.22 ha) is excluded from alternative 2, as (due to its location next to the boundary with Warrington) it is being proposed to meet needs outside of St Helens. However, further sites would also need to be excluded to scale back growth.
- 4.2.16 Sites 5EA and 6EA at Haydock are also excluded from alternative 2 as they do not have any existing planning permission and can be removed without jeopardising the delivery of the level of growth proposed in this option.
- 4.2.17 Alternative 2 therefore includes the following allocations, making a total of 131.64ha. This higher supply figure would allow a degree of flexibility in meeting the minimum requirement of 108.7ha under this option.
- 2EA Florida Farm North, Slag Lane, Haydock (36.67ha)
  - 3EA Land North of Penny Lane, Haydock (11.05 ha)
  - 4EA Land South of Penny Lane, Haydock (2.16 ha)
  - A scaled back total of approximately 70ha at Parkside (with further growth beyond the Plan period)
  - 9EA Land to the West of Sandwash Close, Rainford (6.96ha)
  - 10EA Land at Lea Green Farm West, Thatto Heath (3.85ha)
  - 11EA Gerards Park, Phases 2 and 3, College Street, St Helens Town Centre (0.95 ha)
- 4.2.18 **Alternative 3** reflects the approach that was proposed in the LPPO document in 2016, which proposed the provision of 306.09ha of employment land. This strategy involved all those sites allocated under alternative 1, with the addition of a further site allocation on land next to Junction 23 of the M6, north of the East Lancashire Road. It also proposed a higher level of growth after the end of the Plan period at Omega South.

4.2.19 An appraisal of these alternatives for employment growth is presented in **Appendix IV**.

#### Unreasonable alternatives for employment growth

4.2.20 Two other alternatives for the overall levels of employment growth were found to be unreasonable at the LPPO stage in 2016. For reasons which are set out below these options are still rejected by the Council and they have therefore not been subject to the full sustainability appraisal process.

*Rejected alternative: Provide significantly less employment land than identified objectively assessed needs*

4.2.21 *Reason for Rejection:* This alternative is not precisely defined. In addition it would (particularly given the lack of any agreement with any other district to help meet needs arising in St Helens) fail to comply with the NPPF which requires the Plan to provide a strategy which, as a minimum seeks to meet the area's objectively assessed needs. This alternative would not proactively encourage sustainable growth and inward investment to the Borough and therefore economic demand and creation of new jobs would not be realised in St. Helens. This would result in slower growth in the Borough's economy.

*Rejected alternative: Provide significantly more employment land than the identified employment land requirement*

4.2.22 *Reason for Rejection:* This alternative is not precisely defined. In addition, it could lead to a significant over-supply of employment land which could result in pressure for more housing, create labour supply difficulties and could therefore result in unsustainable levels of in-commuting. It could also result in a large over-supply of development land, which could cause many of the allocated sites to remain vacant and/or undermine the delivery of employment land in neighbouring authorities.

#### Reasonable alternatives for employment land distribution

4.2.23 With regards to the distribution of employment land, the Council appraised a range of reasonable site options for employment (see Section 6). Alongside this 'bottom-up' evidence, the Council also explored strategic approaches to the provision of employment land.

4.2.24 To a certain extent, the distribution is determined by the availability of suitable sites for the delivery of high quality employment sites that are attractive to the market. In the main, these are located on sites close to key road junctions such as the M6 (Junctions 23 and 22), and the M56 (Junctions 7 and 8). The choice is therefore largely based upon which of these sites (both individually and in combination) perform against a range of factors.

4.2.25 The employment growth alternatives discussed in Section 4.2 are based upon this broad approach, which focuses on attractive, accessible sites in key locations.

#### Unreasonable alternatives for employment distribution

4.2.26 A number of other strategic approaches were explored by the Council, but these were ultimately discarded as being unreasonable alternatives.

### *Rejected alternative: Increased employment land within the west of the Borough*

4.2.27 This alternative is considered to be unreasonable by the Council.

4.2.28 There are insufficient suitable sites available within the western part of Borough to deliver a sufficient quantum of high quality, deliverable employment land. Although some sites in the western part of the Borough have links to the A580 and towards the M57/Kirkby, the sites are unlikely to be as attractive to the market as those with stronger links to the M6. Furthermore, the sites which have been put forward for consideration in the western part of the Borough do not generally perform sufficiently well in the Green Belt review, deliverability and/or wider sustainability terms to constitute a distinctly definable reasonable strategic alternative (see the St Helens Green Belt Review 2018 for further details).

### *Rejected alternative - Increased employment on brownfield land in the urban area*

4.2.29 This alternative is considered to be unreasonable by the Council.

4.2.30 Although the Council is supportive of development in the urban area on suitable employment sites, there is insufficient land available of the right type and quality in these areas to meet identified needs. In this context, developable supply of employment land in the current urban areas in St Helens (i.e. which do not currently form part of the Green Belt) as at 1 April 2018 was 23.76 hectares. This compares to the identified need for 227.4 hectares to be provided between 2012 and 2035.

4.2.31 Even if the reduced growth option of 108.7 hectares were pursued (Alternative 2 as referred to in paragraphs 4.2.9 - 4.2.17 above) the urban land supply would deliver less than one quarter of the identified need. Furthermore, no nearby local authority has identified any surplus capacity within its current urban area(s) which could help meet the employment land needs of St Helens. All neighbouring districts have recently or are in the process of reviewing their Green Belt to meet their own employment and housing development needs.

4.2.32 Furthermore, brownfield sites in the existing urban area are generally not suitable to help meet the substantial need for large scale logistics development (to provide large units of over 9,000 square metres), which generally require large flat or gently sloping sites close to motorway and/or rail connections. It would not be possible to adequately meet the economic objectives of the Local Plan or contribute adequately to sub-regional needs, solely through a focus on smaller sites in the urban area.

4.2.33 Furthermore, the preferred approach (set out in the LPSD) in any event maximises the contribution that deliverable urban brownfield sites can realistically be expected to make to meeting needs.

## **4.3 Identification of 'reasonable alternatives' for housing**

### Housing growth

4.3.1 The delivery of sufficient housing to meet local needs is a key objective of national planning policy and of the Local Plan. Given this context the sustainability appraisal has considered a range of growth scenarios, which have been identified through the following process:

Step 1. identify a range of scenarios / options for the overall level of housing growth (see paragraphs 4.3.2 to 4.3.15 below);

Step 2. identify a range of scenarios / options for the distribution of housing growth (see paragraphs 4.3.16 to 4.3.27 below); and

Step 3. Consider the outcomes of steps 1 and 2 together to identify reasonable combined growth and distribution alternatives (see paragraphs 4.3.28 to 4.3.32 below).

Scenarios for the overall level of housing growth

4.3.2 The starting point when assessing different approaches to the overall level of housing growth to be proposed is to establish the full objectively assessed housing need (FOAHN). The FOAHN was initially identified in the Mid-Mersey Strategic Housing Market Assessment (2016) as being for 451 new dwellings to be completed per year. This assessment took account of economic factors and affordable housing requirements.

4.3.3 Different levels of housing growth were explored from an early stage in the preparation of the Plan, and three initial scenarios were tested in the interim SA Report which accompanied the LPPO document in 2016. These approaches are set out as scenarios A, B and C in table 4.1 below.

*Table 4.1: Scenarios for the housing growth considered at LPPO stage (2016)*

Growth scenario	Rationale
<b>'Lower' levels of growth</b>	This scenario was not defined in detail at LPPO stage. However it was rejected as the Council considers that housing growth below the FOAHN would not meet local housing needs, be contrary to national policy and would therefore not be a reasonable alternative given that a key objective of the plan is to support economic growth and housing delivery.
<b>Scenario A (451 dwellings per annum)</b> Meeting FOAHN	This was identified as a valid option at LPPO stage, as it represented evidence that St Helens should plan for a minimum of <b>8,569</b> homes from 2014 to 2033 (451 dwellings per year).
<b>Scenario B (570 dwellings per annum)</b> The preferred approach at LPPO stage  (FOAHN of 451 per annum plus a 20% buffer for flexibility)	This scenario incorporated an uplift of just over 20% applied directly to the FOAHN (an increase to 541 per year) to take account of: <ul style="list-style-type: none"> <li>• the Borough's ambitions to continue stabilising and increasing the population;</li> <li>• allow for more housing choice and competition so more households can afford to form, allow for significant economic growth; and</li> <li>• to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession.</li> </ul> A further requirement of 29 units per annum was added to accommodate the demolitions and round the figure up to 570 dwellings per annum ( <b>10,830</b> )

<p><b>Scenario C (712 dwellings per annum)</b> FOAHN plus 60% buffer for flexibility and additional 'contingency'</p>	<p>This scenario would set the housing requirement at 712 dwellings per annum (<b>13,528</b> in total), which is approximately 25% above the figure of 570 promoted at Preferred Option stage and set out in the current Core Strategy. This additional uplift would:</p> <ul style="list-style-type: none"> <li>• Further support additional economic growth, make homes more affordable and, encourage household formation.</li> <li>• Provide a buffer should the SHELMA identify a higher level of housing need for the Borough or the housing market area.</li> </ul> <p>Meet additional unmet need that might arise from other authority areas in the sub-region.</p>
<p>'Higher' levels of growth</p>	<p>It is considered <b>unreasonable</b> to test even higher levels of growth that are not based upon evidence of needs.</p>

4.3.4 At the preferred options stage, the housing target was set at a minimum of 570 dwellings per annum between 2018 and 2033 (a total of 10,830 dwellings). This included a total of 4,093 homes on allocated housing sites over the Plan period.

4.3.5 The target of 570 was derived by taking what was then identified as the full objectively assessed housing need of 451 dwellings per annum, but uplifted to take account of the Council's ambitions to allow for more housing choice, to support significant economic growth, and to reflect the high levels of house-building achieved in previous years.

Steps taken to reconsider the options for housing growth (after the LPPO stage)

4.3.6 Two significant changes in circumstances have occurred since 2016 which have made it important to reconsider the reasonable alternative levels of housing growth. These new circumstances are discussed in turn below.

1. Firstly, the Strategic Housing Market Assessment for St Helens has been updated by GL Hearn (2018). This considers a range of projected levels of housing growth based on different assumptions about economic growth and related matters. Of the different potential OAHN figures presented in the SHMA Update the figure of 486 dwellings per annum is considered to be the most realistic as it is specifically linked to the quantum of employment development proposed in the emerging Plan and is based on realistic assumptions for example about jobs growth and economic activity rates.

2. The Government has introduced its standard method for identifying housing needs. The application of this method using the most recent (2016 based) household projections published by the Office for National Statistics gives an annual need figure of 383 dwellings per annum for St Helens. However, the Government has confirmed (in consultation proposals published in late 2018) that the 2014 based – and not the 2016 based – projections must be used. Applying the method in this way (and extending the calculation to cover the full Plan period in line with national guidance) gives a need figure of 468 dwellings per annum over the Plan period.

4.3.7 In the light of these changes to the evidence base, and the reliance upon a substantial amount of Green Belt land to deliver the higher scale of growth proposed in the LPPO document, the Council has deemed it appropriate to amend the housing target. The proposed approach is set out in Policy LPA05 as follows:

*In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.*

4.3.8 It is important to ensure that the growth options (scenarios) tested in the SA at the LPPO stage remain appropriate and relevant in the context of this new evidence (and the revised Plan target). The Council therefore worked with the SA Consultants AECOM to establish reasonable approaches to growth at this stage of plan-making.

4.3.9 Given the uncertainty about the Government's standard method outputs at this stage, this is not a straightforward process.

4.3.10 However, a key factor is the Government's requirement for the Plan to cater for housing needs which at least meet those identified using its standard method. As set out in paragraph 4.3.6(2) above, the current output of this method (if applied in line with the Government's recent consultation proposals) provides an indicative figure of 468 dwellings per year. Furthermore, there are no agreements in place with any neighbouring district to help meet St Helens housing needs.

4.3.11 No other reason has been identified which could justify a failure to meet needs in line with the Government's method. It is therefore considered that the lowest level of growth to be tested should not be significantly less than the output of the standard method as currently proposed by the Government (468 dwellings per annum). Whilst the original growth Scenario A (451 dwellings per annum) is below this figure it is sufficiently close to it to retain it as a reasonable baseline for the purposes of the sustainability appraisal. The original Scenario A (451 dwellings per annum) is therefore retained and forms the lowest of the reasonable alternative housing growth scenarios.

4.3.12 The original growth scenarios B and C (570 and 712 dwellings per annum) are also still considered to be reasonable alternatives for the purposes of the sustainability appraisal.

4.3.13 The revised OAHN figure derived using the growth scenario identified by GL Hearn (486 dwellings per annum) is only 665 dwellings more in total over the Plan period when compared to growth scenario A (451 dwellings per annum). However, depending upon the distribution of growth it could have differential effects on certain sustainability factors (particularly if this was focused in one particular area). Therefore, it is considered helpful to appraise a fourth growth scenario (D) in addition to those explored at LPPO stage, which would plan for the delivery of 486 dwellings per year.

4.3.14 Realistically, this would require an 'over allocation' on green belt sites, as well as making allowance for non-delivery and other issues on SHLAA sites that are expected to come forward. With regards to green belt land release, for this option it would require slightly more than for Scenario 1 to account for the additional supply required.

4.3.15 The four reasonable scenarios for the overall level of growth are therefore:

- Scenario A – 451 dwellings per annum
- Scenario B – 570 dwellings per annum
- Scenario C – 712 dwellings per annum
- Scenario D – 486 dwellings per annum

Options for the distribution of housing development

4.3.16 In order to understand the implications of different levels of housing growth, it is important to establish where development would be directed.

4.3.17 Determining the distribution of housing growth involves consideration of strategic objectives, as well as the availability of suitable land. To help establish the preferred approach the Council has explored a variety of alternative distribution strategies. Those that are considered to be reasonable are outlined in **Table 4.2**

4.3.18 Four distribution strategies were identified as reasonable at the 'Preferred Options stage (see 'distribution options 1 to 4 in table 4.2 below). Upon review of these options following consultation on the LPPO, they are still considered to be reasonable approaches to the distribution of housing land.

*Table 4.2: The reasonable options for the distribution of housing growth*

Distribution options	Rationale	Assumptions
1. Proportionate growth / greater dispersal	<p>Each settlement takes a proportionate share of new housing development proportionate to current population size.</p> <p>All settlements make provision to meet the Borough's needs for development.</p> <p>Intensification of development in all settlements irrespective of infrastructure provision and capacity.</p>	<p>Growth would be broadly proportionate to current population size. Where sufficient sites have not been put forward to achieve this, there would be redistribution to nearby settlements with surplus capacity. This would see substantially less growth in Bold, and slightly reduced growth for Earlestown, Eccleston and Haydock. Conversely, there would be an increase in growth in/around Rainhill, Sutton, Rainford, Moss Bank, Billinge, Garswood.</p>
2. Balanced growth	<p>Regeneration of the main urban area but with increased distribution of development to settlements with deliverable sites, new employment allocations and adequate services and facilities.</p>	<p>Seeks to ensure the vitality of settlements is retained, reflecting constraints, but also take advantage of economic opportunities. Spread of development as per LPPO Policy LPA02.</p>

Distribution options	Rationale	Assumptions
3.Focus housing growth close to employment opportunities along key transport routes	Cluster new housing growth around existing settlements along the M6 and M62 corridor to compliment employment allocations.	This would see higher levels of growth at key settlements in close proximity to the M6/M62 strategic junctions such as Haydock (M6/A580), Newton-le-Willows (M6/M62) and Earlestown and Bold/Rainhill (M62). Conversely, there would be lower levels of growth at settlements to the north of the Borough such as Billinge, Rainford, and to the west at Ecclestone.
4.Limited Green Belt dispersal and focus on large scale Sustainable Urban Extension	Limited dispersal to existing Green Belt sites on the edge of main settlements and focus majority of Green Belt release in large scale Sustainable Urban Extension	This would see a large volume of new housing (circa 2200 units) focused in a sustainable urban extension to the south east of the Borough at proposed safeguarded site Bold Forest Garden Suburb (HS03).
5.The proposed strategy  Balanced growth, close to employment opportunities with a longer term aspiration to deliver a garden suburb	The proposed strategy does not neatly correspond with just one of the original distribution alternatives. It is reasonable for Plans to evolve, and for the distribution of growth to be tweaked in response to evidence. It is helpful to present an appraisal of the final strategy alongside the original spatial alternatives to compare its performance in sustainability terms.	This approach most closely reflects the balanced approach, as it seeks to provide a range of housing sites across the Borough. However, housing growth is skewed more towards the south of the borough, reflecting opportunities for employment growth. There is also a greater amount of housing in the urban area itself compared to Scenario 2. Though the approach involves the allocation of a large urban extension at Bold, the expected delivery in the plan period is relatively low and so it differs from distribution option 3 in this respect.

4.3.19 There are elements of the spatial strategy that are common to each option, for example: Each option makes the same allowance for completions (1,989 dwellings between 1 April 2016 and 31 March 2020) and for windfall development. Brownfield land redevelopment is presumed to be maximised for each option, delivering key sites in the urban area where possible

#### Unreasonable distribution options

4.3.20 Several options that were explored were found to be unreasonable, and have therefore not been tested in the SA. These are discussed briefly below.

*Rejected Option 1: Do not release any land from the Green Belt to meet the housing and employment needs of the Borough for the Plan period or for Safeguarded land for the period following it.*

4.3.21 Under this approach, development would be restricted to brownfield and greenfield in the urban area only, thereby maximising housing delivery on urban sites and including an increased pressure to re-allocate land from other uses.

- 4.3.22 Neighbouring authorities would be asked to make up shortfalls, including the provision of affordable housing.
- 4.3.23 The Council set out detailed reasons for rejecting this option in the 'Preferred Options' document (LPPO). In summary, this option has a significant risk of not meeting identified needs for market and affordable housing and employment land, leading to residents having to move out of the Borough to meet their housing needs, harming communities.
- 4.3.24 Furthermore, if housing growth was to be pushed to higher densities and on greenfield land in the urban areas, it could lead to significant effects with regards to infrastructure provision, the loss of recreational land, and changes to the character of the built environment.

*Rejected Option 2: Use brownfield and greenfield land in the urban areas, plus limited release of sites that have the least impact on the Green Belt, rather than attempting to ensure a spread of housing sites around the settlements and locating employment sites close to where locational requirements and market demand is.*

- 4.3.25 This scenario was discounted at Preferred Options stage, because of difficulties in ensuring a distribution of housing sites to meet needs in all settlements across the Borough, the risk of creating unsustainable housing development patterns and reduced ability of the Borough to meet employment land need.
- 4.3.26 It was also considered that this option might necessitate the loss of further open space in the urban area, which would lead to a reduction in the quantity and/or quality of recreational space in these areas.
- 4.3.27 Whilst the reasons for rejecting this option are still considered valid it should be noted that due to the reduced amount of housing development now required (486 dwellings per annum compared to the figure of 570 per annum proposed at LPPO stage) the amount of Green Belt release for housing is now more limited in any event and will not (due to limitations on the availability of suitable sites) include a site allocation in all settlements.

#### Combining growth and distribution scenarios

- 4.3.28 The spatial strategy for the provision of housing is 'built-up' from different elements including the level and distribution of employment and housing land. Table 4.3 below sets out the four growth scenarios (A to D), and the distribution options that are considered to be reasonable at each level of growth. The combinations of growth and distribution which are considered to be reasonable are marked in bold. These are the detailed **reasonable alternatives** for the spatial strategy that have been appraised in the SA.

**Table 4.3:** The reasonable alternatives for housing growth and distribution

<b>A: Provide only for the originally identified OAHN (451 dpa*)</b>	<b>B: 20% buffer for flexibility (570 dpa*)</b>	<b>C: 712 dpa* for flexibility and additional contingency</b>	<b>D. Updated OAHN - 2018 (486 dpa)</b>
<b>A1. Proportionate growth</b>	<b>B1. Proportionate growth</b>	Proportionate growth	<b>D1. Proportionate growth</b>
<b>A2. Balanced growth</b>	<b>B2. Balanced growth</b>	<b>C1. Balanced growth plus new settlement</b>	<b>D2. Balanced growth</b>
<b>A3. Focus on transport routes</b>	<b>B3. Focus on transport routes</b>	<b>C2. Focus on south and a new settlement</b>	<b>D3. Focus on transport routes</b>
<b>A4. Focus on new settlement</b>	<b>B4. Focus on new settlement</b>	Focus on new settlement	<b>D4. Focus on new settlement</b>
N/A	N/A	N/A	<b>D5. The preferred strategy</b>

4.3.29 Under growth scenario A, there are four reasonable ways this level of growth could be distributed, ranging from ‘proportionate growth’ (Alternative A1), to ‘focus on new settlement’ (Alternative A4).

4.3.30 Under growth scenario B, all four of the approaches to distribution are considered to be ‘reasonable’, although it may become more difficult to maintain ‘proportionate growth’ (Alternative B1) than would be the case if ‘proportionate growth’ were pursued under scenario A. Due to the larger amount of development required under growth scenario B (compared to scenario A) the approach of focusing on a new settlement (Alternative B4) is likely to need to be supplemented by release of further sites from the Green Belt (compared to Alternative A4).

4.3.31 Under growth scenario C, the alternatives become more limited. It would be difficult to maintain a proportionate approach as some settlements do not have suitable sites to accommodate the required level of growth. Therefore, the ‘proportionate growth’ approach is not identified as a ‘reasonable alternative’ under this scenario. The approach of ‘focus on a new settlement’ would not be sufficient to meet needs under growth scenario C, and therefore this is not a reasonable alternative. It ought to be possible to still deliver a ‘balanced approach’, although this would involve much more growth and may need to include ‘a new settlement’, or a greater focus on opportunities within the south eastern part of the Borough.

4.3.32 Under growth scenario D, all four of the original approaches to distribution are considered to be ‘reasonable’, ranging from ‘proportionate growth’ (A1) to ‘focus on new settlement’ (A4). A fifth ‘reasonable alternative’ is also appraised at this scale of growth which is a variant of alternative D2. Despite having similarities to alternative D2, this appraisal has been presented to allow for a comparison between the final strategy and the initial options (reflecting amendments made to the strategy in light of consultation responses and new evidence).

## 4.4 Summary of appraisal findings

### Findings for the employment growth alternatives

- 4.4.1 Alternative 1 would not generate any significant effects, either positive or negative. However, it would achieve some minor benefits with regard to health and wellbeing and moderate effects with regard to support for the local economy. These positive effects could be achieved without notable effects upon environmental factors, and with good mitigation and enhancement, the residual effects across most sustainability topics would be neutral. For some factors, minor negative effects would be unavoidable and permanent, so negative effects would remain such as a loss of agricultural land and changes to the setting of heritage assets.
- 4.4.2 Alternatives 2 and 3 present a different picture, as they would help to deliver strategic employment needs and would have more pronounced effects overall.
- 4.4.3 Alternatives 2 and 3 are both predicted to have significant positive effects with regard to employment, tackling deprivation and health and wellbeing. For alternative 3, this could be a major positive effect. However, positive effects would come at the expense of greater impacts upon the natural environment. For the most part, the effects would still not be significant, but they would be more notable than for alternative 1. For example, there would be increased risk of flooding, and greater potential for impacts to landscape, cultural heritage and amenity.
- 4.4.4 There would also be likely to be effects upon traffic and congestion, which could potentially be significant in the short to medium term as a result of increased construction activities and trips to new employment sites, which would be difficult to fully mitigate. However, it should be possible to limit most sustainability effects on sensitive receptors by requiring effective mitigation and enhancement measures to be implemented. The effects for alternative 3 on traffic and congestion would be potentially major though.
- 4.4.5 More notable effects are predicted with regards to biodiversity and soil for both alternatives 2 and 3, and for only alternative 3, potential significant effects on landscape also.
- 4.4.6 Provided that a proactive and effective approach is taken to managing the development process, alternative 2 is considered to be the approach which would most effectively meet the aims of the Plan. However, this is reliant upon necessary infrastructure improvements being delivered in advance of development being brought into use and on green infrastructure being protected and enhanced where necessary to mitigate impact upon multiple factors such as wildlife, water quality, flooding, landscape and cultural heritage.
- 4.4.7 Though alternative 3 could generate further positive effects with regards to the economy, it would generate more pronounced negative effects on traffic and congestion, and landscape (compared to alternative 2).

### Findings for the housing growth/distribution options

- 4.4.8 The detailed appraisal of the reasonable alternative options for housing growth and distribution is set out in **Appendix iii**.
- 4.4.9 Overall, the lower growth alternatives under scenario A would have the fewest significant effects.

- 4.4.10 Whilst this might be favourable from an environmental perspective, this scenario would not take full advantage of opportunities for economic growth and social development.
- 4.4.11 The alternatives under scenario D (486 dpa) would have positive effects on health and wellbeing, housing and economy, which would be broadly greater than those from the equivalent alternatives under scenario A. This is particularly the case for the 'proportionate growth' and the 'balanced growth' options. The potential for negative effects increases at this scale of growth, but only marginally so. The most notable changes are in terms of landscape, heritage and biodiversity.
- 4.4.12 In terms of distribution, Alternatives s D1 and D2 spread the benefits of development more evenly, and so are also less likely to have significant negative effects in any one area. This contrasts with alternatives s D3 and D4, which would have major positive effects on housing and would benefit some communities greatly, but would increase the potential for localised negative effects such as congestion.
- 4.4.13 At a higher level of growth (570 dpa), the positive effects for each alternative (B1-B4) are broadly greater than for the comparative alternatives s under scenario A and scenario D. This higher level of growth would therefore be more attractive in terms of tackling deprivation and boosting economic growth which is a key aim of the Plan. However, at this level of growth the potential for negative effects on environmental factors increases. For the most part, these are minor negative effects, but the 'proportionate growth' and 'focus on south east' options would have significant effects with regard to heritage and landscape.
- 4.4.14 The higher growth scenario alternatives C1 and C2 would have very positive and significant effects in terms of driving housing and employment growth. However, this would be at the expense of significant negative effects upon landscape, heritage, agricultural land and air quality. This would be the case regardless of distribution. Furthermore, it is uncertain whether infrastructure could cope with this level of development, which could lead to negative effects on the transport networks, water quality and access to services such as health and education.

#### **4.5 Outline reasons for selecting the preferred approach (in light of alternatives)**

##### Reasons for the selection of the preferred level and distribution of employment growth

- 4.5.1 The St. Helens Borough Local Plan Proposed Submission Draft (LPSD) proposes to allocate 265.3 hectares of land for employment development i.e. to follow employment growth alternative 1 (as identified in paragraph 4.2.8). When added to the existing supply on 'non-allocated' sites this approach would (unlike alternative 2) meet identified objectively assessed needs (of 227 hectares). It would also offer flexibility without triggering potential sustainability issues which the release of a significant amount of over-supply (under alternative 3) could generate.
- 4.5.2 The proposed approach would also deliver a substantial proportion of sub-regional employment land needs for strategic distribution uses as identified in the SHELMA and enable one site (at Omega South West) to be brought forward which helps to meet Warrington's needs.

- 4.5.3 Also of particular importance is the need to ensure that the necessary infrastructure improvements are in place before development is progressed. For example, there is a need to upgrade Junction 23 of the M6 to tackle existing problems and support additional growth. This is a primary reason that additional development at J23 as proposed in the LPPO (on land north of J23) is now identified as safeguarded land (Site ES2), rather than an allocation within the plan period. Alternative 1 (unlike alternative 3) would respond to this critical infrastructure need.

#### Reasons for the selection of the preferred level and distribution of housing growth

##### *Growth Scenario A: 451 dwellings per year*

- 4.5.4 All four alternatives under growth scenario A have been rejected by the Council, in the main due to the inadequate amount of growth in housing involved. The Council consider that the alternatives appraised under this scenario (i.e. options A1 to A4):
- fail to provide a sufficient quantum of housing to meet needs;
  - do not reflect the Borough's ambitions to continue stabilising the population,
  - do not allow for more housing choice and competition so more households can afford to form;
  - do not include sufficient allowance for significant economic growth; and
  - fail to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession.

##### *Growth Scenario B: 570 dwellings per year*

- 4.5.5 A housing requirement of 570 dwellings per annum is no longer the preferred approach (as it was at LPPO stage).
- 4.5.6 The Council has considered whether a housing target as high as 570 dpa should still be used. This could be achieved by releasing more land from the Green Belt.
- 4.5.7 However, this would not be justified by the evidence of need and would lead to excessive release of Green Belt land in the Borough, contrary to the requirements of national policy seeking to protect the openness and purposes of the Green Belt.
- 4.5.8 Of the distribution options at this scale of growth, alternative B2 is considered to be the least inappropriate. This is because it allows for additional new housing to be provided in every Key Settlement, taking into account constraints and opportunities. This approach would also ensure that all communities have access to new market and affordable housing. However, as outlined above, there is insufficient evidence to support the level of Green Belt release required under scenario B, and the environmental implications at this scale of growth are broadly more negative when compared to growth scenario D (the preferred level of growth).
- 4.5.9 Alternative B1 'proportionate growth' is also inappropriate because the Green Belt assessment did not identify enough land as being suitable for release from the Green Belt to enable such a distribution. Furthermore, there is insufficient data on housing needs per settlement to justify releasing sites from the Green Belt around each settlement to meet these needs rather than being primarily led by suitability for release from the Green Belt.
- 4.5.10 Alternative B3 is also inappropriate because there is unlikely to be enough suitable Green Belt land in the Haydock and Newton-le-Willows areas to meet both

employment and housing needs, leading to less suitable land (in Green Belt release terms) being released, potentially leading to merging of settlements . This may also lead to harmful impacts on local shared infrastructure (i.e. roads). If land was restricted to that with the least Green Belt impact, then there would not be enough land to meet the housing target.

- 4.5.11 Alternative B4 has also been rejected as it would lead to a concentration of housing that would place an excessive strain on local infrastructure and provide a limited choice of location for new housing.

*Growth Scenario C: 712 dwellings per year*

- 4.5.12 Both alternatives C1 and C2 have been rejected by the Council. Given the high scale of growth, this would not be justified by the evidence of need and would lead to excessive release of Green Belt land in the Borough, contrary to the requirements of national policy seeking to protect the openness and purposes of the Green Belt.

- 4.5.13 A 712 unit per year target is substantially above the amount of housing achieved in past years and it is likely that the local housing market and infrastructure would struggle to absorb this number of dwellings, and that the development industry would struggle to supply this level of housing.

- 4.5.14 It is also unlikely that, with a target of 712 dwellings per annum, a five year land supply could be maintained for a number of years at the start of the Plan period, reducing planning control over development. The quantum of new housing required could lead to unsustainable commuting patterns if not well connected to new jobs being created and existing jobs.

*Growth Scenario 4: 486 dwellings per year (with built-in flexibility)*

- 4.5.15 A central aim of national planning policy is to boost significantly the supply of housing.

- 4.5.16 When applying the Governments Standard methodology (using the 2014 household projections) the minimum annual housing need figure for St Helens is calculated at 468 new dwellings per annum.

- 4.5.17 However, this does not make allowance for increased housing need that is likely to result from accelerated employment growth. In addition the figure does not make any allowance for the risk that affordability data to be published in spring 2019 would, if it continues the long term trend, see a decline in affordability and therefore an increase in the amount of housing required under the standard method.

- 4.5.18 For these reasons, the figure of 468 new dwellings per annum is considered to under-estimate housing need.

- 4.5.19 The St Helens Strategic Housing Market Assessment (SHMA) Update 2018 assessed different scenarios to identify the realistic level of housing which is likely to be required, taking account of the impact that development of the employment sites proposed to be allocated within the Plan would have on the housing market. Having regard to this evidence, Policy LPA05 'Meeting St Helens Housing Needs' identifies a minimum average housing need figure of 486 net dwelling completions per year (between 2016 and 2035). This equates to a total of 9,234 dwellings within this period.

4.5.20 Having regard to these factors, the LPSD proposes to pursue growth scenario D (486 dpa).

*Distribution of housing*

4.5.21 The preferred approach to the distribution of housing is Alternative D5, which is a variant of Alternative D2. Outline reasons as to why this is the preferred strategy are provided below.

4.5.22 To meet the Plan's aims the spatial strategy directs new development to sustainable locations which are appropriate to its scale and nature, and which will enable good accessibility between homes, jobs and key services.

4.5.23 The strategy also seeks to prioritise the regeneration of deprived areas and focus most new housing where it will re-use previously developed land in existing Key Settlements.

4.5.24 The strategy will support economic growth by strengthening St Helens and Earlestown town centres, protecting existing employment areas and enabling the growth of the expanding distribution sector on large sites close to strategic roads and railways. St Helens is uniquely placed to help accommodate the growth needs of the logistics sector which have been recognised across the Liverpool City Region as a whole.

4.5.25 With regard to specific allocation of land for housing, the Council's evidence concerning housing needs applies to the Borough as a whole rather than to individual settlements. The housing market operates on a 'larger than individual settlement' basis. For this reason, the distribution of housing growth between settlements is guided to a substantial extent by the distribution of suitable sites.

4.5.26 The distribution of suitable sites is in turn primarily guided by the availability of developable sites within existing urban areas and (for potential expansion of the urban areas) the findings of the St Helens Green Belt Review (GBR) 2018. Other important factors that have guided the strategy include (for example): the requirements of national policy and guidance; the sustainability appraisal; Habitat Regulations Assessment (HRA); and relevant evidence such as the Employment Land Needs Study, Economic Viability Assessment (EVA) and the Transport Impact Assessment.

4.5.27 The GBR assessed sites for potential release from the Green Belt against a robust methodology which takes account of the contribution that the sites currently make to the Green Belt, transport accessibility, infrastructure provision, and a wide range of other deliverability and planning considerations. A number of different strategies have been tested by the Council as to how Green Belt land could be released.

4.5.28 The Review identified that the large urban extension proposed at Bold forms a major opportunity to contribute to the balanced growth of the Borough, with good accessibility to jobs and services and high levels of compliance with other aspects of the Green Belt Review methodology. The Green Belt Review also identified a range of smaller sites across the Borough which are suitable to be released from the Green Belt to help meet housing needs.

4.5.29 The Council has considered other alternatives to determine how housing growth should be distributed at the preferred level of growth (i.e. Scenario D). However, all other alternatives would involve the delivery of sites which are considered to be less suitable in terms of the criteria set out in the GBR document, without sufficient

justification in terms of the distribution of needs across the Borough. Each discarded alternative (at the preferred level of growth) explored in the SA is discussed in greater detail below:

*Proportionate distribution (Alternative D1)*

- 4.5.30 In addition to the reasons already outlined (in paragraphs 4.5.21 to 4.5.29 above), this alternative has been discarded as it would lead to greater growth at settlements that are less well placed to take advantage of economic expansion.

*Focus on transport corridors (Alternative D3)*

- 4.5.31 This approach would lead to a proliferation of development along the M6 corridor and M62 corridor, which would put substantial pressure upon the settlements of Haydock, Earlestown and Newton Le Willows in particular. There would be a requirement to release Green Belt land of higher value/functionality, and greater pressure on road networks that would be difficult to mitigate in the Plan period

*Focus on a new settlement (Alternative D4)*

- 4.5.32 Whilst a new suburb at Bold forms part of the proposed strategy, this will form a large extension to the existing built up area rather than being a free standing settlement. It is also expected that delivery of housing at this location will start towards the latter part of the Plan period up to 2035, with most of the development being delivered after then.
- 4.5.33 Under this distribution alternative, there would be a greater reliance on delivery from a new settlement in the Plan period. This would potentially make the achievement of housing needs more uncertain and reliant upon large scale infrastructure. The achievement of a 5 year supply of housing would also be more difficult. From a sustainability perspective, this option performs relatively well in some respects as the land has relatively low sensitivity. There would also be potential for green infrastructure enhancements, which could have multiple benefits.
- 4.5.34 However, it would not spread the benefits of growth across the district, and is not considered to be an appropriate or deliverable strategy in the immediate future.



# **Alternatives appraisal: Policies**

**05**

## 5 ALTERNATIVES APPRAISAL: POLICY OPTIONS

### 5.1 Introduction

- 5.1.1 A number of policy options (listed in table 5.1) below are predominantly procedural in nature and/or are not sufficiently discrete or precisely defined to allow for a meaningful appraisal in the SA.
- 5.1.2 Whilst these options are helpful to guide the plan-making process towards preferred policy approaches, an SA of all these types of options would not be proportionate or helpful to the decision making process. For this reason, they have not been treated as ‘reasonable alternatives’ and have therefore not been subject to detailed appraisal.

*Table 5.1: Options relating to detailed policy matters that are not deemed to be reasonable alternatives in the SA*

Plan element / policy	Options
<b>Development principles (policy LPA03)</b>	<ol style="list-style-type: none"> <li>1. Have a more prescriptive policy</li> <li>2. Selection of alternative development principles</li> </ol>
<b>Transport and travel (policy LPA07)</b>	<ol style="list-style-type: none"> <li>1. Rely on policies contained with the NPPF and the Third Merseyside Local Transport Plan</li> </ol>
<b>Infrastructure delivery and funding (policy LPA08)</b>	<ol style="list-style-type: none"> <li>1. Introduce an infrastructure tariff</li> <li>2. Have no policy on planning obligations in the Local Plan</li> </ol>
<b>Green Infrastructure (policy LPA09)</b>	<ol style="list-style-type: none"> <li>1. Do not plan for the protection or enhancement of the Borough’s green infrastructure network.</li> </ol>
<b>St Helens Town Centre and Central Spatial Area (policy LPB01)</b>	<ol style="list-style-type: none"> <li>1. Do not identify ‘Areas of Opportunity’ for growth and accept decline in retail market share, encouraging diversification to other uses including residential conversion of offices.</li> <li>2. Allow vacant and under-used land around the town centre for potential leisure and retail uses.</li> <li>3. Draw the town centre boundary closer to the north-west and designate Duke Street as a Local Centre.</li> </ol>
<b>Earlestown Town Centre (policy LPB02)</b>	<ol style="list-style-type: none"> <li>1. Continue to use the existing defined centre boundaries for Earlestown.</li> <li>2. Not to pursue a specific policy seeking the safeguard Earlestown as a Town Centre and instead rely on Policy LPC04 to control retail development and main town centre uses.</li> </ol>

Plan element / policy	Options
<b>Gypsy and Travellers (policy LPC03)</b>	<ol style="list-style-type: none"> <li>1. Not allocating a new permanent site at GTA01 and let existing vacant sites and sites with permission provide new supply by preventing their loss to other uses.</li> <li>2. Consider all brownfield sites in the SHLAA and Green Belt sites for use as permanent sites.</li> <li>3. Do not allocate a transit site as levels of encampments are below historic highs in the early 2000s.</li> </ol>
<b>Retail and Town Centres (policy LPC04)</b>	<ol style="list-style-type: none"> <li>1. Continue to use existing Town, District and Local boundary definitions as defined in the Core Strategy and the 2006 Local Centre Study.</li> <li>2. Do not set local thresholds for the impact test, instead relying on the default floorspace threshold in the NPPF of 2,500sq.m.</li> <li>3. Set intermediate floorspace thresholds (i.e. between those recommended in the St Helens Retail and Leisure Study 2017 and the NPPF default threshold of 2,500 sqm. for requiring an Impact Assessment</li> <li>4. Set policy criteria whereby proposals for small neighbourhood shops and services proposing 150sq.m gross floorspace or less in out of centre locations are not required to submit Sequential Assessments</li> </ol>
<b>Open space, sports and recreation (policy LPC05)</b>	<ol style="list-style-type: none"> <li>1. Do not have specific policy and rely on policies in the NPPF with regard to open space, sports and recreational buildings and land.</li> <li>2. Use alternative open space standards for the Borough; for example propose lower provision standards.</li> </ol>
<b>Biodiversity and geological conservation (policy LPC06)</b>	<ol style="list-style-type: none"> <li>1. Do not allow any development that could have an impact on a natural asset.</li> <li>2. Do not protect the Borough's biodiversity and geological assets.</li> <li>3. Seek lower ratio of mitigation for habitat loss, for example 2 for 1 replacement to reduce land requirement and impact on viability.</li> </ol>
<b>Greenways (policy LPC07)</b>	<ol style="list-style-type: none"> <li>1. Do not safeguard and enhance Greenways.</li> </ol>
<b>Ecological networks (policy LPC08)</b>	<ol style="list-style-type: none"> <li>1. Do not allow any development that could have an impact on a natural asset.</li> <li>2. Do not protect the Borough's ecological networks</li> </ol>
<b>Landscape protection and enhancement (policy LPC09)</b>	<ol style="list-style-type: none"> <li>1. Do not protect landscape character.</li> </ol>
<b>Trees and woodland (policy LPC10)</b>	<ol style="list-style-type: none"> <li>1. Do not protect trees and woodland</li> </ol>

Plan element / policy	Options
<b>Historic Environment (policy LPC11)</b>	1. Do not plan for the protection, conservation, preservation and enhancement of the Borough's historic assets.
<b>Flood risk and water management (policy LPC12)</b>	1. Rely on the NPPF and the Planning Practice Guidance.
<b>Low carbon and renewable energy (policy LPC13)</b>	1. Implement a Borough-wide target for new development to meet a percentage of their energy consumption through renewable or low carbon sources. 2. Do not identify any areas in the Borough as being potentially suitable for wind energy development
<b>Minerals (policy LPC14)</b>	1. Identify Area(s) of Search and / or Preferred Area(s) for future primary mineral extraction. 2. Safeguard additional known mineral deposits of sand (including silica sand) and peat. 3. Delineate Mineral Safeguarding Areas to exclude urban (i.e. non Green Belt) areas.
<b>Waste (policy LPC15)</b>	1. Adopt a policy approach that diverges from the Joint WLP e.g. plan for more or less waste management facilities within St. Helens.
<b>Open space and residential development (policy LPC16)</b>	1. Do not require new development to provide incidental on-site open space provision or make contributions towards other open space in compensation where appropriate.

5.1.3 There are also options in the draft Plan that look at whether different methodologies could be used to determine development needs, and whether different thresholds should be used to determine housing targets.

5.1.4 These are largely technical issues, that should be dealt with in corresponding evidence studies such as the SHELMA and viability assessments. Appraising such alternatives would also be difficult and the findings would be very narrow in focus.

5.1.5 For example, the effect of different levels of viability threshold would largely be focused on how this might affect levels of housing and employment development. The effects on other factors would depend upon the extent to which certain policy requirements might need to be relaxed (e.g. green infrastructure and other enhancement measures).

5.1.6 It is considered to be disproportionate and unhelpful to appraise such options within the SA. The Council's conclusions upon the benefits of each option are provided in sufficient detail in the LPSD.

**Table 5.2:** Targets/needs based options which are not considered to constitute ‘reasonable alternatives’ in the SA

Plan element / policy	Options
<b>Housing mix (policy LPC01)</b>	<ol style="list-style-type: none"> <li>1. Do not have a policy requirement for applicants to refer to the latest SHMA when considering a suitable housing mix for a site.</li> <li>2. Do not have a policy that sets a requirement for the provision of lifetime homes and bungalows.</li> <li>3. Introduce a higher or lower unit threshold for the provision of lifetime homes and bungalows.</li> <li>4. Introduce a specific policy requirement for all new residential development over a certain unit threshold (e.g. 40 units) to supply a set percentage (e.g. 5%) of dwelling plots for sale to self or custom builders on the Borough's Self Build Register.</li> </ol>
<b>Employment land</b>	<ol style="list-style-type: none"> <li>1. Relaxation of policy protecting existing employment land</li> </ol>
<b>Affordable housing</b>	<ol style="list-style-type: none"> <li>1. Continue with the Core Strategy 30% affordable housing requirement across St. Helens (rather than have the varying requirements across different locations).</li> <li>2. Seek lower than 30% affordable housing provision on greenfield sites in Affordable Housing Zones 2, 3 and 4 (as defined in the LPPO<sup>3</sup>).</li> <li>3. Seek higher than 30% affordable housing provision on greenfield sites in Affordable Housing Zones 2, 3 and 4 (as defined in the LPPO).</li> <li>4. Seek higher than 10% affordable housing provision on brownfield land.</li> <li>5. Seek 10% affordable housing provision on all brownfield land.</li> </ol>

<sup>3</sup> NB: at Submission stage only three Affordable Housing Zones are identified



# **Appraisal findings: Site Options**

**06**

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## **6 APPRAISAL FINDINGS: SITE OPTIONS**

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### **6.1 Introduction**

- 6.1.1 The Council considers that there is a need to allocate sites for employment and housing land development in the Plan. This will help to ensure that housing and employment needs are met.
- 6.1.2 Part of the strategy is to maximise brownfield redevelopment. However, this approach will not meet the Borough's needs for housing and employment development, or provide the full range of different types of site which are required, for example by large scale logistics operators. . Therefore, there has been a need to consider Green Belt sites and whether they can make a contribution to these needs without having unacceptable effects on the Green Belt.
- 6.1.3 To identify potentially suitable land, the Council has undertaken several 'call for sites' exercises, the most recent of which was in January- March 2016.
- 6.1.4 Where owners have expressed an interest in their site(s) being developed, and the site falls outside the Green Belt, the Council has assessed their suitability for development. For potential housing sites, this has been done through the Council's regularly updated Strategic Land Availability Assessment (SHLAA) documents. For potential employment sites this has been done through the Council's monitoring of employment land supply. All Green Belt sites have been assessed in the St Helens Green Belt Review 2018.
- 6.1.5 The St Helens Green Belt Review has used a methodology in which parcels of Green Belt land were sieved out at different stages if they are not considered suitable for development. A number of sites were found to be un-suitable at Stage 1b (assessment against Green Belt purposes) whilst others were sieved out at Stage 2a (assessment against other prohibitive constraints). Sites which were sieved out were not progressed to Stage 2b ('Assessment of development potential within remaining parcels and sub-parcels') of the Green Belt Review.
- 6.1.6 The Council has taken account of the Green Belt Review methodology in defining the range of 'reasonable alternative' site options, in accordance with the approach set out below.

#### The site options

- 6.1.7 A total of sixty-two sites were identified as reasonable alternatives for housing development prior to the consultation on the Local Plan Preferred Options (LPPO) in 2016. The majority of these sites relate to discrete parcels of land; though some represent a combination of one or more pieces of land.
- 6.1.8 Two sites for Gypsy and Traveller accommodation were also identified.
- 6.1.9 A total of sixteen sites were identified as reasonable alternatives for employment uses. One further site for potential leisure use was identified.
- 6.1.10 Following the preferred options (LPPO) consultation, additional sites were identified as reasonable site options. These were identified as a result of the revised methodology for the Green Belt Review.

6.1.11 In terms of housing the Council took the decision that all sites which had passed through stages 1b and 2a, to stage 2b, would be appraised as reasonable alternatives.

6.1.12 It should be noted that several of the site options are variations of the same sites and have been included for completeness, to demonstrate how the different site options have been appraised as the Plan as progressed. Certain sites have therefore been included from the previous stage of plan-making (i.e. LPPO).

6.1.13 In terms of brownfield sites, the Council sought to demonstrate that previously developed land was considered seriously at this stage as well as greenfield sites.

6.1.14 With regard to employment sites, it was decided that sites that had scored 'high' for the purposes of Green Belt at stage 1b should also be tested as reasonable alternatives to ensure consistency (given that certain employment sites being proposed for allocation also fell into this category).

6.1.15 Each site option has been appraised against a site appraisal framework as set out in **Appendix II**.

6.1.16 The findings of the appraisal are summarised below in a series of matrices. Detailed proformas for each site option, including a map of the site location and boundaries are contained within **Technical Appendix A**.

## 6.2 Summary of site appraisal findings

6.2.1 Tables 6.1 and 6.2 below illustrate the scores for each site option against the site appraisal criteria.

*Table 6.1: Employment site options*

Aecom Site ID	GB Ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA15. Support local economy	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel
24b	GBP_028_b	Land north of A580 and west of A58.	Blackbrook	Discard												
25b	GBP_028_c	Land north of A580 and west of A58.	Blackbrook	Discard												
27 (E2)	GBP_031_a	Land to the west of Haydock Industrial Estate	Haydock	Site 2EA												
28 (E1)	GBP_031_b	Land to the west of Haydock Industrial Estate	Haydock	Site 6EA												
29 (E5)	GBP_031_c	Land to the West of Haydock Industrial Estate	Haydock	Site 5EA												
30 (E6)	GBP_032	Haydock Green North	Haydock	Sites 3EA & 4EA												

Aeco m Site ID	GB Ref	Site Name	Broad Location	Status											
					SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA15. Support local economy	SA17. Reduce poverty and social exclusion
32	GBP_035	Land north of A580 East Lancashire Road and West of Sandy Lane	Haydock	Discard	Red	Grey	Grey	Green	Green	Yellow	Grey	Grey	Green	Green	Red
33 (E4)	GBP_036	Land south of A580 East Lancashire Road and south east of M6 Junction 23	Haydock	Discard	Red	Red	Red	Green	Green	Yellow	Grey	Yellow	Green	Green	Green
36 (E11)	GBP_039	Land east of M6 and north of A579 Winwick Lane	Newton-le-Willows	Site 7EA	Red	Yellow	Red	Green	Green	Grey	Yellow	Grey	Green	Green	Green
38 (E12)	GBP_041	Land west of M6 at the former Parkside Colliery (Parkside west)? Change to SA2	Newton –le-Willows	Site 8EA	Red	Red	Red	Yellow	Green	Grey	Yellow	Grey	Green	Green	Green
60 (E9)	GBP_075_d	Land north of M62 and south of Gorse Lane	Bold	Site 1ES	Red	Red	Red	Green	Green	Grey	Yellow	Grey	Green	Green	Red
61	GBP_076_c	Land south of M62 and north of A49 Warrington Road	Bold	Part Site 1EA	Red	Red	Red	Green	Green	Yellow	Red	Grey	Green	Green	Red
62	GBP_076_d	Land south of M62 and north of A49 Warrington Road	Haydock	Discard	Red	Red	Yellow	Green	Green	Grey	Red	Yellow	Green	Green	Grey
63	GBP_076_e	Land South of M62 and north of A49 Warrington Road	Haydock	Discard	Red	Yellow	Yellow	Green	Green	Yellow	Red	Grey	Green	Green	Red
101 E3	GBS_022	Haydock Point North	Haydock	Site 2ES	Red	Yellow	Red	Yellow	Green	Grey	Yellow	Grey	Green	Green	Green
102 E7	GBS_065	Land South of Penny Lane	Haydock	Site 4EA	Grey	Grey	Red	Grey	Green	Grey	Yellow	Grey	Green	Green	Green
103 E8	GBS_112	Land to the West of Eurolink and St Helens Linkway	Bold	Discard	Red	Grey	Grey	Green	Green	Yellow	Grey	Yellow	Green	Green	Grey
104 E13	GBS_154	Land to the West of Sandwash Close	Rainford	Site 9EA	Yellow	Grey	Grey	Green	Green	Yellow	Yellow	Grey	Green	Green	Grey
105 E14	URB_E1	Land at Lea Green Farm West	Thatto Heath	Site 10EA	Grey	Grey	Grey	Grey	Green	Grey	Yellow	Grey	Green	Green	Green
106 E15	URB_E2	Gerards Park Phases 2 and 3	Town Centre	Allocate Site 11EA	Yellow	Grey	Yellow	Grey	Green	Grey	Yellow	Grey	Green	Green	Green
107 E16	GBS_165	Omega South Eastern Booths Wood	Bold	Discard	Red	Red	Grey	Green	Green	Yellow	Grey	Grey	Green	Green	Red
LE1	N/A	Former United Glass Site, Salisbury Site	Central area	Discard	Yellow	Grey	Grey	Grey	Green	Grey	Green	Grey	Green	/	Green

Table 6.2: Housing site options

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services	
1	GBP_001_a	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Red	Yellow	Grey	Grey	Green	Grey	Yellow	Grey	Grey	Green	Yellow	Grey	Grey	Yellow	Grey	Green	Yellow	Grey	/	Green	Grey	
2	GBP_001_b	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Yellow	Grey	Grey	Grey	Grey	Grey	Red	Grey	Grey	Grey	Grey	Grey	Grey	Yellow	Grey	Grey	Grey	Grey	/	Green	Grey	
3	GBP_001_c	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Red	Grey	Grey	Grey	Grey	Grey	Red	Grey	Grey	Grey	Grey	Grey	Grey	Yellow	Grey	Green	Grey	Grey	/	Green	Grey	
4	GBP_002	Red Delph Farm/Land to the South of Bushey Lane, Rainford	Rainford	Discard	Grey	Red	Grey	Grey	Green	Grey	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
5	GBP_005_a	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Red	Red	Grey	Grey	Green	Grey	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	Red	/	Green	Grey
6	GBP_005_b	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Yellow	Grey	Grey	Grey	Green	Grey	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Yellow	
7	GBP_005_c	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Red	Grey	Grey	Grey	Grey	Yellow	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Yellow	
8	GBP_006_b	Land east of News Lane west of Junction Road	Rainford	Discard	Grey	Yellow	Grey	Grey	Green	Grey	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
9	GBP_006_c	Land east of News Lane west of Junction Road	Rainford	Discard	Red	Grey	Grey	Grey	Green	Yellow	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
10	GBP_010_a	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Grey	Grey	Grey	Grey	Yellow	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
11	GBP_010_b	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Yellow	Grey	Grey	Green	Grey	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
12	GBP_010_c	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Yellow	Grey	Grey	Green	Yellow	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	/	Green	Green	
13	GBP_010_d	Land between Lords Fold and Mossborough Road, east	Rainford	Discard	Red	Yellow	Grey	Grey	Green	Yellow	Red	Grey	Yellow	Green	Yellow	Grey	Green	Yellow	Grey	Green	Yellow	Grey	Red	/	Green	Green

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
		of Rainford By-Pass)																							
14	GBP_011_c	Land to the west of Rainford By-Pass south of Mossborough Road	Rainford	Discard																			/		
15	GBP_013_b	North West National Golf Club / Land between Rainford By-Pass and Rainford Brook south of Pasture Lane	Rainford	Discard																			/		
16	GBP_015	Land south east of Moss Bank, West of Scafell Road. SA1 change	Blackbrook	Discard																			/		
17	GBP_017	Land north of Moss Bank, off Moss Bank Road and the A571 (Martindale Road)	Blackbrook	Discard																			/		
18	GBP_019_a	Land South of Higher Lane, Rainford	Rainford	Site 8HA																			/		
19	GBP_019_b	Land south of Higher Lane, Rainford	Rainford	Discard																			/		
20	GBP_023	Land at Ash Grove Farm, south of Beacon Road, Billinge	Billinge	Discard																			/		
21	GBP_025_a	Land west of Garswood	Garswood	Site 1HS																			/		
22	GBP_025_b	Land west of Garswood	Garwood	Site 1HA																			/		
23	GBP_027_b	Land south of Billinge	Garswood	Discard																			/		
24a	GBP_028_b	Land north of A580 and west of A58.	Blackbrook	Discard																			/		
25a	GBP_028_c	Land north of A580 and west of A58.	Blackbrook	Discard																			/		
26	GBP_029_b	Land east of Garswood and west of M6	Garswood	Discard																			/		
31a	GBP_033	Land to the east of M6 Junction 23	Haydock	Discard																			/		
34	GBP_037	Land east of M6 and south of Haydock Park Golf Club	Haydock	Discard																			/		

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
35	GBP_038	Land east of M6 and south of Southworth Road	Haydock	Discard																					
37	GBP_040	Land west of M6 and south of A572 Southworth Road	Haydock	Discard																					
39	GBP_042	Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line	Newton / Earlstown	Site 7HA																					
40	GBP_043	Land east of the West Coast Mainline railway line and west of Newton Brook	Haydock	Discard																					
41	GBP_044	Land west of the West Coast Mainline and East of Newlands Grange	Newton / Earlstown	Site 4HS																					
42	GBP_045_a	Land west of Winwick Road and south and east of Wayfarers Drive	Newton / Earlstown	Site 5HS																					
43	GBP_046	Land south of Tyer Road and west of the West Coast Mainline railway line	Newton	Discard																					
44	GBP_048	Land at Newton Cottage Hospital, Newton-le-Willows	Newton	Discard																					
45	GBP_049	Land north of Southward Road, Newton-le-Willows	Newton	Discard																					
46	GBP_051_a	Land north-east of Newton-le-Willows, adjacent to M6	Earlestown	Discard																					
47	GBP_051_c	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard																					
48	GBP_051_d	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard																					
49	GBP_053_a	Land east of Haydock, north of Newton-le-Willows	Newton	Site 2HS																					
50	GBP_053_c	Land east of Haydock, north of Newton-le-Willows	Earlestown	Discard																					
51	GBP_056	Land rear of Tesco Superstore, Haydock Change	Haydock	Discard																					

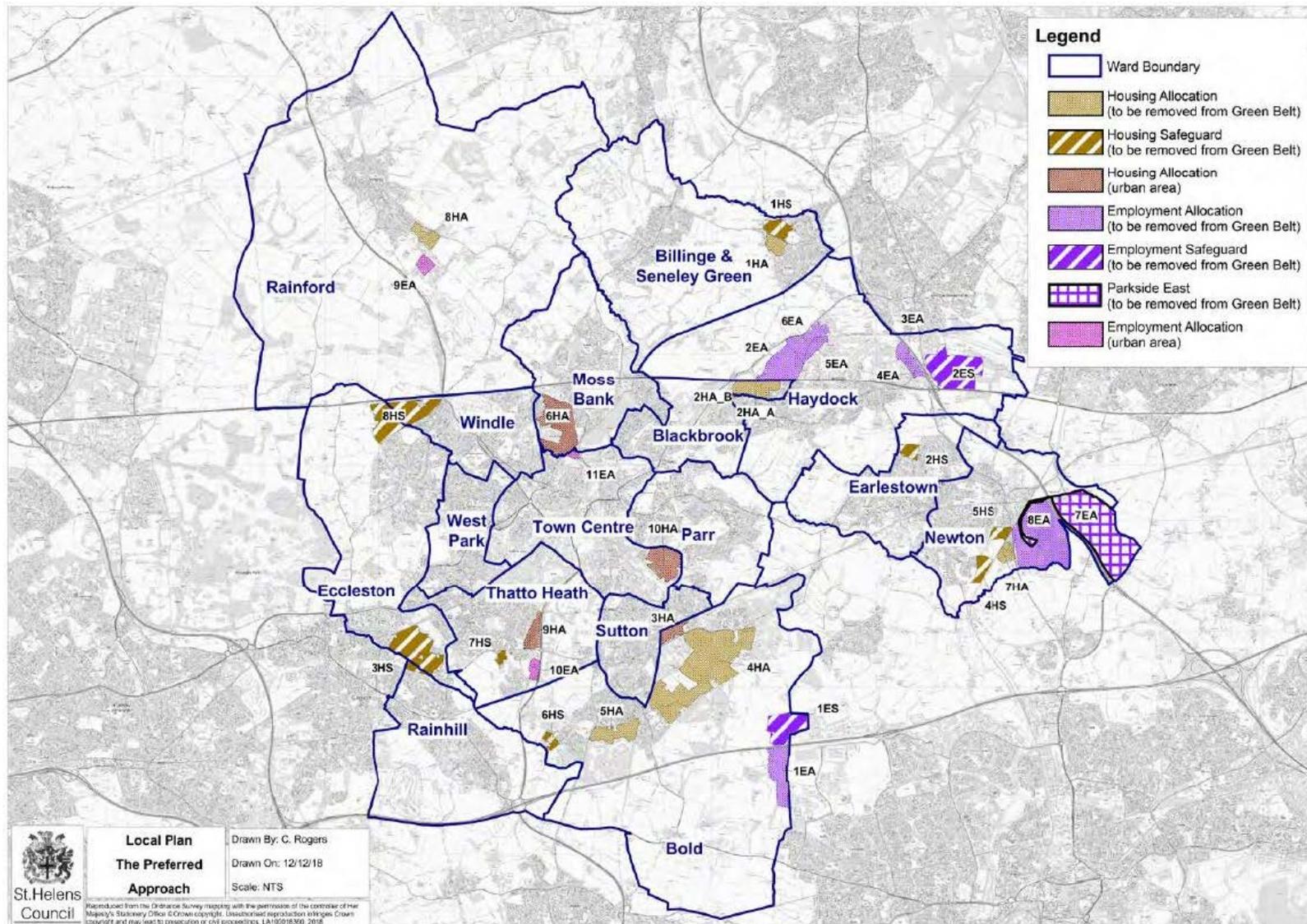
Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
		SA13a- cant find it			Red				Green							Green	Yellow	Green	Green	Green				Green	
52	GBP_058	Land South of Station Road	Haydock	Discard	Red				Green		Red					Green	Yellow	Green	Green	Green			/	Green	
53	GBP_060	Land at Florida Farm, Slag Lane, Haydock, WA11 0UZ	Blackbrook	Site 2HA		Yellow			Green	Yellow	Red				Yellow	Green			Green	Green			/	Green	
54	GBP_070	Land west of Parr and Sutton	Parr	Discard	Red				Green		Yellow				Yellow	Green	Yellow	Green	Green	Green			/	Green	
55-59	GBP_073	Land west of Neills Road, and south of Bold, north of Gorsey Lane	Bold	Site 4HA	Red	Red	Yellow		Green				Yellow	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow		/	Green	
64	GBP_074_b	Land south of Clock Face, north of the M62	Bold	Discard					Green		Yellow			Green		Green	Yellow	Yellow	Green	Green			/	Green	
65	GBP_074_c	Land south of Gartons Lane, Clockface	Bold	Site 5HA		Yellow			Green		Yellow			Green	Yellow	Green	Green	Green	Green	Green			/	Green	
66	GBP_074_d	Land south of Sutton Manor	Sutton Manor	Site 6HS	Red				Green		Yellow		Yellow			Green	Green	Green	Green	Green			/	Green	
67	GBP_082_b	Land South of Sutton Manor	Sutton Manor	Discard	Red				Green	Yellow	Red		Yellow		Yellow	Green	Yellow	Green	Green	Green			/	Green	
68	GBP_082_c	Land south of Sutton Manor	Sutton Manor	Discard					Green		Yellow					Green	Green	Green	Green	Green		Yellow	/	Green	
69	GBP_085_b	Land at hanging Bridge Farm, Elton Head Road	Rainhill	Discard	Red				Green	Yellow	Red	Red			Yellow	Green	Green	Green	Green	Green			/	Green	
70	GBS_085_C	land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School	Thatto Heath	Site 7HS							Red	Red				Green	Green	Green	Green	Green			/	Yellow	
71	GBP_087	Eccleston Park Golf Club, Rainhill Road	Eccleston	Site 3HS	Red				Green		Red	Red				Green	Green	Green	Green	Green			/	Green	
72	GBP_088	Land North East of Eccleston Park Golf Club	Eccleston	Discard	Red				Green		Yellow	Red				Green	Green	Green	Green	Green			/	Green	
73	GBP_089	Land north of the M62 and south of Mill Lane	Rainhill	Discard	Red	Red			Green		Red	Red	Red		Yellow	Green	Red	Green	Green	Green			/	Green	
75	GBP_098	Land south of A580 East Lancashire Road and east of Houghtons Lane, Windle	Windle	Site 8HS	Red	Red			Green	Yellow	Red	Red	Red		Yellow	Green	Green	Green	Green	Green			/	Green	

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
76	N/A	Moss Nook Urban Village, Watery Lane	Urban area	Site 10HA	Red	Grey	Yellow	Grey	Green	Grey	Green	Grey	Yellow	Green	Grey	Green	Green	Green	Green	Green	Green	Green	/	Green	Green
77	N/A	Land North of Elton Head Road	Urban area	Site 9HA	Yellow	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Green	Grey	Green	Green	Green	Green	Green	Green	Green	/	Green	Green
78	N/A	Land east of City Road, Cowley Hill	Urban area	Site 6HA	Red	Grey	Yellow	Grey	Green	Yellow	Grey	Red	Grey	Green	Grey	Green	Green	Green	Green	Green	Green	Green	/	Green	Green
79	N/A	Penlake Industrial Estate	Urban area	Site 3HA	Red	Grey	Grey	Grey	Green	Grey	Green	Grey	Yellow	Green	Grey	Green	Yellow	Green	Green	Green	Green	Green	/	Green	Green
80	GBS_001 - 004	(H1) Sutton Moss Road	Parr	Discard	Red	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Yellow	Green	Green	Green	Green	Green	Green	Green	/	Green	Green	
81	GBS_085	(H33) Bushey Lane South	Rainford	Discard	Grey	Grey	Grey	Grey	Green	Grey	Red	Grey	Grey	Green	Green	Green	Yellow	Green	Green	Green	Green	/	Green	Red	
82	GBS_145	(H52) Land to the West of Omega South (HCA)	Bold	Discard	Red	Red	Grey	Grey	Green	Grey	Grey	Grey	Grey	Green	Grey	Green	Yellow	Green	Green	Green	Green	/	Red	Red	
85	GBS_058 / 059	(H19) Land east of Higher Lane / South of Muncaster Drive / at White House Lane, Rainford	Rainford	Discard	Red	Grey	Grey	Grey	Grey	Grey	Red	Red	Yellow	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	/	Green	Green	
86	GBS_071	(H20) Land rear of Deepdale Drive	Rainhill	Discard	Yellow	Grey	Grey	Grey	Grey	Grey	Red	Red	Grey	Green	Grey	Green	Grey	Grey	Green	Green	Green	/	Green	Yellow	
87	GBS_061	(H21) Land at Scott Clinic, Rainhill Road	Thatto Heath	Discard	Red	Grey	Grey	Grey	Grey	Grey	Red	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	/	Green	Yellow	
88	GBS_069	(H25) Land at Rookery Lane	Rainford	Discard	Grey	Grey	Grey	Grey	Grey	Grey	Red	Grey	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	/	Green	Yellow	
89	GBS_070	(H26) Land at Elton Head Farm	Thatto Heath	Discard	Red	Red	Grey	Grey	Grey	Yellow	Red	Red	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	/	Green	Green	
90	GBS_074	(H27) Land north of Muncaster Drive	Rainford	Discard	Grey	Grey	Grey	Grey	Grey	Grey	Red	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	/	Green	Green	
91	GBS_076	(H29) MSuncaster Drive	Rainford	Discard	Grey	Grey	Grey	Grey	Grey	Grey	Red	Red	Grey	Green	Green	Green	Green	Green	Green	Green	Green	/	Green	Green	
92	GBS_115	(H41) Land at Elton Head Road	Thatto Heath	Discard	Grey	Grey	Grey	Grey	Grey	Grey	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	/	Green	Yellow	
93	GBS_127 / 158	(H43) Land off Common Road/ Swan Road, Newton-le-Willows	Earlestown	Discard	Yellow	Yellow	Grey	Grey	Grey	Grey	Red	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green	/	Green	Green	

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
94	GBS_146	(H53) Rainhill High School	Rainhill	Discard	Red	Grey	Grey	Grey	Grey	Grey	Red	Red	Grey	Green	Green	Green	Yellow	Green	Green	Green	Grey	Red	/	Green	Yellow
95	GBS_157	(H56) Land to the West of Haydock Park Racecourses	Haydock	Discard	Red	Grey	Grey	Yellow	Grey	Grey	Yellow	Grey	Grey	Yellow	Yellow	Green	Red	Grey	Green	Green	Grey	Grey	/	Green	Red
96	GBS_164	(H57) Loyola Hall	Rainhill	Discard	Red	Grey	Grey	Grey	Grey	Grey	Red	Red	Red	Green	Green	Green	Yellow	Green	Green	Green	Grey	Green	/	Green	Yellow
97	GBS_098	(H59) Higher Barrowfield Farm, Houghtons Lane	Eccleston	Discard	Red	Grey	Grey	Green	Green	Green	Red	Red	Grey	Yellow	Yellow	Green	Green	Green	Green	Green	Grey	Green	/	Green	Red
98	GBS_108	(H60) Land south of Burows Lane	Eccleston	Discard	Red	Grey	Grey	Green	Green	Green	Red	Red	Grey	Green	Green	Green	Green	Green	Green	Green	Grey	Red	/	Green	Yellow
99	GBS_104	(H61) Land south of Howards Lane East of Gillars Lane	Eccleston	Discard	Yellow	Yellow	Grey	Green	Green	Green	Red	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	/	Green	Yellow
100	GBS_104	(H62) Land at Hanging Bridge Farm, Elton Head Road	Bold	Discard	Yellow	Yellow	Grey	Green	Green	Green	Red	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	/	Green	Yellow
GT 2	G&T_1	Land north of Sherdley Road	Thatto Heath	GTA01	Red	Grey	Grey	Grey	Grey	Grey	Yellow	Grey	Grey	Green	Green	/	/	/	/	Green	/	/	/	Grey	/
GT 1	G&T_2	Land east of Sherdley Road Caravan Park	Tahtto Heath	GTA02	Yellow	Grey	Grey	Grey	Grey	Grey	Yellow	Grey	Grey	Green	Green	/	/	/	/	Green	/	/	/	Grey	/

### 6.3 The preferred approach

6.3.1 Figure 6.1 below illustrates the Council's preferred approach to site selection.



## Rationale for site selection

6.3.2 All sites submitted in previous Call for Sites between 2008 and 2016 have been subject to assessment by the Council in the St. Helens Strategic Housing Land Availability Assessment 2016 (SHLAA) (for urban housing sites) or the St. Helens Green Belt Review. The Green Belt Review considered the suitability of broad areas and then where appropriate, assessed individual sites. The Preferred Option sites and reasonable alternatives have then been subject to SA.

*Table 6.3: Outline reasons for the allocation, safeguarding or discarding of sites (housing and employment)*

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
1	GBP_001_a	Land North of Bushey Lane, east of Rainford Road	Discard	Both sites contain Grade 1 agricultural land and there are significant deliverability issues. Accessibility is not ideal. There are more acceptable and sustainable sites elsewhere that can better meet the housing needs of the Borough.
2	GBP_001_b	Land North of Bushey Lane, east of Rainford Road	Discard	
3	GBP_001_c	Land North of Bushey Lane, east of Rainford Road	Remove from Green Belt as a minor boundary change	
4	GBP_002	Red Delph Farm/Land to the South of Bushey Lane, Rainford	Discard	The site includes play areas and green space of community value, is distant to community facilities and services and development would result in disproportionate growth at Rainford Junction.
5	GBP_005_a	Land east of Rainford By-Pass south of railway line	Discard	The site is of medium to high landscape and visual sensitivity. The site is distant to community facilities and services including the local centre and a primary school. There is known presence of protected species (Pink Footed Geese).
6	GBP_005_b	Land east of Rainford By-Pass south of railway line	Discard	The site is of medium to high landscape and visual sensitivity. The site is distant to important community facilities and services including the local centre and a primary school. There is potential for air pollution and noise issues and large areas of the site are not developable due to constraints.
7	GBP_005_c	Land east of Rainford By-Pass south of railway line	Discard	The sites are of medium to high landscape and visual sensitivity. The sites are distant to important community facilities and services including the local centre and a primary school. There are access issues to the sites which would need to be addressed in addition to other constraints that could restrict the development of the sites.
8	GBP_006_b	Land east of News Lane west of Junction Road		
9	GBP_006_c	Land east of News Lane west of Junction Road	Discard	The site has access issues and is distant to important community facilities and services including the local centre. The site further contains protected trees and a LWS which would require substantial buffering. When cumulatively assessed, the site is considered less favourable for allocation.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
10	GBP_010_a	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Discard	The sites have access issues and include LWS(s) and areas prone to flooding. There are further issues with regards to noise and potential for development to affect biodiversity and landscape character.
11	GBP_010_b	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass		
12	GBP_010_c	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Discard	Sections of the site fall within flood zones 2 and 3 and there is potential for air quality and noise issues. The developable area could be further reduced due to an infrastructure buffer zone that covers part of the site. The site is considered not suitable for greenbelt release when other more suitable sites are available.
13	GBP_010_d	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass)	Discard	Part of the site falls in flood zones 2 and 3 and is designated as a LWS, rendering a sizable amount highly constrained. There are also air quality and noise issues. The site also includes sports facilities and the absence of adequate facilities nearby means that allocation would be contrary to the Local Plan policy without enhancement. There is also potential for impact on nearby heritage designations / assets.
14	GBP_011_c	Land to the west of Rainford By-Pass south of Mossborough Road	Discard	The site is of medium to high landscape and visual sensitivity. A Heritage Impact Assessment has identified that the site is unsuitable for development due to potential impacts on the setting of Rainford Conservation Area. Substantial areas within the site are subject to high flood risk. Protected woodland in the middle of the site and noise issues from the adjacent Rainford Industrial Estate would further fragment any developable area. Allocation would require a large site to be released from Green Belt when only a limited proportion would be developable.
15	GBP_013_b	North West National Golf Club / Land between Rainford By-Pass and Rainford Brook south of Pasture Lane	Discard	The development of the site is restricted by a LWS to the north and large areas of flood zone 2 and 3. There are further issues with regards to air quality and noise. Accessibility to community facilities and services are also relatively poor.
16	GBP_015	Land south east of Moss Bank, West of Scafell Road. SA1 change	Discard	The majority of the site falls within flood zones 2 or 3 and large sections are considered to be hazardous and thus unsuitable for residential development.
17	GBP_017	Land north of Moss Bank, off Moss Bank Road and the A571 (Martindale Road)	Discard	The site is of medium to high landscape and visual sensitivity. A steep incline means that significant ground works would be required. A quarter of the site further comprises protected woodland.
18	GBP_019_a	Land South of Higher Lane, Rainford	Allocated for housing Site 8HA	The site is adjacent to a developed area and has good access to public transport, highways and employment. Development would result in the loss of high quality agricultural land but this is balanced by the contribution it would make to addressing local housing need. Alternative sites in this area are also classified as best and most versatile agricultural land.
19	GBP_	Land south of Higher Lane,	Discard	The site is of medium to high landscape and

Aecom Site ID	GB ID	Site Name	Status	Rationale (See the St Helens Green Belt Review 2018 for further details)
	019_b	Rainford		visual sensitivity. The site is also distant to important community facilities and services including a primary school and a convenience store. There are further issues with regard to air quality and noise. It is considered that there are more sustainable sites available to meet future housing needs.
20	GBP_023	Land at Ash Grove Farm, south of Beacon Road, Billinge	Discard	The site is of medium to high landscape and visual sensitivity. The site has access issues and is adjacent to a LWS, habitats and heritage assets that require buffers; reducing the developable area and potentially having negative effects.
21	GBP_025_a	Land west of Garswood	Safeguarded for housing Site 1HS	The site is sustainably located with good access to local community facilities and services. However, the site projects further into the countryside than the adjacent site (ref: Aecom 22). Development would not appear as a natural extension to Garswood at this time.
22	GBP_025_b	Land west of Garswood	Allocated for housing Site 1HA	The site is sustainably located with good access to local community facilities and services. Safe vehicular access can also be provided. Development on the site is considered compatible with the natural expansion of the settlement.
23	GBP_027_b	Land south of Billinge	Discard	The site is of medium to high landscape and visual sensitivity. The site has access issues and is not within 800m of a convenience store. There are also a number of protected trees along the south-western boundary, which would need to be retained and protected.
24a	GBP_028_b	Land north of A580 and west of A58.	Discard	These sites have been considered for both housing, and employment (24a for housing, 24b for employment). The sites are of medium to high landscape and visual sensitivity. Only a small portion of the site has been promoted by the land owner and it is considered to be in an unsustainable location given its distance from the nearest urban area, containment from railways lines and proximity to an industrial estate. Site Aecom 25a/25b also has an existing sensitive use.
25a	GBP_028_c	Land north of A580 and west of A58.		
24a	GBP_028_b	Land north of A580 and west of A58.	Discard	These sites have been considered for both housing, and employment (25a for housing, 25b for employment). The sites are of medium to high landscape and visual sensitivity. Only a small portion of the site has been promoted by the land owner and it is considered to be in an unsustainable location given its distance from the nearest urban area, containment from railways lines and proximity to an industrial estate. Site GBP_028c further has an existing sensitive use.
25b	GBP_028_c	Land north of A580 and west of A58.	Discard	
26	GBP_029_b	Land east of Garswood and west of M6	Discard	Development of the site would extend the urban boundary that is well contained and create an island of residential development that does not connect well with the existing settlement. Some parts of the site are not developable and nearby junctions are known to be at capacity, thus creating potential for highway issues.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
27 (E2)	GBP_031_a	Land to the west of Haydock Industrial Estate	Allocated for employment Site 2EA	The site benefits from a hybrid planning consent for two large industrial units, and associated infrastructure (Ref: P/2018/0608/HYBR). Development works to implement the consent are currently under way.
28 (E1)	GBP_031_b	Land to the west of Haydock Industrial Estate	Allocated for employment Site 6EA	Development of the site would provide a strong Green Belt boundary and form a natural extension to Haydock Industrial estate following the development of Florida Farm North. The site benefits from good public transport links and the local highway network.
29 (E5)	GBP_031_c	Land to the West of Haydock Industrial Estate	Allocated for employment Site 5EA	The site lies adjacent to Haydock Industrial Estate, and would form a natural extension to this area. The site benefits from good public transport links and the local highway network, as well as being adjacent to one of the Borough's most deprived areas.
30 (E6)	GBP_032	Haydock Green North	Allocated for employment Site 3EA	The north of this site benefits from planning consent for four industrial units with associated parking and hardstanding, which is currently under construction. The site is considered a natural extension of Haydock Industrial estate, and is well contained.
31	GBP_033	Land to the east of M6 Junction 23	Discard	The site is not currently available and contains a LWS that will require a significant buffer. The site also contains an Ancient Scheduled Monument and partially falls within a conservation area. Allocation would require a large site to be released from greenbelt when only a proportion is suitable.
32	GBP_035	Land north of A580 East Lancashire Road and West of Sandy Lane	Discard	This site is not currently available and there are access issues, with nearby junction 23 known to have capacity constraints. The site also contains woodland which would require a suitable buffer zone which will substantially reduce the developable area. The site is also distant to important community facilities and services including convenience store and a primary school.
33 (E4)	GBP_036	Land south of A580 East Lancashire Road and south east of M6 Junction 23	Discard	Not all of the site is available. There are access issues with nearby Junction 23 of the M6 which is known to have capacity issues. The site also contains protected woodland and individual trees. There is also a sensitive use within the site that would require a significant buffer. Allocation would require a large site to be released from Green Belt when only a proportion is suitable for development.
34	GBP_037	Land east of M6 and south of Haydock Park Golf Club –	Discard	The site is not currently available and contains a LWS that will require a significant buffer. The site also contains an Ancient Scheduled Monument and partially falls within a conservation area. Allocation would require a large site to be released from the Green Belt when only a proportion of it is suitable for development.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
35	GBP_038	Land east of M6 and south of Southworth Road	Discard	The site is not currently available and may be subject to a significant reduction in developable area upon conclusions of investigation work. There are noise issues and the site is also considered to be remote.
36 (E11)	GBP_039	Land east of M6 and north of A579 Winwick Lane	Allocated for employment / SFRI	The parcel lies to the east of the M6 with good access to Junction 22, and has been identified for its unique locational advantages which lend itself to rail enabled employment uses, and potentially a Strategic Rail Freight Interchange (SRFI). There is a national need for such facilities.
37	GBP_040	Land west of M6 and south of A572 Southworth Road	Discard	The site is not currently available and there are access issues. There are noise issues and the site is also considered to be remote.
38 (E12)	GBP_041	Land west of M6 at the former Parkside Colliery	Allocated for employment / SFRI	The site includes the site of the former Parkside Colliery and is therefore partly previously developed. The site has good transport links with a planning application pending consideration for a new link road between the A49 and Junction 22 of the M6. The site is adjacent to one of the Borough's most deprived areas and is suitable to provide substantial new employment opportunities.
39	GBP_042	Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line	Allocated for housing Site 7HA	The site is adjacent to built development and is brownfield. The development area is slightly reduced by mitigation required to the west from an active railway line and from an area to the south that falls within flood zone 3. The site benefits from good public transport and highways connectivity and is suitable for development.
40	GBP_043	Land east of the West Coast Mainline railway line and west of Newton Brook	Discard	The site is not currently available and there are access issues. The developable area is also restricted by a sizable proportion of the site lying in flood zone 3. The site is also distant to important community facilities and services including convenience store and a primary school.
41	GBP_044	Land west of the West Coast Mainline and East of Newlands Grange	Safeguarded for housing Site 4HS	The site is adjacent to a site with residential development currently being constructed and a railway line with potential to cause noise which would require mitigation. The site also neighbours the Vulcan Conservation Area, which reduces the developable area if harm is to be avoided. The surrounding highways network is considered to be at capacity. Otherwise, the site is considered to be sustainably located with good access to community facilities and services. It may be possible to overcome infrastructure constraints in the longer term.
42	GBP_045_a	Land west of Winwick Road and south and east of Wayfarers Drive	Safeguarded for housing Site 5HS	The site is adjacent to residential development and considered to be in a sustainable location with good rail accessibility. However, there are access issues and the site is adjacent to a LWS and nearby a historic landfill site which reduces the developable area. The site is considered suitable for removal from the greenbelt but is not required to meet housing need within the plan period.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
43	GBP_046	Land south of Tyer Road and west of the West Coast Mainline railway line	Discard	The site is adjacent to a LWS and over 40% of it falls within flood zones 2 and 3, thus substantially reducing the developable area. Consultation with Historic England has concluded that the development of the site would negatively impact upon the Vulcan Village conservation area. The site also has access issues.
44	GBP_048	Land at Newton Cottage Hospital, Newton-le-Willows	Discard	This site was discarded at Stage 2a of the Green Belt Review as it has a prohibitive constraint – i.e. over 2/3rds of the site is designated Amenity Greenspace, the loss of which has not been justified.
45	GBP_049	Land north of Southward Road, Newton-le-Willows	Discard	This site was discarded at Stage 2a as it has a prohibitive constraint – it is landlocked with no suitable highway access.
46	GBP_051_a	Land north-east of Newton-le-Willows, adjacent to M6	Discard	The sites have access issues and issues relating to air quality and noise. Effects could be mitigated at the cost of a significantly reduced developable area. This would result in large sites being released from the Green Belt when only a limited proportion of their areas are developable. Development of site 46 would also reduce the strategic gap between Haydock and Newton-le-Willows.
47	GBP_051_c	Land north-east of Newton-le-Willows, adjacent to M6		
48	GBP_051_d	Land north-east of Newton-le-Willows, adjacent to M6		
49	GBP_053_a	Land east of Haydock, north of Newton-le-Willows	Discard	The site was discounted at Stage 1B of the GBR as it still fulfils the purposes of Green Belt designation. In particular, it forms part of an important strategic gap between Haydock and Newton-le-Willows.
50	GBP_053_c	Land east of Haydock, north of Newton-le-Willows	Safeguarded for housing (part only) Site 2HS	The site includes major infrastructure and its location is such that the developable area is restricted. Development within the northern part of the site would interfere with the strategic gap between Haydock and Newton-le-Willows. The Council has concluded that there are sufficient alternative sites that are suitable for allocation. However, a small area within the southern part of the site is suitable for safeguarding.
51	GBP_056	Land rear of Tesco Superstore, Haydock	Discard	The site has access issues and contains a LWS which reduces the developable area. The site is also subject to surface water and flooding issues.
52	GBP_058	Land South of Station Road	Discard	The site contains several protected trees which require suitable buffers, significantly reducing the developable area. There are access issues and the site is in multiple land ownership. Allocation would require a large site to be released from Green Belt when only a limited proportion is developable.
53	GBP_060	Land at Florida Farm, Slag Lane, Haydock, WA11 0UZ	Allocated for housing Site 2HA	The site is adjacent to residential development and in a sustainable location with good access to employment and services. There are potential noise and landscape issues but these can be mitigated.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
54	GBP_070	Land west of Parr and Sutton	Discard	The site is not currently available and there are access issues. The site is also irregularly shaped and contains a Nature Reserve which would require a buffer zone, reducing the developable area.
55-59	GBP_073	Land west of Neills Road, and south of Bold, north of Gorse Lane	Allocated for housing Site 4HA	The site has good access to employment areas and public transport including a railway station. The site is sufficiently large to deliver a local centre, new education and/or health facilities if required. The site contains a LWS but this can be adequately buffered. The site offers the potential to meet a large part of the Borough's housing needs in a highly sustainable location. It is considered likely that the infrastructure requirements connected with development of the site whilst considerable can be addressed through a suitable master planning exercise.
60 (E9)	GBP_075_d	Land north of M62 and south of Gorse Lane	Safeguarded for employment Site 1ES	The site has potential in the future to form a logical extension to the Omega employment area situated to the east of the site within Warrington BC's boundary. However, there are highway and accessibility constraints to this sub-parcel that would require mitigation including provision of access across land in a separate ownership outside the sub-parcel to the east.
61	GBP_076_c	Land south of M62 and north of A57 Warrington Road	Allocated for employment (part only) Site 1EA	The site lies to the south of the M62 on the eastern boundary with Warrington Borough Council. Development of part of this site would form a natural extension of the adjacent Omega employment area, located in Warrington. Warrington BC has agreed that the site could be developed to help meet its needs for employment uses. Whilst there is an area of protected woodland within the site which would need to be retained, this covers only a small area and would not affect the majority of the site.
62	GBP_076_d	Land south of M62 and north of A A57 Warrington Road	Discard	The site was discounted at Stage 1b of the Council's Green Belt Review as the site continues to make a strong contribution to the purposes of Green Belt land. The site has not been promoted by the landowner for development and also has access issues and is distant to important community facilities and services.
63	GBP_076_e	Land South of M62 and north of A A57Warrington Road	Discard	
64	GBP_074_b	Land south of Clock Face, north of the M62	Discard	The development of this site would require a substantial buffer to mitigate the air quality and noise effects of the M62, significantly reducing the developable area. There are also access issues that would need to be addressed. Only a limited part of the site would be developable.
65	GBP_074_c	Land south of Gartons Lane, Clockface	Allocated for housing (5HA)	The site is adequately accessible and development could improve access to the nearby Nature Reserve. The site is also considered sustainable with good access to transport links, education and health facilities.

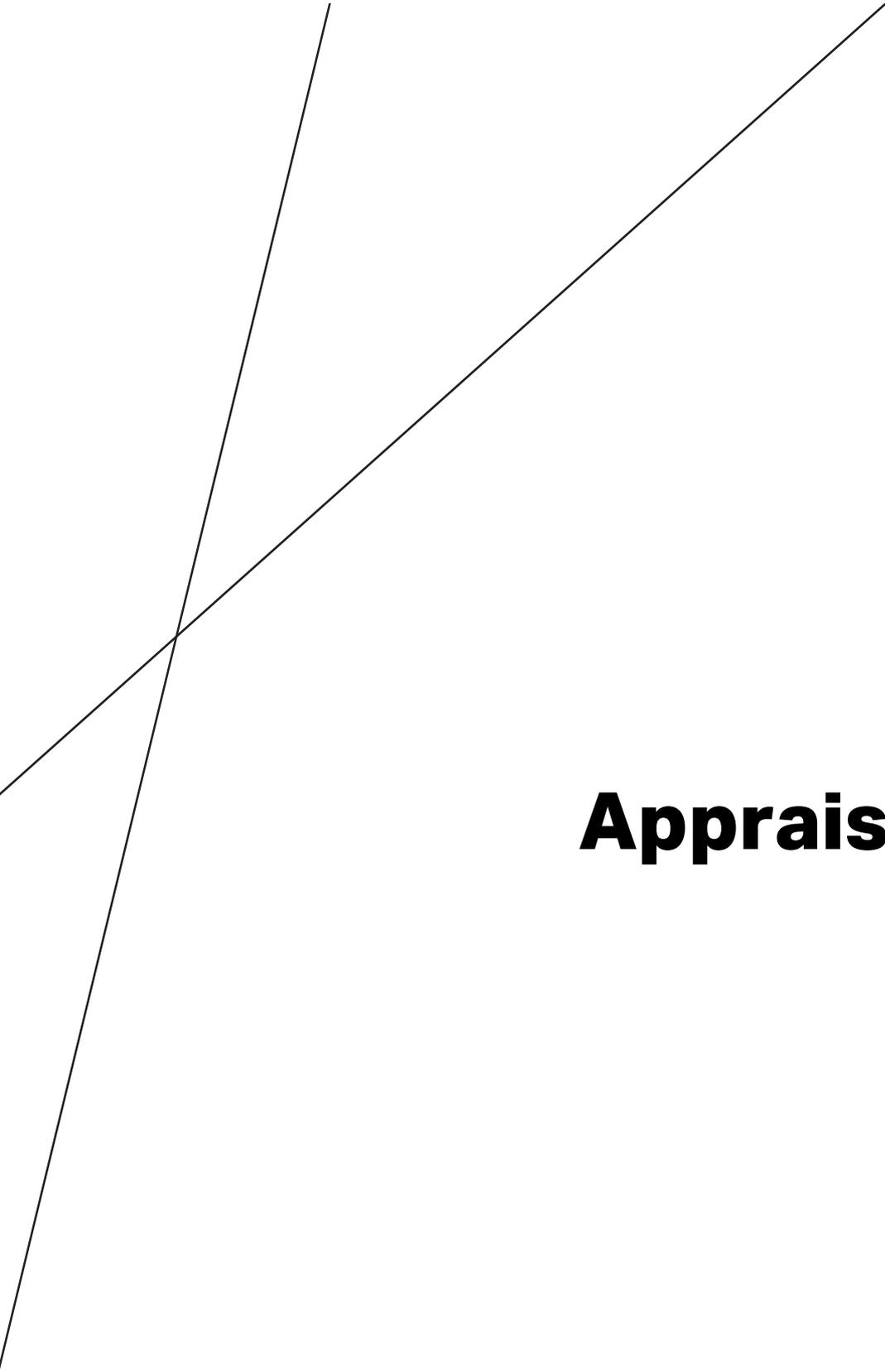
<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
66	GBP_074_d	Land south of Sutton Manor	Safeguarded for housing Site 6HS	The site is adjacent to residential development and is accessible, although some highway improvements would be required. The site also contains protected woodland and a LWS which would require buffer zones. However, the woodland would serve to screen any development within the site from adjacent countryside.
67	GBP_082_b	Land South of Sutton Manor	Discard	The site has access issues and contains a LWS and sections of flood zones 2 and 3. A large proportion of the site is not currently being promoted by the land owner. There are also sustainability issues including distances to the nearest primary school and convenience store.
68	GBP_082_c	Land south of Sutton Manor	Discard	The development of the site would extend the urban area into the adjacent countryside. The site is also in multiple land ownership which could delay development and there are issues with regards to flooding to the south of the site. Highway access issues would also need to be addressed.
69	GBP_085_b	Land at Hanging Bridge Farm, Elton Head Road	Discard	The site suffers from serious highway access issues and junctions in the surrounding highway network have constraints which are likely to be difficult to resolve. The site also includes a LWS, major infrastructure and falls in part within flood zones 2 and 3. These areas would need to be adequately buffered reducing the developable area.
70	GBS_085_C	Land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School	Safeguarded for housing (in part) Site 7HS	The site is adjacent to residential development and priority habitat woodland and grassland. The site is sustainably located for example as it is within safe and convenient walking distance of a local convenience store and public transport. The site is of medium to high landscape and visual sensitivity. Due to landscape issues, only the eastern part of the site is suitable for development. As development here is not required to meet housing need in the Plan period, it is recommended that this area is safeguarded.
71	GBP_087	Eccleston Park Golf Club, Rainhill Road	Safeguarded for housing Site 8HS	The site is in a broadly sustainable location with good access to community facilities and services. The site contains a golf course (closed in summer 2018) and Sport England has indicated that sufficient evidence does not exist at present to justify its development for housing. The site is mostly greenfield and includes infrastructure which would reduce the developable area. It is also likely that, due to constraints in highway capacity in the surrounding area, the capacity of any development on this large site would need to be restricted. The site is not required to meet housing needs within the Plan period but is considered suitable for safeguarding.
72	GBP_088	Land North East of Eccleston Park Golf Club	Discard	Development of the site is considered likely to harm the setting of a nearby listed building. The site also has access issues and is of medium to high value for landscape visual sensitivity.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
73	GBP_089	Land north of the M62 and south of Mill Lane	Discard	Development of the site is considered likely to harm the setting of nearby heritage assets. The site also has access issues and is of medium to high value for landscape visual sensitivity. Due to its elevated position; substantial development within it would be likely to be visually intrusive on the surrounding region and the M62. There are issues relating to noise. Whilst noise issues could be mitigated at the cost of a significantly reduced developable area, this would result in a large site being released from the Green Belt when only a restricted proportion is developable. The site also contains protected trees which would require substantial buffering. These factors mean that the site should be discarded.
75	GBP_098	Land south of A580 East Lancashire Road and east of Houghtons Lane, Windle	Safeguarded for housing Site 8HS	The site is adjacent to residential development and would be adequately accessible following highway improvements. However, the necessary highway improvements are substantial and would take a significant amount of time to deliver. The site comprises an open green-field area with high quality agricultural land and is also likely to provide functionally linked habitat for pink footed geese. It contains a LWS and infrastructure that require a buffer zone in addition to a buffer required to mitigate air and noise pollution from the nearby road. This reduces the developable area.
76	n/a	Moss Nook Urban Village, Watery Lane	Allocated for housing Site 10HA	The site comprises previously developed land and is in a sustainable location. Appropriate noise mitigation measures may be required in relation to industrial land uses close to the site. There are currently playing fields to the north west which would need to be relocated. There is an extant planning consent for the erection of new residential dwellings and retail development on the site.
77	n/a	Land North of Elton Head Road	Allocated for housing Site 9HA	The site comprises previously developed land and is in a sustainable location. Planning permission has been granted for the demolition of existing buildings and structures and outline consent has been granted for up to 352 dwellings on the site with new open space and green infrastructure.
78	n/a	Land east of City Road, Cowley Hill	Allocated for housing Site 6HA	The site comprises previously developed land and is in a sustainable location. There is a large LWS on the site that would need to be retained with a buffer. Access can be gained from a number of locations.
79	n/a	Penlake Industrial Estate	Allocated for housing Site 3HA	The site comprises previously developed land and is in a sustainable location. Planning permission has been granted for the erection of 337 dwellings.
80	GBS_001 - 004	(H1) Sutton Moss Road	Discard	The site is not currently available and there are access issues. The site is also irregularly shaped and contains a Nature Reserve which would require a buffer zone, reducing the developable area.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
81	GBS_085	(H33) Bushey Lane South	Discard	The site is Grade 1 agricultural land. Development within the parcel would not be focussed on any Key Settlement and would be affected by significant transport sustainability issues. It lies outside an 800m safe and convenient walking distance of the nearest identified local centre (Rainford), which lies approx. 1.4km away (as the crow flies). Whilst the eastern part is within 800m of a convenience shop (located on Kendall Drive), the existing road and pathway between the parcel and this shop is narrow and poorly lit, so is not considered safe and convenient. The parcel is also located outside a safe and convenient walking distance of a primary school. The parcel also contains playing fields typologies within the vicinity. There are potential access and highway issues; Red Delph Lane is a single track road with residential dwellings on both sides. Opportunities to widen the highway are therefore limited and at its current standard it would not be suitable to support further residential development.
82	GBS_145	(H52) Land to the West of Omega South (HCA)	Discard	The site was discounted at Stage 1b of the Council's Green Belt Review, as the site continues to make a strong contribution to the purposes of Green Belt land. The site also has access issues and is distant to important community facilities and services.
83	GBP_092	Prescott Reservoir	Discard	Discounted at Stage 1b of the GBR – so not a reasonable alternative
84	GBP_006a	Land at Hydes Brow	Discard	Discounted at Stage 1b of the GBR – so not a reasonable alternative
85	GBS_058 / 059	(H19) Land east of Higher Lane / South of Muncaster Drive / at White House Lane, Rainford	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
86	GBS_071	(H20) Land rear of Deepdale Drive	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
87	GBS_061	(H21) Land at Scott Clinic, Rainhill Road	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
88	GBS_069	(H25) Land at Rookery Lane	Discard	The site is of medium to high landscape and visual sensitivity. A Heritage Impact Assessment has rendered the site unsuitable for development due to potential impacts on the setting of Rainford Conservation Area. Allocation would require a large site to be released from greenbelt when only a proportion is developable.
89	GBS_070	(H26) Land at Elton Head Farm	Discard	This was safeguarded in the LPPO – but then was part of a different sub-parcel in the 2018 GBR and was discounted at Stage 1b of the GBR – so not a reasonable alternative
90	GBS_074	(H27) Land north of Muncaster Drive	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
91	GBS_076	(H29) Muncaster Drive	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
92	GBS_115	(H41) Land at Elton Head Road	Discard	This site forms a smaller part of site AECOM70 (which is allocated)
93	GBS_127 / 158	(H43) Land off Common Road/ Swan Road, Newton-le-Willows	Discard	Discounted at Stage 1b of the GBR – so no longer reasonable alternative
94	GBS_146	(H53) Rainhill High School	Discard	Discounted at Stage 2b of the GBR – so no longer reasonable alternative
95	GBS_157	(H56) Land to the West of Haydock Park Racecourses	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
96	GBS_164	(H57) Loyola Hall	Discard	Discounted at Stage 2b of the GBR – so no longer a reasonable alternative
97	GBS_098	(H59) Higher Barrowfield Farm, Houghtons Lane	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
98	GBS_108	(H60) Land south of Burows Lane	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
99	GBS_104	(H61) Land south of Howards Lane East of Gillars Lane	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
100	GBS_104	(H62) Land at Hanging Bridge Farm, Elton Head Road	Discard	Discounted at Stage 1b of the GBR – so no longer a reasonable alternative
GT1	G&T_2	Land north of Sherdley Road	Allocated for Gypsy and Traveller accommodation GTA01	The site is well located adjacent to existing Gypsy and Traveller accommodation. The site has good access to employment areas and public transport. The site is large enough to meet the current needs for the provision of permanent accommodation.
GT2	G&T_1	Land east of Sherdley Road Caravan Park	Allocated for Gypsy and Traveller accommodation GTA02	The site is well located adjacent to existing Gypsy and Traveller accommodation. The site has good access to employment areas and public transport. The site is large enough to meet the current needs for the provision of transit (limited length of stay) accommodation.
101 (E3)	GBS_022	Haydock Point North	Safeguarded for employment Site 2ES	The site makes a high contribution to Green Belt purposes, as it forms a large part of the strategic gap between Haydock and Golborne. However, it is considered to have long term potential to meet needs for large scale logistics employment uses. It is adjacent to Junction 23 of the M6 which has known capacity issues. The site should not be developed until transport studies have been concluded and the potential land take of any improvements required at that junction have been confirmed. Land from this site is likely to be required to enable the junction to be improved to an extent which will satisfactorily address its capacity issues.
102 (E7)	GBS_065	Land South of Penny Lane	Allocated for employment Site 4EA	The north of this site benefits from planning consent for four industrial units with associated parking and hardstanding, which is currently under construction. The site is considered a natural extension of Haydock Industrial estate, and is well contained.

<b>Aecom Site ID</b>	<b>GB ID</b>	<b>Site Name</b>	<b>Status</b>	<b>Rationale (See the St Helens Green Belt Review 2018 for further details)</b>
103 (E8)	GBS_ 112	Land to the West of Eurolink and St Helens Linkway	Discard	The site was discounted at Stage 1b of the Council's Green Belt Review as the site continues to make a strong contribution to the purposes of Green Belt land.
104 (E13)	GBS_ 154	Land to the West of Sandwash Close	Allocated for employment Site 9EA	This site is located adjacent to Rainford Industrial Estate, outside of the Green Belt. The site benefits from planning consent for two buildings for B1 and B2/B8 use with the formation of new access road and other ancillary works.
105 (E14)	URB_ E1	Land at Lea Green Farm West	Allocated for employment Site 10EA	This is a brownfield site with planning consent for the erection of four new buildings, for B1, B2 and B8 uses with ancillary offices and associated access and parking facilities.
106 (E15)	URB_ E2	Gerards Park Phases 2 and 3	Allocated for employment Site 11EA	The site is brownfield, with consent for the erection of three industrial units containing 20 workshop units for use class B1, B2 and B8.
107 (E16)	GBS_ 165	Omega South Eastern Booths Wood	Discount	The site was discounted at Stage 1b of the Council's Green Belt Review, as the site continues to make a strong contribution to the purposes of Green Belt land. The site also has access issues and is distant to important community facilities and services.
(LE1)	n/a	Former United Glass Site, Salisbury Site	Discount	This site is brownfield and as such planning permission for any development on this site would be determined subject to existing and emerging policies. The site has been appraised as a potential leisure opportunity.



# **Appraisal of the Plan**

**07**

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## 7 APPRAISAL OF THE PLAN

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### 7.1 Methodology

- 7.1.1 This section presents an appraisal of the Plan against the SA Framework. Effects have been identified taking into account a range of characteristics including: magnitude, duration, frequency, and likelihood. Combined, these factors have helped to identify the significance of effects, whether these are positive or negative.
- 7.1.2 To give the appraisal a clear structure but avoid repetition and duplication, the findings are presented in a summary table for each SA Topic. The table sets out all the policies within the Plan, and identifies the effects that different elements (groups of similar policies) of the Plan would have.
- 7.1.3 Finally, the effect of the Plan ‘as a whole’ is identified, which considers cumulative effects, synergistic effects and how the different plan policies interact with one another. This is important as Plan policies should be read in the context of the whole Plan and not in isolation.
- 7.1.4 A score is given to reflect the significance of effects as follows:

✓✓	The policy is likely to have a <b>significant positive effect.</b>
✓	The policy is likely to have a <b>minor positive effect.</b>
-	The policy is likely to have a <b>negligible effect.</b>
✓ / ✘	The policy is likely to have a <b>mixture of positive and negative effects</b>
✘	The policy is likely to have a <b>minor negative effect</b>
✘✘	The policy is likely to have a <b>significant negative effect</b>
?	It is <b>uncertain</b> what effect the policy will have on the SA objective(s).

## 7.2 Biodiversity and Geodiversity

7.2.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'Biodiversity and Geodiversity'. The effects of the Plan are presented in table 7.1 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.1.

*Table 7.1: Appraisal of the Plan on Biodiversity and Geodiversity*

Local Plan Chapters / Policies	Score
<p><b>Core Policies (Including sites)</b></p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓</p> <p>LPA02: <i>Spatial Strategy</i> ✓</p> <p>LPA03: <i>Development Principles</i> ✓</p> <p>LPA04: <i>A Strong and Sustainable Economy</i> ✗?</p> <p>LPA05: <i>Meeting St. Helens Borough's Housing Needs</i> ✗?</p> <p>LPA05.01: <i>Strategic Housing Sites</i> ✓/✗</p> <p>LPA06: <i>Safeguarded land</i> ✓?</p> <p>LPA10: <i>Parkside East</i> ✗?</p> <p>LPA11: <i>Health and Wellbeing</i> -</p>	✓ / ✗
<p><b>Retail and town centres</b></p> <p>LPC04: <i>Retail and Town Centres</i> -</p> <p>LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> -</p> <p>LPB02: <i>Earlestown Town Centre</i> -</p>	-
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> -</p> <p>LPC02: <i>Affordable Housing</i> -</p> <p>LPC03: <i>Gypsies, Travellers &amp; Travelling Showpeople</i> -</p> <p>LPD04: <i>Householder Developments</i> -</p>	-
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ✓✓</p> <p>LPC07: <i>Greenways</i> ✓</p> <p>LPC08: <i>Ecological Network</i> ✓✓</p>	✓✓
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> ✓</p> <p>LPC10: <i>Trees and Woodland</i> ✓</p> <p>LPC11: <i>Historic Environment</i> -</p> <p>LPD06: <i>Prominent Gateway Corridors</i> -</p> <p>LPD05: <i>Extension, Alteration or Replacement of Buildings in the Green Belt</i> -</p>	✓
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓</p> <p>LPC12: <i>Flood Risk and Water Management</i> ✓</p> <p>LPC14: <i>Minerals</i> -</p> <p>LPC15: <i>Waste</i> -</p> <p>LPD09: <i>Air quality</i> -</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> -</p> <p>LPC13: <i>Renewable and Low Carbon Energy Development</i> -</p> <p>LPD07: <i>Digital Communications</i> -</p> <p>LPC05: <i>Open Space</i> -</p>	-
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓</p> <p>LPD02: <i>Design and Layout of New Housing</i> ✓✓</p> <p>LPD03: <i>Open Space and Residential Development</i> ✓</p> <p>LPD08: <i>Advertisements</i> -</p> <p>LPD10: <i>Food and drink</i> -</p>	✓
<p><b>The Local Plan 'as a whole' (i.e. cumulative effects)</b></p>	✓✓✓ / ✗

### Spatial strategy (including sites)

- 7.2.2 In terms of biodiversity, Policy LPA02: Spatial Strategy outlines the importance of maintaining, enhancing, connecting and expanding the ecological network, open space and recreation sites and greenway network. Policy LPA03: Development Principles adds to this stating (in part 5d) that development should contribute to “*protecting and enhancing the quality of the Borough’s natural resources including water, air, land and biodiversity.*” This is likely to lead to a positive effect over the Plan period.
- 7.2.3 Development has the potential to affect biodiversity through the loss of land, and disturbance to habitats and species by recreation, domestic pets, and air and water quality changes.
- 7.2.4 The bulk of development is anticipated to come forward in the urban area and Green Belt land allocations.
- 7.2.5 However, Policy LPA05.01 (Strategic housing Sites) requires all strategic sites to produce a masterplan covering the whole of the site, which will include a Green Infrastructure Plan to address any issues relating to biodiversity, geodiversity, greenways, ecological network, landscape character, trees and woodland in an integrated way. This is likely to mitigate the impacts felt on biodiversity and geodiversity on these large strategic sites and enhance the green network where possible.
- 7.2.6 The allocations are located some distance from Ancient Woodland and none of the allocated or safeguarded sites would lead to the direct loss of ancient woodland. These habitats are therefore unlikely to be significantly affected.
- 7.2.7 With regard to SSSIs within the Borough, none of the allocated or safeguarded housing sites are within close proximity, and cumulative effects such as increased recreational pressure are unlikely given the location of development. Whilst some proposed site allocations and areas of safeguarding have been identified as potentially affecting functionally linked habitats for pink footed goose (connected with European designated sites in the Liverpool City Region), Policy LPC06 contains a mechanism for addressing any harm to these habitats.
- 7.2.8 There are protected trees on a number of allocated sites, though in the main, these are restricted to site boundaries and could be avoided through design and layout.
- 7.2.9 Site 6HA involves a substantial amount of protected trees to the northern edge of the site, and it will be important to retain these as part of any development to avoid negative effects. The Council would be content to add a site specific requirement in the appendix to Policy LPA05.01 (if this is necessary) which would seek to retain the extent of existing wooded areas. This should help to ensure negative effects are avoided.
- 7.2.10 The employment site 1EA also involves protected trees that may be more difficult to retain given their central location on the site. Therefore, negative effects could occur here. It is recommended that trees are retained where possible, and new trees introduced as part of landscaping to compensate for any loss.
- 7.2.11 The majority of housing and employment sites are not directly within local wildlife sites, there is a wide network of locally important wildlife habitats that are adjacent to, or in some cases (with brooks and streams) pass through sites. For example, Sutton Brook runs round the perimeter of site 10HA, and employment site 3EA is adjacent to two local wildlife sites.

- 7.2.12 There is therefore potential for disturbance to these habitats during construction and also as a result of increased recreational pressure and the introduction of domestic animals. However, the negative effects are not predicted to be significant as other Plan policies (seeking to protect and enhance green infrastructure) ought to be sufficient to prevent harm and secure enhancements at some locations. The vast majority of development would also be located in less sensitive locations.
- 7.2.13 Furthermore, strategic site requirements are set out to secure enhancements in some locations. This includes biodiversity enhancements along Clipsley Brook (6EA / 2HA), expansion of tree cover at Bold Forest (site 4HA), and the creation of a green corridor along Rainford Brook. This should help to ensure positive effects are generated in these locations in particular.
- 7.2.14 The Parkside employment allocation (sites 8EA and 7EA) is within close proximity to Highfield Moss SSSI. As well as the potential for localised effects on wildlife on site, there may be a loss of farmland (which is under stewardship and may therefore have some benefits for local species such as birds). A number of farmland birds and migrating birds have been recorded on the SSSI, and so disturbance to surrounding areas could have a knock on effect on birds feeding.
- 7.2.15 The main threats to the moss are eutrophication, burning and drying out. Changing the land use from agricultural use could reduce the threat of eutrophication, but conversely, may create its own issues with regards to drainage and disturbance (e.g. noise during construction and operation of both warehouses and a rail line). There will be a need to engage with Natural England to ensure that significant effects do not occur. At this stage, an uncertain negative effect is predicted in this regard.

#### Retail and town centre policies

- 7.2.16 The town centre policies are not directly related to biodiversity protection and enhancement and therefore a neutral effect is predicted.

#### Housing policies

- 7.2.17 The non-strategic policies are not directly related to biodiversity or geodiversity and so neutral effects are predicted.

#### Biodiversity policies

- 7.2.18 Policy LPC06 outlines various requirements for development and its impact on biodiversity. The policy is likely to have a positive effect as there is a requirement that development encourages opportunities to enhance habitats within development sites, including within public open space or sustainable drainage schemes. There is also a need to consider effects upon designated habitats, with a hierarchy of mitigation and compensation. Though this is beneficial, such measures would be likely to be implemented under the existing policy framework, and so the effects are not considered significant.
- 7.2.19 With regard to European protected sites (notably the Mersey Estuary SPA), the Council has set out its intention to work with neighbouring authorities to establish appropriate mechanisms for protecting this habitat from negative effects.
- 7.2.20 The greenways policy (LPC07) should have a positive effect on biodiversity as it seeks to safeguard and enhance the number of greenways throughout St Helens. Development affecting greenways will be subject to stringent measures such as not impairing the integrity of a greenway as a wildlife corridor which should ensure preservation and longevity of biodiversity assets.

7.2.21 It is possible that the effects of climate change should be considered as part of the policies, i.e. that flora/fauna sensitive to temperature changes are considered in any new development.

7.2.22 The ecological network policy (LPC08) should result in a positive effect as it seeks to “*ensure greater resilience of the natural environment and secure a net gain in biodiversity*”. This will improve the links between networks in the longer term which would constitute a **significant positive effect**.

#### Built and natural environment policies

7.2.23 The character of landscapes could be influenced by the presence of particular habitats (for example trees, watercourses, hedges) or geological features (rocks, landforms etc.). Therefore, protection and enhancement of landscape character ought to have an indirect positive effect on biodiversity and geodiversity. However, it should be acknowledged that the focus of these policies is upon landscape character, and so the effects for biodiversity and geodiversity are not predicted to be significant.

7.2.24 Policy LPC10 seeks to ensure protection and enhancement of trees and woodlands, with a clear requirement that no ancient woodland is lost, resources are protected and enhanced (e.g. through the forest management plans), and compensating for loss by requiring higher levels of new provision. LPC11 promotes the conservation and enhancement of Registered Parks and Gardens by preserving the setting of the designated assets through careful landscaping, which could lead to positive effects for the biodiversity and geodiversity within and around these assets. Overall, this policy would have positive effects.

#### Natural resources

7.2.25 The green infrastructure policy (LPA09) provides an overarching framework for the protection of green and open space, with close links to several other policies in the plan. The policy seeks to protect and strengthen green infrastructure networks, with a specific aim to “*strengthen and expand the network of wildlife sites, corridors and stepping stone habitats to secure a net gain in biodiversity*”.

7.2.26 Policy LPC12 requires that flood risk management measures should, where possible, contribute to the protection and enhancement of biodiversity networks and should where appropriate, provide ecological benefits by integrating surface water drainage with wildlife habitats.

7.2.27 Together, these policies are likely to have a positive effect on biodiversity, as they provide a proactive and locally specific approach to green infrastructure networks.

#### Infrastructure

7.2.28 It is possible that biodiversity corridors/schemes could be adopted in the retention and creation of open spaces.

7.2.29 Policy LPC13 (Renewable and Low Carbon Energy Development) aims to support renewable energy proposals provided that they avoid substantial harm to St Helens biodiversity and geodiversity assets. However, the effects are not predicted to be significant given that such provisions would apply under the current policy framework.

#### Design

7.2.30 Policy LPD01 (Ensuring Quality Development) states that all development proposals will need to meet or exceed the requirement to ‘*respect any existing natural features*

*of the site by conserving, restoring or enhancing biodiversity and minimising any adverse impact on important natural features'.*

- 7.2.31 Therefore although new development has the potential to cause harm to biodiversity assets, this policy aims to minimise these affects through design, which could potentially lead to enhancements.
- 7.2.32 Policy LPD02 (Design and Layout of New Housing) states that all new residential developments are required to '*provide appropriate landscaping using native trees and shrub species*' leading to a strong approach to green infrastructure provision, in line with Policy LPA09.
- 7.2.33 The policy also states under clause 7) that development should *avoid causing harm to any important natural habitat, historic or other important landscape, mature tree(s), hedgerow, wildlife habitat, pond or watercourse*. This falls in accordance with Policy LPC09, which seeks to protect St Helens biodiversity assets. Policy LPD03 (Open Space) looks to retain open space within residential development, which could help retain biodiversity value.

Cumulative effects (i.e. the effects of the Plan as a whole).

- 7.2.34 The Plan will lead to the development of a variety of sites on greenfield land and also some which have environmental constraints such as being close to local wildlife sites and/or containing protected trees.
- 7.2.35 The majority of strategic sites are not located in sensitive areas, and potential negative effects on local wildlife ought to be mitigated by core policies throughout the plan.
- 7.2.36 There is particularly strong protection for ancient woodland, and any loss of habitat should be compensated with a greater quantity of species / habitat. The Green Infrastructure network ought to be protected and enhanced, with particular benefits relating to the creation of new local wildlife sites at Billinge Hill and the Bold Forest Area Action Plan. Furthermore, site specific policies should lead to improvements along Rainford Brook and Clipsley Brook.
- 7.2.37 Overall, despite the planned growth, the Plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a **significant positive effect** predicted in the long term.
- 7.2.38 The potential for temporary **minor negative effects** should be highlighted though, as there could be increased disturbance to habitats and species during construction, and the net value of biodiversity across the Borough may take time to be restored / and/or increased following development.
- 7.2.39 To ensure that there is 'net environmental gain', it will be important to identify delivery mechanisms for enhancement and compensation schemes. Monitoring of the measures identified for strategic sites would also be beneficial.

## 7.3 Land quality

7.3.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'Land Quality'. The effects of the Plan are presented in table 7.2 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows.

*Table 7.2: Appraisal of the Plan on Land Quality*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b> (Including site allocations)</p> <p>LPA01 <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02 <i>Spatial Strategy</i> ✓ / ✗            LPA03 <i>Development Principles</i> ?            LPA04 <i>A Strong and Sustainable Economy</i> ✗            LPA05: <i>Meeting St. Helens Borough's Housing Needs</i> ✗            LPA06: <i>Safeguarded Land</i> ✗            LPA10: <i>Parkside East</i> ✗            LPA11: <i>Health and Wellbeing</i> -</p>	✗ / ✓
<p><b>Retail and town centres</b></p> <p>LPC04 <i>Retail and Town Centres</i> ✓            LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓            LPB02: <i>Earlestown Town Centre</i> ✓</p>	✓
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✗ / ✓            LPC02: <i>Affordable Housing</i> ✗ / ✓</p> <p>LPC03 : <i>Gypsies, Travellers &amp; Travelling Showpeople</i> -            LPD04: <i>Householder Developments</i> -</p>	✗ / ✓
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ?            LPC07: <i>Greenways</i> ?            LPC08: <i>Ecological Networks</i> ?</p>	?
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> ✓            LPC10: <i>Trees and woodland</i> -            LPC11: <i>Historic Environment</i> ✓            LPD06: <i>Prominent Gateway Corridors</i> -            LPD05: <i>Development in the Green Belt</i> ✓</p>	✓
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC12: <i>Flood Risk and Water Management</i> -</p> <p>LPC14: <i>Minerals</i> ✓            LPC15: <i>Waste</i> ✓            LPD09: <i>Air quality</i> -</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> -            LPC13: <i>Renewable and Low Carbon Energy Development</i> ?            LPD07: <i>Digital Communications</i> -            LPC05: <i>Open Space</i> -            LPA08: <i>Infrastructure Delivery and Funding</i> -</p>	-
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> -            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>Open Space and Residential Development</i> -</p> <p>LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> -</p>	-
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	✗ / ✓

### Spatial strategy (including sites)

- 7.3.2 The spatial strategy and supporting policies propose the use of brownfield land where possible, and more intensive use of sites in the urban area where appropriate. This will help to encourage brownfield land use and regeneration (which might involve derelict or contaminated land). Further development would also need to be in accordance with these general principles. Consequently minor positive effects are predicted.
- 7.3.3 However, to meet identified housing needs, the Plan also proposes to release Green Belt land through a series of housing and employment land allocations. This land is predominantly agricultural or open green space, and its loss could have negative effects upon soil (namely through the loss of agricultural land).
- 7.3.4 Policy LPA04 (A Strong and Sustainable Economy) and Policy LPA02 (Spatial Strategy) both state that St Helens should embrace its potential for strategic logistics development, however land allocated to accommodate this growth is largely classified as Grade 3. The four largest employment sites within the Borough (Parkside West (8EA), Parkside East (7EA), Land west of Millfield Lane (6EA), and Florida Farm North (2EA) are all located within ALC Grade 3 within the north eastern and eastern parts of the Borough. It is unclear whether this is Grade 3a or 3b, and so the precise nature of effects is uncertain. However, negative effects will occur in any instance.
- 7.3.5 Policy LPA04.1 (Strategic Employment Sites) and Policy LPA05.1 (Strategic Housing Sites) both make reference to allocated sites for development within St Helens. Whilst some of these sites are located on lower quality / brownfield land, others are located within land that is classified as 'best and most versatile' (Grades 1-3a).
- 7.3.6 Much of the land within the north western part of the Borough is mapped as being of ALC Grade 1 and 2, and therefore of a particularly high quality. Rainford, and the north-eastern side of Billinge, are surrounded by land of this high quality; for site 8HA there would be a loss of approximately 11ha Grade 1 land. Whilst this is the highest quality land, the amount of loss is relatively low. Therefore the effects are considered to be minor.
- 7.3.7 Where the development of best and most versatile land is considered to be unavoidable (there may not be alternative sites at some settlements) there ought to be compensation for any loss to minimise negative effects on the baseline position for soil. This is difficult to achieve on a like-for like basis but could take the form of the provision of on-site quality allotments for example (should demand exist).
- 7.3.8 The quality of land should be confirmed through an up to date assessment of grading. In particular, it would be beneficial to distinguish whether the sites that fall onto Grade 3 land constitute best and most versatile soils (Grade 3a) or not (Grade 3b).
- 7.3.9 In addition to the allocations, Policy LPA06 (Safeguarded Land) removes certain sites from the Green Belt and safeguards them from change over the Plan period. This could have mixed effects. During the Plan period, land will be protected from development, but a marker has clearly been set out that this land may be appropriate for allocation in the longer term (beyond the plan period). Much of the land identified is classified as best and most versatile agricultural land. Therefore, the potential for negative effects beyond the Plan period is likely.

7.3.10 However, these effects would need to be identified in light of new evidence at that time as part of a Plan review or new plan.

7.3.11 Policy LPA03 (development principles) looks to minimise air, soil and water pollution which is positive in principle, but may not totally prevent negative effects from occurring.

#### Retail and town centre policies

7.3.12 Policy LPC04 (Retail and Town Centres) introduces a hierarchy which prioritises the location of various town centre uses. The hierarchy should help to ensure that the scale and type of development is appropriate to its setting, and is likely to help ensure that available brownfield land is identified for development where suitable. Required Impact Assessments will also help to ensure that the land used for development is proportional to the area and in the most accessible location, utilising existing infrastructure.

7.3.13 Policy LPC04 (Retail and Town Centres), Policy LPB01 (St Helens Central Spatial Area) and Policy LPB02 (Earlestown Town Centre) all encourage the development of homes, shopping, leisure, tourism and cultural facilities within the Town Centres. They also state a resistance to out of centre development, and promote land located within the Town Centres. These measures ought to help support regeneration efforts, which could tackle contaminated / derelict land and property. The policies are also likely to encourage higher-density development, which has a smaller development footprint, thereby having a minor positive effect on land quality.

7.3.14 With a resistance to out of town locations, it is possible that peripheral land outside the defined boundaries could become poorer quality, and / or used for services such as car-parking. However, other Plan policies ought to encourage links between the town centres and surrounding settlements.

7.3.15 Overall a minor positive effect on land quality is predicted.

#### Housing policies

7.3.16 Policy LPA05 sets requirements for the density of housing developments, which ought to encourage more efficient use of land in town centre/urban locations. The need to deliver lower density development on edge of settlement sites could in some instances lead to an overall greater loss of land. However, the quality of the development would be likely to be higher, by avoiding causing harm to the character and appearance of the area

7.3.17 Policy LPC01 (Housing Mix), requires 5% of the market housing mix on greenfield sites to be delivered as bungalows. This will lead to relatively low density housing in some areas, and is not the most efficient use of land, particularly in Green Belt locations where agricultural land quality is high. However, there are needs for such property to support an aging population. Nevertheless, this is a negative effect.

7.3.18 Policy LPC02 (Affordable Housing Provision) sets a lower affordable housing requirement for developments within areas where viability is not optimal. This includes much of the St Helens urban area and predominantly brownfield sites. This could act as an incentive for developers to redevelop such land, potentially tackling contamination, dereliction and delivering higher density development.

7.3.19 Overall, mixed effects are predicted, both positive and negative; reflecting the issues discussed above.

7.3.20 The effects are not predicted to be significant, as there are other influential factors that play a greater role in the delivery of regeneration schemes, and the location of development is largely set through the spatial strategy.

#### Biodiversity policies

7.3.21 Protection of biodiversity, geological and ecological sites under Policy LPC06 (Biodiversity and Geodiversity Conservation) and Policy LPC07 (Greenways) could potentially limit the appropriateness of some sites for development. In this instance, the policy could have a minor positive influence in encouraging the re-development of brownfield or derelict sites (although these can themselves contain valuable biodiversity).

7.3.22 Strong protection for biodiversity could however, direct development towards sites which have greater value for agriculture (and less so for biodiversity), which would have negative implications for land quality.

7.3.23 Overall, the minor, mixed and uncertain nature of the effects, mean that these policies are likely to have insignificant effects on the baseline.

#### Built and natural environment policies

7.3.24 Contaminated sites could potentially be remediated through the planting of trees and woodland as supported through Policy LPC (Trees and Woodland). Likewise, Policy LPC09 (Landscape Protection and Enhancement) is likely to have a minor positive effect by making it a requirement that landscape character assessments are conducted which consider the quality of the land prior to development. Such assessments should help to gauge the appropriateness of development and may help to guide development to previously developed sites rather than agricultural and green-field land.

7.3.25 A minor positive effect is predicted for Policy LPD05 (Development in the Green Belt) which sets standards for the allowed size of building extensions and should help to contain development.

#### Natural resources

7.3.26 Policy LPA09 (Green Infrastructure) supports the implementation of the Bold Forest AAP, establishment of a Local Nature Reserve at Billinge Hill, and delivery of the Sankey Catchment Action Plan. These measures should have positive implications for land quality by seeking to preserve high quality land and encourage the reclamation of land.

7.3.27 Policy LPC14 (Minerals) and Policy LPC15 (Waste) prioritise the reduction of waste, reuse of materials and the use of materials with a high recycled content; all of which would reduce the need for virgin materials and waste management / disposal sites.

7.3.28 The adoption of Mineral Safeguarding Areas may help to delay the development process in the short term, and could therefore be beneficial in safeguarding high quality land should it overlap with such areas.

7.3.29 Overall, the effect of the natural resource policies is likely to be positive, but not significant.

### Infrastructure

- 7.3.30 Focusing development in existing settlements / edge of settlement locations makes good use of existing physical and social infrastructure (thereby reducing the pressure to develop land for new infrastructure).
- 7.3.31 The promotion of sustainable transport methods and a reliance on cleaner energy sources under Policy LPA07 (Transport and Travel) could, in the longer term, reduce the need to extract raw materials (which would help to protect land quality). The effects are uncertain at this stage though.
- 7.3.32 Policy LPC05 (Open Space) seeks to maintain access to open space, and as such is likely to protect some areas of land from being developed and soil resources from being permanently lost.
- 7.3.33 Policy LPC13 (Renewable and Low Carbon Energy) supports wind energy schemes where they would not have an unacceptable effect upon environmental factors such as landscape, biodiversity, and natural resources. It is not clear in the policy if soil is included within this definition of 'natural resources'. If so, the policy should afford protection of high quality agricultural land. It would be beneficial to make the policy more explicit so that effects on 'best and most versatile' agricultural land are considered strongly in the decision making process. It ought to be feasible to return land to its former use for agriculture where land loss is unavoidable. An uncertain effect is predicted at this stage.
- 7.3.34 Given the minor nature of the effects discussed above, the infrastructure policies are considered to have a neutral effect on land quality overall.

### Design

- 7.3.35 Encouraging higher density development in the urban area / town centre ought to be positive in terms of supporting the efficient use of land, and potential reclamation of derelict sites. Additionally, Policy LPD01 (Ensuring Quality Development) states that new residential development should ensure that any contamination of the land and ground stability issues which currently exist on site are remediated and make use of sustainable remediation technologies, which could improve the land quality of these sites.
- 7.3.36 However, due to sites with significant ground issues not being as likely to come forward for development, the likelihood of development improving the land quality within St Helens is less pronounced; therefore it could be predicted to have neutral effects.
- 7.3.37 The policy states that all development should avoid the loss of or damage to high quality soil or minimise the loss where this is unavoidable. This is in order to retain the Borough's best and most versatile (BMV) agricultural land, especially to the north of the A580, which is of the highest grade. Whilst this is positive with regards to general development, it will have limited effects in terms of the allocated sites that fall within BMV agricultural land.

### Cumulative effects (i.e. the effects of the Plan as a whole).

- 7.3.38 The Plan will lead to development on land of agricultural value; some of which is categorised as 'best and most versatile'. Once developed, this resource cannot be recovered, and so this represents a **negative effect** on soil resources.

- 7.3.39 The overall amount of land affected is relatively low, and in the main avoids the most sensitive land. Therefore, the effects are not predicted to be significant.
- 7.3.40 With regard to alternative sites, these too would be mostly agricultural in nature, but in some locations the quality would be higher (for example, alternative sites around Rainford are Grade 1). Therefore, the strategy broadly makes use of lower quality agricultural land wherever possible.
- 7.3.41 The Plan also seeks to make efficient use of land and infrastructure, and promotes the regeneration of land, particularly brownfield land in the urban area (as demonstrated by the allocation of four large sites in the urban area). This would generate **minor positive effects** with regard to land quality.

## 7.4 Traffic, Congestion and Air Quality

7.4.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic ‘traffic, congestion and air quality’. The effects of the Plan are presented in table 7.3 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.3.

**Table 7.3: Appraisal of the Plan on Traffic, Congestion and Air Quality**

Local Plan Chapters / Policies	Score
<p><b>Core Policies (Including strategic sites)</b></p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> -            LPA02: <i>Spatial Strategy</i> -            LPA03: <i>Development Principles</i> ✓            LPA04: <i>A Strong and Sustainable Economy</i> ✘✘            LPA05: <i>Meeting St. Helens Borough’s Housing Needs</i> ✓ / ✘            LPA06: <i>Safeguarded Land</i> ✘            LPA10: <i>Parkside East</i> ✓✓ / ✘            LPA11: <i>Health and Wellbeing</i> ✓</p>	<p>✓ / ✘✘?</p>
<p><b>Retail and town centres</b></p> <p>LPC04: <i>Retail and Town Centres</i> ✓ / ✘            LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓ / ✘            LPC02: <i>Earlestown Town Centre</i> ✓ / ✘</p>	<p>-</p>
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> -            LPC02: <i>Affordable Housing</i> -</p> <p style="text-align: right;">LPC03: <i>Gypsies, Travellers &amp; Travelling Show people</i> -            LPD04: <i>Householder Developments</i> -</p>	<p>-</p>
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ✓            LPC07: <i>Greenways</i> ✓            LPC08: <i>Ecological Network</i> ✓</p>	<p>✓</p>
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> -            LPC11: <i>Historic Environment</i> -            LPC10: <i>Trees and woodland</i> ✓</p> <p style="text-align: right;">LPD06: <i>Prominent Gateway Corridors</i> -            LPD05: <i>Extension, Alteration or Replacement of Buildings in the Green Belt</i> -</p>	<p>-</p>
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC12: <i>Flood Risk and Water Management</i> ✓</p> <p style="text-align: right;">LPC14: <i>Minerals</i> ✓            LPC15: <i>Waste</i> ✓            LPD09: <i>Air quality</i> ✓</p>	<p>✓</p>
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> ✓            LPA08: <i>Infrastructure Delivery and Funding</i> ✓            LPC13: <i>Renewable and Low Carbon Energy Development</i> ✓            LPD07: <i>Digital Communications</i>. -            LPC05: <i>Open Space</i> -</p>	<p>✓</p>
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>New Housing and Open Space Provision</i> -            LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> -</p>	<p>✓</p>
<p><b>The Local Plan ‘as a whole’ (i.e. cumulative effects)</b></p>	<p>✓ / ✘✘?</p>

### Spatial strategy (including sites)

- 7.4.2 Given the relatively high number of people without access to a car in St Helens, the Local Plan seeks to locate new development in areas which are accessible by non-car modes. Enhancing linkages between areas of deprivation and employment is also a key principle.
- 7.4.3 Policy LPA02 (Spatial Strategy), Policy LPA03 (Development Principles) and LPA11 (Health and Wellbeing) each support improved accessibility, green infrastructure, pedestrian and cycling routes and public transport improvements across the Borough. These Policies also guide new development to sustainable and accessible locations or to locations that can be made sustainable. This sets the basis for encouraging a modal shift away from less sustainable transport means.
- 7.4.4 The spatial strategy directs most housing growth to key settlements (including the allocation of a number of strategic sites on the edge of settlements), which have reasonable or good access to transport links, local services and facilities and employment. Where access is poorer, there is an assumption that bus services could be enhanced to support substantial new development.
- 7.4.5 There is a substantial amount of brownfield regeneration land in the St Helens urban area that forms part of the Plan, as well as employment and housing growth at selected Green Belt sites. The level and spread of development over the Plan period is not proportionate to the existing settlements, with a large amount being distributed to the core central areas, the south and east, and less so to the north and west of the Borough.
- 7.4.6 There is a large urban extension to the south (4HA), though much of the growth anticipated here would be beyond the Plan period. Nevertheless, development would lead to increased trips on local road networks, particularly the A659, B5204 and Gorse Lane. It could also contribute to pressure at Junctions 7 and 8 of the M62. Though housing here would have access to local employment opportunities, a local train station at St Helens Junction, and bus services could be expanded onto the site, it is likely that a large number of additional car trips would be generated. This could lead to increased traffic into St Helens town, and other destinations for employment and retail. For example, towards Warrington, Huyton, Widnes.
- 7.4.7 On its own, development here within the Plan period is unlikely to have significant effects in terms of traffic and congestion. However, additional land allocations at sites 3HA 5HA, 9HA, 10EA and 10HA (to a lesser extent), would contribute to an overall increase in car usage in these areas. This is recorded as a negative effect, but it should be possible to avoid significant negative effects given that there is a requirement for highways improvements, and encouragement of alternative modes of transport.
- 7.4.8 To the west of the urban area, the level of planned growth is small, and so effects upon the local road networks in this area are anticipated to be neutral. To the west and northwest, increases in traffic along the B5201, B5203 are not likely to be significant. Likewise, traffic filtering onto the East Lancashire Road would not be expected to increase. To the south west around the areas of Holt, Whiston, Portico, Rainhill and Prescot, there is limited planned development. Therefore, traffic along the A58 towards St Helens and towards Junction 2 of the M57 would also be unlikely to change significantly beyond the projected baseline position. Given that there is an AQMA at Borough Road and Linkway East in the town centre, a lack of development in this part of the Borough is appropriate.

- 7.4.9 Growth in the urban area at site 2HA would be likely to increase traffic on the East Lancs Road (A580), but its location close to the town centre could mean that trips to the south are less prominent (helping to manage increased pressure on the inner road networks). Overall, minor negative effects are predicted, because in combination with site 2HA and employment growth towards Haydock there is potential for negative effects.
- 7.4.10 The level of development to the north and east is relatively low, and therefore, the effects on the road network are considered likely to be minor. This means that expected increases in traffic through Billinge and Rainford towards St Helens would be minor.
- 7.4.11 The allocated strategic employment sites under Policy LPA04 (Strategic Employment Sites) are located close to primary transport routes. Whilst positively located in terms of accessibility, the increased number of employees and goods vehicles using the associated junctions could add to congestion and air quality issues in these areas. There are concentrations of development towards M6 Junction 23 (Haydock) and Junction 22 (Parkside), and so an assessment of cumulative effects here is critical.
- 7.4.12 The Plan acknowledges the potential for negative effects, and seeks to manage increased growth with the necessary infrastructure; making clear that certain developments should not commence until supporting infrastructure has been secured. For example, Policies LPA02 (Spatial Strategy) and LPA07 (Transport and Travel) outline a commitment to improving railway stations and other public transport facilities, the availability of which could reduce the number and length of car trips. As part of each strategic allocation, there is also a requirement to produce a Travel Plan to accompany the plans for the site. This should help to highlight potential effects of development on travel and transport and secure mitigation and enhancement measures. Consequently, the overall effects of development ought to be moderate to minor in the long term, acknowledging that there could be more prominent disruption during construction phases.
- 7.4.13 Policy LPA02 (Spatial Strategy), Policy LPA04 (A Strong and Sustainable Economy), and Policy LPA10 (Parkside East) all seek to locate economic opportunities along strategic transport corridors. Locating large employment sites in proximity to the strategic road network of the M6 and the M62 could have mixed effects.
- 7.4.14 Should employees be travelling from outside of the Borough, they should benefit from good links to employment sites, and routes through settlements in the Borough should be avoided. For employees who live in St Helens, accessibility to these sites varies. Residents residing in the south (Clock Face) or the south-east (Newton-le-Willows or Haydock), would have relatively short journeys (by car) to new strategic employment opportunities, whilst there would be little change for those to the north and more rural parts of the Borough. Overall, a reliance on car travel is likely to continue, given that rail access to these employment sites is absent and bus services do not demonstrate high usage.
- 7.4.15 There are air quality management areas within close proximity to allocated employment sites at M6 Junction 23, and development at Parkside SRFI could potentially increase trips through Newton-le-willows (possibly affecting the High Street AQMA).
- 7.4.16 In the short-term, the construction of the SRFI may therefore cause disruption to road networks, and until a direct access to the M6 is secured, there could be negative effects upon local traffic flows (with associated air quality implications).

- 7.4.17 However, the Plan policies seek to minimise such disruption by requiring a phased approach to development, network management, ensuring collaboration with the Highways Agency, and promoting alternative modes of travel.
- 7.4.18 In the long term, the development of Parkside SRFI is predicted to have a positive effect on both air quality and congestion. Such infrastructure would enable the transport of heavy goods by rail, freeing up capacity on the road network from HGVs. The operation of the SRFI, once constructed, is also likely to result in fewer associated air emissions from the transport of such goods. A direct link to the M6 on the eastern phase of the SRFI would help to minimise negative effects in the longer term.
- 7.4.19 Overall, the Plan strategy is predicted to have negative effects with regards to the traffic, congestion and air quality. Though there are efforts to support modal switch towards active modes of travel and public transport, there is a large amount of development in areas that are likely to encourage car usage. In particular, the location of employment land at key road and motorway junctions. A potentially significant negative effect is predicted, but this may be offset by infrastructure improvement, and with regards to freight, the long term aspiration for a strategic rail freight terminal.
- 7.4.20 With regard to air quality, the distribution of growth could affect AQMAs associated with motorway travel, but would be less likely to contribute to a worsening of the situation at AQMAs in the town centres. Therefore, the effects are not predicted to be significant.

#### Retail and town centre policies

- 7.4.21 Policy LPB01 (St Helens Central Spatial Area) and Policy LPB02 (Earlestown Town Centre) both seek to maintain and improve the vitality of town centres and access to them. This ought to be positive in terms of reducing travel and locations for retail. However, whilst the town centres are broadly more accessible than other locations, the use of private vehicles is still the prominent mode of transport. Increased trips into town centres could therefore add to congestion on key routes into St Helens and Earlestown in particular. However, these policies also seek to enhance cycling; walking and public transport routes, and strengthen links to out of town locations, which ought to counteract increased growth in these areas to an extent.
- 7.4.22 Overall, the retail and town centre policies are predicted to have a neutral effect on traffic, congestion and air quality; reflecting enhancements to accessibility, but the potential for increased trips into these centres.

#### Housing policies

- 7.4.23 Offering individuals a choice of quality housing in proximity to local services and employment should help to minimise journeys made by car, and allow more sustainable modes of transport to be adopted.
- 7.4.24 The flexibility of the housing affordability policy should allow for necessary infrastructure improvements to be made on brownfield sites in the urban area without affecting viability significantly. Such improvements could include upgrades to highways, and so a minor positive effect is predicted.

### Biodiversity policies

7.4.25 Policy LPC06 (Biodiversity and Geological Conservation) Policy LPC07 (Greenways) and Policy LPC08 (Ecological Network) all support the preservation and enhancement of green infrastructure, which should contribute to the management of air quality and promote walking and cycling as alternatives to the car. This ought to have benefits in terms of air quality, but the effects are not predicted to be significant given current and predicted trends in car usage.

### Built and natural environment policies

7.4.26 Policy LPC09 seeks to protect local landscape character; which could in some instances affect the alignment or delivery of highways schemes. Though there are potential barriers to development, these are not likely to prevent necessary infrastructure being implemented, and so effects are not significant.

7.4.27 Policy LPC10 (Trees and Woodland) should lead to the protection and enhancement of trees and woodland in urban areas, which is beneficial in terms of helping to regulate air quality. Only minor effects are predicted.

7.4.28 Overall, the effects of the built and natural environment policies are neutral. Whilst there may be some minor benefits with regards to environmental protection, these are counterbalanced by potential minor negative effects from policies that could affect the delivery of transport infrastructure.

### Natural resources

7.4.29 Efforts to maintain and increase the provision of green space, GI and LNRs under Policy LPA06 (Green Infrastructure) are likely to make alternative modes of transport, such as walking and cycling, more attractive. The maintenance and presence of green infrastructure can also have a positive influence on air quality; though the effects of green infrastructure alone are unlikely to be significant (e.g. the location of development may necessitate further trips and / or private car travel).

7.4.30 Policy LPC12 (Flood Risk and Water Management) will help to minimise the damage of potential flood events and, in doing so, there is less likely to be disruption to the local transport systems during such events.

7.4.31 Primary mineral extraction is a practice which typically releases high levels of emissions. By encouraging the use of substitute, secondary or recycled sources, Policy LPC14 (Minerals) could contribute to a reduction in emissions from such sources. However, the air quality issues within the Borough are mostly attributed to emissions from transport.

7.4.32 The requirement to include temporary recycling facilities on site should help to reduce the associated travel demands of transporting construction waste to either land-fill or off-site recycling facilities.

7.4.33 Both Policy LPC14 (Minerals) and Policy LPC15 (Waste) could help to reduce the amount of trips required to transport materials and waste. However, the effect is predicted to be minor.

7.4.34 Policy LPD09 (Air Quality) seeks to reduce air pollution and minimise exposure to pollutants, which ought to have a beneficial effect on air quality.

7.4.35 In combination the natural resource policies are predicted to have a positive effect on traffic, congestion and air quality.

#### Infrastructure

7.4.36 Policy LPA07 (Transport and Travel) and Policy LPC07 (Greenways) actively promote the adoption of sustainable modes of transport within the Borough, with provision for pedestrians, cyclists, electric vehicle charging. Efforts to generate a modal shift should help to reduce dependency on the private vehicle, and therefore help to reduce the effects of economic and housing growth upon the road networks.

7.4.37 Policy LPA08 also supports the protection, provision and enhancement of all forms of infrastructure, including green infrastructure and sustainable transport infrastructure, along with safeguarding and allocating land for new or improved infrastructure to meet the needs of the local people and wider area.

7.4.38 Policy LPA07 (Transport and Travel) seeks to improve air quality and minimise carbon emissions through the transport network across St Helens by improving all sustainable transport provision and ensuring all new development prioritises these sustainable modes of transport. The requirement for Transport Assessments under Policy LPA07 should also help to highlight potential threats to air quality, and could allow for adequate mitigation to be adopted. Likewise, public transport provision in proximity to developments may make this form of travelling a preferred option to the private vehicle, and the provision of adequate parking facilities is likely to reduce the need for on-street parking, and improve road safety.

7.4.39 Policy LPC13 (Renewable and Low Carbon Development) is likely to contribute to a general improvement to air quality by encouraging the adoption of low-carbon or renewable energy generation. Additionally, new development for housing, employment or other uses should meet high standards of sustainable design and construction to minimise carbon emissions through the use of renewable and low carbon energy. Policy LPC13 encourages development within the Strategic Housing and Employment sites (identified in Policies LPA04.1 and 05.1) to meet at least 10% of their energy needs in this way. Although this could lead to potential minor positive effects for air quality, the major source of air quality issues is emissions from vehicular travel, which would not be affected by this policy.

7.4.40 Overall, the infrastructure policies are predicted to have a positive effect on local traffic, congestion and air quality.

#### Design

7.4.41 Policy LPD02 (Design and Layout of New Housing) encourages the design of streets that generate low vehicle speeds, helping to improve highway safety and reduce the likelihood of accidents. The policy also seeks to improve local legibility and wayfinding which could encourage individuals to adopt more sustainable modes of transport to access local facilities and services.

7.4.42 Policy LPD02 (Design and Layout of New Housing) requires new development to provide safe, secure, attractive, permeable, legible and useable environments for all users which will reinforce connections and incorporate new connections where necessary to encourage a shift to more sustainable modes of travel by improving accessibility for all residents across St Helens. Additionally, this policy will promote safe living environments, increasing public surveillance, reducing crime in the area which in turn could also increase more sustainable modes of transport throughout the day.

7.4.43 Whilst these policies are positive, the effects generated are unlikely to be significant with regard to traffic, congestion and air quality at a Borough-wide level.

Cumulative effects (i.e. the effects of the Plan as a whole).

7.4.44 The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Bold, Newton le Willows and Earlestown.

7.4.45 Increased traffic in these areas could have **minor negative effects** upon levels of congestion with knock-on adverse effects upon air quality. In particular there are substantial concentrations of proposed employment land at Haydock, and a large urban extension at Bold. The amount of traffic generated in these locations needs to be supported by improvements to infrastructure.

7.4.46 Not all new trips would be car based though, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This should help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made. The strategic approach already seeks to achieve these connections by allocating housing sites in the urban area close to employment opportunities, and bringing forward housing and employment development in similar locations (for example site 2HA is well related to existing and new employment in Haydock). These elements of the Plan ought to reduce the significance of potential negative effects somewhat. However, uncertainty remains.

7.4.47 In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have **minor positive effects** for the wider region with regards to a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed. An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.

7.4.48 Nevertheless, the overall implications for traffic and air quality are likely to be negative given the focus on development along key road networks, and in economic sectors that generate significant vehicular movements. On balance, an uncertain **significant negative effect** is predicted. The Council will need to continue working with infrastructure providers, developers and in collaboration with the transport authority to help deliver the improvements necessary to reduce the dominance of car travel.

## 7.5 Natural resources

7.5.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'Natural Resources'. The effects of the Plan are presented in table 7.4 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.4.

*Table 7.4: Appraisal of the Plan on natural resources*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b></p> <p>LPA01 <i>Presumption in Favour of Sustainable Development</i> -            LPA02 <i>Spatial Strategy</i> -            LPA03 <i>Development Principles</i> ✓            LPA04: <i>A Strong and Sustainable Economy</i> ✘/✓            LPA05: <i>Meeting St. Helens Borough's Housing Needs</i> ✘/✓            LPA06: <i>Safeguarded Land</i>            LPA10: <i>Parkside East</i> ✓✓            LPA11: <i>Health and Wellbeing</i> ✓</p>	✘ / ✓
<p><b>Retail and town centres</b></p> <p>LPC04 <i>Retail and Town Centres</i> -            LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> -            LPC02: <i>Earlestown Town Centre</i> -</p>	-
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> -                      LPC03: <i>Gypsies, Travellers &amp; Travelling Showpeople</i> -            LPC02: <i>Affordable Housing</i> -            LPD04: <i>Householder Developments</i> -</p>	-
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ✓?            LPC07: <i>Greenways</i> ✓?            LPC08: <i>Ecological Network</i> ✓?</p>	✓?
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> -            LPC10: <i>Trees and Woodland</i> -            LPC11: <i>Historic Environment</i> -            LPD06: <i>Prominent Gateway Corridors</i> -            LPD05: <i>Extension, Alteration or Replacement of Buildings in the Green Belt</i> -</p>	-
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓                      LPC15: <i>Waste</i> ✓            LPC12: <i>Flood Risk and Water Management</i> ✓      LPD09: <i>Air quality</i> -            LPC14: <i>Minerals</i> -</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> -            LPC13: <i>Renewable and Low Carbon Energy Development</i> -            LPD07 <i>Digital Communications</i> -            LPC05: <i>Open Space</i> -</p>	-
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>Open Space and Residential Development</i> -            LPD08: <i>Advertisements</i> -</p>	LPD10: <i>Food and drink</i> - ✓
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	- / ✓

### Spatial strategy (including sites)

- 7.5.2 The spatial strategy should have a positive effect on natural resources, particularly as Policy LPA02 (Spatial Strategy) requires that the re-use of previously developed land will remain a key priority and that a *“substantial proportion of new housing throughout the Plan period will be on such sites”*.
- 7.5.3 Policy LPA03 (Development Principles) indicates that a key requirement of development will be *“protecting and enhancing the quality of the Borough’s natural resources including water...”* and that *“using water, energy, minerals and waste resources in an efficient and effective way”* is ensured. These broad principles should help to contribute to a positive effect on the preservation and enhancement of natural resources.
- 7.5.4 Policy LPA03 (Development Principles) states the importance of lowering St Helen’s carbon footprint, which includes support for the sustainable use of resources and a reduction in waste generated. Schemes which demonstrate these principles would help to ensure that new development is more resource efficient, and have a positive effect on natural resources.
- 7.5.5 Policy LPA03 also seeks to minimise air, soil and water pollution with the aim that all new development will contribute to a high quality built and natural environment by *‘protecting and enhancing the quality of the Boroughs natural resources including water air, land and biodiversity’*.
- 7.5.6 The plan will lead to a higher level of growth than might be anticipated in the absence of the Plan (i.e. planning for the full objectively assessed housing and employment needs but adding an uplift to ensure flexibility). This increased level of growth would lead to greater generation of wastes, and possible effects upon water quality. However, the distribution and quality of development ought to help reduce effects upon natural resources.
- 7.5.7 In some instances it may also be possible to achieve positive effects for natural resources. For example, much of the Borough falls within a Surface Water Nitrate Vulnerable Zone, attributable mainly to agricultural activities. Conversion of the land into land for housing or employment should help to reduce polluted run-off into watercourses. Conversely, it will be important to ensure that contaminants within soil are not released during construction activities.
- 7.5.8 The majority of sites are not within close proximity to Groundwater Protection Zones, and therefore, effects are predicted to be neutral in the main. Site 7HA falls within Zone 2. The proposed use (housing) is not likely to be a major risk to groundwater once operational, but it will be important to ensure that construction activities do not lead to spillages / leakages that could affect groundwater resources. Implementation of a construction site management plan should mitigate these effects.

### Retail and town centres policies

- 7.5.9 The policies require a hierarchical approach to retail provision, with a preference for town centre locations. This is more likely to encourage the recycling of land and buildings in the urban areas rather than the development of new sites in out of town locations. This ought to reduce the generation of waste and the use of natural resources.

- 7.5.10 However, a significant effect is unlikely to occur as these are principles that are set out in the NPPF and current Core Strategy (and would therefore be likely to occur anyway).

#### Housing policies

- 7.5.11 The housing policies are predicted to have a neutral effect on natural resources as the policies on housing mix, density, affordable housing and gypsy and travellers are not explicitly linked to natural resource use, quality or efficiency.

#### Biodiversity policies

- 7.5.12 It is possible that the protection and enhancement of ecological habitats and networks (which may include waterways) could have benefits for water quality (and vice versa). However, the effects upon water quality are uncertain and not predicted to be significant.

#### Built and natural environment policies

- 7.5.13 Neutral effects are predicted on natural resources from these policies as they are not linked explicitly to waste or water quality.

#### Natural resources

- 7.5.14 The green infrastructure policy includes the requirement for (where applicable) development to contribute to the development and implementation of the Sankey Catchment Action Plan. There is potential for development to incorporate green and blue infrastructure which could help to filter pollutants from water. This should help to protect and improve water quality.
- 7.5.15 Policy LPC12 (Flood Risk and Water Management) is predicted to have a positive effect on natural resources as it states that “*development that would adversely affect the quality or quantity of water in any watercourse or groundwater ....will not be permitted*”. In particular, “*new development will be required to enhance and protect the water quality of existing water resources, such as watercourses and groundwater*”. These measures should help to protect and improve water quality, which is a positive effect.
- 7.5.16 In terms of waste, the policy aligns with the Merseyside and Halton Joint Waste Local Plan and uses the waste hierarchy set out in that document. It is therefore unlikely that the baseline position would be altered significantly as a result of this policy so a neutral effect is predicted in this respect. Policy LPC15 (Waste) does however state that design ought to take account of the need to store and collect waste. This is positive, as it will help to ensure that barriers to recycling are removed.

#### Infrastructure

- 7.5.17 **Neutral effects** are predicted on natural resources from these policies as they are not linked explicitly to waste, minerals or natural resources (such as soil).

#### Design

- 7.5.18 Policy LPD01 (Ensuring Quality Development) is likely to generate a **positive effect** on natural resources, as it includes measures to ensure environmental quality (more specifically water quality) is managed, including the safe disposal of waste and protection of watercourses from encroachment by new development.

7.5.19 Additionally, clause 3) 'resource management' should ensure that all new development including demolition and construction minimizes the generation of waste and promotes the use of recycled locally sourced materials. This aligns with the Merseyside and Halton Joint Waste Local Plan).

Cumulative effects (i.e. the effects of the Plan as a whole).

7.5.20 The Plan has a key aim of supporting economic growth, and also allocates a higher amount of land for housing than projected population forecast suggests is needed (uplifted to match employment aspirations and with an element of flexibility). This is likely to lead to increased generation of waste, and the use of natural resources. However, growth would still occur in the absence of a Local Plan, albeit perhaps not at the same rate.

7.5.21 Whilst growth could have negative implications, the policies in the Plan ought to ensure that there are no significant effects. A number of policies seek to preserve and enhance natural resources, with explicit reference to the need to enhance water quality. Therefore, neutral effects are concluded.

7.5.22 Given that many of the Borough's watercourses are vulnerable to nitrates within surface water run-off, changes in land use (from agricultural) could actually help to reduce this problem in the longer term, which is a positive minor effect.

7.5.23 Overall, the effects of the Plan are predicted to be **neutral**; acknowledging that high levels of growth can affect the use of natural resources, but the efficiency of resource use and waste generation ought to be improved. In the long term, there could be a **positive effect** on water quality if new development reduces the amount of nitrates in surface water run-off and introduces measures to protect and where possible improve water quality as required by policies in the Plan.

## 7.6 Climate change and energy

7.6.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'climate change and energy'. The effects of the Plan are presented in table 7.5 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.5.

*Table 7.5: Appraisal of the Plan on climate change and energy*

Local Plan Chapters / Policies	Score
<p><b>Core Policies (Including site allocations)</b></p> <p>LPA01 Presumption in Favour of Sustainable Development            LPA02 Spatial Strategy -            LPA03 Development Principles ✓            LPA04: A Strong and Sustainable Economy ✘/✓            LPA05: Meeting St. Helens Borough's Housing Needs -            LPA06: Safeguarded Land -            LPA10: Parkside East ✓✓            LPA11: Health and Wellbeing ✓</p>	✓/✘
<p><b>Retail and town centres</b></p> <p>LPC04 Retail and Town Centres -            LPC01: St. Helens Town Centre and Central Spatial Area -            LPC02: Earlestown Town Centre -</p>	-
<p><b>Housing policies</b></p> <p>LPC01: Housing Mix -            LPC02: Affordable Housing -            LPC03: Gypsies, Travellers &amp; Travelling Showpeople -            LPD04: Householder Developments -</p>	-
<p><b>Biodiversity policies</b></p> <p>LPC06: Biodiversity and Geological Conservation -            LPC07: Greenways ✓            LPC08: Ecological Network ✓</p>	✓
<p><b>Built and natural environment policies</b></p> <p>LPC09: Landscape Protection and Enhancement -            LPC10: Trees and Woodland            LPC11: Historic Environment -            LPD06: Prominent Gateway Corridors -            LPD05: Extension, Alteration or Replacement of Buildings in the Green Belt -</p>	-
<p><b>Natural resources</b></p> <p>LPA09: Green Infrastructure ✓            LPC12: Flood Risk and Water Management ✓            LPC14: Minerals -            LPC15: Waste -            LPD09: Air quality ✓</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: Transport and Travel ✓            LPC13: Renewable and Low Carbon Energy Development ✓            LPD07: Digital Communications -            LPC05: Open Space -</p>	✓✓?
<p><b>Design</b></p> <p>LPD01: Ensuring Quality Development ✓            LPD02: Design and Layout of New Housing ✓            LPD08: Advertisements -            LPD10: Food and drink -            LPD03: Open Space and Residential Development ✓</p>	✓
<p><b>The Local Plan 'as a whole' (i.e. cumulative effects)</b></p>	✓✓?

### Spatial strategy (including sites)

- 7.6.2 The spatial strategy sets out that development should “*lower St. Helens’ carbon footprint and adapt to the effects of climate change*”, setting out a clear intention that the Plan will seek to contribute to climate change mitigation and adaptation.
- 7.6.3 The distribution of development should foster close links and accessibility between services, jobs and homes, helping to reduce car journeys and encourage more sustainable transport methods such as cycling or walking (which is a key message throughout the Plan). This should help to minimise increases in emissions associated with new development, and make new and existing communities more resilient. However, the locations of employment opportunities are based mostly upon motorway junctions. This will inevitably encourage car trips to access work, and focuses on distribution and logistics as a key employment sector (which involves substantial HGV movements). These are negative effects.
- 7.6.4 The development of a Strategic Rail Freight Interchange in particular, would be positive in terms of reducing emissions from freight in the longer term though.
- 7.6.5 Whilst there is no reference to specifically reducing carbon emissions or encouraging renewable energy development in the spatial strategy, it is acknowledged in the Borough’s development principles (under Policy LPA03) that a particular key aim is to “*lower St. Helens’ carbon footprint*”.
- 7.6.6 Policy LPA03 (Development Principles) also encourages the use of sustainable travel and the use of lower carbon transport. This could result in a modal shift over time, reducing the negative impacts on climate change through a reduction in the carbon footprint across St Helen’s. However, a more influential factor on transport movements is the spatial strategy (which is likely to have mixed effects in terms of travel emissions).
- 7.6.7 Policy LPA11 (Health and wellbeing) seeks to manage air quality and pollution by promoting public health principles across the Borough. This could have parallel benefits in terms of reducing energy usage.
- 7.6.8 Overall, mixed effects are predicted. Although there are positive principles for development, and patterns of development ought to be efficient with regard to movement, the strategy is likely to lead to a continuation of car trips as the main mode of travel.

### Retail and town centres policies

- 7.6.9 No effects are predicted on climate change and energy from these policies as they are not directly linked to renewable energy or climate change adaptation. However, supporting town centre locations as alternatives to out-of-town shopping should help to contribute to a reduction in emissions from transport.
- 7.6.10 As a recommendation, opportunities for district heating ought to be explored for any town centre developments that create a significant source or demand for heat.

### Housing policies

- 7.6.11 No effects are predicted on climate change and energy specifically from these policies, although significant housing development is likely to bring about more car journeys and therefore emissions. Development would be likely to occur in absence of the Plan, though in a less coordinated manner.

7.6.12 Therefore, despite an increase in the level of housing being planned for, a neutral effect is predicted. A significant modal shift is unlikely to occur over the Plan period, although well sited developments with good access to sustainable transports methods should support this going forward.

#### Biodiversity policies

7.6.13 The retention and enhancement of greenways, and the requirement for development to include net gains in biodiversity should be beneficial with regard to climate change adaptation. For example, greenways and other habitats (e.g. woodlands) can provide shade for people and wildlife helping to improve resilience to the predicted effects of climate change such as hotter summers and other extremes of weather.

7.6.14 Although the policies are likely to be beneficial in this respect, the effects are not predicted to be significant as the scale of the effects would be small.

#### Built and natural environment policies

7.6.15 A strong approach to the protection of environmental assets (i.e. landscape, biodiversity, and heritage) may limit the development of some renewable energy sources such as wind or solar farms (if they are not in-keeping with local character).

7.6.16 Having said this, Policy LPC09 (Landscape Protection and Enhancement) does state that “*Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm*”. This ensures a degree of flexibility and should allow well-designed renewable energy schemes to be granted planning permission where they are able to acceptably mitigate effects and be supported by local communities.

7.6.17 Overall the effects are predicted to be neutral.

#### Natural resources

7.6.18 Ensuring the conservation and enhancement of green infrastructure will support alternative modes of transport, helping to reduce greenhouse gas emissions from transport. This is not considered to be a significant effect as whilst the policy is positive in its approach, there is unlikely to be a huge modal shift away from vehicular travel. Additionally, Policy LPD09 (Air Quality) aims to shift to the use of sustainable transport within major developments, which in turn would reduce emissions. The protection and enhancement of Green Infrastructure may also contribute a minor positive effect in terms of resilience to hotter weather (by providing shade and helping to reduce the urban heat island effect).

#### Infrastructure

7.6.19 There is potential for a positive effect from the transport and travel policy (LPA07) as it “*actively promote[s] sustainable modes of transport*” which should help reduce vehicle emission by de-carbonising transport.

7.6.20 The Low Carbon and Renewable Energy Development policy (LPC13) could have a **significant positive effect** as it supports low carbon/renewable energy proposals and requires new development to deliver high levels of energy efficiency. It is uncertain whether this aspect of the policy could be applied successfully though, as developments meeting national standards in energy and water efficiency are not required to satisfy locally specific targets. Therefore, this **effect is uncertain**.

- 7.6.21 However, the policy also seeks to ensure that developments are adaptable to the use of low carbon technologies, which should help to ensure that homes can continue to be improved in the longer term by occupiers. This for example could be to create enough space on roofs for solar panels. Another example is to ensure there is enough room for potential air and ground source heat pumps to be retrofitted in future.
- 7.6.22 The policy also encourages the exploration of district heating networks in large-scale new developments, which could potentially lead to a reduction in carbon emissions.

#### Design

- 7.6.23 Policy LPD01 (Ensuring Quality Development: Part 3-Resource Management) requires all development proposals to ensure that any demolition and construction methods minimise waste and promote recycled and locally sourced materials. The explanatory text for this policy states that greenhouse gases can be reduced through the location of new development, orientation and design and all new development should be designed to minimise energy consumption. This feeds into the Council's positive strategy to promote energy from renewable and low carbon sources.
- 7.6.24 Where appropriate, all new development should incorporate renewable or low carbon technologies in accordance with policy LPC13; resulting in potential positive effects on energy and climate change. Policy LPD02 seeks to ensure that the design and layout of new homes incorporates recycling facilities for residents. Although minimal effects are predicted Borough-wide, this is positive for climate change and energy.
- 7.6.25 There are no effects predicted on climate change and energy from Policy LPD03. Although design can play a part in improving resilience to climate change and reducing carbon emissions, this Policy contains no explicit references to these factors (although relevant principles are set out in policy LPA03).

#### Cumulative effects (i.e. the effects of the Plan as a whole).

- 7.6.26 Overall, the Plan should help to tackle climate change and facilitate adaption to climate change. Whilst increased growth is likely to lead to greater greenhouse gas emissions, the Plan seeks to improve energy efficiency and the generation of energy from low carbon sources. In particular, development on Strategic Housing and Employment sites is encouraged to secure 10% of its energy from renewable sources, and all development is encouraged to explore opportunities for low carbon energy generation.
- 7.6.27 Counter balancing these positive effects somewhat is a focus on the delivery of employment sites that will encourage HGV use and is likely to increase emissions from vehicle based travel.
- 7.6.28 Over time a **significant positive effect** is predicted reflecting these factors, but there is a degree of uncertainty whether this would be achieved.



#### Spatial strategy (including sites)

- 7.7.2 The overarching development principles are positive in reducing flood risk as they require development to be resilient and avoid contributing to the effects of climate change.
- 7.7.3 The increased likelihood of flooding is one of the major consequences of rising global temperatures and it is vitally important to ensure that development can adapt.
- 7.7.4 The general principles align closely with that of the NPPF, paragraph 149 of which states “*Plans should take a proactive approach to mitigating and adapting to climate change*”. Policy LPA03 (Development Principles) explicitly states that all new development should address *the need to mitigate and, where appropriate, adapt to flood risk*” The site specific policies are also likely to bring a positive effect as they require all development to include “*measures to address the potential flood risk and surface water drainage issues on the site and assist in reducing flood risk downstream*”. As well as the overarching requirement, there are specific measures given at certain sites which provide more detail and future proofing measures such as ‘*slowing the flow*’. This policy approach is above and beyond the detail provided in the NPPF.
- 7.7.5 The majority of housing and employment allocations are on land designated as Flood Zone 1. Effects on flooding on these allocations are therefore predicted to be neutral (given that the Plan seeks to manage flood risk).
- 7.7.6 Several sites (referenced 2HA, 7HA, and 10HA) lie adjacent to areas at risk of flooding but management of surface water run-off ought to ensure there are no negative effects. Site 6HA is intersected by Rainford Brook, but this runs adjacent to the site boundary, and could be avoided with design and layout.
- 7.7.7 Policy LPA03 seeks to ensure that all new developments address the need to mitigate and where appropriate adapt to flood risk

#### Retail and town centre policies

- 7.7.8 The retail and town centre policies do not influence flooding as the focus is upon town centre uses and development rather than measures to reduce flood risk. Therefore, no effects are predicted.
- 7.7.9 However, redevelopment of brownfield land is more likely in the urban town centre areas, which presents the opportunity to reduce surface water run-off rates from brownfield sites. This is one way of improving the resilience of urban areas, and ought to be encouraged in the policy.

#### Housing policies

- 7.7.10 There are no effects predicted on flooding from these policies as they focus mainly on the mix, density, type and affordability of housing. Both Gypsy and Traveller site allocations are appropriately sited with regards to flood risk. Therefore, **neutral effects** are predicted.

### Biodiversity policies

- 7.7.11 In combination, the policies will lead to the protection and creation of wildlife habitats across the Borough. These habitats could include wetlands, ponds, woodland and others that can be beneficial to the management of water and flooding.
- 7.7.12 Overall a positive effect is predicted, but this is not significant as it cannot be assumed that the effects on wildlife would always correspond with flood protection measures.

### Built and natural environment policies

- 7.7.13 In the main, these policies are predicted to have negligible effects upon flood risk, as the focus is upon the character of the built and natural environment. Policy LPC10 is an exception, as the protection of trees and woodland ought to have beneficial effects in terms of helping to manage flood risk. This link could be made more explicit by identifying flood and water management as a form of green infrastructure (under point 6).

### Natural resources

- 7.7.14 In combination, the policies are likely to have a positive effect on flood prevention and resilience in St Helens. The Green Infrastructure policy requires contribution to the Sankey Catchment Action Plan which will help to ensure that flood risk issues are captured in any future development proposals.
- 7.7.15 The Flood Risk and Water Management policy (LCP12) outlines clear requirements for development needing to be supported by appropriate flood risk measures and assessments to ensure no new development will cause an unacceptable risk of flooding on the site or elsewhere.
- 7.7.16 Whilst closely aligned with the NPPF, there are further measures required involving locally specific rivers and catchments and aims for biodiversity and sustainable urban drainage systems (SUDs) to be incorporated in development. This is likely to bring a **significant positive effect** in the longer term as the green and blue infrastructure network is strengthened.

### Infrastructure

- 7.7.17 No effects predicted on flooding from these policies as these policies do not influence flood risk.

### Design

- 7.7.18 No effects predicted on flooding from these policies as these policies do not influence flood risk.

### Cumulative effects (i.e. the effects of the plan as a whole).

- 7.7.19 Overall, the Plan seeks to ensure that flood risk is minimised during the Plan period, setting out a number of policies to help achieve this objective. Although the Plan involves housing and employment land allocations on greenfield land; most of these are in areas that are not at significant risk of flooding and which could be enhanced through the implementation of sustainable natural drainage systems.

7.7.20 Brownfield sites in the urban area could also be at risk of flooding, but there may also be potential here to improve current rates of run off (with implementation of improved drainage), which would be positive.

7.7.21 The effects of the Plan are therefore predicted to be positive overall, with **significant positive effects** accruing in the longer term as a result of blue and green infrastructure enhancement, linked to the Sankey Catchment Action Plan.

## 7.8 Landscape

7.8.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'landscape'. The effects of the Plan are presented in table 7.7 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows Table 7.7.

*Table 7.7: Appraisal of the Plan on landscape*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b></p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02: <i>Spatial Strategy</i> ✓ / ✗            LPA03: <i>Development Principles</i> ✓            LPA10: <i>Parkside East</i> -            LPA04: <i>A Strong and Sustainable Economy</i> ✓ / ✗            LPA05: <i>Meeting St. Helens Borough's Housing Needs</i> ✓ / ✗            LPA06: <i>Safeguarded Land</i> ✓ / ✗            LPA11: <i>Health and Wellbeing</i> -</p>	<p>✓ ✗</p>
<p><b>Retail and town centres</b></p> <p>LPC04: <i>Retail and Town Centres</i> ✓            LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓            LPB02: <i>Earlestown Town Centre</i> ✓</p>	<p>✓</p>
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✓            LPC02: <i>Affordable Housing</i> -</p> <p>LPC03: <i>Gypsies, Travellers &amp; Travelling Showpeople</i> -            LPD04: <i>Householder Developments</i> -</p>	<p>✓</p>
<p><b>Biodiversity policies</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC06: <i>Biodiversity and Geological Conservation</i> ✓            LPC07: <i>Greenways</i> ✓            LPC08: <i>Ecological Network</i> ✓</p>	<p>✓</p>
<p><b>Built and natural environment policies</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC09: <i>Landscape Protection and Enhancement</i> ✓            LPC10: <i>Trees and woodlands</i> ✓            LPC11: <i>Historic Environment</i> ✓            LPD06: <i>Prominent Gateway Corridors</i> ✓            LPD05: <i>Extension, Alteration or Replacement of Buildings in the Green Belt</i> ✓</p>	<p>✓✓</p>
<p><b>Natural resources</b></p> <p>LPC12: <i>Flood Risk and Water Management</i> -            LPC14: <i>Minerals</i> ✓</p> <p>LPC15: <i>Waste</i> -            LPD09: <i>Air quality</i> -</p>	<p>-</p>
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> ✓            LPA08: <i>Infrastructure and funding</i> -            LPC13: <i>Renewable and Low Carbon Energy Development</i> ✓            LPD07: <i>Digital Communications</i> -            LPC05: <i>Open Space</i> -</p>	<p>✓</p>
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>Open Space and Residential Development</i> -</p> <p>LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> -</p>	<p>✓</p>
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	<p>✓✓✗</p>

### Spatial strategy (including sites)

- 7.8.2 Policy LPA03 sets the principles for development, and this includes consideration of landscape value and promotes the efficient use of land within the context of its surroundings.
- 7.8.3 The spatial strategy could have mixed effects. On one hand, the strategy would help to continue landscape reclamation and environmental improvements within the Bold Forest Park and Sankey Valley Park. The positive effects in these areas are predicted to be significant in the longer term. Conversely, the strategy requires the delivery of new homes and employment land within the Green Belt, which will change the character of several settlements over the Plan period and beyond (taking into account safeguarded land).
- 7.8.4 A range of sites underpin the spatial strategy, with potential for effects at each site and in combination with others. The Plan includes the development of several strategic housing and employment sites that fall within the Green Belt. There is the potential for negative effects at those sites that fall within areas of more sensitive landscape, or are visible from prominent ridgelines. This is particularly the case where there are multiple sites in close proximity to one another.
- 7.8.5 The following allocated sites fall within areas of medium to high landscape sensitivity: 1HA (Garswood); 2HA (Haydock); 7HA (Newton-le-Willows); and 8HA (Rainford). These sites therefore present greater potential for adverse effects upon the character of the landscape and the settlements they are related to.
- 7.8.6 Site specific measures do not explicitly address effects on landscape for these sites. However, there is a requirement for sites to achieve high quality landscaping and involve a green infrastructure plan to address any issues relating to landscape alongside a range of other factors. This should help to mitigate effects to an extent. The overall effect on landscape at these sites is predicted to be negative. The dispersal of site allocations across the Borough means that the effects on settlement character are less likely to be significant though when considered cumulatively.
- 7.8.7 Some allocated sites are of lower quality, and therefore create the potential for positive effects should new development implement attractive features that enhance the current landscape appearance and function. This applies to Site 4HA (Bold) which as a large urban extension should be capable of delivering substantial improvements to green infrastructure. The site specific measures also explicitly state that extensive green links should be established in a well landscaped setting.
- 7.8.8 Urban sites 3HA, 6HA and 10HA could also involve improvements to the character of the townscape in the urban area. These are potentially significant positive effects in the longer term.
- 7.8.9 The same is the case for Site 5HA, although the landscape is categorised as low to medium sensitivity (and so negative effects could be more prominent compared to the allocated sites that are located away from the urban fringes described above).
- 7.8.10 Development of employment land around Haydock and M6 Junction 23 is also likely to lead to permanent changes to the character of this area. However, the character of the landscape and urban edges in these areas are dominated by the A580 and M6 and is categorised as having 'medium' sensitivity. Whilst negative effects are predicted, they are not likely to be significant provided that suitable mitigation is implemented to maintain separation between nearby settlements of Haydock, Newton-le-Willows and Ashton-in-Makerfield.

- 7.8.11 Site 8EA (linked to policy LPA10) covers the proposed employment land allocation at Newton-le-Willows. Development is predicted to have negative effects on landscape through the loss of open Green Belt land. However, the employment development is located within an area of low-moderate landscape sensitivity, so the effects are not predicted to be significant provided that sufficient mitigation and compensation measures are secured (which ought to be likely in light of other plan policies concerning landscape).
- 7.8.12 Policy LPA06 (Safeguarded Land) would have mixed effects. On one hand, the policy seeks to protect safeguarded sites from development in the Plan period. However, the safeguarded sites are identified for potential development in the longer term. At this stage the effects are uncertain as the potential to develop these sites would need to be determined by a future Plan review and assessment.
- 7.8.13 Overall, the spatial strategy is predicted to have mixed effects on landscape reflecting those issues discussed above.

#### Retail and town centre policies

- 7.8.14 These policies encourage a town centre location for retail premises, which ought to be positive in terms of reducing the likelihood of edge of centre development (and potential effects upon edge of settlement landscape character). The effects are not predicted to be significant, as the scale of retail development in sensitive locations would not be anticipated to be substantial.

#### Housing policies

- 7.8.15 Policy LPA05 (Meeting St. Helens Borough's Housing Needs) should have a positive effect upon landscape character, as it sets minimum density requirements of 30 dwellings per hectare at settlement edges, with the flexibility to implement lower densities if appropriate in order to protect the character and appearance of the area
- 7.8.16 Policy LPC01 (Housing mix) is mainly concerned with the mix of housing rather than location and design, however clause 7 aims to ensure proposals for change of use to an HMO avoid causing harm to the character and or appearance of the area. This could result in minor positive effects on the landscape within highly populated HMO areas within St Helens and reduce the negative impacts on the character of these areas.
- 7.8.17 LPD04 (Householder development) could have minor positive effects on the landscape character and any alternative/extensions should respect and enhance the appearance and character of the existing built form.
- 7.8.18 Policy LPC02 (Affordable housing) is predicted to have neutral effects on landscape character, as it is concerned with the affordability and mix of homes, and not the location, design or layout.
- 7.8.19 Gypsy and traveller sites are unlikely to have a significant effect on landscape character as they are small and relatively well contained in the urban area.

#### Biodiversity policies

- 7.8.20 Wildlife habitats such as trees, hedges and grassland can form an important part of the character of the landscape. Therefore, protection and enhancement of such assets should also have benefits for the Borough's landscapes, by retaining their sense of place.

- 7.8.21 Policy LPA09 (Green Infrastructure) provides the key principles for managing green and open space across the Borough.
- 7.8.22 It states that the GI network will be protected and enhanced, with specific policy links to protect and enhance environmental assets at Billinge Hill, the Sankey Valley and the Bold Forest. Improvements in these areas should help to protect landscape character, as well as better bringing people into contact with the countryside.
- 7.8.23 Overall a positive effect is predicted on landscape character by protecting and enhancing green corridors and wildlife assets.

#### Built and natural environment policies

- 7.8.24 Policy LPC09 (Green infrastructure) is predicted to have a positive effect on landscape by ensuring that development proposals are supported by an assessment of landscape sensitivity, visual impacts, and demonstrate that landscape distinctiveness is protected and effects mitigated / compensated for where necessary. Policy LCP11 (Historic environment) will also have positive effect on the landscape as any development will be required to preserve or enhance the appearance, character and setting of a designated heritage asset by using appropriate and good landscaping.
- 7.8.25 Policies LPD05 (Extension, Alteration or Replacement of Buildings in the Green Belt) and LPO6 (Prominent Gateway Corridors) are predicted to have positive effects for landscape character by respecting Green Belt character and highlighting the importance of gateway locations. This should help to ensure that new developments at key routes and junctions are sensitively designed and are of high quality. Policy LPC10 (Trees and Woodland) is also predicted to contribute positively to the protection of the Borough's landscape, particularly those that involve tree cover.
- 7.8.26 In combination, the policies are predicted to have a **significant positive effect** on St Helens landscape character and distinctiveness by focusing on the protection, management and enhancement of landscapes. The policies ought to help mitigate effects upon character associated with a number of the site allocations, particularly as many of these fall within areas of medium-high landscape sensitivity, and are at 'gateway locations'.

#### Natural resources

- 7.8.27 Policy LPC14 (Minerals) would help to ensure that minerals-related development is sensitive to landscape character. Whilst this is positive, it is unlikely to prevent effects on landscape during the operation of a site, as workings lead to significant changes in the land. However, the need to ensure sensitive aftercare could help to ensure that the long term effects are positive (i.e. the land is returned to a similar or higher quality).
- 7.8.28 Safeguarding certain minerals may also have a positive effect on some geological features, which can contribute to landscape character.
- 7.8.29 Policies LPC12, LPC15 and LPD09 are predicted to have neutral effects as they would not contribute significantly towards landscape character.
- 7.8.30 Overall the policies are predicted to have a neutral effect.

## Infrastructure

- 7.8.31 Policies LPC13 (Renewable and low carbon energy developments) and LPD07 (Digital communications) are predicted to have a positive effect on landscape character and views by requiring telecommunications developments and renewable and low carbon developments to take account of the latest landscape character and sensitivity assessments for St Helens.
- 7.8.32 Crucially, the need to take account of cumulative effects is identified, which ought to ensure effects do not accrue in the long term.
- 7.8.33 LPC05 (Open space) could have some benefit for landscape character through the protection of open space, though the focus here is on recreation rather than visual appearance.
- 7.8.34 Policies LPA07 (Transport and travel) and LPA08 (Infrastructure and funding) are predicted to have neutral effects, as they do not relate directly to landscape management.
- 7.8.35 Overall these policies are predicted to have a positive effect on landscape because they generally intend to respect and protect landscape character from development.

## Design

- 7.8.36 Policies LPD01, LPD02 and LPD10 are predicted to have positive effects by requiring the consideration of landscape and townscape as vital components of the development process.
- 7.8.37 Policy LPD08 is predicted to have a neutral effect because it does not especially relate to landscape and is unlikely to have an influence on character.

## Cumulative effects (i.e. the effects of the plan as a whole).

- 7.8.38 The Local Plan allocates a number of housing and employment sites to ensure that the spatial strategy can be achieved. The effect on the character of landscapes is predicted to be neutral (or positive) for some settlements such as Bold and Eccleston, where the sensitivity of the landscape is low-moderate. The Plan also encourages the regeneration of brownfield land and buildings, which ought to improve townscape and landscape character, particularly in the urban area.
- 7.8.39 The effects on landscapes with greater sensitivity are more likely to be negative, especially where the quantum of development around a particular settlement is higher (Haydock and Newton-le-Willows for example). For most of these areas, it ought to be possible to secure mitigation and enhancement through other Plan policies (particularly LPC11). Therefore, whilst the overall effects in these locations would remain negative, it should be possible to ensure that effects are not significant.
- 7.8.40 Some sites fall within areas of medium-high sensitivity, and therefore present the potential for significant negative effects. This is the case for Rainford and Garswood. However, the scale of site and their location as logical extensions to the built area should minimise the magnitude of effects. Therefore, it ought to be possible to avoid significant effects.
- 7.8.41 The spatial strategy also focuses on the regeneration of the town centre (including on several allocated sites where townscapes could be enhanced) and seeks to protect the vitality of key centres such as St Helens and Earlstown.

- 7.8.42 Several policies offer protection for green infrastructure, ecological networks and design policies ought to ensure that high quality developments are secured, particularly at gateway locations.
- 7.8.43 These policies in combination are likely to contribute to a general improvement of the townscape and settlement edges, which will help to offset the loss of character associated with Green Belt loss.
- 7.8.44 Therefore, overall, the effects upon landscape and townscape are predicted to be mixed.
- 7.8.45 **Significant positive effects** are predicted in the main, reflecting the proactive approach to the management of the built and natural environment. In particular, several of the strategic sites offer the opportunity for enhancement, particularly the housing sites in the urban area and at Bold, for which explicit requirements for landscape enhancement are set out.
- 7.8.46 It should be acknowledged that **negative effects** are predicted for the majority of Green Belt allocations for housing and employment. With suitable mitigation and enhancement though, these effects could be prevented from becoming significant. That being said, the effects associated with employment development are likely to be more difficult to avoid given the nature and layout of such types of development. However, a mitigating factor is the provisions within Policy LPA04.1, which seeks to ensure that an attractive built form is secured.

## 7.9 Built and natural environment

7.9.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'built and natural environment'. The effects of the Plan are presented in table 7.8 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.8.

*Table 7.8: Appraisal of the draft Plan on built and natural environment*

Local Plan Chapters / Policies	Score
<p><b>Core Policies (including housing and employment sites)</b></p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02: <i>Spatial Strategy</i> ✓ ✗            LPA03: <i>Development Principles</i> ✓            LPA10: <i>Parkside East</i> ✗            LPA04: <i>A Strong and Sustainable Economy</i> ✗            LPA05: <i>Meeting St. Helens Borough's Housing Needs</i> ✗ / ✓            LPA06: <i>Safeguarded Land</i> ✗ / ✓            LPA11: <i>Health and Wellbeing</i> -</p>	✓ ✗
<p><b>Retail and town centres</b></p> <p>LPC04: <i>Retail and Town Centres</i> ✓            LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓            LPB02: <i>Earlestown Town Centre</i> ✓</p>	✓
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✓            LPC02: <i>Affordable Housing</i> -            LPC03: <i>Gypsies, Travellers &amp; Travelling Showpeople</i> -            LPD04: <i>Householder Developments</i> ✓</p>	✓
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> -            LPC07: <i>Greenways</i> ✓            LPC08: <i>Ecological Network</i> ✓</p>	✓
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> ✓            LPC10: <i>Trees and woodlands</i> ✓            LPC11: <i>Historic Environment</i> ✓            LPD06: <i>Prominent Gateway Corridors</i> ✓            LPD05: <i>Extension, Alteration or Replacement of Buildings in the Green Belt</i> ✓</p>	✓ ✓
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC12: <i>Flood Risk and Water Management</i> ✓            LPC14: <i>Minerals</i> ✓            LPC15: <i>Waste</i> -            LPD09: <i>Air quality</i> -</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> -            LPA08: <i>Infrastructure and funding</i> -            LPC13: <i>Renewable and Low Carbon Energy Development</i> -            LPD07: <i>Digital Communications</i> -            LPC05: <i>Open Space</i> -</p>	-
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>Open Space and Residential Development</i> -            LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> -</p>	✓
<p><b>The Local Plan 'as a whole' (i.e. cumulative effects)</b></p>	✓ ✓ ? ✗

### Spatial strategy (including sites)

- 7.9.2 One of the development principles within Policy LPA03 seeks to protect, conserve, and enhance the Borough's natural, built and historic environments. This should help to provide a framework for the protection and enhancement of cultural heritage and the historic environment. The policy also seeks to ensure that new development protects and enhances the quality of the Borough's natural resources including water, air, land and biodiversity, and makes effective use of land, buildings and existing infrastructure (including through the remediation of contaminated land).
- 7.9.3 Policy LPA02 seeks to continue a strategy of urban regeneration, whilst delivering suitable development on settlement edges where appropriate. In principle, this ought to be positive for cultural heritage as it will encourage the reuse of buildings and land that are derelict / vacant, and which could be of historic or cultural value. However, sites at the settlement edge are mostly Green Belt, and could lead to negative effects on landscape character and function.
- 7.9.4 Policies LPA04.01 and LPA05.01 set out a number of key sites that will be crucial to delivering the spatial strategy, employment and housing targets.
- 7.9.5 There is a concentration of development proposed close to Haydock at Junction 23 and off the A580 nearby. This includes housing allocations 2HA and employment land at 2EA, 3EA, 4EA, 5EA and 6EA. Though this level of development in the area will lead to substantial changes to the built and natural environment, the effects upon the historic environment are predicted to be negligible for the most part.
- 7.9.6 Most of the sites do not contain any designated heritage assets, nor is their development likely to affect the setting of any assets. The exception is site 6EA, which is within close proximity to a Grade 2 Listed Building 'Le Chateau'. This asset is a former lodge / estate office for Garswood Hall and the associated coal mining business. This building is characterised by open agricultural landscape, reflecting the wider estate that it served. Employment land development immediately opposite this building has the potential to alter the setting, and therefore the significance of this asset.
- 7.9.7 In order to mitigate such effects, the Council intends to add site specific requirements (in response to SA Recommendations), which require a buffer zone of open space to be retained adjacent to Millfield Lane. The scale and design of employment buildings should also seek to reduce visual intrusion. As a consequence, it is less likely that significant effects would be generated.
- 7.9.8 Site 1HA is within 400m of Church of the Holy Trinity (Grade II listed) in Garswood, but lies on relatively flat land that is not prominent. Therefore, the effects on the historic environment are predicted to be neutral in this location. Beyond the Plan period, safeguarded land could be developed adjacent to site 1HA (at site 1HS). This expansion would still not be expected to affect heritage assets (but would need to be explored through a new Local Plan).
- 7.9.9 There are several sites proposed for housing in the St Helens urban area itself. Site 3HA is adjacent to the listed St Helens Junction, and a listed building at 2 Lionel Street. Residential development here could potentially improve the appearance of the built environment, as it is currently brownfield land that is not in use. It is therefore likely that negative effects could be avoided.
- 7.9.10 Also in the urban area are smaller site allocations for employment land. These are not adjacent to any heritage assets, and their development would not have any effect on the setting of assets or the character of the built environment. If anything, they

provide an opportunity for improvements to townscape along gateway routes, should high quality design be implemented.

- 7.9.11 Site 10HA is in close proximity to Sutton Oak Welsh Chapel, which is a Grade 2 listed building. Whilst the scale of growth here would be considerable, the character of the surrounding area is low in quality, with a number of derelict buildings and vacant land.
- 7.9.12 Development would therefore be unlikely to have detrimental effects on the sense of place or cultural heritage. In fact, there may be potential to enhance the built environment through good design.
- 7.9.13 Site 6HA is industrial in nature, and screened almost entirely by walls and vegetation. Although the larger industrial units and chimneys are visible, new residential development would not be. Therefore, potential effects on the character of nearby heritage assets at Victoria Park are unlikely.
- 7.9.14 With regard to the site itself it is one of the locations for Pilkington's Glass, which has long been an important company for the town. Industrial uses at this site could therefore be seen to be part of the 'sense of place' in this location. Changing this to solely residential development could therefore have impacts in this respect. In response, the Council intends to add site specific requirements which seek to ensure that public realm features are incorporated to development that reflect the industrial legacy of this site. This should help to retain and enhance the character of the townscape.
- 7.9.15 Employment land expansion in Rainford is predicted to have negligible effects on the built environment.
- 7.9.16 Housing land in Rainford at Site 8HA is adjacent to a listed building (Dial House). The setting of this asset could be affected by development, as its character is enhanced by the open fields and wooded areas that the building overlooks. The Council intends to add a site specific requirement (in response to earlier SA Recommendations), which will state the need for a buffer of green/open space adjacent to Higher Lane. This should help to prevent significant effects from arising.
- 7.9.17 The large urban extension at Bold is currently on open land. It is bounded by industrial units and housing on several sides though and so the sensitivity to development is not high. To the south there is a Country Park, which screens several listed buildings somewhat (at the former Bold Hall estate). Consequently, negative effects ought to be possible to avoid.
- 7.9.18 The Parkside proposals (under Policies LPA04.1 and LPA10) have potential to have a negative effect on the setting of several historic assets, including farm buildings and an ancient monument, which is predicted to be a negative effect.
- 7.9.19 Overall, the strategy is predicted to have mixed effects on heritage. Some sites present the possibility of negative effects, whilst others are predicted to be neutral or positive (particularly on brownfield land and areas of lower quality).
- 7.9.20 The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are minor positive effects.
- 7.9.21 The negative effects are generally predicted to be not significant from a Borough-wide perspective. At individual development site allocations, the potential for significant negative effects was identified. However, site specific measures have been established which should ensure that these effects are mitigated.

### Retail and town centre policies

- 7.9.22 The effects of Policies LPB01 and LPC04 ought to be beneficial for the town centre environment as these Policies will encourage the use of buildings and land that could otherwise lie vacant. There should also be environmental improvements secured at Langtree Park and the existing waterway of the St. Helens Canal.
- 7.9.23 Policy LPB02 should benefit the built and natural environment of Earlestown through the implementation of an Area Action Plan/town centre Masterplan that would seek to maintain and enhance the town's built heritage.
- 7.9.24 Overall the policies are predicted to have positive effects upon the built environment. The effects are not predicted to be significant because key heritage assets are unlikely to be affected by improvements. The principle of protecting town centre function, vitality and vibrancy is also one that is set out in national policy and guidance (i.e. it is likely that this pattern of development would be encouraged in the absence of a new Local Plan).

### Housing policies

- 7.9.25 The (non-strategic) housing policies are unlikely to have significant effects upon the historic environment, as they deal with issues that are less relevant to heritage such as affordability. However, achieving a suitable housing mix is an important component in securing high quality, appropriate developments.
- 7.9.26 The requirement to be flexible on the density of development in rural areas ought to help better protect heritage features that are typical of such areas like farm buildings.

### Biodiversity policies

- 7.9.27 The protection and enhancement of biodiversity habitats and networks can be positive for the built environment and heritage assets by improving countryside and urban environments. Therefore policies LPC06, LPC08 and LPC09 should have positive implications for the historic environment. Effects are not predicted to be significant, as these policies focus upon biodiversity function and appearance, rather than cultural or historic features. Therefore, effects would be indirect.

### Built and natural environment policies

- 7.9.28 Policy LPC11 is the main policy within the Plan that considers the historic environment. The policy is predicted to have a positive effect on the built and natural historic environment by seeking to protect, maintain and enhance the historic environment, including designated and non-designated assets within St Helens. A number of mechanisms for achieving this are outlined in the policy including the need to undertake an informed impact assessment, implementing Conservation Area Plans and encouraging community schemes. These measures ought to build upon the general principles set out within the NPPF.
- 7.9.29 Several other Plan policies could also help to support the historic environment including the protection of ancient woodland and trees (LPC10), respect for landscape character (LPC09, LPD05) and high quality design at gateway locations (LPD06).
- 7.9.30 In combination, these policies are predicted to have a **significant positive effect** on St Helens cultural and historic environment.

### Natural resources

- 7.9.31 Policy LPC14 is likely to be beneficial for the built and natural environment as it seeks to ensure that mining developments take account of heritage assets and their setting during operation and following decommission. Whilst these are positive effects, they are not predicted to be significant, as protection of heritage is already afforded through national policy.
- 7.9.32 Policy LPA09 should help to protect and enhance the quality of the natural environment, which can have positive knock-on effects for cultural and historic assets.
- 7.9.33 Policy LCP12 states that all new development should protect the water environment during any construction process and development should not adversely affect the quality of any watercourses or groundwater. This is predicted to have neutral effects upon the natural environment.
- 7.9.34 These policies are predicted to have fairly localised effects, and are therefore not predicted to be significant in the context of the Borough.

### Infrastructure

- 7.9.35 Policy LPC13 requires renewable and low carbon developments to not cause significant harm to historical and cultural assets. Whilst this is positive, it is largely a reflection of national policy, and is therefore unlikely to have a significant effect upon the baseline position.
- 7.9.36 The effects of policies LPA07, LPA08, LPC05 and LPD07 are predicted to be neutral as they are not explicitly related to the historic environment.
- 7.9.37 Overall these policies are predicted to have a neutral effect on St Helens because they generally intend to protect and enhance cultural and historic assets.

### Design

- 7.9.38 Policy LPD02 and LPD10 (Food and Drink) are predicted to have a positive effect on the built and natural environment by requiring new developments to respect existing buildings and land uses.
- 7.9.39 Policy LPD01 seeks to secure well designed developments that respect and enhance local character and environment. This is positive with regard to sense of place and townscape character.

### Cumulative effects / summary

- 7.9.40 Overall, the strategy is predicted to have mixed effects on heritage. Some of the allocated strategic sites present the possibility of negative effects, whilst others are predicted to be neutral or positive.
- 7.9.41 The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are minor positive effects. In the longer term, these effects could potentially be significant from a Borough-wide perspective as the cumulative effects of regeneration are realised.
- 7.9.42 The negative effects are generally predicted to be not significant across the Borough. Whilst there are particular locations where significant negative effects could be generated; site specific measures have been identified that will help to manage and minimise such effects.

7.9.43 Furthermore, the Plan sets out a range of measures that could help to protect and enhance the historic environment.

7.9.44 Whilst some negative effects could remain, these would be likely to be minor and limited in extent.

## 7.10 Health and wellbeing

7.10.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'health and wellbeing'. The effects of the Plan are presented in table 7.9 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.9.

*Table 7.9: Appraisal of the draft Plan on health and wellbeing*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b></p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02: <i>Spatial Strategy</i> ✓✓ ✘            LPA03: <i>Development Principles</i> ✓✓            LPA04: <i>Strong and Sustainable Economy</i> ✓✓ ✘            LPA05: <i>Meeting St. Helens Housing Needs</i> ✓✓ ✘            LPA06: <i>Safeguarded Land</i>            LPA10: <i>Parkside East</i> ✓✓            LPA11: <i>Health and Wellbeing</i> ✓✓</p>	✓✓ ✘
<p><b>Retail and town centres</b></p> <p>LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓            LPC02: <i>Earlestown Town Centre</i> ✓            LPC04: <i>Retail and Town Centres</i> ✓</p>	✓
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✓✓            LPC02: <i>Affordable Housing</i> ✓✓</p> <p>LPC03: <i>Gypsies, Travellers &amp; Travelling Show people</i> ✓            LPD04: <i>Householder Developments</i> ✓</p>	✓✓
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> -            LPC07: <i>Greenways</i> ✓            LPC08: <i>Ecological Network</i> ✓</p>	✓
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> -            LPC10: <i>Trees and Woodland</i> ✓            LPC11: <i>Historic Environment</i> ✓            LPD06: <i>Prominent Gateway Corridors</i> -            LPD05: <i>Development in the Green Belt</i> ✓</p>	✓ / ✘
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC12: <i>Flood Risk and Water Management</i> ✓            LPC14: <i>Minerals</i> ✓</p> <p>LPC15: <i>Waste</i> -            LPD09: <i>Air quality</i> ✓</p>	✓
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> ✓✓            LPA08: <i>Infrastructure Delivery and Funding</i> ✓            LPC13: <i>Low Carbon and Renewable Energy Development</i> -            LPD07: <i>Digital Communications</i> -            LPC05: <i>Open Space</i> ✓✓</p>	✓
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD03: <i>Open Space and Residential Development</i> ✓</p> <p>LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> ✓</p>	✓
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	✓✓ ✘

### Spatial strategy (including sites)

- 7.10.2 Policy LPA02 (Spatial Strategy) (parts 2 and 8), LPA03 (Development Principles) and Policy LPA10 (Parkside East) are each predicted to have positive effects on issues relating to health and wellbeing. This is largely due to the promotion of sustainable transport such as cycling and walking between homes and employment. It also involves supporting the provision and retention of shared space, such as sports and health facilities.
- 7.10.3 Policy LPA02 (parts 2 and 8) also promote improved access to a range of services and opportunities for formal and informal recreation.
- 7.10.4 Policy LPA02 (Spatial Strategy) (part 9) and Policy LPA10 (Parkside East) (part 3 g) seek to protect the existing active travel and public transport networks throughout St. Helens whilst encouraging improvements to public transport. This ought to have positive effects on health and wellbeing by encouraging more people to use active transport modes.
- 7.10.5 Policy LPA03 promotes a series of eight criteria when assessing development. These would each have benefits for health by seeking to improve economic wellbeing, supporting community development, facilitating active travel, improving accessibility and protection of environmental quality.
- 7.10.6 Policy LPA10 (Parkside East) also encourages the development of training schemes to increase the opportunities for the local population to obtain employment, which should have positive effects on the health and wellbeing of the local population.
- 7.10.7 Policy LPA05 (Meeting St. Helens Housing Needs) aims to ensure that over the Plan period a minimum of 9,234 net additional dwellings are delivered in the Borough. This policy is therefore likely to have a positive effect on health and wellbeing.
- 7.10.8 Additionally, Policy LPA11 (Health and wellbeing) will promote public health principles, maximise opportunities for people to lead healthy and active lifestyles, and reduce inequalities for residents within the Borough. This includes where appropriate the provision of opportunities for physical activity within the design of any new development; which would result in positive effects on the health and wellbeing of communities across St Helens.
- 7.10.9 Furthermore, Policy LPA04: (A Strong and Sustainable Economy) seeks to improve the employment opportunities for local people, which ought to help reduce the overall incidence of poverty and experience of social exclusion
- 7.10.10 Site specific measures are also proposed to help encourage walking and cycling, to reduce amenity concerns, and to encourage recreation. Where there is a loss of existing recreation facilities, there are stipulations that replacements should be secured (for example playing pitches at site 10HA).
- 7.10.11 Minor negative effects are predicted with regard to housing and employment site allocations as development in some locations may be perceived negatively. This may be due to amenity concerns, increased traffic, and a loss of natural greenspace (on sites removed from the Green Belt in particular).

### Retail and town centre policies

- 7.10.12 Policies LPC01, LPC02 and LPC04 reinforce the role of town centres by supporting the provision of jobs in town centre locations and encouraging the concentration of goods and services. This ought to be beneficial for health and wellbeing as the town centres are well connected to communities (via maintained pedestrian links to adjacent areas and via hosting the public transport hub).
- 7.10.13 Policy LPB01 also seeks to improve the public realm by securing improvements to green infrastructure, which ought to have benefits for wellbeing. In combination, the policies are predicted to have a positive effect on health and wellbeing.

### Housing policies

- 7.10.14 The housing policies seek to deliver a range of housing types, tenures and sizes to meet the needs of the Borough.
- 7.10.15 Policy LPC01 (Housing Mix) aims to ensure an appropriate housing mix is delivered within the Borough including affordable and market and a range of different types, tenures and size. The policy specifically mentions the delivery of bungalows and the use of optional accessibility standards on larger development sites, which would benefit an aging population. Furthermore, the provision of specialist and supported housing for the elderly and vulnerable people, sheltered housing, extra care, retirement accommodation and residential care homes will all be supported in sustainable locations, which would be likely to benefit a range of people.
- 7.10.16 Additionally, the policies support planning proposals for change of use to HMOs whereby the proposal would not harm the amenities within the area and would provide satisfactory levels of amenity for the future occupiers. This would help support the well-being of any future and current occupiers in such schemes.
- 7.10.17 Policy LPC02 (Affordable Housing) supports the delivery of affordable housing on developments of eleven or more dwellings. This is likely to have a positive effect on health and well-being as it would help to reduce poverty and social exclusion by allowing greater accessibility to housing for residents that are struggling to get onto the housing ladder.
- 7.10.18 Policy LPC03 (Gypsies, Travellers and Travelling Show People) allocates two sites for the use of gypsies, travellers and travelling show people to meet an identified need. Allocating areas will have a slight positive effect on health and well-being by reducing the need for this group to be forced to use inappropriate sites elsewhere in the Borough.
- 7.10.19 Policy LPD04 (Householder Developments) is expected to have a slight positive effect on health and well-being as it encourages householder developments to maintain reasonable standards of privacy for neighbouring properties and gardens. Additionally, they should not cause any harm to the safety of highway users, including sustainable modes of transport.
- 7.10.20 In combination, these policies are predicted to have a **significant positive effect**, reflecting the benefits that ought to be generated for those with poor access to appropriate housing (a major determinant of health and wellbeing).

### Biodiversity policies

- 7.10.21 Policy LPC06: (Biodiversity and Geological Conservation) seeks to protect sites of biodiversity and geological conservation. Whilst experience of biodiversity can have positive effects on wellbeing, the effects of this policy alone are not predicted to be significant given its focus on wildlife and geodiversity.
- 7.10.22 However, Policies LPC07 and LPC08 are likely to have positive effects upon health and wellbeing, by safeguarding and enhancing recreational resources and public access through greenways and linkages.

### Built and natural environment policies

- 7.10.23 The effects of Policy LPC09: (*Landscape Protection and Enhancement*) and LPD6: (*Prominent Gateway Corridors*) on health and well-being are predicted to be neutral because they focus upon maintaining landscape character and gateway locations such as motorways, A-roads and railway lines. It is unlikely that these policies will have a direct effect on health/well-being issues.
- 7.10.24 Policy LPC11: (Historic Environment) is predicted to have a minor positive effect on health and well-being as it encourages enjoyment of the historic environment.
- 7.10.25 Likewise, policies LPD5 and LPA06 are predicted to have a minor positive effect on health and well-being as these policies make a contribution towards meeting local housing needs. Safeguarded land will be protected from development in the Plan period, but in the longer term is 'earmarked' for potential release for development. This presents some confidence that longer term housing needs could be met, but may be a concern for some local communities, and hence a negative effect is also predicted.
- 7.10.26 Overall mixed effects are predicted reflecting those factors discussed above.

### Natural resources

- 7.10.27 Policies LPA09, LPC12 and LPC14 are predicted to have positive effects on health and wellbeing. LPA09 aims to protect and enhance the existing green infrastructure and supports the provision of new open spaces and the expansion, improvement of functionality, connectivity and accessibility of the green infrastructure network. Green infrastructure has a wide range of functions including public access for recreation. Therefore, improving the network should have a positive effect on health and wellbeing by enabling people to access space for active recreation.
- 7.10.28 Policy LPC12 is predicted to have a positive effect on health as it seeks to reduce the risk of flooding from all new development, along with protecting the quality of any watercourse and groundwater. The policy promotes the use of a sequential approach to new development, which should ensure that more sensitive developments such as hospitals are not approved within flood risk areas.
- 7.10.29 Policy LPC14 encourages the consideration of amenity, air quality, the landscape, flood risk and land stability amongst other factors when proposing mineral developments. Similarly, Policy LPD9 seeks to ensure proposals do not hinder the achievement of AQMA objectives and major developments are to incorporate measures to reduce air quality. These considerations are directly related to issues associated with human health and wellbeing and therefore encouraging developers to consider these impacts within their proposals ought to have a positive effect on health and wellbeing.

7.10.30 Policy LPC15 is predicted to have a neutral effect on health and wellbeing because it deals entirely with the sustainable management of waste.

#### Infrastructure

7.10.31 Policy LPA07 is predicted to have a positive effect on health and wellbeing as it encourages new development to be positioned where there is access to public transport services (helping access to health facilities), it promotes active modes of transport to, from and within development, and promotes the inclusion of adequate parking for those of limited mobility, service vehicles and cycles.

7.10.32 These elements combined ought to support a reduction in health inequalities, improve access to goods, services and local centres and therefore have a positive effect on health and wellbeing across the Borough.

7.10.33 Policy LPA08 (Infrastructure Delivery and Funding) is predicted to have a positive effect on health and well-being as it encourages the protection, provision and enhancement of all forms of infrastructure including green infrastructure (parks and green space) and additional social infrastructure (such as education and health establishments). Also within the hierarchy of developer contributions for all new development, public safety is of the highest priority, followed by the provision of local infrastructure needs. Therefore, positive effects on the health and well-being of residents are more likely to be generated from development contributions.

7.10.34 Policies LPC13 and LPD7 will help to ensure that residential amenity is protected; which is beneficial for those communities that could potentially be affected by energy and communications infrastructure. The policies are in line with national planning policy, and so a significant effect is not anticipated F.

7.10.35 The number of properties that would be affected is also likely to be relatively low, so whilst the effects could be significant to individuals and some communities, a lot of residents would be unaffected and so a minor positive effect is predicted.

7.10.36 Policy LPC05 encourages the protection and enhancement of open spaces which contribute to opportunities for leisure (which is beneficial for health). Consequently a positive effect is predicted.

#### Design

7.10.37 Policies LPD01, LPD02 and LPD03 are predicted to have a positive effect on health and well-being by supporting the development of housing to meet the specific needs of different groups within the Borough to encourage healthy lifestyles. Furthermore, Policy LPD03 seeks to ensure high quality new public space is provided with major residential developments, to improve the current deficiency in the Borough.

7.10.38 By setting a clear exclusion zone around primary and secondary schools policy LPD10 ought to have a slight positive effect on health and well-being by reducing the accessibility of takeaway foods for children and encouraging healthy eating habits in the manner set out in the St Helens Hot Foot Takeaway SPD.

#### Cumulative effects (i.e. the effects of the Plan as a whole).

7.10.39 The Plan is predicted to have a positive effect on health and wellbeing, primarily through the delivery of housing to meet the needs of a range of groups, as well as the aspiration to provide increased job opportunities.

- 7.10.40 The distribution of growth ought to ensure that jobs, services and leisure are accessible to new and existing communities and can help to reduce levels of deprivation in areas of need. For example, the proposed employment sites at Haydock would be in safe and convenient walking / cycling distance to communities that fall into the 20% most deprived areas in England (Blackbrook, parts of Haydock). Likewise, employment and housing in the core urban area should be accessible to a range of deprived communities.
- 7.10.41 Of particular importance is the continued commitment to urban regeneration and the need to secure enhancements to infrastructure as part of new development.
- 7.10.42 It is a commitment throughout the Plan to enhance open space and green infrastructure, whilst also promoting active travel. These measures should all help to encourage healthier lifestyles and create attractive environments for residents.
- 7.10.43 In combination, the Plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the Borough. However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people.
- 7.10.44 Congestion may also increase in the short term / before infrastructure improvements are secured, which could lead to a poorer quality environment in parts of the Borough where development is greatest (for example St Helens urban area, Haydock, Bold and Newton-le-Willows). To reflect these issues, a **minor negative effect** is predicted, but these should only be temporary providing that effective infrastructure is delivered to support developments.

## 7.11 Economy and Employment

7.11.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'economy and employment'. The effects of the Plan are presented in table 7.10 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.10.

*Table 7.10: Appraisal of the Plan on economy and employment*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b> (Including housing and employment allocations)</p> <p>LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02: <i>Spatial Strategy</i> ✓✓            LPA03: <i>Development Principles</i> ✓            LPA04: <i>A Strong and Sustainable Economy</i> ✓✓            LPA05: <i>Meeting St. Helens Housing Needs</i> ✓            LPA06: <i>Safeguarded Land</i> ✓            LPA10: <i>Parkside East</i> ✓✓            LPA11: <i>Health and Wellbeing</i> ✓</p>	✓✓
<p><b>Retail and town centres</b></p> <p>LPC04: <i>Retail and Town Centres</i>            LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓✓            LPC02: <i>Earlestown Town Centre</i> ✓</p>	✓✓
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✓✓            LPC02: <i>Affordable Housing</i> ✓</p> <p>LPC03: <i>Gypsies, Travellers &amp; Travelling Show people</i> -            LPD04: <i>Householder Developments</i> -</p>	✓✓
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ✓            LPC07: <i>Greenways</i> x            LPC08: <i>Ecological Network</i>-</p>	-
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> ✓            LPC10: <i>Trees and Woodland</i>            LPC11: <i>Historic Environment</i> ✓            LPDM x: <i>Development in Prominent Gateway Locations or Character Areas</i> ✓            LPDM x: <i>Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt</i> -</p>	✓
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> ✓            LPC12: <i>Flood Risk and Water Management</i> -</p> <p>LPC14: <i>Minerals</i> -            LPC15: <i>Waste</i> ✓            LPD09: <i>Air quality</i> -</p>	-
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> ✓✓            LPA08: <i>Infrastructure Delivery and Funding</i> ✓            LPC13: <i>Low Carbon and Renewable Energy Development</i> -            LPD07: <i>Digital Communications</i>. ✓            LPC05: <i>Open Space</i> ✓✓            LPA11: <i>Infrastructure Delivery and Funding</i></p>	✓
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> -            LPD03: <i>Open Space and Residential Development</i> -</p> <p>LPD08: <i>Advertisements</i> ✓            LPD10: <i>Food and drink</i> ✓</p>	-
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	✓✓

### Spatial strategy (including sites)

- 7.11.2 Policy LPA02 (Spatial Strategy) seeks to promote healthy communities and access to green infrastructure. This could help in the long term to support a more active and healthy work force that is less likely to suffer from health problems.
- 7.11.3 Policy LPA02 directs new development to locations appropriate to their nature and scale, with a focus on areas that are accessible to major transport routes. The growth of existing business areas with modern floor space could help to attract investment in the economy and contribute to infrastructure improvements.
- 7.11.4 By requiring the consideration of climate change resilience, the development principles (Policy LPA03 'Development Principles') and spatial strategy should help to safeguard the Borough from potential economic disruption under certain climatic events.
- 7.11.5 The spatial strategy promotes strategic employment sites in proximity to the M6 and the M62 under Policy LPA02 which are considered to be attractive to the market. Development at these sites would generate employment opportunities in broadly accessible locations, which would be beneficial for the Borough's image as well as its communities. There is a clear focus on logistics and distribution, which the evidence suggests is what the market requires. Whilst this is positive in one respect, it does not diversify the economy or differentiate St Helens from neighbouring authorities that are also promoting similar patterns of growth.
- 7.11.6 To ensure that employment and development opportunities benefit those in greatest need, the spatial strategy outlines the need for good transport links, especially to areas of multiple deprivation. This should help to address poverty and improve skills in areas of most need.
- 7.11.7 One of the development principles set out in policy LPA03 is expected to improve the economic well-being of the Boroughs residents, particularly local unemployed and disadvantaged people, whilst contributing to the reduction of socio-economic inequality, overall resulting in positive effect on the local economy and employment.
- 7.11.8 Sites previously used for employment are protected for similar uses under Policy LPA04 (A Strong and Sustainable Economy), helping to safeguard the provision of these uses within the Borough. Promoting the reuse of existing sites could potentially be unattractive to some land owners/developers who have specific ideas about the location and condition of their preferred sites. However, the variety of sites on offer, and the opportunity to develop strategic sites linked to the M6/A580 and M62 should ensure flexibility and choice in the market (though there is a heavy focus on B2 / B8 uses).
- 7.11.9 By supporting the creation and expansion of small businesses, Policy LPA04 (A Strong and Sustainable Economy) could help to further diversify the economy and provide choice and flexibility. Such diversification is likely to make the economy more robust, resilient to external factors, and support local entrepreneurs who may consider initiating a business venture.
- 7.11.10 Support is also offered to local suppliers, helping to maintain spending within the local economy, and the creation of apprenticeships is likely to help grow a skilled workforce which could serve the long term needs of St Helens. As a result, the effects of policy LPA04 are predicted to be minor positive.

- 7.11.11 Both Policy LPA04 and Policy LPA10 (Parkside East) encourage apprenticeships and training schemes for the local workforce. This should help to tackle deprivation and reduce the need to seek opportunities outside of the Borough. Likewise, the policies intention to provide adequate infrastructure for business needs should help to prevent companies relocating elsewhere.
- 7.11.12 Partnership with the Liverpool City Region is also likely to attract interest from developers and investors who seek to gain access to the wider agglomeration of businesses and opportunities at motorway junctions, which could see increased interest in St Helens as a quality business location.
- 7.11.13 Policy LPA10 offers a large scale investment opportunity which could help to diversify the local economy and make it more resilient to economic changes. This Strategic location could attract a wider market to invest in St Helens given its accessibility from the key routes of the M6 and the M62.
- 7.11.14 In support of the spatial strategy, a number of housing and employment site allocations are proposed. Policy LPA05 (Meeting St Helens Housing Need) seeks to develop an annual average of 486 dwelling units in the Borough, the construction and preparation of which is likely to support the local house building industry.
- 7.11.15 The proposed housing sites are generally well related to employment opportunities, whether it be locally, or along strategic transport routes by car or public transport.
- 7.11.16 Policy LPA11 (Health and wellbeing) aims to work with health and well-being partners to promote public health principles, by seeking to maximise residents ability to access jobs across the Borough. This will contribute a positive effect on health and wellbeing (and subsequently, the local economy).
- 7.11.17 Overall, the spatial strategy (including site allocations) is likely to have a **significant positive effect** on the local economy and employment. This should be achieved through the allocation of high quality employment land that can contribute to the regional economy, whilst ensuring that local residents benefit from increased employment opportunities. There is also support for local businesses and an adequate supply of housing in accessible locations to ensure that an increase in economic opportunities can be accommodated.

#### Retail and town centre policies

- 7.11.18 Policy LPB01 (St Helens Central Spatial Area) seeks to protect and enhance St Helens town centre as a destination for retail, tourism and dwellings through the identification of an 'Area of opportunity' for the scope of future retail, leisure and cultural development. This should help to maintain the role of the town centre and improve the quality and the attractiveness of town centre space.
- 7.11.19 Encouraging town centre development could help to strengthen the town centre economy, bringing with it employment opportunities and increased visitors.
- 7.11.20 With the presence of online shopping and retail parks, it is unclear whether the policy will have a significant positive effect in terms of altering shopping behaviours. However, the policy is proactive in its aim to revitalise the town centre, which is a positive effect.
- 7.11.21 Continued monitoring through town centre health checks should allow for trends, barriers to development and opportunities to be identified and interventions

implemented. This should help to ensure that the economic strength of the centre is maintained over the Plan period.

7.11.22 Growing Earlestown as a commuter settlement under Policy LPB02 (Earlestown Town Centre) should contribute to the vitality of the centre, as there will be a larger local population with a need for local services and facilities. With such growth, opportunities for businesses to expand or establish in the town centre ought to be increased.

7.11.23 In combination, the retail and town centre policies are predicted to have a **significant positive effect**.

#### Housing policies

7.11.24 The housing policies seek to deliver and diversify additional housing provision within St Helens. Diversity within the type and tenure of housing on offer should cater to the varying needs of those employed within the Borough, allowing them to live in close proximity to their workplace. This could help to increase the attractiveness of St Helens as a place of employment.

7.11.25 Adopting optional standards on adaptability and accessibility through Policy LPC01 (Housing Mix) should help to retain employees within the Borough by providing their housing needs over the long term, and reducing the necessity for them to relocate which could potentially disrupt their productivity and attendance in the workplace.

7.11.26 Supporting self-build projects under Policy LPC01 (Housing Mix) may also have a positive effect on local economies in terms of supplying opportunities and building the skills necessary for such constructions.

7.11.27 The affordable housing targets as introduced under Policy LPC02 (Affordable Housing Provision) help to facilitate development which may have otherwise been unviable by offering different targets for brownfield or greenfield sites. This could make development more attractive to developers.

7.11.28 Together, the housing policies are predicted to have a **significant positive effect**.

#### Biodiversity policies

7.11.29 Protection of SSSIs under Policy LPC06 (Biodiversity and Geological Conservation) could create a requirement for the development of certain employment sites to adopt mitigation measures, potentially incurring additional costs.

7.11.30 Most noticeably of these is the Parkside site which is located in proximity to such a designation. The requirement for net gains in biodiversity could potentially affect development viability; however the policies offer sufficient flexibility to avoid such scenarios, and allow developments to be dealt with on an individual basis.

7.11.31 The protection of sites with local nature conservation / local species value could reduce the developable-site offering within the Borough.

7.11.32 Whilst such requirements may catalyse small-scale employment for those working in the conservation industries, is likely to have a minor negative effect on the economy and employment opportunities within St Helens.

7.11.33 However, increased accessibility across the Borough through Policy LPC07 (Greenways) could help to unlock an otherwise inaccessible workforce.

7.11.34 Overall, the biodiversity policies are predicted to have a **neutral effect** on the economy, reflecting the potential for some minor benefits but also minor constraints.

#### Built and natural environment policies

7.11.35 Maintaining the overall quality of landscape and historic assets under Policy LPC10 ('Landscape Protection and Enhancement) and Policy LPC11 (Historic Environment) could be attractive to inward investment and could help to support tourism industries.

7.11.36 A high quality built and natural environment, as encouraged under Policy LPD06 (Prominent Gateway Corridors) is likely to be attractive to potential investors (by offering modern, accessible sites), and could help to secure further developer interest.

7.11.37 Overall, the built and natural environment policies are considered likely to have a minor positive effect.

#### Natural resources

7.11.38 Adopting green infrastructure' (Policy LPA09 Green Infrastructure) as a way to commute to work could help to support increased walking and cycling to work, which would have benefits for employees and employers with regard to healthy workforce and efficient ways of accessing places of work (without having to rely on vehicles that are prone to traffic delays).

7.11.39 Policy LPC12 (Flood Risk and Water Management) should prevent the development of potential employment sites if they would exacerbate flood risk, and may therefore reduce the size and number of sites on offer within the Borough. However, the adoption of this policy overall is likely to protect employment sites from flooding in the future, and in instances where uses are compatible development ought not to be affected.

7.11.40 The shift towards substitute, secondary and recycled sources of minerals under Policy LPC14 (Minerals) could help to catalyse local economies associated with these practices. However this may also coincide with a loss of industry and employment related to primary mineral extraction. Mineral Safeguarding Areas could also present a barrier to the development of potential employment sites which overlap with such designations (although it is possible for minerals to be extracted prior to development).

7.11.41 Encouraging the sustainable management of waste (Policy LPC15 Waste) may help to generate business opportunities in recycling, collection and storage industries. However, the influence of the policy is likely to be minor, as trends in waste management are driven more by national policy, market demands and capacity.

7.11.42 Whilst the individual policies may have a mixed effect, overall the natural resource policies are considered to have a positive effect.

#### Infrastructure

7.11.43 The development of an employment site with the capability to support rail freight (Policy LPA10) is likely to bring widespread economic benefits such as job creation associated with the rail and construction industries, a high profile investment opportunity for the whole site, and bringing a new economy to the area in the form of rail-based freight industries.

- 7.11.44 It could help to facilitate the introduction of new infrastructure, such as the HS2, in the future, thereby improving the investment offer of the Borough.
- 7.11.45 Policy LPA07 (Transport and Travel) aims to improve the accessibility of jobs, homes and services by all modes of transport and will therefore help to create a more attractive place to live and work. Additionally, by securing improvements to sustainable modes of transport infrastructure this should help to promote active forms of travel, which help to ensure a healthier workforce. This is likely to benefit the economy by reducing the amount of absences and unproductive time.
- 7.11.46 The provision and protection of infrastructure under Policy LPA08 (Infrastructure Delivery and Funding) such as health, community and cultural facilities should help to maintain physical, social and mental wellbeing of the residents of the Borough. This could project into the workplace, and create a more productive and positive environment. Conversely, the requirement for contributions to such infrastructure could affect scheme viability.
- 7.11.47 Policy LPC05 (Open Space) could help to generate business opportunities in the sports, leisure, recreation and tourism sector; which provides a boost to the economy.
- 7.11.48 Policy LPD07 (Digital Communications) removes the ambiguity surrounding potential applications for development. With increased clarity, the policy could allow for a faster processing of such applications, and for more rapid development to take place within the Borough. However, the requirements of this policy could add costs to the development.
- 7.11.49 The infrastructure policies are predicted to have a broadly positive effect on the economy and employment opportunities within the Borough. These could be significant in the longer term once major schemes such as strategic rail freight capabilities are in place.

#### Design

- 7.11.50 A high quality built and natural environment, as encouraged under Policy LPD01 (Ensuring Quality Development) is likely to be attractive to developers looking to invest in the Borough.
- 7.11.51 Policy LPD08 (Advertisements) removes the ambiguity surrounding potential applications for this development. With increased clarity, the policy could allow for a faster processing of such applications, which would be beneficial for business. The effects are minor though.
- 7.11.52 Policy LPD10 (Food and drink) makes clear the parameters within which food and drink establishments can operate within the Borough. In setting an exclusion zone around educational establishments, the policy could prevent certain vendors from operating within their desired locations, and could have a minor negative effect on entrepreneurial ambition for those which it applies.
- 7.11.53 Overall, the design policies are predicted to have minor effects; there could be small benefits for some companies and small disadvantages for others.

Cumulative effects (i.e. the effects of the Plan as a whole)

- 7.11.54 The Plan seeks to take advantage of growth opportunities, which ought to lead to **significant positive effects** on the economy through attracting investment and generating new jobs. The widespread economic benefits that ought to be generated through the development of strategic sites will help to strengthen the Borough's economy and its links with the Liverpool City Region.
- 7.11.55 Many of the policies help to locate employment sites and guide investment to the most appropriate / accessible areas within the Borough. The policies are also supportive of efforts to train individuals, offer apprenticeships, and increase accessibility throughout St Helens (including digital communications), creating a more robust and mobile workforce into the long term.
- 7.11.56 Although the Plan seeks to protect existing industrial and businesses areas, its focus is mostly on strategic opportunities rather than support for smaller scale businesses. This could mean that opportunities to diversify, or support 'local' economies are not fully taken advantage of. However, existing sites, several smaller site allocations in the urban area, and the potential for conversions ought to offer the capacity and quality of sites required to support small medium enterprises.
- 7.11.57 Of critical importance to the success of the economic strategy (for the people of St Helens) is to ensure that public transport links to strategic employment sites are strengthened. It is also important to seek high quality developments that distinguish the Borough from the employment offer of other land opportunities that are located along motorway corridors.

## 7.12 Housing

7.12.1 This section presents an appraisal of the Plan against the SA Objectives within the SA topic 'housing'. The effects of the Plan are presented in table 7.11 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows.

*Table 7.11: Appraisal of the Plan on housing*

Local Plan Chapters / Policies	Score
<p><b>Core Policies</b> (Including housing and employment allocations)</p> <p>LPA01 <i>Presumption in Favour of Sustainable Development</i> ✓            LPA02 <i>Spatial Strategy</i> ✓✓            LPA03 <i>Development Principles</i> ✓            LPA04 <i>A Strong and Sustainable Economy</i> ✓            LPA05: <i>Meeting St. Helens Housing Needs</i> ✓✓            LPA06: <i>Safeguarded Land ?</i>            LPA10: <i>Parkside East</i> - / ✗            LPA11: <i>Health and wellbeing</i> ✓</p>	<p>✓✓</p>
<p><b>Retail and town centres</b></p> <p>LPC04 <i>Retail and Town Centres</i> ✓            LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓            LPC02: <i>Earlestown Town Centre</i> ✓</p>	<p>✓</p>
<p><b>Housing policies</b></p> <p>LPC01: <i>Housing Mix</i> ✓            LPC02: <i>Affordable Housing</i> ✓</p>	<p>LPC03: <i>Gypsies, Travellers &amp; Travelling Show people</i> ✓            LPD04: <i>Householder Developments</i> ✓</p> <p>✓✓</p>
<p><b>Biodiversity policies</b></p> <p>LPC06: <i>Biodiversity and Geological Conservation</i> ✗            LPC07: <i>Greenways</i> ✓</p>	<p>LPC08: <i>Ecological Network</i> ✗</p> <p>-</p>
<p><b>Built and natural environment policies</b></p> <p>LPC09: <i>Landscape Protection and Enhancement</i> ✗            LPC10: <i>Trees and Woodland</i> -            LPC11: <i>Historic Environment</i> ✓</p>	<p>LPD06: <i>Prominent Gateway Corridors</i> ✗            LPD05: <i>Development in the Green Belt</i> ✗</p> <p>-</p>
<p><b>Natural resources</b></p> <p>LPA09: <i>Green Infrastructure</i> -            LPC12: <i>Flood Risk and Water Management</i> ✓</p>	<p>LPC14: <i>Minerals</i> ✓            LPC15: <i>Waste</i> -            LPDM: <i>Air quality</i> -</p> <p>✓</p>
<p><b>Infrastructure</b></p> <p>LPA07: <i>Transport and Travel</i> ✓            LPA08: <i>Infrastructure Delivery and Funding</i> ✓            LPC13: <i>Low Carbon and Renewable Energy Development</i> ✓            LPDM: <i>Digital Communications</i> ✓            LPC05: <i>Open Space</i> ✓</p>	<p>✓</p>
<p><b>Design</b></p> <p>LPD01: <i>Ensuring Quality Development</i> ✓            LPD02: <i>Design and Layout of New Housing</i> ✓            LPD08: <i>Advertisements</i> -            LPD10: <i>Food and drink</i> -            LPD03: <i>Open Space and Residential Development</i> -</p>	<p>✓</p>
<p><b>The Local Plan 'as a whole'</b> (i.e. cumulative effects)</p>	<p>✓✓</p>

### Spatial strategy (including sites)

- 7.12.2 The spatial strategy, employment and housing policies seek to create more employment opportunities, secure high quality design, and make provision for high quality housing to meet (and exceed) objectively identified needs.
- 7.12.3 Policy LPA02 (Spatial Strategy) seeks to secure housing that is in close proximity to services, to improve accessibility, and enhance environmental quality. This should enhance the attractiveness of housing in the Borough for residents.
- 7.12.4 Policy LPA02 seeks to deliver a proportion of housing development upon brownfield land, but also proposes the release of Green Belt sites to meet needs. This spread of development opportunities across both brownfield and greenfield land is likely to be attractive to developers and buyers who seek a variety and range of sites depending on their needs.
- 7.12.5 The distribution of housing is spread widely across the Borough and is fairly well related to new and existing employment sites (in the main). Therefore, housing needs are likely to be met where they arise, help to support the vitality of a range of settlements and create links to places of work. A buffer of 20% has been applied to ensure there is flexibility and choice in the market, which should ensure a **significant positive effect** upon the baseline position is generated.
- 7.12.6 There is a stronger focus of housing growth towards the south of the urban area at a large new settlement and other strategic sites. This location is not the most closely related to the bulk of new employment opportunities (at Haydock for example), but would help to support an overall increase in housing needs, and is in close proximity to other opportunities (for example at Omega, the town centre, Reginald Road Industrial Estate).
- 7.12.7 One of the development principles within Policy LPA03 states that new development must meet the challenges of population retention and growth. This should be achieved by providing a mix of housing types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations. This should help to ensure that housing provision is supported that will meet the needs of all residents.
- 7.12.8 Due to the inclusion of provisions seeking to prevent the use of employment sites allocated under Policy LPA04 (A Strong and Sustainable Economy) for housing, it is unlikely that these sites would be available for housing. However, there is sufficient land identified and allocated in the Plan to ensure that housing needs can be met on other sites without the need to change the use of land which is allocated for employment.
- 7.12.9 The development of the SRFI and its associated effects on traffic, noise and air during its construction and operation could have an effect on residential amenity for housing sites in proximity to the site. Whilst Policy LPA10 (Parkside East) seeks to minimise this residential impact, the effectiveness of mitigation is yet to be determined and may not be aligned to the individual concerns of the affected residents. It is expected that such issues will be addressed through an environmental assessment.
- 7.12.10 Policy LPA11 (Health & Wellbeing) looks to improve access to a choice of homes that meet the needs of the residents of the area, which will have a positive effect on housing inequalities in the area.

7.12.11 Overall, a **significant positive effect** is predicted upon housing.

#### Retail and town centre policies

7.12.12 Policy LPB01 (St. Helens Central Spatial Area) and Policy LPC04 (Retail and Town Centre) seek to preserve the vitality and function of St Helens and other key centres; including for residential development where appropriate. This is also the case with regard to Earlestown under Policy LPB02 (Earlestown Town Centre). This ought to have a positive effect on the provision of housing in accessible locations, though it is uncertain how attractive these sites would be.

7.12.13 Overall, the retail and town centre policies are predicted to have a minor positive effect on housing.

#### Housing policies

7.12.14 Guidance on the density and design of housing should help to ensure that housing is appropriate to its surroundings and of a consistently high quality; which ought to ensure that new homes are attractive to potential buyers.

7.12.15 There is also explicit reference to maintaining a 5 year supply of housing land, which itself should help to safeguard opportunities for housing supply in the short term, and throughout the Plan period if a review highlights the need for more sites within a 5 year time period.

7.12.16 High quality and diverse housing development of varying types and tenures is required under the Policy LPC01 (Housing Mix), and as such is likely to provide a suitable range of homes. The support of self-build projects should also increase the housing mix of St Helens and cater for the demands of those with aspirations to build homes.

7.12.17 The requirement for provision of affordable housing within developments under (Policy LPC02 Affordable Housing Provision) is likely to enable wider access to the housing market. The policy also provides flexibility to deliver lower targets if viability could be affected. In particular, affordability targets are lower in response to deliverability and viability signals, which means that brownfield sites will remain an attractive prospect for developers.

7.12.18 Additionally, Policy LPD04 (Householder Developments) allows residents to alter and extend their home, increasing the adequacy of the home meeting the needs of the residents and reducing the need for them to relocate into another home.

7.12.19 Overall the Plan policies are likely to have a **significant positive effect** on housing within the Borough.

#### Biodiversity policies

7.12.20 Policy LPC06 (Biodiversity and Geological Conservation) and Policy LPC08 'Ecological Network' could prevent the location of residential development on certain sites which are considered sensitive with regard to biodiversity, geological or ecological assets. This could therefore limit housing development in some locations. However, the Plan provides sufficient housing as allocations elsewhere to avoid significant negative effects.

7.12.21 On the other hand, the provision of an off-road travel network (Policy LPC07 'Greenways') could allow for increased accessibility between housing sites and

recreation, work and services, which could increase the attractiveness and accessibility of homes.

On balance, the policies are predicted to have a neutral effect upon housing.

#### Built and natural environment policies

- 7.12.22 Policy LPC11 (Historic Environment) seeks to protect, enhance and maintain heritage assets, both designated and non-designated, which could potentially involve redevelopment for residential uses. This could help to diversify choice and cater for a range of individual demands in the housing market, having a minor positive effect in terms of the economy (investment in construction for example).
- 7.12.23 Safeguarding cultural heritage and green infrastructure could inhibit the development of potential housing sites should they be located in sensitive locations. However, it ought to be possible to make developments that are sympathetic to character, and which contribute to green infrastructure networks. The allocated sites will also provide a significant proportion of needs. Therefore, any effects would be anticipated to be minor.
- 7.12.24 The built and natural environment policies are predicted to have neutral effects overall with regards to housing delivery.

#### Natural resources

- 7.12.25 Policy LPC12 (Flood Risk and Water Management) seeks to prevent development from being located on sites which could exacerbate flood risk, thereby helping to protect housing across the Borough from potential damage during future events.
- 7.12.26 The encouragement of SUDS, soft landscaping and sustainable transport could also help to make for more attractive and resilient communities; which is considered to be a minor positive effect.
- 7.12.27 The adoption of Mineral Safeguarding Areas (Policy LPC14) could inhibit the development process, and either delay or prevent the development of housing in some areas. However, it is not thought likely in practice that housing development would be sought in areas of existing minerals extraction. Furthermore, it may be possible to extract minerals prior to development being commenced. Diverting housing away from mineral extraction sites is also sensible given the potential for effects on amenity and ground stability.
- 7.12.28 The natural resource policies are therefore predicted to have a minor **positive effect** on housing within St Helens.

#### Infrastructure

- 7.12.29 Policy LPA08 (Infrastructure Delivery and Funding) could help to ensure the delivery of affordable housing units. Affordable housing is not at the top of the Council's hierarchy of potential development contributions, but is the second priority. This ought to ensure that affordability is considered seriously as part of all relevant developments.
- 7.12.30 The policy also seeks to ensure the widespread implementation of broadband and other digital services which ought to make housing more attractive and accessible.

- 7.12.31 Proximity between housing and open space (Policy LPC05) is likely to increase the attractiveness of developments, and may help to retain residents in the area. Likewise, accessibility to services and employment sites is likely to be a consideration for potential buyers, and as such Policy LPA07 (Transport and Travel) attempts to improve transportation links and modal choice, which could make properties within the Borough more attractive.
- 7.12.32 Policy LPC13 (Renewable and Low Carbon Development) encourages proposals for development within the strategic housing sites to ensure that at least 10% of the development's energy needs can be met through the use of on-site renewable sources. This could affect the viability of the scheme for certain developers. Although the policy is flexible to allow for this target to be reduced (where there are viability concerns), the additional costs involved could still be a barrier to housing development. Conversely, adopting these requirements, would help to reduce the future energy costs for residents within the new builds, and could therefore be more attractive to buyers who seek such measures.
- 7.12.33 Overall, the Infrastructure policies are considered to be likely to have mixed effects. A minor positive effect is predicted; reflecting the benefits that infrastructure improvements and contributions to affordable housing would be likely to have. Conversely, the additional requirements relating to renewable and low carbon energy could prove to be a barrier to some developments in the short term, reflecting a minor negative effect for some locations.

#### Design

- 7.12.34 Policy LPD01 (Ensuring Quality Development), Policy LPD02 (Design and Layout of New Housing) and Policy LPD05 (Development in the Green Belt) are likely to secure high quality, functional, legible housing design in the Borough to meet the needs of all residents.
- 7.12.35 Policy LPD06 (Prominent Gateway Corridors) is likely to contribute to a positive image of the Borough, the impression of which could help to attract developer interest and residential investment.
- 7.12.36 Policy LPD07 (Digital Communications) could help to locate telecommunication infrastructure in appropriate areas/orientations so as not to encroach or negatively affect residential amenity for existing or new communities.
- 7.12.37 Overall, the design policies are expected to have a positive effect on local housing.

#### Cumulative effects (i.e. the effects of the Plan as a whole).

- 7.12.38 The Plan seeks to deliver the housing needs for the Borough, with a buffer added to allow for flexibility and choice. The distribution of housing ought to ensure that housing is accessible, and that 'local needs' can be met across the Borough in most areas.
- 7.12.39 Growth to the north and west of the Borough is lower than that proposed to the south and east, which could result in the demand for new houses in some locations not being met. For example, there is no additional planned growth identified in the Plan period at Billinge, or within the western parts of the urban area such as Eccleston. Nevertheless, the Plan is positively prepared in respect of housing delivery, and it would be possible for further development in settlements to be delivered through neighbourhood plans if specific local needs are identified.

- 7.12.40 The application of Plan policies should also help to improve the quality of housing developments and their surrounding environment, which is likely to be attractive to buyers/investors. Consequently, a **significant positive effect** is predicted throughout the plan period.
- 7.12.41 The Policy requirements to develop affordable, accessible and energy efficient homes could prove to be a barrier in some circumstances (due to viability). However, the Plan is sufficiently flexible to ensure that housing is delivered if viability could be an issue.
- 7.12.42 Several sites have also been safeguarded to ensure that sufficient land exists beyond the Plan period for longer term development needs. This is positive, as it sets a marker for future growth, but the effects would need to be identified and attributed to the next Plan that sets out the delivery of housing and employment land more explicitly.



# **Mitigation and enhancement**

**08**

## 8 MITIGATION AND ENHANCEMENT

### 8.1 Introduction

- 8.1.1 The sustainability appraisal (SA) of the emerging St. Helens Local Plan has been an iterative process, in which proposals for mitigation and enhancement have been considered at different stages.
- 8.1.2 Firstly, initial working draft policies for the Plan were appraised in the SA before the Preferred Options document (LPPO) was finalised for publication in 2016. This allowed for mitigation and enhancement measures to be identified before the LPPO document was finalised.
- 8.1.3 Following consultation on the LPPO, the Council has had time to consider the full range of recommendations made in the SA at that stage. Where appropriate, additional recommendations have been made in response to the appraisal of working draft policies as they have developed further after the LPPO stage.
- 8.1.4 Table 8.1 below sets out how the recommendations made at both stages (i.e. the LPPO and the 'working draft' LPSP stages) have been taken into account. The Council's response to the recommendations of the SA and the implications of the response for the findings of the SA are also summarised.

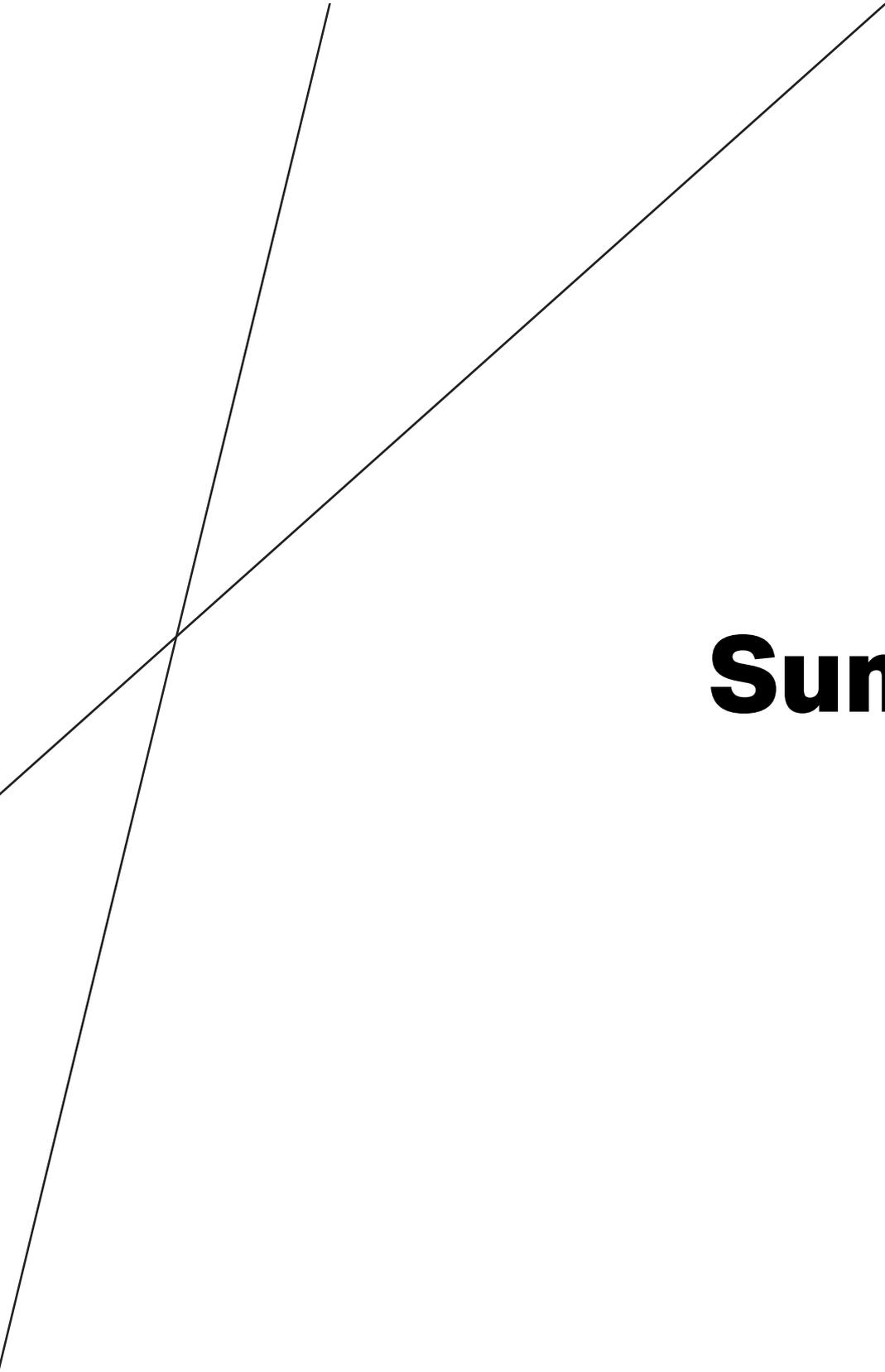
*Table 8.1 Mitigation and enhancement measures*

SA Recommendations	St Helens Response	Implications for the SA findings
<p><i>Further benefits could be generated by acknowledging the role that ecological networks (LPC08) and greenways (LPC07) should play in securing resilient habitats and a greater range of habitat for species. For example, the following text could be added to LPC07:</i></p> <p><i>"They do not impair the integrity of the Greenway as a wildlife corridor".... or its resilience to development pressures and climate change.</i></p>	<p>Incorporated recommended wording into Policy LPC07.</p>	<p>Minor improvements with regards to biodiversity resilience.</p>
<p>The allocation HA1 at Billinge could have some adverse effects on the setting of heritage assets, as there are a number of listed buildings within proximity (Crookhurst Farm and the Old Barn).</p> <p>Though plan policies that deal with heritage and design ought to cover such an issue, it is considered beneficial to include a site specific policy clause that requires the development to incorporate sufficient screening so that views from Billinge Hill are not significantly intruded upon/altered. This would help to ensure that new homes are well integrated into the existing settlement and maintain the 'rural' feel of the area.</p>	<p>At LPPO stage in 2016, the Council felt that the implementation of other Plan policies that deal with design and heritage would enable these concerns to be addressed.</p> <p>At publication draft (LPSP) stage, the site allocation has been removed and no longer forms a part of the spatial strategy.</p>	<p>Negative effects associated with development at the allocated site in Billinge would be avoided.</p>

SA Recommendations	St Helens Response	Implications for the SA findings
<p>Housing land at 10HA (now 8HA) is adjacent to a listed building (Dial Wood House). The setting of this asset is likely to be affected by development, as its character is enhanced by the open fields and wooded areas that the building overlooks. It is likely that negative effects upon this asset will occur as a result of substantial development here. It may therefore be beneficial to include a clause within a site specific policy for 8HA. This could seek to achieve a relatively open design and/or a buffer of green space adjacent to Higher Lane.</p>	<p>Other Plan policies would ensure that the setting of the Listed Building is protected. The Council would however have no objection to this change being introduced if considered necessary as a modification.</p>	<p>Potential negative effects on the setting of a listed building would be minimised. The likelihood of significant effects occurring would therefore be lower.</p>
<p>As a form of compensation for the loss of best and most versatile agricultural land, soil resources could be retained in part through the provision of allotments (Either on or off site for those allocations where loss would be involved). This recommendation would help to mitigate the effects somewhat.</p>	<p>The provision of allotments will be governed by standards which are given policy effect through LPC05 and LPD03</p>	<p>No changes have been made and so the effects in the SA remain the same.</p>
<p>The protection of trees and woodland (LPC10) ought to have beneficial effects in terms of helping to manage flood risk. This link could be made more explicit by identifying flood and water management as a form of green infrastructure (under point 6).</p>	<p>Part 1 of policy LPA09 confirms that the Council will seek to increase the extent of tree cover across the Borough. The supporting text confirms that part of the reasoning for this approach is to help manage flood risk.</p>	<p>Effects are more beneficial with regards to flood risk, but not to a significant degree.</p>
<p>For site 6HA it is recommended that protected trees and wooded areas are retained where possible, and new trees introduced as part of landscaping to compensate for any loss. Policy LPC10 includes provisions to ensure that trees and woodland are protected and enhanced. However, it would be beneficial to clarify that the extent of the existing woodland is retained.</p>	<p>Protection is already given to the trees by policy LPC10. There is also a requirement in the site profile (appendix 5 of the LPSD) for a green corridor to be retained. The Council would however have no objection to this further change being introduced if considered necessary as a modification.</p>	<p>Greater likelihood that negative effects on biodiversity will be avoided and enhancements secured.</p>
<p>As a recommendation, opportunities for district heating ought to be explored for any town centre developments that create a significant source or demand for heat. This could be incorporated into Policy LPB01 by requiring largescale mixed use development to consider such measures.</p>	<p>Policy LPC13 has been updated to encourage the exploration of district heat networks.</p>	<p>The significant positive effects predicted for LPC13 are strengthened.</p>

SA Recommendations	St Helens Response	Implications for the SA findings
A recommendation is to encourage design that is adaptable over time and allows for retrofitting of low carbon energy technologies.	Whilst this change has yet to be made, the Council would have no objections to it being introduced as a modification.	The significant positive effects predicted for LPC13 would be strengthened.
With regards to strategic employment sites, innovative approaches to design should be encouraged / required to ensure that buildings do not dominate the landscape and the footprint of the areas are not predominantly occupied by hard-standing.	The Council considers this point to be adequately addressed by the revised Policy LPA04.1 (part 2c). This requires the master planning of development within the strategic employment sites to provide for an attractive built form with high quality landscaping.	The likelihood of significant negative effects upon landscape character ought to be lower.
Site 6EA has the potential to have negative effects on the setting of a listed building (Le Chateau). In order to mitigate such effects, it is recommended that a buffer zone of open space is retained adjacent to Millfield Lane, and the scale and design of employment buildings help to minimise visual intrusion.	Other Plan policies would ensure that the setting of the Listed Building is protected. The Council would however have no objection to this change being introduced if considered necessary as a modification.	The extent and likelihood of negative effects occurring as a result of development here would be less likely.
At Site 6HA, it may be beneficial to incorporate public realm features in development that reflect the industrial legacy of the site.	Policy LPD01 part 1(h) confirms that new development should include or contribute to the provision of public art in appropriate circumstances (which would apply to this site). This matter is therefore already covered in the Plan. The Council would however have no objections to this further change being introduced as a modification of considered necessary.	The effects upon the character of the built environment would be more likely to be positive.

Generally, the Plan has been positively prepared, but several potential significant effects were identified through the SA. A range of mitigation and enhancement measures have been suggested, and the Council has responded positively by making policy amendments. This has improved the overall performance of the Plan in sustainability terms.



# Summary

**09**

## 9 SUMMARY OF FINDINGS

### 9.1 Introduction

9.1.1 Table 9.1 below presents a summary of the effects of the Plan, identified for each SA topic. Table 9.2 sets out a discussion of these effects.

*Table 9.1 – Summary of cumulative effects of the Local Plan on the SA Topics*

Biodiversity and geodiversity	Land quality	Traffic, congestion and air quality	Natural Resources	Climate change and energy	Flooding	Landscape	Built and natural environment	Health and wellbeing	Economy and employment	Housing
✓✓	✓✗	✓ ✗✗?	-	✓✓	✓✓	✓✗	✓✓?✗	✓✓✗	✓✓	✓✓

*Table 9.2 – Summary of cumulative effects of the Plan*

#### 1. Biodiversity and geodiversity

The Plan will lead to the development of a variety of sites on greenfield land and also some which have environmental constraints such as being close to local wildlife sites and/or containing protected trees.

However, the majority of proposed strategic and other site allocations are not located in sensitive areas and potential negative effects on local wildlife ought to be mitigated by core policies throughout the Plan.

There is strong protection for ancient woodland, and any loss of habitat should be compensated with a greater quantity of species / habitat. The Green Infrastructure network ought to be protected and enhanced, with particular benefits relating to the Bold Forest Area Action Plan and site specific policies seeking improvements along Rainford Brook and Clipsley Brook.

Overall, despite the planned growth, the Plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a **significant positive effect** predicted in the long term.

The potential for temporary **minor negative effects** should be highlighted though, as there could be increased disturbance to habitats and species during construction, and the net value of biodiversity across the Borough may take time to be restored / and increased following development.

To ensure that there is 'net environmental gain', it will be important to identify delivery mechanisms for enhancement and compensation schemes. Monitoring of the measures identified for strategic sites would also be beneficial.

## 2. Land quality

The Plan will lead to development on land of agricultural value; some of which is categorised as 'best and most versatile'. Once developed, this resource cannot be recovered, and so this represents a **negative effect** on soil resources. The overall amount of land affected is relatively low, and in the main avoids the most sensitive land. Therefore, the effects are not predicted to be significant.

With regard to alternative sites, these too would be mostly agricultural in nature, and of a high quality in some locations (for example, alternative sites which have been considered for proposed housing development around Rainford also include grade 1 land). The strategy broadly makes use of lower quality agricultural land wherever possible.

The Plan also seeks to make efficient use of land and infrastructure, and promotes the regeneration of land, particularly brownfield land in the urban area (as demonstrated by the allocation of four large sites in the urban area). This would generate **minor positive effects** with regard to land quality.

## 3. Traffic, congestion and air quality

The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Bold, Newton-le-Willows and Earlestown.

Increased traffic in these areas could have **minor negative effects** upon levels of congestion with knock-on adverse effects upon air quality. In particular there are substantial concentrations of proposed employment land at Haydock, and a large urban extension at Bold. The amount of traffic generated in these locations needs to be supported by improvements to infrastructure.

Not all new trips would be car based though, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This should help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made.

The strategic approach already seeks to achieve these connections by allocating housing sites in the urban area close to employment opportunities, and bringing forward housing and employment development in similar locations. These elements of the Plan ought to reduce the significance of potential negative effects. However, uncertainty remains.

In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have **minor positive effects** for the wider region by causing a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed.

An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.

Nevertheless, the overall implications for traffic and air quality are likely to be negative given the focus on development along key road networks, and in economic sectors that generate significant vehicular movements. On balance, an uncertain **significant negative effect** is predicted.

The Council will need to continue working with infrastructure providers, developers and in collaboration with relevant transport authorities to help deliver the improvements necessary to reduce the dominance of car travel.

#### 4. Natural resources

The Plan is driven by economic growth, and allocates a higher amount of land for housing than projected population forecasts suggest is needed (*uplifted to match employment aspirations and with an element of flexibility*). This is likely to lead to increased generation of waste, and the use of natural resources. However, growth would still occur in the absence of a Local Plan, although perhaps not at the same rate.

Whilst growth could have negative implications, the policies in the Plan ought to ensure that there are no significant effects. A number of policies seek to preserve and enhance natural resources, with explicit reference to the need to enhance water quality. Therefore, neutral effects are concluded.

Given that many of the Borough's watercourses are vulnerable to nitrates within surface water run-off, changes in land use (from agricultural) could actually help to reduce this problem in the longer term, which is a positive minor effect.

Overall, the effects of the Plan are predicted to be **neutral**; acknowledging that high levels of growth can affect the use of natural resources, but the efficiency of resource use and waste generation ought to be improved. In the long term, there could be a **positive effect** on water quality if new development reduces the amount of nitrates in surface water run-off and introduces measures to 'improve water quality as required by policies in the Plan.

#### 5. Climate change and energy

Overall, the Plan should help to tackle climate change and facilitate adaption to climate change. Whilst increased growth is likely to lead to greater greenhouse gas emissions, the Plan seeks to improve energy efficiency and the generation of energy from low carbon sources. In particular, development is encouraged to secure a 10% improvement in efficiency, ensure that opportunities for low carbon energy generation are explored and promote high quality design.

Counter balancing these positive effects somewhat is a focus on the delivery of employment sites that will encourage HGV use and is likely to increase emissions from vehicle based travel.

Over time a **significant positive effect** is predicted reflecting these factors, but there is a degree of uncertainty about whether this would be achieved.

#### 6. Flooding

Overall, the Plan seeks to ensure that flood risk is minimised during the Plan period, setting out a number of policies to help achieve this objective. Although the Plan involves housing and employment land allocations on greenfield land, many of these are in areas that are not at significant risk of flooding and could be enhanced through the implementation of sustainable natural drainage systems.

Brownfield sites in the urban area could also be at risk of flooding, but there may also be potential here to improve current rates of run off (with implementation of improved drainage), which would be positive.

The effects of the Plan are therefore predicted to be positive overall, with **significant positive effects** accruing in the longer term as a result of blue and green infrastructure enhancement, linked to the Sankey Catchment Action Plan.

## 7. Landscape

The Plan proposes to allocate a number of housing and employment sites to ensure that the spatial strategy can be achieved. The effect on the character of landscapes is predicted to be neutral (or positive) for some settlements such as Bold and Eccleston, where the sensitivity of the landscape is low-moderate. The Plan also encourages the regeneration of brownfield land and buildings, which ought to improve townscape and landscape character, particularly in the urban area.

The effects on landscapes with greater sensitivity are more likely to be negative, especially where the quantum of development around a particular settlement is higher (for example in Haydock and Newton-le-Willows). For most of these areas, it ought to be possible to secure mitigation and enhancement through other Plan policies (particularly LPC11). Therefore, whilst the overall effects in these locations would remain negative, it should be possible to ensure that effects are not significant.

Some sites fall within areas of medium-high sensitivity, and therefore present the potential for significant negative effects. This is the case for Rainford and Garswood. However, the scale of site and their location as logical extensions to the built area should minimise the magnitude of effects. Therefore, it ought to be possible to avoid significant effects.

The spatial strategy also focuses on the regeneration of the town centre (including on several allocated sites where townscapes could be enhanced) and seeks to protect the vitality of key centres such as St Helens and Earlstown.

Several policies offer protection for green infrastructure and ecological networks, and the design policies of the Plan aim to ensure that high quality developments are secured, particularly at gateway locations.

These policies in combination are likely to contribute to a general improvement of the townscape and settlement edges, which would help to offset the loss of character associated with Green Belt loss. Therefore, overall, the effects upon landscape and townscape are predicted to be mixed.

**Significant positive effects** are predicted in the main, reflecting the proactive approach to the management of the built and natural environment. In particular, several of the strategic sites offer the opportunity for enhancement, particularly the housing sites in the urban area and at Bold, for which explicit requirements for landscape enhancement are set out.

It should be acknowledged that **negative effects** are predicted for the majority of Green Belt allocations for housing and employment. With suitable mitigation and enhancement though, these effects could be prevented from becoming significant. That being said, the effects associated with employment development are likely to be more difficult to avoid given the nature and layout of such types of development.

However, some mitigation would be provided by the provisions within Policy LPA04.1, which seeks to ensure that high quality design and layout is secured.

## 8. Built and natural environment

Overall, the strategy is predicted to have mixed effects on heritage. Some of the allocated strategic sites present the possibility of negative effects, whilst others are predicted to be neutral or positive.

The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are minor positive effects. In the longer term, these effects could potentially be significant from a Borough-wide perspective as the cumulative effects of regeneration are realised.

The negative effects are generally predicted to be not significant across the Borough. Whilst there are particular locations where significant negative effects could be generated, site specific measures have been identified that will help to manage and minimise these effects.

Furthermore, the Plan sets out a range of measures that could help to protect and enhance the historic environment.

Whilst some negative effects could remain, these would be likely to be minor and limited in extent.

## 9. Health and wellbeing

The Plan is predicted to have a positive effect on health and wellbeing, primarily through the delivery of housing to meet the needs of a range of groups, as well as the aspiration to provide increased job opportunities.

The distribution of growth ought to ensure that jobs, services and leisure are accessible to new and existing communities and can help to reduce levels of deprivation in areas of need. For example, the proposed employment sites at Haydock would be within a convenient walking / cycling distance to communities that fall into the 20% most deprived areas in England (Blackbrook, parts of Haydock). Likewise, employment and housing in the core urban area should be accessible to a range of deprived communities.

Of particular importance is the continued commitment to urban regeneration and the need to secure enhancements to infrastructure as part of new development.

It is a commitment throughout the Plan to enhance open space and green infrastructure, whilst also promoting active travel. These measures should all help to encourage healthier lifestyles and create attractive environments for residents.

In combination, the Plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the Borough. However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people.

Congestion may also increase in the short term / before infrastructure improvements are secured, which could lead to a poorer quality environment in parts of the Borough where development is greatest (for example St Helens urban area, Haydock, Bold and Newton-le-Willows).

To reflect these issues, a **minor negative effect** is predicted, but these should only be temporary providing that effective infrastructure is delivered to support developments.

## 10. Economy and employment

The Plan seeks to take advantage of growth opportunities, which ought to lead to **significant positive effects** on the economy through attracting investment and generating new jobs. The widespread economic benefits that ought to be generated through the development of strategic sites will help to strengthen the Borough's economy and its links with the Liverpool City Region.

Many of the policies help to locate employment sites and guide investment to the most appropriate / accessible areas within the Borough. The policies are also supportive of efforts to train individuals, offer apprenticeships, and increase accessibility throughout St Helens (including digital communications), creating a more robust and mobile workforce into the long term.

Although the Plan seeks to protect existing industrial and businesses areas, its focus is mostly on strategic opportunities rather than support for smaller scale businesses. This could mean that opportunities to diversify, or support 'local' economies are not fully taken advantage of. However, existing sites, several smaller site allocations in the urban area, and the potential for conversions ought to offer the capacity and quality of sites required to support small medium enterprises.

Of critical importance to the success of the economic strategy (for the people of St Helens) is to ensure that public transport links to strategic employment sites are strengthened. It is also important to seek high quality developments that distinguish the Borough from the employment offer of other land opportunities that are located along motorway corridors.

## 11. Housing

The Plan seeks to deliver the housing needs for the Borough, with a buffer added to allow for flexibility and choice. The distribution of housing ought to ensure that housing is accessible, and that 'local needs' can be met across the Borough in most areas.

Proposed growth in the northern and western parts of the Borough is lower than that proposed to the south and east, which could mean that desires to move to some locations would not be met. For example, there is no additional planned growth identified at Billinge, or in the western parts of the urban area such as Eccleston. Nevertheless, the Plan is positively prepared in respect of housing delivery, and it would be possible for further development in settlements to be delivered through neighbourhood plans if specific local needs are identified.

The application of Plan policies should also help to improve the quality of housing developments and their surrounding environment, which is likely to be attractive to buyers / investors. Consequently, a **significant positive effect** is predicted throughout the Plan period.

The Policy requirements to develop affordable, accessible and energy efficient homes could prove to be a barrier in some circumstances (due to viability). However, the Plan is sufficiently flexible to ensure that housing is delivered if viability could be an issue.

Several sites have also been safeguarded to ensure that sufficient land exists beyond the Plan period for longer term development needs. This is positive, as it sets a marker for future growth, but the effects would need to be identified and attributed to the next Plan that sets out the delivery of housing and employment land more explicitly over the longer term.



# **Monitoring and next steps**

**10**

# 10 MONITORING

## 10.1 Monitoring

- 10.1.1 At this stage there is a requirement to outline the measures envisaged to monitor the predicted effects of the Plan. In particular, there is a need to focus on the significant effects that are identified. It is important to track predicted effects to ensure that positive effects are actually realised and to identify any unforeseen negative effects that may occur.
- 10.1.2 Table 10.1 below sets out monitoring measures under each SA topic which are intended to be used to monitor any significant effects and to track the baseline position more generally. At this stage the monitoring measures have not been finalised, as there is a need to confirm the feasibility of collecting information for the proposed measures. Wherever possible, measures have been drawn from the Local Plan monitoring framework to reduce duplication.
- 10.1.3 The monitoring measures will be finalised once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.

*Table 10.1: Monitoring the effects of the Plan*

SA Topics	Proposed monitoring measures
<p><b>Biodiversity and geodiversity</b></p> <p><b>Significant positive effects</b> are predicted due to an expected net improvement in biodiversity.</p> <p>Temporary minor negative effects are predicted due to disturbance and loss of wildlife habitats.</p>	<p>Net loss / gain in designated habitats (ha).</p> <p>Net change in tree coverage (ha)</p> <p>Indicators in the Bold Forest Area Action Plan Monitoring Framework.</p> <p>Quantity and extent of additional land contributing to the ecological network as a result of planning permissions granted.</p>
<p><b>Land quality</b></p> <p>Minor negative effects are predicted due to a loss of agricultural land.</p> <p>Minor positive effects are predicted in relation to brownfield land regeneration.</p>	<p>Although no significant effects have been predicted, the following indicators are proposed to track trends:</p> <p>Amount of brownfield land developed (Ha)</p> <p>Amount of agricultural land lost to development (by grade)</p>
<p><b>Traffic, congestion and air quality</b></p> <p>Potential / uncertain <b>significant negative effects</b> are predicted in relation to increased amounts of traffic and congestion.</p>	<p>Number and proportion of trips made by car, public transport, walking and cycling</p> <p>Changes in peak congestion along key routes.</p> <p>Net change in the number of HGV trips generated within St Helens (and proportion of total freight).</p>

SA Topics	Proposed monitoring measures
<p>Positive effects are predicted with regard to a reduction in road freight in the longer term.</p>	<p>Cycle and footpaths created</p>
<p><b>Natural resources</b></p> <p>Overall, neutral effects are predicted, but there may be some positive effects on water quality in the longer term due to a change in use from agriculture to residential / employment.</p>	<p>Although no significant effects have been predicted, the following indicators are proposed to track trends:</p> <p>Achievement of water framework directive objectives.</p> <p>Waste generation per capita (tonnes per year)</p>
<p><b>Climate change and energy</b></p> <p>An <u>uncertain</u> <b>significant positive effect</b> is predicted as it is expected that there would be a decrease in emissions of greenhouse gases per capita.</p>	<p>Per capita emissions of greenhouse gases (domestic, transport and industrial).</p> <p>Installed capacity of renewable / low carbon energy generation (MW)</p> <p>Percentage of developments at strategic sites that would generate at least 10% of energy needs from renewable / low carbon sources.</p> <p>Number of electric charging points provided</p>
<p><b>Flooding</b></p> <p><b>Significant positive effects</b> are predicted in the longer term related to the enhancement of green and blue infrastructure (which should help to 'slow the flow').</p>	<p>SUDs schemes incorporated into new developments</p> <p>Planning permissions granted for sensitive uses in flood zones 2 and/or 3'.</p>
<p><b>Landscape</b></p> <p>Minor negative effects are predicted due to a change in the character of landscape, particularly for employment land.</p> <p>In the longer term, <b>significant positive effects</b> could be generated due to landscape enhancement on land that is currently not of high sensitivity.</p>	<p>Progress against Bold Forest Park Action Plan monitoring indicators</p> <p>Net change in green infrastructure (area in ha)</p> <p>Number of developments allowed on appeal that had been initially refused on landscape character grounds.</p>

SA Topics	Proposed monitoring measures
<p><b>Built and natural environment</b></p> <p>Minor negative effects are predicted as development could have effects upon the setting of some heritage assets.</p> <p>Potential minor positive effects are predicted as a result of regeneration activities and the enhancement of the built environment.</p>	<p>Although no significant effects have been predicted, several indicators are proposed to track trends:</p> <p>Percentage of planning permissions granted in accordance with Heritage England advice</p> <p>Number of dwellings which have been vacant for over 6 months.</p> <p>Public realm improvements implemented.</p> <p>Number of updated Conservation Area Appraisals completed</p>
<p><b>Health and Wellbeing</b></p> <p><b>Significant positive effects</b> are predicted as the Plan will help to tackle affordable housing, provide improvements to green infrastructure and improve social infrastructure.</p>	<p>Compliance with open space standards</p> <p>Percentage of new dwellings permitted within 800m of a health centre.</p> <p>Housing register of people wanting to move to affordable housing</p>
<p><b>Economy and employment</b></p> <p><b>Significant positive effects</b> are predicted related to economic growth, regeneration and infrastructure improvements</p>	<p>Employment land developed (Square feet)</p> <p>Loss of employment on existing employment sites</p> <p>Employment land available per annum by type</p>
<p><b>Housing</b></p> <p><b>Significant positive effects</b> are predicted as the Plan is likely to support identified needs for a range of community groups.</p>	<p>Rates of housing delivery.</p> <p>Percentage of affordable housing delivered in accordance with Plan targets.</p> <p>Analysis of progress with strategic sites</p> <p>Density numbers of approved housing developments</p>

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## 11 NEXT STEPS

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- 11.1.1 The Council has prepared the Submission Draft of the emerging St Helens Borough Local Plan. It proposes to publish the Plan and other 'proposed submission' documents in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. An 8 week period will be provided for any representations to be received, commencing early in 2019.
- 11.1.2 This SA report documents the SA process that has been undertaken in preparing the Local Plan and sets out a discussion of the significant effects that are likely to arise.
- 11.1.3 The final Plan will be 'submitted' for Examination in Public (EiP). The Council will also submit a summary of issues raised (if any) through representations at the publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the EiP. At the end of the EiP, the Inspector will judge whether or not the Plan is 'sound'.
- 11.1.4 Further SA work may be required to support the Plan-making process as it moves through Examination (for example the preparation of SA Addenda to deal with any proposed modifications).
- 11.1.5 Upon adoption of the Plan, an SA Statement must be prepared that sets out:
- o *How SA findings and the views of consultees are reflected in the adopted Plan,*
  - o *Measures decided concerning **monitoring**.*

## APPENDIX I: THE SA FRAMEWORK

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
<b>ENVIRONMENT</b>			
1. To protect and enhance biodiversity and geodiversity	<p>Will it protect and enhance natural/semi-natural habitats?</p> <p>Will it protect and enhance geodiversity?</p> <p>Will it maintain and enhance woodland cover and management?</p> <p>Will it improve biodiversity, especially within urban areas?</p> <p>Will it enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks?</p> <p>Will it avoid the needless sterilisation of viable minerals resources?</p>	<p><b>Issue 1. Biodiversity, Flora and Fauna</b></p> <p><b>Issue 4. Geodiversity</b></p>	<p>Biodiversity</p> <p>Flora</p> <p>Fauna</p>
2. To protect and improve land quality in St. Helens	<p>Will it seek to reclaim derelict land?</p> <p>Will it result in the positive remediation of contaminated land?</p> <p>Will it protect and enhance soil quality in St Helens including the highest quality agricultural land?</p> <p>Will it increase the amount of development on Previously Developed Land?</p>	<p><b>Issue 4. Geodiversity</b></p> <p><b>Issue 5. Soil</b></p> <p><b>Issue 6. Contaminated Soils</b></p>	<p>Soil</p>

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
3. To improve air quality in St. Helens	<p>Will it improve air quality?</p> <p>Will it reduce the number of journeys made by private car in order to reduce the high levels of nitrogen dioxide in areas of traffic congestion in the Borough?</p>	<b>Issue 7. Air Quality</b>	Air
4. To maintain and enhance the quality of controlled waters in St. Helens and to sustainably manage water resources	<p>Will it improve the quality of controlled waters?</p> <p>Will it ensure efficient use and management of water resources throughout the Borough?</p> <p>Will it promote sustainable design and construction measures that reduce water consumption and result in decreased run-off of polluted water (including during the construction phase).</p>	<b>Issue 10. Water Resources/Water Quality</b>	Water Material assets
5. To mitigate and adapt to the impacts of climate change	<p>Will it support building designs and a green infrastructure network that is adapted to climate change?</p> <p>Will it support take-up of renewable energy or low carbon technologies?</p>	<b>Issue 9. Climate Change</b>	Climatic factors
6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties	<p>Will it support development located outwith high flood risk areas?</p> <p>Will it incorporate sustainable urban drainage systems as part of the design?</p> <p>Will it incorporate new green spaces and habitat creation helping to mitigate flood risk?</p>	<b>Issue 11. Flood Risk</b>	Water Resources; Climatic factors.

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
7. To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside	<p>Will it contribute to landscape character?</p> <p>Will it protect and enhance the landscapes of the highest sensitivity in the Borough?</p>	<b>Issue 3. Landscape</b>	Landscape
8. To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment	<p>Will it protect and enhance sites, features and areas of historic, archaeological and cultural value in both urban and rural areas?</p> <p>Will it help to protect and enhance historic buildings through sensitive adaptation and reuse?</p>	<b>Issue 2. Cultural Heritage</b>	Cultural heritage including architectural and archaeological heritage
9. Ensure access to and protection and enhancement of high quality public open space and natural greenspace	<p>Will it ensure that all people have access to public open space within a reasonable walking distance from where they live?</p> <p>Will it promote access to green infrastructure such as natural greenspace?</p> <p>Will it create new areas of open space and natural greenspace?</p>	<b>Issue 12. Open Space and Recreation</b>	Material assets
<b>NATURAL RESOURCES</b>			
10. To minimise energy use and increase the proportion of energy both purchased and	<p>Will it minimise greenhouse gas emissions?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p>	<b>Issue 9. Climate Change</b>	<p>Climatic Factors</p> <p>Population</p> <p>Material Assets</p>

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
generated from renewable and sustainable sources	<p>Will it increase energy efficiency and make use of new and clean technologies?</p> <p>Promote sustainable design and construction standards for housing and non-housing development?</p>		
11. To reduce the amount of waste, and to increase in order of priority, the proportion of waste reused, recycled and composted and recovered	<p>Will it reduce waste generation?</p> <p>Will it increase waste reuse, recovery and recycling?</p>	No specific issue identified.	<p>Population</p> <p>Material assets</p>
<b>SOCIAL AND ECONOMIC</b>			
12. To improve health and reduce health inequalities	<p>Will it improve access to high quality health facilities?</p> <p>Will it encourage healthier lifestyles e.g. provide more opportunities for physical activity reduce car dependency and encourage walking and cycling and provide better access to healthy food?</p> <p>Will it reduce health inequalities in health between different groups by improving the health of the least healthy in society?</p>	<p><b>Issue 13: Population and Social Issues</b></p> <p><b>Issue 15. Poor Health and Lower Life Expectancy</b></p>	<p>Population</p> <p>Human health</p>
13. To improve the education and skills levels of the population	Will it increase opportunities for access to education, training and employment opportunities for all, but in particular those in greatest need, such as those with low	<b>Issue 17. Educational Underachievement</b>	Population

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
overall	<p>educational attainment, the unemployed and lower skilled and those in deprived communities?</p> <p>Will it provide access to work experience, apprenticeships and training, especially for young people?</p>		
14. To ensure local residents have access to employment opportunities	<p>Will it reduce unemployment levels, particularly in areas of high employment deprivation?</p> <p>Will it help improve earnings?</p>	<p><b>Issue 14. Deprivation</b></p> <p><b>Issue 16. High Unemployment Rate</b></p>	Population
15. To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	<p>Will it improve business development and enhance competitiveness?</p> <p>Will it encourage inward investment?</p> <p>Will it encourage graduates to return and help to retain skilled employees in the area?</p> <p>Will it encourage tourism development?</p> <p>Will it provide or contribute to a balanced portfolio of employment sites?</p> <p>Will it maintain and enhance the vitality and viability of St Helens and Earlestown town centres?</p>	<p><b>Issue 14. Deprivation</b></p> <p><b>Issue 16. High Unemployment Rate</b></p>	Population
16. To improve access to a range of good quality	Will it contribute towards addressing the objectively	<b>Issue 13. Population</b>	Population

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
and affordable housing that meets the diverse needs of the Borough	<p>assessed housing needs?</p> <p>Will it improve housing quality?</p> <p>Will it increase the availability of affordable housing?</p> <p>Will it ensure that specialist housing needs, including those of an ageing population are met?</p> <p>Will it meet the identified needs of Gypsies, Travellers and Travelling Showpeople?</p> <p>Will it reduce the number of vacant properties?</p>	<b>and Social Issues</b>	
17. To reduce poverty and social exclusion	<p>Will it reduce poverty in those areas most affected?</p> <p>Will it reduce social exclusion including access to employment opportunities and health and educational facilities in those areas most affected by deprivation?</p>	<b>Issue 14. Deprivation</b>	Population
18. To reduce crime, disorder and the fear of crime	<p>Will it reduce the potential for crime?</p> <p>Will it promote design that discourages crime?</p>	No specific issue identified	Population
<b>TRANSPORT AND ACCESS TO SERVICES</b>			
19. To reduce the need to travel, encourage alternatives to the car, and other motor vehicles improve	<p>Will it reduce traffic volumes/miles travelled by motor vehicles?</p> <p>Will it increase the proportion of journeys using modes</p>	<b>Issue 18. Transport and Accessibility</b>	Air; Climatic Factors

SA Objectives	Proposed Criteria	Link to Sustainability Issues	SEA Topics (Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2014)
highway safety and make best use of existing transport infrastructure	<p>other than the car?</p> <p>Will it reduce the effect of transport such as heavy goods traffic on people and the environment?</p> <p>Will it improve highway safety and so reduce road accidents?</p> <p>Will it avoid the capacity of the transport network being exceeded?</p>		
20. To improve access to and use of basic goods, services and amenities in town and local centres	<p>Will it improve accessibility to key local services (primary and secondary schools; GP surgeries; hospitals, town, district and local centres) and employment opportunities?</p> <p>Will it make access easier for those without access to a car?</p> <p>Will it protect the shopping and community services function of local service centres?</p>	<b>Issue 18. Transport and Accessibility</b>	Population



## APPENDIX II: THE SITE APPRAISAL FRAMEWORK

	SA Objectives	Criteria
1	<p>To protect and enhance biodiversity</p> <p><i>Applicable to all site options</i></p>	<p>Effects unlikely</p> <ul style="list-style-type: none"> <li>▪ Over 400m from a SSSI, SAC or SPA.</li> <li>▪ Over 100m from a local wildlife site.</li> </ul> <p><b>Potentially adverse effects</b></p> <ul style="list-style-type: none"> <li>▪ Within 400m of a SSSI</li> <li>▪ Within 100m of a local wildlife site, priority species or habitats, ancient woodland.</li> </ul> <p><b>Effects likely without mitigation</b></p> <ul style="list-style-type: none"> <li>▪ Contains or adjacent (50m) to a SSSI.</li> <li>▪ Loss of Local Wildlife Site.</li> <li>▪ Contains priority species. TPO on site. Ancient Woodland onsite</li> </ul>
2	<p>To protect and improve land quality in St Helens</p> <p><i>Applicable to all site options</i></p>	<p>Does not contain any agricultural land Grade 1-2</p> <p>Contains less than 10 ha of agricultural land 1-3b</p> <p>Contains more than 10 ha of agricultural land 1-2 or &gt;20ha of 1-3b land.</p> <p>Contains more than 20ha of agricultural land 1-2 or &gt;50ha 1-3b</p>
3	<p>To improve air quality in St Helens</p> <p><i>Applicable to all site options</i></p>	<p>Housing development under 1000 dwellings over 2km from an AQMA</p> <p>HGV generating employment development over 2km from an AQMA</p> <p>Housing development within 1km of AQMA</p> <p>HGV generating employment development within 2km from an AQMA</p> <p>HVG generating development within AQMA</p> <p>Housing development over 200 units in AQMA</p>

4	<p>To maintain and enhance the quality of controlled waters and to sustainably manage water resources.</p> <p><i>Applicable to all site options</i></p>	<p>Site is located within or adjacent to (within 100m) a groundwater source protection zone 1 or 2  Site is not located within or adjacent to groundwater source protection zone 1 or 2</p>
5	<p>To mitigate and adapt to the impacts of climate change</p> <p><i>Applicable to all site options</i></p>	<p>Site presents opportunities for enhancement of GI network.  Site will be required to contribute towards increased tree cover</p> <p>Site too small to accommodate green infrastructure enhancements on site.</p>
6	<p>To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.</p> <p><i>Applicable to all site options</i></p>	<p>Site is located entirely within Flood Zone 1 and / or  Surface water flooding 1000 years</p> <p>Some of the site is in Flood Zones 2 or 3 (up to 50%) and / or  Surface water flooding 100 years</p> <p>Most of the site is in Flood Zones 2 or 3 (more than 50%) and / or surface water flooding 30 years</p>
7	<p>To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.</p> <p><i>Applicable to all site options</i></p>	<p>Site will lead to enhancement of a derelict site.</p> <p>Site is within a landscape character area considered to have a low landscape sensitivity  Site is within a landscape character area considered to have a low -medium or medium landscape sensitivity  Within 400m of a prominent ridgeline  Site is within a landscape character area considered to have a medium-high or high landscape sensitivity</p>
8	<p>To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment.</p>	<p>Site includes heritage assets in need of repair/occupation/enhancement. Development has potential to incorporate such assets into the development.</p> <p>Site more than 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological interest site</p> <p>Site in urban area more than 50m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.</p>

	<i>Applicable to all site options</i>	<p>Urban site within 50m of listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains</p> <p>Site in open setting within 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.</p> <p>Urban site containing heritage assets which are likely to be damaged or lost.</p> <p>Site within an open setting within 50m of heritage assets.</p>
9	Ensure access to and protection and enhancement of high quality public open space and natural greenspace.	<p>400m from public open space or natural greenspace of at least 1ha in size</p> <p>1200m from public open space or natural greenspace of at least 1ha in size</p> <p>More than 1200m from public open space or natural greenspace of at least 1ha in size</p> <p>Severance of PROW</p>
10	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources.	No criteria established. Any development has the potential to be designed and constructed to a high quality, including energy efficiency and the use of low carbon technologies. Sites cannot therefore be distinguished on this basis. The potential for district heating networks may be higher for sites in close proximity to anchor heat loads and a heat demanding land uses (e.g. leisure facilities, residential, educational facilities). However, there are no specific opportunities identified.
11	To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered	No criteria established. Not appropriate as all development has the potential to generate waste, as well as employ efficient management techniques. Recycling of buildings could be perceived as waste minimisation, but this would require an understanding of whether buildings on site were likely to be reused or demolished (which actually would create inert waste requiring disposal).
12	To improve health and reduce health inequalities.	<p><u>Access to healthcare</u></p> <p>Within 10 minutes journey (&lt;800m walking, cycling &lt;1.6km, public transport <b>2km</b>) of a GP or health centre</p> <p>Within 15 minutes journey (Walking 800m-1200m, Cycling 1.6km - 2.5km, public transport, 2km - <b>3.5km</b>) from a GP or health centre</p>

		<p>Within 20 minutes journey (Cycling 2.5km-3.2km, public transport 3.5km-<b>4.6km</b>) from a GP or health centre</p> <p>Over 20 mins journey (cycling 3.2km, public transport 4.6km).</p> <p><u>Leisure facilities (Allotments, Children’s play areas, cycle routes, parks and gardens)</u></p> <p>Within 1200m of more than 3 facilities  Within 1200m of 2 facilities  within 1200m of 1 facility  No facilities within 1200m</p>
13	<p>To improve the education and skills levels of the population overall</p> <p><i>Applicable to housing sites</i></p>	<p><u>Primary</u></p> <p>Site would support new primary education facilities (over 500 dwellings)  Within good walking distance (400m) of a primary school with spare capacity or with space for expansion through developer contributions.  400m-1200m from a primary school with spare capacity or with space for expansion through developer contributions.  No primary school within 1200m with adequate spare capacity and no space for expansion on site.  Site below 500 dwellings not considered sufficient to support new facilities.</p> <p><u>Secondary</u></p> <p>Site is within 1200m of a secondary school  Site is within 5km of a secondary school.  Site is more than 5km from a secondary school</p>
14	<p>To ensure local residents have access to employment opportunities.</p>	<p>Less than 1.2km from a key employment site  1.21km - 5km from a key employment site  More than 5km from a key employment site</p>

15	<p>To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.</p> <p><i>Applicable to all site options</i></p>	<p>Employment site less than 5km from a Motorway/A580 Junction or offices/retail within town centre or existing successful business retail/ park</p> <p>Employment site more than 5km from Motorway/A580 or office/retail uses outside of a town centre or established successful business/retail park</p> <p>Housing site on land not suitable/attractive for employment.</p> <p>Housing site on land suitable for employment (*not mixed use).</p> <p>Housing site on high quality employment land</p>
16	<p>To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough.</p> <p><i>Applicable to housing sites</i></p>	<p>The site (or a considerable part) is considered to be available and/or achievable in the first 5 years.</p> <p>The site is considered to be potentially available and/or potentially achievable over the plan period</p> <p>The site has potential deliverability issues.</p> <p>Site is critically constrained by infrastructure (i.e. within Shell pipeline buffer zone)</p>
17	<p>To reduce poverty and social exclusion.</p> <p><i>Applicable to employment / retail</i></p>	<p>Employment generating development within 1km of areas within the top 20% most deprived in the UK</p> <p>No areas within the top 20% deprived in the UK within 1km</p>
18	<p>To reduce crime, disorder and the fear of crime.</p>	<p><i>No criteria established.</i></p>
19	<p>To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.</p> <p><i>Applicable to all site options</i></p>	<p>&lt;400m from a bus stop or train station with 2/3 or more services per hour</p> <p>&lt;800m from a bus stop or train station with 4 or more services per hour</p> <p>&lt;400m from a bus stop or train station with 1 service per hour</p> <p>&lt;800m from a bus stop or train station with 2/3 services per hour</p> <p>800-1200m from a bus stop or train station with more than 4 services per hour</p> <p>800-1200m from a bus stop or train station with 2/3 services per hour</p> <p>&lt;800m from a bus stop or train station with 1 service per hour</p> <p>&gt;1200m from a bus or train station</p>
20	<p>To improve access to and use of basic goods, services and amenities in town and local centres.</p> <p><i>Applicable to housing sites</i></p>	<p>Within 400m walking distance to convenience store or supermarket</p> <p>Within 800m walking distance to a convenience store or supermarket</p> <p>800m-1200m walking distance to a convenience store or supermarket</p> <p>More than 1200m walking distance to a convenience store or supermarket</p>

## APPENDIX III: APPRAISAL OF REASONABLE ALTERNATIVES – HOUSING GROWTH AND DISTRIBUTION

This appendix presents an appraisal of the reasonable alternatives against the SA Framework (presented as eleven SA topics). Effects have been identified taking into account a range of characteristics including: *magnitude, duration, frequency, and likelihood*. Combined, these factors have helped to identify the **significance of effects**, and whether these are positive or negative.

To give the appraisal a clear structure but avoid repetition and duplication, the findings are presented in a summary table for each SA Topic.

A score is given to reflect the significance of effects as follows:

✓✓✓	Likely to have a <b>major significant positive effect</b> .
✓✓	Likely to have a <b>significant positive effect</b> .
✓	Likely to have a <b>minor positive effect</b> .
-	Likely to have a <b>negligible effect</b> .
✓ / *	Likely to have a <b>mixture of positive and negative effects</b>
*	Likely to have a <b>minor negative effect</b>
**	Likely to have a <b>significant negative effect</b>
***	Likely to have a <b>major significant negative effect</b>
?	It is <b>uncertain</b> what effect the alternatives would have

## SA Topic 1. Biodiversity and geodiversity

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	*	C1. Balanced growth	** ✓?	D1. Proportionate growth	*?
A2. Balanced growth	-	B2. Balanced growth	*	C2. Focus on south east and new settlement	** ✓?	D2. Balanced growth	*?
A3. Focus on south east	-	B3. Focus on south east	*			D3. Focus on south east	*?
A4. Focus on new settlement	✓?	B4. Focus on new settlement	*✓?			D4. Focus on new settlement	✓?

### Discussion of effects

There are no European sites within the Plan area. However, there are three within 6kms including Mersey Estuary SPA and Ramsar (approx 5km away) and Manchester Mosses SAC (approx 5.5 km away). There is one SSSI (Stanley Bank Meadows) within the Plan area and a number of Ancient Woodlands.

There are unlikely to be any significant differences between the alternatives under growth scenario A in terms of potential effects on internationally or nationally designated biodiversity. Alternative A1 could potentially result in more development within and around settlements to the north of the A580. Stanley Bank Meadows SSSI and a number of Ancient Woodlands are situated close to the A580 to the east and south east of Moss Bank. If development avoids the designated areas themselves then it is unlikely that there would be any significant negative effects. Alternative A3 could result in a higher level of growth within and around Blackbrook and Haydock as well as Earlestown and Newton-le-Willows. There are two Ancient Woodlands in this area and as for Alternative A1 above, if development avoids the designated areas themselves then there should not be any significant negative effects.

Locally designated wildlife sites are spread across the Plan area. Depending on where development is focussed this will determine the designated sites that are more likely to be affected. Alternative A1 would increase the potential for negative effects on locally designated wildlife sites north of the A580 and around Sutton as well as Rainhill. Alternative A3 would increase the potential for negative effects on local wildlife sites within and around settlements in the south east and the south. If development avoids the loss of these sites then it is considered that there is suitable mitigation available to ensure that there will not be any significant negative effects. At the level of growth proposed under growth scenario B, it is considered likely that effects could be avoided, mitigated and compensated if necessary.

While Alternatives A4, B4, C1, C2 and D4 could result in the loss of a local wildlife site (at a new settlement) it would also help to reduce the likelihood and significance of negative effects on local wildlife sites in other areas. As above, development could avoid the designated wildlife site and it is considered that there are suitable mitigation measures available to ensure that there would not be any significant negative effects. Furthermore, the strategic nature of a new settlement ought to allow enhancement of the green infrastructure network and the creation of links to the Bold Forest. The distribution of growth for the alternatives under growth scenario B is the same as for the alternatives under scenario A (meet original OAHN needs). However, there is an increased level of development proposed and therefore more sites required under Scenario B. The higher the level of growth the greater the likelihood and potential significance of negative effects on biodiversity. This is primarily as a result of habitat loss and fragmentation, increased disturbance and increased atmospheric and water pollution. Ultimately, the nature and significance of effects will be dependent on the precise location of development. However, there is potential for a residual minor negative effect for Alternatives B1 to B4.

For the Alternatives under growth scenario D, the effects are similar to growth scenario A, but the greater amount of development required could potentially lead to minor negative effects in combination with other development. However, there is an element of uncertainty involved, as the scale of growth is not substantially different to Scenario A (but it would be likely to involve additional release of Green Belt land that may have some local wildlife value).

Alternative C1 and C2 under growth scenario C propose a significantly higher quantum of growth compared to the alternatives under growth scenarios A and B. Taking this into account it is considered that there is a greater likelihood of a residual negative effect compared to options under growth scenarios A and B.

As the proposed quantum of growth increases so does the potential likelihood and significance of negative effects on biodiversity and geodiversity. While there are no significant differences between the Alternatives in terms of their potential effect on internationally and nationally designated sites as a result of distribution, the increased level of growth proposed through Alternatives C1 and C2 presents the potential for more negative effects on locally important wildlife habitats and networks. Consequently, a moderate (significant) negative effect is predicted for Alternative C1 and C2.

Uncertain positive effects are predicted for those Alternatives that involve the Bold garden village. This reflects the increased potential to secure strategic improvements to green infrastructure and strengthen the existing network whilst making links to the Bold Forest.

## SA Topic2: Land Quality

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	*✓	B1. Proportionate growth	*✓	C1. Balanced growth and new settlement	**✓	D1. Proportionate growth	*✓
A2. Balanced growth	*✓	B2. Balanced growth	*✓	C2. Focus on south east and new settlement	*✓	D2. Balanced growth	*✓
A3. Focus on south east	*✓	B3. Focus on south east	*✓			D3. Focus on south east	*✓
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓			D4. Focus on new settlement	✓

### Discussion of effects

Each alternative proposes the use of brownfield land where possible, and more intensive use of sites in the urban area where appropriate. This will help to encourage brownfield land use and regeneration (which might involve derelict or contaminated land). Further development would also need to be in accordance with these general principles. Consequently minor **positive effects** are predicted for each alternative.

However, to meet identified housing needs, the Plan also proposes to release Green Belt land through a series of housing and employment land allocations. This land is predominantly agricultural or open green space, and its loss could have negative effects upon soil (namely through the loss of agricultural land).

For all options, employment land allocation would involve the loss of agricultural land. The four largest employment sites within the Borough (Parkside West, Parkside East, and Florida Farm North) are all located within ALC Grade 3 to the north east of the Borough.

Much of the land within the northern part of the Borough is mapped as being of ALC Grade 1 and 2, and therefore of a particularly high quality. Rainford, and the north-eastern side of Billinge, are surrounded by land of this high quality.

The loss of high quality agricultural land would be inevitable under each of Alternative A1, A2, and A3. For alternative A4, the agricultural land that would be lost would be likely to mainly be of a lower quality i.e. grade 3.. A similar picture is presented for the alternatives under growth scenario D. Although there is an overall higher provision of housing, this would not necessarily involve agricultural land, and would be likely to be no more than an additional 20ha.

The loss of agricultural land represents a negative effect on land quality, and is likely to be more prominent for growth scenarios B and C (in particular), which would require the delivery of a greater number of Green Belt sites (therefore it would be harder to avoid the most sensitive areas). Significant effects are predicted for Alternative C1 as there would be a requirement to release substantial amount of agricultural land of best and most versatile quality. The effects are negative for C2 but are offset somewhat by the development of a new settlement on land which is likely to be of lower agricultural value.

On balance, Alternatives A4 and B4 perform the most favourably with regard to land quality.

### SA Topic 3: Traffic, congestion and air quality

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	*?	B1. Proportionate growth	*	C1. Balanced growth and new settlement	✓***	D1. Proportionate growth	*?
A2. Balanced growth	*?	B2. Balanced growth	*	C2. Focus on south east and new settlement	✓***	D2. Balanced growth	*?
A3. Focus on south east	✓*	B3. Focus on south east	✓***			D3. Focus on south east	✓*
A4. Focus on new settlement	✓?	B4. Focus on new settlement	✓			D4. Focus on new settlement	✓?

#### Discussion of effects

Under Alternatives A1 and A2, growth is likely to have a **neutral or minor negative effect** upon traffic and congestion and air quality. These Alternatives spread growth more across the Borough, which would put less strain on the network in any one location. However, given that the major employment opportunities are along key transport routes (M6/A580/M62), the length of trips might be expected to increase from settlements to the north and west travelling south and east. This could have minor negative effects on congestion in some parts of the Borough, but these are uncertain effects. The effects for D1 and D2 are predicted to be the same, as the increased scale of growth is relatively small, and would be dispersed across the Borough.

Alternatives s A3 and A4 would have mixed effects. Whilst these Alternatives s would possibly reduce the length and number of trips by car, the concentration of growth into these locations could lead to increased congestion along key routes in these areas, having potential negative effects on air quality. For A4, it is likely that strategic infrastructure improvements could be secured to support increased growth, so the effects would be less likely to be negative. The effects for Alternatives D1 and D2 are predicted to be the same, as the scale of additional growth would not be likely to generate notably different effects from Alternatives A3 and A4.

At a higher rate of growth (Scenario B) the number of car trips would be likely to be greater (than scenario A). The distribution of growth would influence the effects upon traffic, congestion and air quality. A proportionate/dispersed approach would be less likely to put undue pressure on any particular route, but some development would be less well related to strategic employment opportunities along transport hubs. This is reflected by a **minor negative effect**. A balanced approach (B2) would have similar effects, although a greater proportion of growth would be directed toward the areas of economic growth, which would reduce the need for trips slightly. However, a **minor negative effect** is still likely to occur.

Alternative B3 would focus more development into areas of employment growth, which ought to reduce the need to travel and the length of trips locally. However, such an increase in development in a short space of time (relatively speaking) in this location could place a strain on the transport network in this area, potentially having minor **negative effects** on air quality and **significant negative effects** on levels of congestion. Alternative B4 is predicted to have a **minor positive effect** as it creates a new community that is well linked to employment opportunities. Given the strategic nature of the site, it is considered that infrastructure improvements could be more likely to be secured in a timely manner to serve the development.

Similar to Alternative B3, Alternative C1 and C2 would locate new housing growth close to major employment opportunities, helping to reduce the length and number of trips generated. However, the much higher scale of growth could be difficult to accommodate, especially where it is focused towards the south east and a new settlement (C2). This could lead to congestion and air quality impacts, which is a **significant (major) negative effect** for Alternative C2 and a **significant (moderate) negative effect** for Alternative C1 (As growth is distributed more proportionately than for Alternative C2).

In the long term, each Alternative would generate benefits with regard to reduced emissions from freight. However, these are effects that would be noted on a regional scale rather than in St Helens (as the overall level of emissions may not decrease in St Helens itself which is the source of economic growth).

## SA Topic 4: Natural resources

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility (570 dpa)		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	✓	C1. Balanced growth and new settlement	✗✓	D1. Proportionate growth	✓?
A2. Balanced growth	-	B2. Balanced growth	✓	C2. Focus on south east and new settlement	✗✓	D2. Balanced growth	✓?
A3. Focus on south east	-	B3. Focus on south east	✓			D3. Focus on south east	✓?
A4. Focus on new settlement	-	B4. Focus on new settlement	-			D4. Focus on new settlement	-

### Discussion of effects

Development produces waste regardless of location during construction and also operation. Therefore, each distribution option is predicted to have similar effects. Higher growth however, is likely to lead to greater waste generation. The level of waste generated under Scenario A would be unlikely to be different from the projected baseline, which is based upon a level of growth in keeping with population projections. Growth scenario B would see a slight increase in waste generated, but this is not considered to be significant. However, scenario C is predicted to have minor negative effects reflecting the substantially higher housing targets involved. Growth scenario D is very similar to Scenario A and the effects with regard to waste are still likely to be negligible, despite an increased drive to support housing growth.

With regard to recycling, and the efficiency of waste collection rounds, no alternative is predicted to be more beneficial than another. Access to recycling facilities is widespread across the Borough including at kerbside and also at recycling points. Existing waste collection regimes span the entire Borough, and are routine in urban areas. Therefore, growth in any one area could be planned into new routes relatively easily. A more dispersed / rural approach would create longer and less efficient waste collection regimes, but each of the alternatives focuses on key settlements to one degree or another, which avoids such issues.

With regard to water quality, the effects are uncertain. On one hand, increased development could present the opportunity for impacts during construction, and also a wider issue of pollutants being concentrated in water due to decreased permeability. Conversely, much of the Borough lies within a nitrates vulnerable zone which is related to dispersed pollution from agricultural practices. Therefore development that changes such land uses (designed sensitively) could help to reduce the run off of pollutants from agricultural practices. In this respect, the higher growth scenarios would be more favourable. The broad distribution of development is less of an influential factor than overall growth, although this depends upon the exact sites that are developed (i.e. some are non-agricultural greenfield land). At a broad level, alternatives A1 and A2 are more likely to involve loss of high quality agricultural land, as the new settlement at Bold proposed under alternative A4 affects land which is only identified as grade 3. .

Overall, Alternatives s A1-A4 are predicted to have neutral effects on waste and water. Alternatives s B1-B3 are recorded as having minor positive effects (uncertain) to reflect the potential to reduce diffuse pollution from agricultural practices. Alternative B4 is predicted to have neutral effects as the bulk of development would be on non-agricultural land. Alternatives s C1 and C2 would have potentially positive effects upon water quality, but minor negative effects on waste. The alternatives under Scenario D would have similar impacts to those under Scenario A with regard to water quality, as it only involves a slight increase in development. It could perhaps lead to minor positive effects with regard to the change of use from agricultural land, but this would be less the case for Alternative D4.

## SA Topic 5: Climate change and energy

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	✘	C1. Balanced growth and new settlement	✘✘ ✓?	D1. Proportionate growth	-
A2. Balanced growth	-	B2. Balanced growth	✘	C2. Focus on south east and new settlement	✘✘ ✓?	D2. Balanced growth	-
A3. Focus on south east	-	B3. Focus on south east	✘			D3. Focus on south east	-
A4. Focus on new settlement	- ✓?	B4. Focus on new settlement	✘ ✓?			D4. Focus on new settlement	✓?

### Discussion of effects

Development will generate emissions regardless of location as a result of construction and accommodation of buildings. In this respect, the lower growth scenario A is predicted to have a neutral effect. In the absence of the Plan, this level of growth would be likely to occur anyway. Scenario B would lead to an increase in the level of growth that would be anticipated to occur in the absence of the Plan. Therefore there would be an associated increase in emissions from new development. This is recorded as a minor negative effect for each Alternative under scenario B. At a higher level of growth, the effects could be expected to be more prominent, and thus a significant negative effect is predicted with regard to an increase in carbon emissions for Alternatives s C1 and C2. The Alternatives s under Scenario D would have the same impacts as those under Scenario A, because the quantity of additional development would be unlikely to make much difference with regard to the amount of carbon emissions generated.

With regard to the resilience of the Borough to the effects of climate change (e.g. hotter, drier summers, more extreme weather events) the location of development is not likely to be a major influential factor.

Each alternative will involve growth in the St Helens urban area, but the contribution to an urban heating effect is not considered likely to occur given the need to design developments effectively and the Council's commitment to improved green infrastructure networks.

Each alternative would also involve the development of a SRFI, which in the long term would help to reduce emissions from freight transport. This would help to offset the negative effects associated with alternatives under the higher growth options.

Each distribution option would locate growth in areas that are broadly accessible, and therefore an increase in emissions from transport is unlikely to be significantly different between the different distributions. Distribution options 3 and 4 are perhaps better located in relation to access to services and jobs and could therefore be expected to have a slightly lesser effect in terms of vehicle emissions compared to a proportionate approach.

Opportunities to deliver low carbon energy schemes as part of strategic development are considered to be more likely where there is a concentration of development, or existing demand for such energy (for example, demand for heat and anchor loads). A dispersed approach is the least likely to lead to such opportunities, but this would depend upon the use and mix of development sites. The development of a new settlement could provide better opportunities to secure strategic infrastructure for distributed energy, as it would be located close to an industrial estate, and a mixed use development would typically offer a more varied demand for energy. However, effects are uncertain at this stage.

## SA Topic 6: Flooding

B. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	x ?	C1. Balanced growth and new settlement	x	D1. Proportionate growth	-
A2. Balanced growth	-	B2. Balanced growth	-	C2. Focus on south east and new settlement	x	D2. Balanced growth	-
A3. Focus on south east	-	B3. Focus on south east	-			D3. Focus on south east	-
A4. Focus on new settlement	✓	B4. Focus on new settlement	-			D4. Focus on new settlement	✓

### Discussion of effects

For each alternative, the employment sites are broadly within areas that are not at risk of flooding. Their development should therefore not create a flood risk on those sites, whilst management of downstream flooding ought to be possible through the application of Plan policies on water management.

Alternatives s A4 and D4 are predicted to have a **positive effect** on the baseline position for flooding, as a new settlement located in Bold would not fall within areas at risk of river flooding. The strategic nature of the site should also allow for enhancement of green infrastructure which could incorporate sustainable drainage systems. There would be a much lesser need for further development in the rest of the Borough to meet needs under these alternatives, and therefore flood risk elsewhere would be unlikely to change as the sequential test would allow for suitable sites to be identified more easily. At a notably higher rate of growth under growth scenario B4, the need for additional sites as well as the 'new settlement' would be increased, but it should still be feasible to identify suitable sites that are not at risk of flooding. **Neutral effects** are predicted to reflect the need to develop further land and a possible increase in surface water run-off (i.e. the positive effects at the new settlement would be offset somewhat).

Under growth scenarios C1 and C2 there would be a need to release substantial amounts of land in addition to the new settlement, which would increase the possibility that land in proximity to flood risk would be developed. The increased quantum of growth overall would also increase the possibility of flooding should there be an overall decrease in permeable land. Consequently, a **negative effect** is predicted for C1 and C2.

Focusing growth to the south east of the Borough (scenarios A3, B3, D3) is predicted to have a **neutral effect** upon flooding as there is sufficient land available in these areas to accommodate development without the necessity to encroach into areas at risk of flooding. Therefore, provided that development is designed to ensure no net increase in run off or impermeable land, then the effects on the baseline position ought to be negligible.

A proportionate approach to growth under scenario A1 would allow for suitable sites to be developed without the need to encroach onto areas at risk of flooding, this would also be the case for Alternative D1. For Alternative B1, there may be an increased potential for flood risk given that some land available around settlements (such as Ecclestone and Rainhill) is intersected by watercourses. Therefore an uncertain negative effect is predicted for Alternative B1.

The spread of development under Alternatives A2, B2 and D2 (balanced growth) is fairly proportionate, but directs higher or lower levels of growth to some settlements dependent upon constraints and opportunities. The effects are therefore predicted to be neutral.

## SA Topic 7: Landscape

C. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	x	B1. Proportionate growth	xx	C1. Balanced growth and new settlement	✓xx x	D1. Proportionate growth	x
A2. Balanced growth	-	B2. Balanced growth	x	C2. Focus on south east and new settlement	✓xx	D2. Balanced growth	x?
A3. Focus on south east	-	B3. Focus on south east	x			D3. Focus on south east	-
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓x			D4. Focus on new settlement	✓

### Discussion of effects

A proportionate approach to growth would lead to development across the Borough, and would require the release of Green Belt land in increasing quantities from A1 to C1. The Borough has landscapes that are sensitive to development and / or more prominent. Development in such areas would lead to a detrimental effect upon landscape character. In particular, there are areas of high landscape sensitivity.

In broad terms, the north of the Borough contains a higher amount of sensitive landscape and several prominent ridgelines. A proportionate approach to development would see more growth in these areas compared to the balanced approach, which is more likely to lead to a **negative effect** on landscape character. Under Alternatives A1 and D1, the level of growth would be fairly modest, and so only a minor negative effect is predicted. However, at the higher level of growth under Alternatives B1, the necessity to increase further land in a proportionate manner could see some of the more sensitive parts of the Borough developed, which constitutes a significant effect. Under Alternatives C1, the effects would be further exacerbated, leading to a **major significant negative effect**.

A balanced approach to growth would allow for development to be spread fairly proportionally, but sensitive sites avoided if necessary. Whilst it would still be difficult to avoid negative effects in the more sensitive areas such as Ecclestone, Billinge, Garswood and Rainford (as an element of development would still be involved across the Borough under this approach), a balanced approach would give greater scope for locating increased development to the less sensitive areas such as parts of Haydock and Bold. The effects of Alternative A2 are predicted to be **neutral** given the greater flexibility to avoid sensitive areas at this level of growth. However, under a higher level of growth B2, **negative effects** would be likely to occur. For Alternative D1, there would be a slightly higher level of growth, which could possibly lead to negative effects depending upon the additional sites involved. This is reflected by an uncertainty.

Focusing growth towards the south east of the Borough would help to avoid sensitive landscapes to the north and east. At a lower scale of growth, there would be greater scope for avoiding the more sensitive areas within the south/south east, and therefore a neutral effect is predicted for Alternatives A3 and D3. However, under Alternatives B3, the higher rate of growth in these areas such as Haydock, Newton-le-Willows and Earlestown would make it more likely that the sensitive landscape in these areas could need to be developed. Therefore, a minor negative effect is predicted for Alternative B3.

Focusing a large element of growth to a new settlement at Bold would be beneficial with regard to landscape, as much of this area is classified as low quality / sensitivity. Therefore, the potential for enhancements to the landscape present themselves. This is a **positive effect** at any growth scenario. For Alternative D2, there would be a greater need for land in addition to the new settlement to meet higher needs. However, the level of growth required should leave some flexibility in the choice of sites, thereby avoiding significant negative effects. Nevertheless, the potential for negative effects in other parts of the Borough still exist.

Alternatives C1 and C2 both involve high levels of growth and part of this would be delivered at the new settlement in Bold, generating positive effects. However, the need for substantially higher levels of growth would lead to negative effects. For Alternative C1, there would be a need to release further land in a more dispersed pattern of growth, which could have a **major negative effect**. For C2, there would be focus on more sites in the south east some of which fall into areas of medium-

high sensitivity. Consequently, a **significant negative effect** is predicted (moderate).

### SA Topic 8: Built and natural environment

D. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	xx	C1. Balanced growth and new settlement	xx	D1. Proportionate growth	x?
A2. Balanced growth	-	B2. Balanced growth	x	C2. Focus on south east and new settlement	xxx	D2. Balanced growth	x?
A3. Focus on south east	-	B3. Focus on south east	xx			D3. Focus on south east	x
A4. Focus on new settlement	-	B4. Focus on new settlement	-			D4. Focus on new settlement	-

#### Discussion of effects

Each Alternative would involve an element of brownfield land regeneration within the St Helens town centre and urban area. This presents the potential for effects upon heritage assets and their settings. It is difficult to accurately assess the effects of development in the urban area without knowing the precise locations, design and layout. Development on brownfield land could offer opportunities to enhance the setting of heritage assets as well as bringing vacant buildings back into use. Conversely, insensitive development could affect the setting of heritage assets. Provided that design policies are used effectively, it is considered unlikely that there would be significant adverse effects on the historic environment in the urban area, as the range of sites likely to be developed are broadly of low quality. At this stage, neutral effects are predicted, but there is uncertainty.

The loss of Green Belt land associated with development has the potential to affect the setting of heritage assets on the edge of settlements. It is difficult to predict effects accurately without identifying specific sites and development uses. However, some broad implications can be identified for each of the strategic alternatives given the pool of sites likely to be involved.

At a lower level of growth (A1-A4), there would still be a necessity to release land from the Green Belt, but it ought to be possible to avoid the most sensitive areas. For Alternatives A1 and A2, development would be dispersed across the Borough. This should help to ensure that effects on the character of settlements are not too profound in any one location. There would also be a greater choice of sites to choose from, which should allow for sensitive areas to be avoided if necessary. Alternatives D1 and D2 would involve a greater amount of growth, which would necessitate additional sites to be released or densities to be reconsidered. This raises the potential for negative effects occurring, but there should still be sufficient flexibility to avoid and mitigate effects. Therefore, potential minor negative effects have been flagged.

Alternative A3 would focus a greater amount of development to Haydock / Newton-le-Willows and Earlestown. However, at this level of growth it should be possible to avoid sensitive areas such as the Newton-le-Willows Conservation Area. At a higher scale of growth, this may be more difficult to avoid, and so minor negative effects are predicted.

Alternative A4 would direct most growth to a new garden village at Bold. There are no heritage assets directly on the site, nor should the setting of any nearby assets be affected given they are separated from the site by industrial land and / or woodland. Although Alternative D4 would involve additional growth at a new settlement, and perhaps some additional supporting sites, it is considered unlikely that residual negative effects would occur.

At a higher level of growth under scenario B, a proportionate approach could mean that more sensitive sites across the Borough need to be developed. This could be an issue in areas containing a number of heritage assets and / or bordering Conservation Areas such as Rainhill, Rainford and Earlestown. Consequently, a significant negative effect is predicted for Alternative B1. Alternative B2 would have a similar effect to B1, although greater emphasis is placed on settlements such as Bold and Haydock/Newton-le-Willows, which (at this level of growth) are less likely to suffer from adverse effects. Consequently, Alternative B2 is predicted to have a **minor negative effect**. Alternative B3 would place more growth into the south east, which at this level of growth would be more likely to necessitate the release of land around the settlements or adjacent to Conservation Areas.

Consequently, a significant negative effect is predicted. Alternative B4 is predicted to have a **neutral effect**, as the majority of growth would still occur at a garden village that is not particularly sensitive in its current form. The additional growth required elsewhere in the Borough would be at a level that ought to allow for sensitive areas to be avoided.

At higher levels of growth under Alternatives C1 and C2 the potential for adverse effects upon the setting of heritage assets is increased, as there would potentially be a need to release land in sensitive locations across the Borough (C1), or at a very high level in the south east (C2) which would be likely to more profoundly affect the character of Newton-le-Willows, Earlestown and Haydock.

### SA Topic 9: Health and wellbeing

E. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	✓	B1. Proportionate growth	✓✓	C1. Balanced growth and new settlement	✓✓✓ ✗	D1. Proportionate growth	✓✓
A2. Balanced growth	✓	B2. Balanced growth	✓✓✓	C2. Focus on south east and new settlement	✓✓✓ ✗✗	D2. Balanced growth	✓✓
A3. Focus on south east	✓✓ ✗	B3. Focus on south east	✓✓✓ ✗			D3. Focus on south east	✓✓ ✗
A4. Focus on new settlement	✓✓ ✗	B4. Focus on new settlement	✓✓✓ ✗			D4. Focus on new settlement	✓✓ ✗

## Discussion of effects

Each Alternative is predicted to have positive effects on health and wellbeing through the delivery of housing to meet the Borough's needs. A large proportion of housing would be delivered in and adjacent to the St Helens urban area which is where levels of deprivation and inequality are highest. The effects are more prominent for growth scenarios B and C which would allow for greater flexibility and choice, and would offer greater potential for delivery of more affordable homes.

Although housing needs have not been identified on a settlement-by-settlement basis, the distribution of growth in a proportionate way would be more likely to meet needs locally across the Borough.

Conversely, whilst a focus on the south east or a new settlement would direct a large amount of growth into one part of the Borough, these are locations that are close to deprived communities. Increased employment and housing opportunities in these areas should therefore have a positive effect upon areas of greatest need. This approach however, would be less likely to support the needs of each settlement and could be a barrier to individuals that wish to settle or remain in those locations (where there are concealed households for example). A large increase in development in any one area could also put a pressure on social and physical infrastructure in the short and medium term, which might affect access to services for communities, and affect neighbourhood amenity.

A balanced approach to distribution ought to help support needs for the key settlements across the Borough but also to add a more targeted approach to those areas where levels of deprivation are higher (such as Bold, and parts of Haydock / Newton le Willows / Earlestown). Therefore, this approach is predicted to be the most beneficial overall.

Alternatives s A1 and A2 are predicted to have minor positive effects upon health as they would deliver housing at a level of need that ought to support organic population growth. A3 and A4 are also predicted to have positive effects and these could be significant for those communities where growth is targeted. However, there would be potential for negative effects on health and wellbeing in the short term for reasons discussed above.

Alternatives s D1 and D2 are also predicted to have positive effects, but these could potentially be significant, as the additional homes provided (compared to Scenario A) would provide additional affordable homes and social infrastructure improvements without generating notable negative effects.

At a higher level of growth, Alternatives s B1 and B2 are predicted to have **significant positive effects**, as they would help to deliver a greater amount of growth both across the Borough and in specific areas of need. A major positive effect is predicted for Alternatives B2, B3 and B4 as they would locate growth in areas of need as well as across the district. However, for Alternatives s B3 and B4 which would place substantial development into particular locations could put pressure on services, and affect amenity. Therefore a **minor negative effect** is also predicted. Alternatives D3 and D4 are predicted to have more prominent effects when compared to A3 and A4 due to the higher levels of growth. However, it is unlikely that this would change the effects from moderate to major significant effects. Likewise, the negative effects would remain not significant.

Alternatives s C1 and C2 would also have significant positive effects as they would both support housing growth and employment across the Borough and in areas of most need. However, the scale of growth involved could be more likely to put pressure on infrastructure and create amenity issues.

## SA Topic 10: Economy and employment

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	✓✓?	B1. Proportionate growth	✓✓	C1. Balanced growth and new settlement	✓✓✓	D1. Proportionate growth	✓✓
A2. Balanced growth	✓✓?	B2. Balanced growth	✓✓	C2. Focus on south east and new settlement	✓✓✓ *	D2. Balanced growth	✓✓
A3. Focus on south east	✓✓? *	B3. Focus on south east	✓✓ *			D3. Focus on south east	✓✓ *
A4. Focus on new settlement	✓✓? *	B4. Focus on new settlement	✓✓*			D4. Focus on new settlement	✓✓ *

### Discussion of effects

The level of employment land has been determined by an assessment of needs, and with uplift to reflect the Plan's aspirations for economic growth (a lower growth scenario has been appraised too).

A positive effect would be achieved for each alternative reflecting this development. However, there is some uncertainty about whether the effects for each alternative under growth scenario A would be significant. This is because the level of housing growth proposed does not leave much flexibility to help support higher levels of economic activity that the Plan is seeking to facilitate.

At lower levels of economic growth, housing would be matched to employment growth more closely, but significant benefits upon the economy would not be likely to arise.

Scenario D provides a slightly higher level of growth compared to Scenario A, which would provide additional house building and more homes for a growing workforce. The level of housing need has been adjusted to reflect higher levels of employment growth, and so the potential for significant effects is greater than for Scenario A. With regard to distribution, Alternatives A3, A4, D3 and D4 are also predicted to have minor negative effects as they do not support the growth and vitality of local centres to the north and east of the Borough in particular.

At higher levels of housing growth (Scenarios B and C), there would be greater opportunities for jobs in construction, which is recorded as a **significant positive effect** for Alternatives s B1-B4.

The distribution of development would influence the effects upon the economy in the following ways:

- A proportionate approach to growth would be more supportive of the local economies and the vitality of key settlements. This is recorded as a **positive effect** for Alternatives B1 and B2.
- A focus on a new settlement would generate a new community with accompanying infrastructure. This could benefit some nearby communities, but generally, this approach would not spread the benefits of growth across the Borough and would not support the vitality of some key settlements such as Rainford, Garswood and Billinge. This is recorded as a **minor negative effect** for Alternatives B3 and B4 (alongside the positive effects).
- A focus on the south east would have **significant positive effects** in terms of linking housing to the majority of strategic employment opportunities. There would also be knock-on benefits for the local economies of Haydock, Earlestown and Newton-le-Willows. However, as in Alternative B4, some settlements in the Borough may suffer from a lack of growth and investment.

The high levels of growth under Scenario C are predicted to be significantly positive, especially as both alternatives s would also involve substantial housing growth in areas of employment growth. Alternative C1 is predicted to have major significant positive effects, as it would drive growth in the Borough, support key employment locations with adequate housing and would still disperse an element of growth to key settlements throughout the Borough, helping to support local economies. Alternatives C2 would also generate **major significant positive effects** through high levels of growth. However, the spread of development would not support some key settlements to the north and west of the Borough, which is recorded as a **minor negative effect**.

## SA Topic 11: Housing

A. Meet original OAHN needs (451 dpa )		B. 20% buffer for flexibility (570 dpa)		C. 60% buffer for flexibility and additional contingency		D. updated OAHN with flexibility (486 dpa)	
A1. Proportionate growth	✓	B1. Proportionate growth	✓✓✓	C1. Balanced growth and new settlement	✓✓✓	D1. Proportionate growth	✓✓
A2. Balanced growth	✓	B2. Balanced growth	✓✓✓	C2. Focus on south east and new settlement	✓✓	D2. Balanced growth	✓✓
A3. Focus on south east	✓	B3. Focus on south east	✓✓			D3. Focus on south east	✓
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓✓			D4. Focus on new settlement	✓

### Discussion of effects

All of the alternatives will meet the identified objectively assessed housing need for the Borough with long-term positive effects. The significance of this positive effect increases as the proposed quantum of development increases. This reflects the additional flexibility and choice in the provision of housing, and the greater likelihood that housing needs will be met in full.

Alternatives A1, A2, B1, B2, and C1 are more likely to meet the housing needs for communities across the Plan area as they would result in a more proportionate and balanced distribution of development across the Borough compared to the other alternatives. .

Alternatives A3, A4, B3, B4 and C2 would focus the majority of development within the east and south of the Borough, which is less likely to help meet the housing needs of communities in the north and west.

Focus on development in at a new settlement (A4, B4, C1, C2) could also rely too heavily on the deliverability of one large site, which may require careful phasing and supporting infrastructure. Therefore, positive effects may be less likely to occur in the short term.

With regard to the scale of growth / housing land provision, scenario A is least likely to provide needs in full, which could affect the ability to match economic growth and affordability needs. Nevertheless, minor positive effects are predicted for each Alternative.

For Scenario D, there would be an 'over-provision' of housing land supply to account for non-delivery. This would better help to meet housing needs in full, including a greater amount of affordable housing. The spread of housing is more equitable for Alternatives D1 and D2, and so the effects are predicted to be significant. However, for Alternatives D3 and D4, the distribution of growth is more focused, which would be less likely to provide for people wishing to locate or remain in other communities. Therefore, the effects are only minor.

For growth scenario B, the effects are similarly positive, but there would be much more land released for development. Therefore, for B1 and B2 major significant effects are predicted. For Alternatives B3 and B4, the overall effects would be moderately positive.

For Alternative C1, growth would also be significant, which would help to meet and probably exceed housing needs locally. There would also be growth across the Borough, which would provide a range of locational choice. Alternative C2 would also exceed needs, but the choice of locations would be more limited, and so the effects are predicted to be moderate.

## Summary of appraisal findings

	Biodiversity	Land quality	Traffic & air quality	Natural resources	Climate change	Flooding	Landscape	Heritage	Health & wellbeing	Economy	Housing
<b>Meet original OAHN needs (451 dpa)</b>											
A1. Proportionate growth	-	✓ ✗	✗ <sup>?</sup>	-	-	-	✗	-	✓	✓✓ <sup>?</sup>	✓
A2. Balanced growth	-	✓ ✗	✗ <sup>?</sup>	-	-	-	-	-	✓	✓✓ <sup>?</sup>	✓
A3. Focus on south east	-	✓ ✗	✓✗	-	-	-	-	-	✓✓ ✗	✓✓ <sup>?</sup> ✗	✓
A4. Focus on new settlement	✓ <sup>?</sup>	✓	✓ <sup>?</sup>	-	✓ <sup>?</sup>	-	✓	-	✓✓ ✗	✓✓ <sup>?</sup> ✗	✓
<b>B. 20% buffer for flexibility (570 dpa)</b>											
B1. Proportionate growth	✗	✗✓	✗	✓	✗	✗ <sup>?</sup>	✗✗	✗✗	✓✓	✓✓	✓✓
B2. Balanced growth	✗	✗✓	✗	✓	✗	-	✗	✗	✓✓✓	✓✓	✓✓
B3. Focus on south east	✗	✗✓	✓✗✗	✓	✗	-	✗	✗✗	✓✓✓ ✗	✓✓ ✗	✓
B4. Focus on new settlement	✓ <sup>?</sup> ✗	✓	✓	-	✓ <sup>?</sup> ✗	-	✓ ✗	-	✓✓✓ ✗	✓✓ ✗	✓
<b>C. 25% above option B (712 dpa)</b>											
C1. Balanced growth and new settlement	✓ <sup>?</sup> ✗✗	✓ ✗✗	✓ ✗✗	✓ ✗	✓ <sup>?</sup> ✗✗	✗	✓ ✗✗✗	✗✗	✓✓✓ ✗	✓✓✓	✓✓✓
C2. Focus on south east and new settlement	✓ <sup>?</sup> ✗✗	✓ ✗	✓ ✗✗✗	✓ ✗	✓ <sup>?</sup> ✗✗	✗	✓ ✗✗	✗✗✗	✓✓✓ ✗	✓✓✓ ✗	✓✓
<b>D. OAHN with flexibility (486 dpa)</b>											
D1. Proportionate growth	✗ <sup>?</sup>	✓ ✗	✗ <sup>?</sup>	✓ <sup>?</sup>	-	-	✗	✗ <sup>?</sup>	✓✓	✓✓	✓✓
D2. Balanced growth	✗ <sup>?</sup>	✓ ✗	✗ <sup>?</sup>	✓ <sup>?</sup>	-	-	✗ <sup>?</sup>	✗ <sup>?</sup>	✓✓	✓✓	✓✓
D3. Focus on south east	✗ <sup>?</sup>	✓ ✗	✓✗	✓ <sup>?</sup>	-	-	-	✗	✓✓ ✗	✓✓ ✗	✓
D4. Focus on new settlement	✓ <sup>?</sup>	✓	✓ <sup>?</sup>	-	✓ <sup>?</sup>	✓	✓	-	✓✓ ✗	✓✓ ✗	✓

## Discussion of effects

Overall, the lower growth alternatives under scenario A would have the fewest significant effects. Whilst this might be favourable from an environmental perspective, this scenario would not take full advantage of opportunities for economic growth and social development.

The alternatives under scenario D (486 dpa) would have positive effects on health and wellbeing, housing and economy, which would be broadly greater than those from the equivalent alternatives under scenario A. This is particularly the case for the 'proportionate growth' and the 'balanced growth' options. The potential for negative effects increases at this scale of growth, but only marginally so. The most notable changes are in terms of landscape, heritage and biodiversity.

In terms of distribution, Alternatives s D1 and D2 spread the benefits of development more evenly, and so are also less likely to have significant negative effects in any one area. This contrasts with alternatives s D3 and D4, which would have major positive effects on housing and would benefit some communities greatly, but would increase the potential for localised negative effects such as congestion.

At a higher level of growth (570 dpa), the positive effects for each alternative (B1-B4) are broadly greater than for the comparative alternatives s under scenario A and scenario D. This higher level of growth would therefore be more attractive in terms of tackling deprivation and boosting economic growth which is a key aim of the Plan. However, at this level of growth the potential for negative effects on environmental factors increases. For the most part, these are minor negative effects, but the 'proportionate growth' and 'focus on south east' options would have significant effects with regard to heritage and landscape.

The higher growth options C1 and C2 would have very positive and significant effects in terms of driving housing and employment growth. However, this would be at the expense of significant negative effects upon landscape, heritage, agricultural land and air quality. This would be the case regardless of distribution. Furthermore, it is uncertain whether infrastructure could cope with this level of development, which could lead to negative effects on the transport networks, water quality and access to services such as health and education.

## APPENDIX IV: APPRAISAL OF EMPLOYMENT STRATEGY ALTERNATIVES

This appendix sets out an appraisal of the three reasonable alternatives for employment growth which are set out and discussed in Section 4 of the SA Report. The alternatives are as follows:

**Alternative 1** is the approach proposed in the LPSD (i.e. to deliver 265.3 ha of employment development).

**Alternative 2** is to plan for a lower level of growth (sufficient to deliver a minimum of 108.7ha of employment development).

**Alternative 3** reflects the approach that was proposed in the LPPO document in 2016, which proposed the provision of 306.09ha of employment land.

To give the appraisal a clear structure but avoid repetition and duplication, the findings are presented in a summary table for each SA Topic.

A score is given to reflect the significance of effects as follows:

Likely to have a <b>major significant positive effect.</b>
Likely to have a <b>significant positive effect.</b>
Likely to have a <b>minor positive effect.</b>
Likely to have a <b>neutral effect</b>
Likely to have a <b>mixture of positive and negative effects</b>
Likely to have a <b>minor negative effect</b>
Likely to have a <b>significant negative effect</b>
Likely to have a <b>major significant negative effect</b>
It is <b>uncertain</b> what effect the alternatives would have

## SA Topic 1. Biodiversity and geodiversity

Employment Alternative 1: Lower growth (approx 130ha)	Employment Alternative 2: Preferred approach (.265ha)	Employment Alternative 3: LPPO approach (.306ha)
Minor negative effect ?	Significant negative effect?	Significant negative effect?
<p>Site 1EA is located to the south of the Borough next to the border with Warrington. On site there are several areas containing TPOs (Tree Protection Orders) with an approximate area of 4Ha in total. The location of trees is such that they would be likely to be lost. This is due to the large scale nature of warehousing development that is likely to occur. Some trees may be possible to avoid, and compensation should be possible through landscaping. However, the residual effects would be negative. There are also several wildlife sites nearby, with two wooded areas adjacent to the site. These areas could be negatively affected in the short term due to construction, and in the longer term due to noise and light disturbance to associated species. Overall, the effects of development at this site could potentially be significant at a local scale.</p> <p>Sites 3EA and 4EA are adjacent, and so the effects are considered in combination. However, given that construction is already underway at site 3EA, the effects on this site are taken as part of the baseline position. Site 4EA would form an extension to the existing industrial uses in the area, and would be unlikely to cause noticeable effects on habitats or species.</p> <p>Sites 2EA, 5EA and 6EA form a large continuous area for employment land. With regard to each individual site, there are no particular sensitivities associated with 2EA. Site 5A contains one very small area with a TPO, which could easily be avoided. There are extensive areas of woodland adjacent to the site, with the grounds of Ashton Golf Course. Development would not have a direct effect on these habitats though.</p> <p>Whilst site 6EA contains a larger area (Approx. 1.3 Ha) of protected trees, design should allow for this to be protected given the amount of clear open space available on the site. Although there are several wildlife sites within close proximity, these are separated by the highway network, and are unlikely to be directly affected by development.</p> <p>In terms of the overall scale of growth in this area (Haydock), there is likely to be increased traffic along the A580, Millfield Lane and the A58 (Liverpool Road). This could cause disturbance to species and potentially contribute to worse air and water quality. However, the effects would not be anticipated to be significant. The road networks are already established, and well used. So disturbance already occurs. The additional development would not lead to significantly greater impacts.</p> <p>Site 8EA is at Parkside, this is likely to lead to negative impacts on bio-geodiversity because the site in question contains small areas containing TPOs (Approx. 0.8 Ha) and is adjacent to a wildlife site (Newton Brook). Effects upon these features should be possible to mitigate given the location around the site periphery, but this would depend upon the application of buffer zones. In addition, the site is proximity to Highfield Moss SSSI. As well as the potential for localised effects on wildlife on site, there may be a loss of farmland (which is under stewardship and may therefore have some benefits for local species such as birds).</p> <p>A number of farmland birds and migrating birds have been recorded on the SSSI, and so disturbance to surrounding areas could have a knock on effect on birds feeding. The main threats to the moss are eutrophication, burning and drying out. Changing the land use from agricultural use could reduce the threat of eutrophication, but conversely, may create its own issues with regard to drainage and disturbance (e.g. noise during construction and operation of both warehouses and a rail line). There would be a need to engage with Natural England to ensure significant effects did not occur. At this stage, an uncertain negative effect is predicted in this regard.</p> <p>Site 7EA is also at Parkside. Whilst there are no features of particular importance to wildlife on site, it is adjacent to Highfield Moss SSSI. The mosses are sensitive to changes in drainage, and land use practices. However, a change from agricultural use may actually be positive should it lead to a reduction in the amount of inorganic fertilisers and / or pesticides. Conversely, large scale warehouses will require supporting road infrastructure and water supply / discharge arrangements; which have the potential to have negative effects on</p>		

the SSSI (by affecting the water table, and potentially leading to water and air pollution. Therefore, for Option 2, a negative effect is predicted. The effects for Option 1 could be slightly lower given the scaled back nature of development.

Site 2ES would be included as a site allocation under alternative 3. The site is in part surrounded by wooded areas and trees, which includes a local wildlife site (Haydock Park Woodlands). Development would be unlikely to lead to a direct loss of these assets, but could certainly disturb wildlife both during construction and operations. Therefore negative effects are likely.

### **Overall effects**

From a collective viewpoint, the effects of alternatives 2 and 3 are considered to be negative, and potentially significant in the short term. In the longer term, operational impacts would be anticipated to be manageable, and some enhancement could occur at particular locations. However, there would be some unavoidable negative effects such as a loss of TPOs. The potential for negative impacts at Highfield Moss would also need to be carefully considered and managed.

Alternative 1 involves a lower amount of growth, which could mean less growth in the vicinity of Haydock, and less growth at Omega (although this is considered to meet some of Warrington's employment needs) and scaled back growth at Parkside. With lower growth at Haydock, the potential for negative effects would remain similar to alternative 2 at a Borough-wide scale, because the negative effects are mostly associated with development at Omega and Parkside. Should the lower level of growth mean that the site at Omega was not proposed for development though, then the significance of the effects ought to be lower. At Parkside, there is potential for negative effects at Highfield Moss.

Should it be possible to secure enhancements to biodiversity at the strategic sites (for example through the use of BREEAM, and the application of policies that seek net gain in biodiversity), then alternatives 2 and 3 could perform stronger than alternative 1. However, there is uncertainty whether this would occur or not.

Overall, alternative 2 is predicted to have **potentially significant negative effects**, when considered as a strategy. However, the application of Plan policies could minimise these effects, so the likelihood of effects is not certain. The effects for alternative 3 are similar, but the additional site 2ES would bring further negative effects in the location of Haydock. Similar to alternative 2, **potential significant negative effects** are predicted.

The overall effects for alternative 1 could be **minor negative effects**, but this would depend upon which sites were discarded and the mitigation/compensation that was secured. Therefore, there is **uncertainty**.

## SA Topic2: Land Quality

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Minor negative effect	Significant negative effect	Significant negative effect
<p><b>Site discussion</b></p> <p>The potential for loss of agricultural land could occur at several site options. For each site, a discussion is provided as to the impacts of development, followed by a consideration of the cumulative effects for each of the three alternatives.</p> <p><u>Site 1EA</u></p> <p>The land is classified of grade 3 agricultural land (44.9 ha).</p> <p>With regard to the lower growth alternative 1, the site would not be involved, and so <b>neutral effects</b> are predicted. For alternatives 2 and 3 there would be a need to include this site, which would lead to an irreversible loss of agricultural land. It is unclear whether the site is Grade 3a or 3b land though, and so the effects are not clear. Although quite a large amount of land would be affected, this is not significant in the context of Borough-wide and regional resources. Therefore, <b>minor negative effects</b> are recorded.</p> <p><u>Site 2EA</u></p> <p>The site is categorised as Grade 3 agricultural land. The site has planning permission though, so effects are predicted to be neutral for all alternatives (given that development is already going to happen regardless of the Local Plan).</p> <p><u>Site 3EA</u></p> <p>The effects are neutral for each alternative as this site is already under construction.</p> <p><u>Site 4EA</u></p> <p>Site 4EA is small, and unlikely to be used for agricultural purposes. Therefore neutral effects are predicted for each alternative.</p> <p><u>Site 5EA</u></p> <p>The land at site 5EA is 100% grade 3 agricultural land (8.7ha)</p> <p>This site would be involved for alternatives 2 and 3, but the effects are considered to be negligible given the small scale nature of development. It is also unclear whether the site is grade 3a or 3b. For the lower level of growth, <b>neutral impacts</b> are predicted, as the scale of growth in Haydock would be scaled back, and so the development of the site would not be likely to be required.</p> <p><u>Site 6EA</u></p> <p>The land at Site 6EA is classified as grade 3 agricultural land (21.6 Ha)</p> <p>For option 2 and 3, there would be a need to include this site, which would lead to an irreversible loss of agricultural land. It is unclear whether the site is Grade 3a or 3b land though, and so the effects are not clear. Although quite a large amount of land would be affected, this is not significant in the context of Borough-wide and regional resources.</p>		

For alternative 1, growth at Haydock would be scaled back, and so it would be possible to avoid as much agricultural land loss. Therefore, neutral effects are predicted.

#### Sites 7EA and 8EA

Site 7EA is not classified as being agricultural in nature. However, aerial photography suggests that the land is in agricultural use. The surrounding land is also predominantly grade 3, and so it is presumed that this is the same. This is a large site of approximately 125ha in area, which comprises mostly of agricultural land. Site 8EA currently consists of mostly Grade 3 agricultural land with an area of approximately 97 ha.

Both sites are likely to be involved for each alternative, but to a lesser extent for alternative 1. Employment development in these locations would lead to irreversible loss of active agricultural land, which is a negative effect for both options. Substantial amounts of land would be lost, but in the context of Borough and regional resources, the effects are not predicted to be significant (given that this is not Grade 1 or 2 land). Nevertheless, negative effects are predicted.

#### Site 9EA

This is relatively small site (13.2ha), and would be involved for each alternative. However, the site is classified as Grade 1 agricultural land, and so the effects are considered to be negative. Given the small proportion of land involved overall compared to Borough resources, the effects are minor.

#### Site 10EA

Site 10EA currently consists of grade 3 agricultural land on 5.1ha and 0.7ha is non-classified land. However, upon inspection, this site is not used for agriculture, nor is it likely to be given its condition and location. The effects are therefore neutral in this respect. Minor positive effects are recorded in relation to the reuse of vacant/underused land. This is the case for all alternatives given that they would all be likely to involve development at this site.

#### Site 11EA

Site 11EA is not classified as agricultural land, so neutral effects are predicted in this respect. As it is already in a built up area it represents a positive use of land, and so minor positive effects are predicted.

#### Site 2ES

The site is classified as Grade 3 agricultural land and could lead to the loss of at least 50ha. It is unclear whether this is 3a or 3b, but current activity suggests that the land has some agricultural value. Minor negative effects are recorded for alternative 3, which involves this site.

#### **Overall effects**

For all three alternatives there would be considerable loss of agricultural land, which would be mostly Grade 3 in nature, and as a result of development at the Parkside location. Although a substantial amount of land would be permanently affected, this is not considered to be significant in the context of the overall resources available at the Borough scale. The amount of additional land lost for alternative 1 would be limited, but would include a small amount of Grade 1 land. For alternatives 2 and 3 (to the greatest extent), additional land would be lost, which would be mostly Grade 3 in nature, but also involve the same Grade 1 land that would be affected for alternative 1. The increased amount of agricultural land lost would clearly be more negative compared to alternative 1, and so a significant negative effect is predicted (with regards to soil loss, rather than the effects on the rural economy). For alternative 1, a minor negative effect is predicted, whilst a significant negative effect is predicted for alternatives 2 and 3.

**SA Topic 3: Traffic, congestion and air quality**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Minor negative effect	Significant negative effect?	Major significant negative effect?
<p><b>Discussion of sites</b></p> <p><u>Site 1EA</u></p> <p>Site 1EA is adjacent to an existing air quality management area (along the M62 motorway). Access to the site would be likely to be primarily from Junction 8 of the M62. Development would therefore contribute increased vehicle movements along the M62, and a potential worsening of air quality (albeit only minor in the context of current levels of pollutants). Whilst the AQMA could be adversely affected, the impact on residential areas should not be significant. But having said this, there would be increased vehicle movements from Junction 8 towards Lingley Mere / Omega, thus contributing to poorer air quality near to the communities of Kingswood, West Brook and Great Sankey.</p> <p>For alternatives 2 and 3, the impacts in terms of transport, traffic and air quality are predicted to be minor-moderately negative. For alternative 1, the effects are neutral as the site would not be required.</p> <p><u>Sites 4EA, 5EA and 6EA and 2ES at Haydock - (In combination with 2EA, 3EA which are already permitted)</u></p> <p>In combination, development of these sites is likely to add substantially more vehicle trips onto the local road network, particularly along the A580, Liverpool Road, the A49 and at Junction 23 of the M6. This area is already congested at peak times, and so development of this scale (for alternative 2) is likely to exacerbate the current situation. Although there are no AQMAs close to residential areas, it is likely that air quality would be negatively affected by development in this location. Overall, a minor negative effect is predicted for alternative 2. For alternative 3, there would be a further large site allocated in this area (2ES), which would add pressure to the network and may cause significant negative effects on traffic in the plan period in the absence of infrastructure improvements.</p> <p>For alternative 1, the additional large sites would not be required, and so the effects should be neutral.</p> <p><u>Sites 7EA and 8EA</u></p> <p>The development of these sites would be in close proximity to the M6 AQMA, and so construction and operational activities could contribute to increased emissions of dust and pollutants, and increased numbers of cars and HGVs using the motorway and local highway network.</p> <p>The proximity of development to residential units on site 8EA also lead to some potential temporary air quality issues during construction activities.</p> <p>Employment development at these sites is likely to generate substantial amounts of traffic. Southbound traffic could potentially use the A49 to access the site, which would generate increased traffic through Newton-le-Willows. This could have negative effects on air quality in this area, part of which (at High Street) is designated as an AQMA. It is however, likely that HGV traffic would be routed away from such areas. Although traffic and congestion would be likely to increase, it is probable that a significant change in air quality would not occur.</p> <p>In the longer term, there may be a reduction in the amount of HGV usage, once the rail interchange is secured. This should help to reduce traffic, congestion and air quality issues. The creation of a direct link onto the A579 would also significantly reduce the need for traffic to travel through existing communities on the local road network.</p> <p>Overall, alternatives 2 and 3 are predicted to have moderate to significant negative effects in the short to</p>		

medium term, but these could reduce to moderate or minor effects in the long term once supporting infrastructure and a rail interchange have been established. Development would be scaled back for alternative 1, and so the effects in the short term are more likely to be moderate, and in the longer term perhaps minor.

#### Site 9EA

The scale of development involved would be fairly low compared to strategic sites elsewhere in the Borough, and the types of uses would not be expected to involve a large number of HGVs. The current road network should be able to cope with additional traffic without causing congestion. Likewise, there are no background air quality issues locally, and trips generated would not have a particular effect on other AQMAs within the Borough. For both options, the implications of this site on its own (and in combination with moderate housing growth at Rainford) would be likely to be neutral. Furthermore, the site has an extant planning permission, which means it could potentially come forward in the absence of the Local Plan in any event.

#### Sites 10EA and 11EA

Both sites sit within the urban area, and are therefore well located in terms of walking, cycling and public transport. This should help to reduce increased traffic flows to and from the sites. The location and size of the developments should not pose any particular issues with regard to congestion and air quality. Site 10EA already has planning permission and so the impacts are already well understood.

#### **Overall effects**

There are several sites that would be involved for all alternatives that would be unlikely to generate significant traffic, congestion or air quality impacts, whether in isolation or cumulatively. This includes small sites in the urban area, and a small site at Rainford (9EA). All alternatives would involve development at Parkside, but this would be to a greater extent for alternatives 2 and 3. In the short term, the effects are likely to be moderate to significantly negative, although these could reduce in the longer term. For alternative 1, the effects would be somewhat lower. No further development would be necessary for alternative 1, but for alternatives 2 and 3, development would also be required at the Omega site and at Haydock. The scale of growth involved could lead to substantial increases in vehicle movements and in the case of Omega, this would be adjacent to the M62 AQMA. For alternative 3, the addition of site 2ES at Haydock could also be potentially significant.

In combination, the effects of development locations required for alternative 1 would be anticipated to be **minor negative** from a Borough wide perspective; with much of this being attributable to Parkside.

For alternatives 2 and 3, in addition to the effects identified for alternative 1, there would be more prominent effects upon motorway junctions at the M62 Junction 8 and the M6 Junction 23. Although impacts upon air quality would not be expected to be significant, there could be a general worsening, and traffic and congestion would be likely to worsen too (at least in the short to medium term). Consequently, a potential **significant negative effect** is predicted for alternative 2. The effects for alternative 3 could potentially be a **major significant negative effect** in the short term due to the additional pressure at Junction 23 compared to alternative 2. The effects in the longer term for each alternative could reduce as a result of infrastructure upgrades and the establishment of an SFRI at Parkside East.

**SA Topic 4: Natural resources**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPP0 approach (c.306ha)
<b>Neutral effect</b>	<b>Minor negative effect</b>	<b>Minor negative effect</b>
<p><b>Water</b></p> <p><i>Sites 1EA, 2EA, 3EA, 4EA,5EA,6EA, 7EA, 9EA, 10EA, 11EA, 2ES</i></p> <p>Each of these sites is distant from ground water source protection zones, and therefore negative effects in this respect are unlikely for all alternatives. With regard to the quality of waterbodies, development could put pressure on waste water treatment works, which could lead to deterioration in water quality. However, the sectors of employment being targeted are less likely to produce large amounts of waste water. Nevertheless, there is substantial growth, which would need infrastructure upgrades to support it. Counterbalancing this issue, is the potential for diffuse pollution from agricultural land to be reduced. Overall, it is expected that neutral effects would be generated from employment land development under all alternatives.</p> <p><i>Site 8EA</i></p> <p>Site 8EA is adjacent to a groundwater source protection zone. For growth alternatives 2 and 3 a potential negative effect is predicted, as there could be disturbance nearby. However, it is unlikely that significant effects would be generated given that only a very small area of the site overlaps the groundwater protection zone, and it is not in zone 1. Mitigation measures during construction ought to be routine and ensure that effects are avoided. For alternative 1, a scaled back development should mean that the site does not overlap in any case. So neutral effects are predicted.</p> <p><b>Waste</b></p> <p>Development produces waste regardless of location during construction and also operation. Higher growth however, is likely to lead to greater waste generation locally. This means that alternative 2 and 3 are less favourable than alternative 1. However, the effects associated with all alternatives are considered to be neutral, and would be influenced by other factors such as operational practises, government legislation and consumer pressure.</p> <p><b>Overall effects</b></p> <p>The effects for all the alternatives are not likely to be significant, as the type of employment development and location of sites is not a particular threat to water quality. However, alternatives 2 and 3 involve a greater amount of development, which would generate more waste locally, and would put additional pressure on waste water treatment and drainage networks. Therefore, a minor negative effect is predicted for both alternatives.</p>		

**SA Topic 5: Climate change and energy**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPO approach (c.306ha)
Neutral / minor positive effect <sup>?</sup>	Minor negative effect / neutral <sup>?</sup>	Minor negative effect / neutral <sup>?</sup>
<p><u>Emissions from the built environment</u></p> <p>The building and operation of buildings would lead to the generation of carbon emissions and the usage of energy. In this respect, alternative 3 is more likely to generate impacts compared to alternative 2, and likewise, alternative 2 would have greater effects than alternative 1. However, the amount of growth involved and the sectors of employment would not be anticipated to generate significant effects in the context of Borough emissions and energy use.</p> <p>With regards to low carbon energy schemes, the sites involved would not be likely to support mixed uses, or generate a particular demand for heat. Therefore, the potential for district heating schemes would be limited. In terms of other technologies, the potential for micro generation in the form of wind turbines and solar panels ought to be explored, and sustainable design encouraged (for example by encouraging the adoption of BREEAM standards). In the absence of specific policies that seek to achieve these outcomes, neutral effects are likely for all alternatives.</p> <p><u>Emissions from transportation</u></p> <p>The employment sites are accessible to nearby communities, which might allow for some walking and cycling. There are also bus routes to each of the employment locations. However, travel to sites that are located at motorway junctions and along key road networks are likely to attract car usage. The form of employment land involved will also encourage greater HGV trips locally. For alternative 1, the effects are predicted to be neutral, as the level of growth is likely to be the same or lower than the projected baseline position. For alternative 2, a minor negative effect is predicted given that there would be increased employment development. For alternative 3, the effects would be greater still, but not likely to be significant.</p> <p>Each alternative would also involve the development of a SRFI, which in the long term would help to reduce emissions from freight transport. This would help to offset the negative effects associated with alternatives 2 and 3 in particular. The long term effects are predicted to be potentially positive, but there is uncertainty at this stage.</p> <p><u>Adaption to climate change</u></p> <p>With regard to the resilience of the Borough to the effects of climate change (e.g. hotter, drier summers, more extreme weather events) significant effects are not likely to occur for any alternative.</p> <p>Each alternative will involve small amounts of employment land growth in the urban area, but the contribution to an urban heating effect is not considered likely to occur given the small scale changes involved.</p> <p>It is considered unlikely that the types of development involved (with large scale warehousing and vehicle parking areas) would offer the potential for green infrastructure improvements. Therefore, all alternatives are likely to have neutral effects in this respect also.</p> <p><u>Overall effects</u></p> <p>Alternative 1 is predicted to have neutral effects. Although the type and distribution of employment land could encourage a continuation of car usage, it is unlikely to be much different to the projected baseline position. In the longer term, the SFRI could potentially generate minor positive effects though by decreasing emissions from road based freight. Emissions relating to the built environment are likely to be similar to the baseline position, and the opportunities for climate change adaptation are also limited, and so neutral effects are predicted in this respect too.</p>		

Alternative 2 is predicted to have minor negative effects due to the higher level of growth involved, and the increase in emissions this would generate in terms of the built environment and transportation. Though alternative 3 would generate increased trips still (HGVs and car transport), the increase in emissions would still not be considered significant.

Similar to alternative 1, there could be minor positive effects in the long term due to reduced emissions from freight transport.

## SA Topic 6: Flooding

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Neutral effects	Minor negative effect	Minor negative effect

### Site 1EA

There is a slight overlap with areas of flood zone 2/3, but this is a small amount and restricted to the site boundary. It is therefore unlikely that development would be at risk of fluvial flooding. With regard to surface water, there are pockets of flood risk across the site. Much of this is classified as ‘low’, but there are some parts which are ‘high’. For alternatives 2 and 3, this site would be involved, and so the potential for minor negative effects exists. For alternative 1, this site would not necessarily be required, and so neutral effects are predicted.

### Site 2EA

There is a slight overlap with areas of flood zone 2/3, but this is a small amount and restricted to the site boundary. It is therefore unlikely that development would be at risk of fluvial flooding. However, large parts of the site to the south are at risk of surface water flooding (though mostly low risk), and there are zones to the north that are categorised as high flood risk. However, the site is already subject to a planning permission for employment development, and so it is presumed that flood risk has been adequately addressed. The effects are therefore neutral for all alternatives.

### Site 3EA

This site is already under construction and so neutral effects are predicted for all options.

### Sites 4EA, 5EA, 9EA, 10EA and 11EA

Neutral effects are predicted for all of these sites as they do not border or contain areas of flood zone 2 or 3, nor do they contain areas of particular concern with regards to surface water flooding. Therefore, for all options there is limited risk of flooding on these sites.

### Site 6EA

No areas are at risk of fluvial flooding, but there are areas within the site which are of medium or high risk of surface water flooding. Given the presence of these areas, minor negative effects are predicted for alternatives 2 and 3, which would require satisfactory mitigation. For alternative 1, it would be possible to avoid this site, and so neutral effects are predicted.

### Site 7EA

No areas are at risk of fluvial flooding, but there are some stretches of surface water flooding to the south of the site. The location of the flood risk areas make it likely that they could be avoided, and this would be most likely for Option 1, which would involve scaled back development. Given the scale of the site, it is likely that green infrastructure improvements could be secured. Therefore, neutral effects are predicted for all alternatives.

Site 8EA

Newton Brook runs along the west of the site boundary. However, it is unlikely that development would be located in these areas. There are some small pockets of land at risk of surface water flooding, but these should not pose a significant risk to development. Therefore a neutral effect is predicted for all alternatives.

Site 2ES

This site is entirely within flood zone 1, but there are areas at risk of surface water flooding to the south of the site in particular. The proposed uses would likely not be sensitive with regards to such flooding though, and so effects would not be anticipated to be significant given that SUDs will need to be implemented to manage run off and drainage. Therefore, only minor negative effects would be predicted for alternative 3 in this respect.

Overall effects

The employment sites are broadly within areas that are not at risk of fluvial flooding. Their development should therefore not create a flood risk on those sites, and so neutral effects are predicted in this respect.

Although alternatives 2 and 3 involve a higher amount of growth, the additional sites required would not pose a fluvial flood risk for development. Therefore, neutral effects are predicted also in this respect.

With regard to surface water flooding, there could be minor negative effects for alternatives 2 and 3, as a number of sites contain areas of medium or high flood risk. For alternative 1, the effects are neutral, as several of the sites with greater risk of flooding (for example at Haydock), would not be involved.

Management of downstream flooding ought to be possible through the application of Plan policies on water management. . However, it will be important to ensure that the design and layout of new development adequately mitigates flood risk for example by the inclusion of green infrastructure measures.

**SA Topic 7: Landscape**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
<b>Uncertain effects (potentially negative)</b>	<b>Minor negative effects</b>	<b>Significant negative effects (uncertain)</b>
<p><u>Site 1EA</u></p> <p>Site 1EA is categorised as medium-high landscape sensitivity. Development therefore has potential to have negative effects upon the open nature of land in this location. The scale of growth however, is unlikely to have substantial effects upon the wider landscape, as large areas of land would remain to the north and west. There would also be a small area of separation between the development and nearby Lingley Green, which should help to mitigate visual impacts. Nevertheless, negative effects are likely to occur given the type of development involved would be large scale and dominant. For alternative 1, the effects could be avoided as this site would not need to be involved.</p> <p><u>Site 3EA</u></p> <p>This site is already under construction and so neutral effects are predicted for all alternatives.</p> <p><u>Site 4EA</u></p> <p>Site 4EA has a low sensitivity to change, and is bounded by development. Therefore, its development is unlikely to have any notable effects on landscape character or visual amenity. Neutral effects are predicted for all alternatives.</p> <p><u>Sites 5EA, 6EA</u></p> <p>These three sites would form an extension to Haydock Industrial Estate to the west. They fall within an area classified as having medium-high landscape sensitivity. Currently, the sites present an open landscape, which separates Liverpool Road from the industrial estate. Development would alter the character of this area permanently, and would affect visual amenity for a number of residential properties along Liverpool Road. Although negative effects are predicted, these are not considered to be significant, as areas of landscape would still remain between the industrial area and nearby settlements of Garswood and Ashton-in-Makerfield.</p> <p>For alternative 1, the effects are predicted to be neutral as development would not need to occur, or would be much scaled back, allowing for greater flexibility in the application of mitigation measures and retention of existing open space.</p> <p><u>Site 7EA</u></p> <p>Site 7EA is located within an area classified as having low to medium landscape sensitivity. The location is entirely rural in nature, although it is adjacent to the M6, which somewhat reduces its value. Whilst development would alter the character of the area, effects are not likely to be significant.</p> <p><u>Site 8EA</u></p> <p>Site 8EA is located within an area classified as having low to medium landscape sensitivity. In some parts of the site, there is vacant land and derelict buildings, which are of poor quality. Development here would have a positive effect on the land. However, in other parts of the site, there is open land, which provides a rural setting to the area. Development of large employment units is therefore likely to have negative effects. However, the scale of the site should allow for mitigation to be secured to ensure that significant effects are not generated. All alternatives would be likely to involve development at this site, but it would be scaled back somewhat for alternative 1. Nevertheless, negative effects are likely to occur for all</p>		

alternatives.

#### Site 9EA

Rainford falls within an area of medium high sensitivity. Although this site is open in nature, it is adjacent to built development of industrial character, and is relatively well screened from the wider rural area. The effects are therefore unlikely to be negative for any of the 3 alternatives. Furthermore, the site already has an extant planning permission, and could potentially come forward in any event.

#### Sites 10EA, 11EA

These sites are both categorised as having low landscape sensitivity, and fall within the urban area. The potential for negative effects is therefore limited, and with good design enhancements to the townscape could potentially be secured. For all alternatives, the effects are predicted to be neutral at this stage.

#### Site 2ES

This site is large scale, and falls within an area of medium sensitivity. Alongside existing development and planned growth in the vicinity, there could be a significant impact upon the openness of the landscape in this area. This site would be included as an allocation under alternative 3 only, and so would have negative effects for this alternative.

#### Overall effects

Alternative 2 is predicted to have minor negative effects overall. Several sites would be developed which would lead to negative effects on landscape character that would be difficult to fully mitigate. However, the scale of development involved would be unlikely to lead to significant effects in the context of the landscape sensitivity and/or the remaining open land in the vicinity of development. Given the visual dominance of warehouses it will be important to secure innovative design.

Alternative 3 involves the same sites and one additional site to the south of Haydock Park (2ES). Development of this site would further erode the openness of the landscape in this part of the borough. Whilst the effects would not be considered significant, they would be greater than for alternative 2. Consequently, moderate negative effects are predicted.

For alternative 1, the effects on landscape would be less widespread compared to alternative 2. Whilst there would be some minor effects associated with growth at Parkside, this would be scaled back compared to alternative 1, and therefore it could be possible to avoid impacts or mitigate more successfully. As a consequence, an uncertain effect is recorded, rather than a negative effect.

**SA Topic 8: Built and natural environment**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPO approach (c.306ha)
<b>Minor negative effects</b>	<b>Moderate negative effects</b>	<b>Moderate negative effects</b>
<p><b>Discussion of sites</b></p> <p><u>Site 1EA</u></p> <p>There is a scheduled monument and two listed buildings some 900m to the west of the site. However, the site is fairly well screened and development is unlikely to have a significant effect on the setting of these heritage assets (i.e. the rural nature of the surroundings). Consequently, it is unlikely that negative effects would be generated.</p> <p><u>Site 2EA</u></p> <p>The site has planning permission for employment development and so neutral effects are predicted for all options.</p> <p><u>Site 3EA</u></p> <p>This site is already under construction for employment development and so neutral effects are predicted for all options.</p> <p><u>Site 4EA</u></p> <p>The site sits within an existing industrial area, and does not contribute to the setting of any listed heritage assets. Development is therefore unlikely to have negative effects.</p> <p><u>Site 5EA</u></p> <p>The site is not immediately adjacent to any designated or locally important heritage assets. Its development in isolation would therefore be unlikely to have significant effects on the character of the built environment.</p> <p><u>Site 6EA</u></p> <p>The site is adjacent to two listed buildings, which are sensitive to changes in the rural landscape. Development of large scale warehouses would therefore be likely to have negative effects on the setting of these assets. For Option 2, this constitutes a negative effect. For Option 1, development would be much scaled back and so effects ought to be possible to avoid.</p> <p><u>Site 7EA</u></p> <p>There is a listed asset at the south of the railway line (Huskisson Memorial). Although there would be construction activities and freight movements, this would be unlikely to have significant effects on the memorial, as it already sits within an industrial setting. There is also a large area of architectural potential that is likely to be affected by development. This is not necessarily a negative effect though, as it provides an opportunity for potential artefacts and features to be recorded and recovered. Overall, neutral effects are predicted.</p> <p><u>Site 8EA</u></p> <p>The development of site 8EA is likely to have some negative effect on the built and natural environment. This relates primarily to the presence of two listed buildings in the centre of the site, and proximity to a Conservation Area. Any employment development in this area would have to be designed and laid out so as</p>		

to avoid causing unjustified harm to the setting of the heritage assets. However, it is likely that residual effects would remain given the large scale nature of development which is likely to be involved.

#### Site 9EA

Site 9EA is within an existing industrial setting, and although it has an open character, it is not particularly important to the surrounding built form, which is largely low quality / industrial in nature. Furthermore, the site has extant planning permission for employment development and could therefore come forward for development in the absence of the Local Plan.

#### Sites 10EA / 11EA

Sites 10EA and 11EA are within the urban area on sites that are vacant / of poor quality and do not contribute positively to the character of the built environment. There are no important local features, or designated heritage assets nearby, and thus neutral effects are predicted for all options.

#### Site 2ES

There are no designated or locally important heritage assets within close proximity to the site. Development is therefore unlikely to have a notable effect on cultural heritage or the character of nearby settlements of Haydock, Ashton-in-Makerfield and Newton-le-Willows.

#### **Overall effects**

For all alternatives, there are several sites that would be involved where effects on the historic environment would be limited. For example, sites 4EA, 9EA, 10EA, 11EA are located close to existing industrial areas and their development would not be likely to cause harm to the built environment. Of these sites, 9EA and 10EA already have planning permissions, which suggests impacts have been deemed to be insignificant.

For alternatives 2 and 3, there would be greater development at Haydock, and at one site in particular (6EA) the setting of listed buildings could be negatively affected. However, the provision of a buffer zone between development and the listed buildings would help to minimise these effects. Likewise, development at Parkside would directly affect two listed buildings (Newton Park Farmhouse and Barn). These are currently in poor condition, but development on the site is likely to have adverse effects upon their rural setting. There is therefore potential for negative effects. For alternative 1, the scale of growth at Parkside would be lesser, and so perhaps such effects could be avoided more easily. For alternative 1, negative effects at Haydock would also be possible to avoid.

On balance, alternatives 2 and 3 are predicted to have **moderate negative effects** overall. For the most part, site development would lead to neutral effects, but where there are larger developments in the open landscape (at Haydock and Parkside), the potential for negative effects arise. These could potentially be mitigated, but at this stage, such factors have not been factored into the assessment scores.

For alternative 1, the effects would be similar to alternatives 2 and 3 for the most part, but it would be possible to avoid negative effects at Haydock, and it may be easier to avoid impacts at Parkside. Nevertheless, **minor negative effects** could remain.

**SA Topic 9: Health and wellbeing**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Minor positive effects	Significant positive effects / minor negative effects	Significant positive effects / minor negative effects
<p><b>Site discussion</b></p> <p><u>Site 1EA</u></p> <p>This site is not used formally for recreational purposes and its development would not affect any public rights of way. It is near to existing employment uses, and its development would be unlikely to cause too many amenity issues, apart from possible visual disturbance to nearby Lingley Green. The development of the site would be likely provide a range of jobs, which would be accessible to residents from Warrington and the south of St Helens in particular, having a positive effect on wellbeing. For alternatives 2 and 3, the effects are minor positive, but they are neutral for alternative 1, given that this site would not be needed.</p> <p><u>Sites 5EA and 6EA</u></p> <p>Public rights of way are adjacent to sites 5EA and 6EA, which should allow employees to access open space and encourage walking and cycling to the site to work (provided design and layout take these factors into account). However, the site also contains a small area of public open space, which would be likely to be lost to development without suitable mitigation or compensation.</p> <p>In combination, the sites are likely to create amenity concerns for a number of properties along Liverpool Road (i.e. as a result of increased vehicle movements, and visual changes to the landscape). This is a negative effect for these communities.</p> <p>With regard to other determinants of health, employment provision would be positive in terms of providing accessible local jobs for residents of St Helens. The location of development would also be likely to attract workers who live in neighbouring areas such as Wigan, West Lancashire and Knowsley, and thereby bring health and wellbeing benefits to the wider area.</p> <p>For alternatives 2 ad 3, the effects are mixed, with some minor negatives and positive effects. For alternative 1, development in this location would be much scaled back, and so neutral effects are predicted.</p> <p><u>Site 3EA</u></p> <p>This site is already under construction and so neutral effects are predicted for all alternatives.</p> <p><u>Site 4EA</u></p> <p>The site is not used for recreational purposes, and would not be likely to create amenity issues. It would allow for further expansion of employment land, which would provide a small number of jobs to local residents; which is positive for wellbeing.</p> <p><u>Site 7EA</u></p> <p>The site is intersected by two public rights of way, which could be severed by development. Furthermore, any informal recreation on the site would be likely to be affected negatively by large scale development (i.e. the rural nature of development would be affected). These are minor negative effects. Conversely, the scale of development involved would be likely to generate a large amount of jobs for residents in the long term, which would be beneficial.</p>		

Site 8EA

The site does not contain any public rights of way, but may be used for informal recreation. Large scale development would be likely to affect the experience of any users of the site, but it may be possible to mitigate these effects through the provision of green infrastructure enhancement to the south of the site. An increase in activity here could affect amenity for nearby residential areas both visually, and also through increased traffic. However, there would be significant benefits in terms of job provision for local residents.

Site 9EA

The site is not used for recreational purposes, and its development would not be likely to create amenity issues. It would allow for further expansion of employment land, which would provide a small number of jobs to local residents, which would be positive for wellbeing. The site has an extant planning permission, so neutral effects are predicted.

Site 10EA

The site is not used for recreational purposes, and would not be likely to create significant amenity issues. It would allow for further expansion of employment land, which would provide a small number of jobs to local residents; which is positive for wellbeing. The site has an extant planning permission, so neutral effects are predicted.

Site 11EA

Site 11EA is adjacent to a public right of way and open space. It should also be possible to secure good walking and cycling links to employment within the site from nearby residential areas. The scale of development is unlikely to have major effects with regard to amenity, and development would provide additional jobs, which would be positive for wellbeing. Minor positive effects are predicted for each alternative.

Site 2ES

Development would be unlikely to have an effect on rights of way or public recreation space (given the agricultural nature of the site, and its location away from communities). Furthermore, there are few existing properties nearby and so effects on amenity ought to be limited. The development would however provide additional jobs which would be positive for wellbeing. Therefore, additional benefits are noted for alternative 3.

**Overall effects**

Overall, alternatives 2 and 3 are predicted to have significant positive effects as they would provide a range of jobs that would help to tackle unemployment, leading to improvements in wellbeing. Several sites could also be made accessible through walking and cycling links, if design is innovative. However, large scale growth of employment, particularly at Haydock and Newton-le-Willows could lead to amenity impacts for a number of local residents. Therefore, minor negative effects are also predicted. Though the scale of growth is higher for alternative 3, it is unlikely that there would be significantly greater benefits in terms of health, nor would the amenity issues be much different.

For alternative 1, the negative effects at Haydock would be much lower given the scaled back growth here. Likewise, the magnitude of effects at Parkside would be lower. Overall, negative effects ought to be easier to avoid for this alternative. However, the positive effects would be less pronounced in terms of the provision of job opportunities.

**SA Topic 10: Economy and employment**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Minor positive effects	Significant positive effects	Major significant positive effects
<p><b>Discussion of sites</b></p> <p><u>Site 1EA</u></p> <p>The site is located next to an existing high quality business park, and would be likely to provide attractive land for the development of strategic distribution and warehousing (given its proximity to the M62). Given that this sector is driving market growth, development here offers a good opportunity to boost the economy. For alternatives 2 and 3, this is a positive effect, but neutral for alternative 1, which would not involve this site.</p> <p><u>Site 2EA</u></p> <p>The site has planning permission and is being prepared for development. Therefore, the economic benefits are already likely to be generated in any event (i.e. the development of this site forms part of the projected baseline position). Nevertheless, its presence is important in the context of potential further growth on adjacent sites (5EA and 6EA).</p> <p><u>Site 3EA</u></p> <p>This site is already under construction and so neutral effects are predicted for all options.</p> <p><u>Site 4EA</u></p> <p>Site 4EA is a small site, which would complement existing employment uses in the Haydock area. Its development would be included in all options, and would have minor positive effects.</p> <p><u>Sites 5EA and 6EA</u></p> <p>Each of these sites is located in the Haydock area adjacent to an existing industrial estate. Each has good access to Liverpool Road / the A580, which is also well linked to the M6. The nature of the sites means that they should be attractive to the market, especially for strategic development which is driving the market. In combination, development here should therefore contribute towards significant positive effects in terms of economic growth. Access to the sites would be good, but this might be more likely to be by car. Nevertheless, the development would be likely to support a substantial number of jobs for local residents. For alternatives 2 and 3, the effects would be positive, whilst for alternative 1 a neutral effect is predicted, given that growth here would not be required or would be scaled back.</p> <p><u>Sites 7EA and 8EA</u></p> <p>Sites 7EA and 8EA are important in the wider context of supporting a rail freight interchange at Parkside. Although there is no direct access to the nearby motorway junctions at present, the site would still be attractive to market, and would be suited for strategic warehousing and distribution. In the short term, there would be benefits to the economy, and these would be anticipated to be significant in the longer term due to the establishment of an SFRI and supporting employment land. For alternatives 2 and 3, the effects would be more prominent as it would involve a higher scale of growth.</p> <p>Accessibility to the site for residents would need to be improved to ensure that benefits arising from a reduction in deprivation and unemployment would be maximised.</p>		

Site 9EA

The site is relatively small, and would be unlikely to support strategic opportunities. However, the site presents the opportunity to support local businesses, and would provide job opportunities for residents to the north of the Borough in particular. The site has an extant planning permission, so neutral effects are predicted.

Sites 10EA and 11EA

Both of these urban sites would be unlikely to support strategic opportunities, but would provide support for smaller businesses in the urban area. This would provide a boost to the local economy, and would help to modernise business units in the urban area. Both sites have relatively good access to the road network, and would also be accessible to a range of deprived communities. Site 10EA has an extant planning permission, so neutral effects are predicted in respect of this site.

**Overall effects**

For alternative 2, the scale of growth involved would help to support sub-regional opportunities for economic development. The range and location of sites involved ought to be attractive for such strategic opportunities, as well as provision of a small amount of land that could support businesses locally. Overall, a **significant positive effect** is predicted.

An even greater choice of sites and scale of growth would be supported for alternative 3, which has the potential for **major significant positive effects**.

For alternative 1, whilst there would be provision of enough land to meet local needs, there would be a more modest contribution towards the delivery of strategic employment sites for logistics and distribution. Whilst the effects would still be positive, they would be less likely to have a significant effect upon the baseline position in terms of jobs growth, and economic activity. Therefore, **minor positive effects** are predicted.

**SA Topic 11: Housing**

Employment Alternative 1: Lower growth (c.130ha)	Employment Alternative 2: Preferred approach (c.265ha)	Employment Alternative 3: LPPO approach (c.306ha)
Neutral effects	Neutral effects <sup>2</sup>	Neutral effects <sup>2</sup>
<p><b>Commentary on sites</b></p> <p>Sites EA1, EA2, EA3, EA4, EA5, EA6, EA9 and EA10 are all located adjacent to or within existing employment locations. This makes them more suitable for employment than housing development. The sites are also relatively well located with regard to existing communities, and so access to jobs ought to be good (though it may be reliant on private transport). Development on these sites is therefore considered to have a neutral effect with regard to housing provision.</p> <p>Sites EA7 and EA8 are earmarked for a strategic rail freight facility with supporting employment, and therefore housing would not be appropriate in this location. Therefore, neutral effects are predicted.</p> <p>Site EA11 is located close to industrial uses, is relatively small and self-contained, and (having regard for example to its location within the urban area) would make a potential site for housing development. However, allocation of this site for employment use is unlikely to jeopardise the achievement of housing targets and delivery of desirable housing developments elsewhere.</p> <p>Site 2ES is not in a location that is particularly suitable for housing, given the potential amenity issues (from traffic), and the relatively distant location from services and facilities. Therefore, its development for housing would not likely have an effect on housing provision.</p> <p><b>Overall effects</b></p> <p>The sites discussed above are better suited for employment uses, and their development is unlikely to have any effect upon the ability to deliver a sufficient amount and choice of housing over the Plan period.</p> <p>With regard to the quantum of growth, alternative 1 would provide lower numbers of jobs, which would put less pressure on existing housing provision (should workers want to live and work in St Helens). Under alternative 2, higher economic growth would be likely to drive higher demand for housing within St Helens. If this leads to the provision of more housing at affordable prices, it could be positive. Conversely, it could create greater competition for local housing. For alternative 3, the effects are similar, but could be anticipated to be slightly greater than for alternative 2 (as there would be more jobs created locally).</p> <p>For alternative 1, neutral effects are predicted. For alternatives 2 and 3, it is likely that the effects would also be neutral provided that housing land is provided at an appropriate level to match economic aspirations. However, there is some uncertainty given that more people could be attracted to live in the borough to obtain employment.</p>		

## Summary of effects

Alternative 1 would not generate any significant effects, either positive or negative. However, it would achieve some minor benefits with regard to health and wellbeing and moderate effects with regard to support for the local economy. These positive effects could be achieved without notable effects upon environmental factors, and with good mitigation and enhancement, the residual effects across most sustainability topics would be neutral. For some factors, minor negative effects would be unavoidable and permanent, so negative effects would remain such as a loss of agricultural land and changes to the setting of heritage assets.

Alternatives 2 and 3 present a different picture, as they would help to deliver strategic employment needs and would have more pronounced effects overall.

Alternatives 2 and 3 are both predicted to have significant positive effects with regard to employment, tackling deprivation and health and wellbeing. For alternative 3, this could be a major positive effect. However, positive effects would come at the expense of greater impacts upon the natural environment. For the most part, the effects would still not be significant, but they would be more notable than for alternative 1. For example, there would be increased risk of flooding, and greater potential for impacts to landscape, cultural heritage and amenity.

There would also be likely to be effects upon traffic and congestion, which could potentially be significant in the short to medium term as a result of increased construction activities and trips to new employment sites, which would be difficult to fully mitigate. However, it should be possible to limit most sustainability effects on sensitive receptors by requiring effective mitigation and enhancement measures to be implemented. The effects for alternative 3 on traffic and congestion would be potentially major though.

More notable effects are predicted with regards to biodiversity and soil for both alternatives 2 and 3, and for only alternative 3, potential significant effects on landscape also.

Provided that a proactive and effective approach is taken to managing the development process, alternative 2 is considered to be the approach which would most effectively meet the aims of the Plan. However, this is reliant upon necessary infrastructure improvements being delivered in advance of development being brought into use and on green infrastructure being protected and enhanced where necessary to mitigate impact upon multiple factors such as wildlife, water quality, flooding, landscape and cultural heritage.

Though alternative 3 could generate further positive effects with regards to the economy, it would generate more pronounced negative effects on traffic and congestion, and landscape (compared to alternative 2).

The table below presents a summary of the effects for each alternative, to give a visual comparison of the nature and significance of effects for each alternative. This is taken from the detailed appraisal boxes for each SA Topic above.

SA Topic	Employment Alternative 1: Lower growth (c.130ha)		Employment Alternative 2: Preferred approach (c.265ha)		Employment Alternative 3: LPPO approach (c.306ha)	
Biodiversity and Geodiversity	Minor negative		Significant negative effect?		Significant negative effect?	
Land quality	Minor negative		Significant negative effect		Significant negative effect	
Traffic, congestion and air quality	Minor negative		Significant negative effect?		Major significant negative effect?	
Natural resources	Neutral		Minor negative		Minor negative	
Climate change and energy	Neutral	Minor positive?	Minor negative	Neutral?	Minor negative	Neutral?
Flooding	Neutral		Minor negative		Minor negative	
Landscape	Minor negative (uncertain)		Minor negative		Significant negative effect?	
Built and natural environment	Minor negative		Moderate negative		Moderate negative	
Health and Wellbeing	Minor positive		Significant positive	Minor negative	Significant positive	Minor negative
Economy and employment	Moderate positive		Significant positive		Major Significant positive	
Housing	Neutral		Neutral?		Neutral?	

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