

# **St Helens Borough Local Plan 2020-2035**

## **Submission draft**

### **Sustainability Appraisal: SA Report**

#### **Non-technical summary**

**January 2019**

## Table of Contents

---

<b>1</b>	<b>Introduction</b> .....	<b>1</b>
<b>2</b>	<b>Scoping</b> .....	<b>3</b>
<b>3</b>	<b>Consideration of alternatives</b> .....	<b>9</b>
<b>4</b>	<b>Appraisal of the plan</b> .....	<b>22</b>
<b>5</b>	<b>Mitigation and enhancement</b> .....	<b>29</b>
<b>6</b>	<b>Monitoring</b> .....	<b>32</b>
<b>7</b>	<b>Next steps</b> .....	<b>36</b>

Three thin black lines intersect to form a large, irregular triangle on the left side of the page. One line is nearly vertical, another is nearly horizontal, and the third is diagonal, crossing the other two.

# **Introduction**

**01**

---

# 1 INTRODUCTION

---

## 1.1 Background

1.1.1 AECOM has been commissioned by St Helens Council to undertake a sustainability appraisal (SA) in support of the new St Helens Borough Local Plan (the 'Plan').

1.1.2 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.

1.1.3 A Plan has been prepared by the Council, which sets out a preferred approach based upon the best available evidence. Following consultation on the Plan, the Council intends to submit it for Examination.

1.1.4 The SA Report sets out the findings of the SA process. This is a Non-Technical Summary (NTS) of the SA Report and presents a summary of the following:

- The scope of the SA
- The methods for appraisal ;
- Consideration of alternatives and summary appraisal findings;
- Appraisal of the Plan;
- Mitigation and enhancement measures;
- Monitoring; and
- Next steps.

## 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. Creating an accessible St Helens
4. Meeting housing needs
5. Ensuring a strong and sustainable economy
6. Safeguarding and enhancing quality of life
7. Meeting resource and infrastructure needs.



# Scoping

**02**

---

## 2 SCOPING

---

### 2.1 Background

- 2.1.1 The Scoping stage of the SA process involves the collection of information about the environment, economy and social factors. This stage also involves a review of important plans, policies and programmes which are relevant to the local plan sustainability appraisal.
- 2.1.2 The Scoping stage is used to establish the key issues that should be the focus of the appraisal, as well as the assessment methodologies.
- 2.1.3 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.
- 2.1.4 The scope of the SA has been updated throughout the plan making process in light of new evidence.

### 2.2 Key issues

- 2.2.1 The key issues identified through the scoping process are summarised below.

*Table 2.1: Key sustainability issues*

---

#### 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

---

#### 2. Cultural Heritage

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

---

#### 3. Landscape

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

---

#### 4. Geodiversity

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

---

#### 5. Soil

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

---

**Table 2.1: Key sustainability issues**

---

**6. Contaminated Soils**

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

---

**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.

---

**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.

---

**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

---

**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.

---

**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

---

**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.

---

**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.

---

**Table 2.1: Key sustainability issues**

---

**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.

---

**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.

---

**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.

---

**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.

---

**2.3 SA Framework**

2.3.1 The SA framework in **Table 2.2** forms the basis for the appraisal of the Plan including policies, sites, and reasonable alternatives.

2.3.2 The SA framework contains a series of objectives and sub-criteria to guide the appraisal of the Plan. The framework has been established drawing upon the key issues identified through scoping.



**Table 2.2: The SA Framework**

<b>SA Topic</b>	<b>SA Objective Reference</b>	<b>Objective</b>
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	Ensure access to and protection and enhancement of high quality public open space and natural greenspace.
9. Health and wellbeing	12	To improve health and reduce health inequalities.
	17	To reduce poverty and social exclusion.

<b>SA Topic</b>	<b>SA Objective Reference</b>	<b>Objective</b>
	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.
	13	To improve the education and skills levels of the population overall.
10. Economy and employment	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.



# **Consideration of Alternatives**

**03**

---

## 3 CONSIDERATION OF ALTERNATIVES

---

### 3.1 Introduction

- 3.1.1 During the development of the Plan, a number of key planning issues were explored, including an appraisal of different approaches through the sustainability appraisal.
- 3.1.2 Alternative approaches were considered for a range of plan policy areas. Those that are central to the Plan strategy are the spatial strategy (employment and housing growth and distribution) and site options for housing and employment.
- 3.1.3 This NTS sets out a summary of the appraisals undertaken for these key planning issues. A wider consideration of plan options and issues is presented in the full SA Report.

### 3.2 Alternatives for employment

#### Establishing alternatives for employment

- 3.2.1 Three reasonable alternatives were identified for employment land provision. These are set out below:

**Alternative 1** - The approach proposed in the Local Plan Proposed Submission Draft (LPSD) - (261ha);

**Alternative 2** - lower level of growth reflecting that the preferred approach makes a provision for needs from Warrington / the wider sub-region (108.7ha); and

**Alternative 3** - The approach proposed in the Preferred Options stage (306.09ha).

- 3.2.2 A number of other strategic approaches were explored by the Council, but these were ultimately discarded as being **unreasonable alternatives**. These include:

1. Increased employment land to the west of the Borough - considered unreasonable due to insufficient sites and poor public transport links.
2. Increased employment land on brownfield land in the urban area - considered unreasonable due to insufficient sites that meet identified need such as logistics, the economic aspirations of the LEP and the objectives of the Local Plan.
3. Provide significantly less employment land than identified objectively assessed needs – This would 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.
4. Provide significantly more employment land than the identified employment land requirement 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 un-sustainable 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.

### Summary of findings: Employment alternatives appraisal

3.2.3 The table below sets out a summary of the effects for each alternative against the SA Topics. Following this is a commentary on how each alternative compares to one another. A detailed appraisal of each alternative is set out in **Appendix IV** of the main SA Report.

**Table 3.1:** Summary of effects for each alternative against the SA Topics.

SA Topic	Employment Alternative 1: Lower growth (c130ha)		Employment Alternative 2: Preferred approach (c265ha)		Employment Alternative 3: LPPO approach (c306ha)	
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 <sup>?</sup>	Minor negative	Neutral <sup>?</sup>	Minor negative	Neutral <sup>?</sup>
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 <sup>?</sup>		Neutral <sup>?</sup>	

3.2.4 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.

- 3.2.5 Alternatives 2 and 3 present a different picture, as they would help to deliver strategic employment needs and would have more pronounced effects overall.
- 3.2.6 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.
- 3.2.7 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.
- 3.2.8 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.
- 3.2.9 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.
- 3.2.10 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).

#### Rationale for the preferred approach: Employment

- 3.2.11 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. 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.
- 3.2.12 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.
- 3.2.13 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.

3.2.14 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.

### 3.3 Alternatives for housing

#### Establishing alternatives for housing

3.3.1 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 reasonable alternatives, which have been identified through the following process:

- Identify a range of scenarios / options for the overall level of housing growth
- Identify a range of scenarios / options for the distribution of housing growth
- Consider the outcomes of steps 1 and 2 together to identify reasonable combined growth and distribution alternatives (The reasonable alternatives).

3.3.2 Table 3.2 below sets out the four growth scenarios and the distribution alternatives that are considered to be reasonable at each level of growth.

*Table 3.2: Reasonable alternatives for housing strategy*

<b>A: Provide only for OAHN needs (470 dpa*)</b>	<b>B: 20% buffer for flexibility (570 dpa*)</b>	<b>C: 712 dpa* for flexibility and additional contingency</b>	<b>D: Full OAHN (486 dpa)</b>
A1. Proportionate growth	B1. Proportionate growth	Proportionate growth	D1. Proportionate growth
A2. Balanced growth	B2. Balanced growth	C1. Balanced growth plus new settlement	D2. Balanced growth
A3. Focus on transport routes	B3. Focus on transport routes	C2. Focus on south and a new settlement	D3. Focus on transport routes
A4. Focus on new settlement	B4. Focus on new settlement	Focus on new settlement	D4. Focus on new settlement
N/A	N/A	N/A	D5. The preferred strategy

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

3.3.4 Under growth scenario B, these alternatives remain appropriate, though it may become more difficult to maintain proportionate growth. There would also be a need for further development in the Green Belt as the New Settlement would not deliver all needs on its own.

- 3.3.5 Under growth scenario C, the alternatives become more limited. It would be difficult to maintain a proportionate approach as some settlements do not have the identified land to accommodate the level of growth. Therefore, this alternative (C1) is considered to be unreasonable. Focusing on a new settlement would not be sufficient to meet needs under growth scenario C, and therefore this alternative is not reasonable. It ought to be possible to still deliver a 'balanced approach', though this would involve much more growth and may need to include 'a new settlement', or a greater focus on opportunities to the south east.
- 3.3.6 Under growth scenario D, there are four reasonable ways this level of growth could be distributed, ranging from proportionate growth (A1), to focus on a new settlement (D4). A 'fifth' reasonable alternative' is 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 tweaks made to the strategy in light of consultation responses and new evidence).

#### Unreasonable alternatives

- 3.3.7 Several distribution 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** - 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.

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** - 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.

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.

#### Summary of appraisal findings: Housing alternatives

- 3.3.8 The detailed appraisal of the reasonable alternative options for housing growth and distribution is set out in **Appendix III** of the SA Report.
- 3.3.9 Overall, the lower growth alternatives under scenario A would have the fewest significant effects.
- 3.3.10 Whilst this might be favourable from an environmental perspective, this scenario would not take full advantage of opportunities for economic growth and social development.



- 3.3.11 The alternatives under scenario D (486 dwellings per annum) 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.
- 3.3.12 In terms of distribution, Alternatives 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 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.
- 3.3.13 At a higher level of growth (570 dwellings per annum), the positive effects for each alternative (B1-B4) are broadly greater than for the comparative alternatives under scenario A and scenario D.
- 3.3.14 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.
- 3.3.15 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.

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

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

- 3.3.16 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.

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

- 3.3.17 A housing requirement of 570 dwellings per annum is no longer the preferred approach (as it was at LPPO stage).
- 3.3.18 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. 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.

*Growth Scenario C: 712 dwellings per year*

- 3.3.19 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.
- 3.3.20 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.

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

- 3.3.21 A central aim of national planning policy is to boost significantly the supply of housing. 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.
- 3.3.22 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.
- 3.3.23 Having regard to these factors, the LPSD proposes to pursue growth scenario D (486 dpa).

*Distribution of housing*

- 3.3.24 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.
- 3.3.25 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.
- 3.3.26 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.
- 3.3.27 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.
- 3.3.28 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.

- 3.3.29 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.
- 3.3.30 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.
- 3.3.31 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.
- 3.3.32 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.
- 3.3.33 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)*

- 3.3.34 In addition to the reasons already outlined, 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)*

- 3.3.35 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)*

- 3.3.36 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.

- 3.3.37 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.
- 3.3.38 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.
- 3.3.39 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.

### **3.4 Site options**

- 3.4.1 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.
- 3.4.2 There has been a need to consider Green Belt sites and whether they can make a contribution to housing and employment land needs without having unacceptable effects on the Green Belt.
- 3.4.3 To identify potentially suitable land, the Council has undertaken several 'call for sites' exercises, the most recent of which was in January- March 2016.
- 3.4.4 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.
- 3.4.5 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.
- 3.4.6 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.

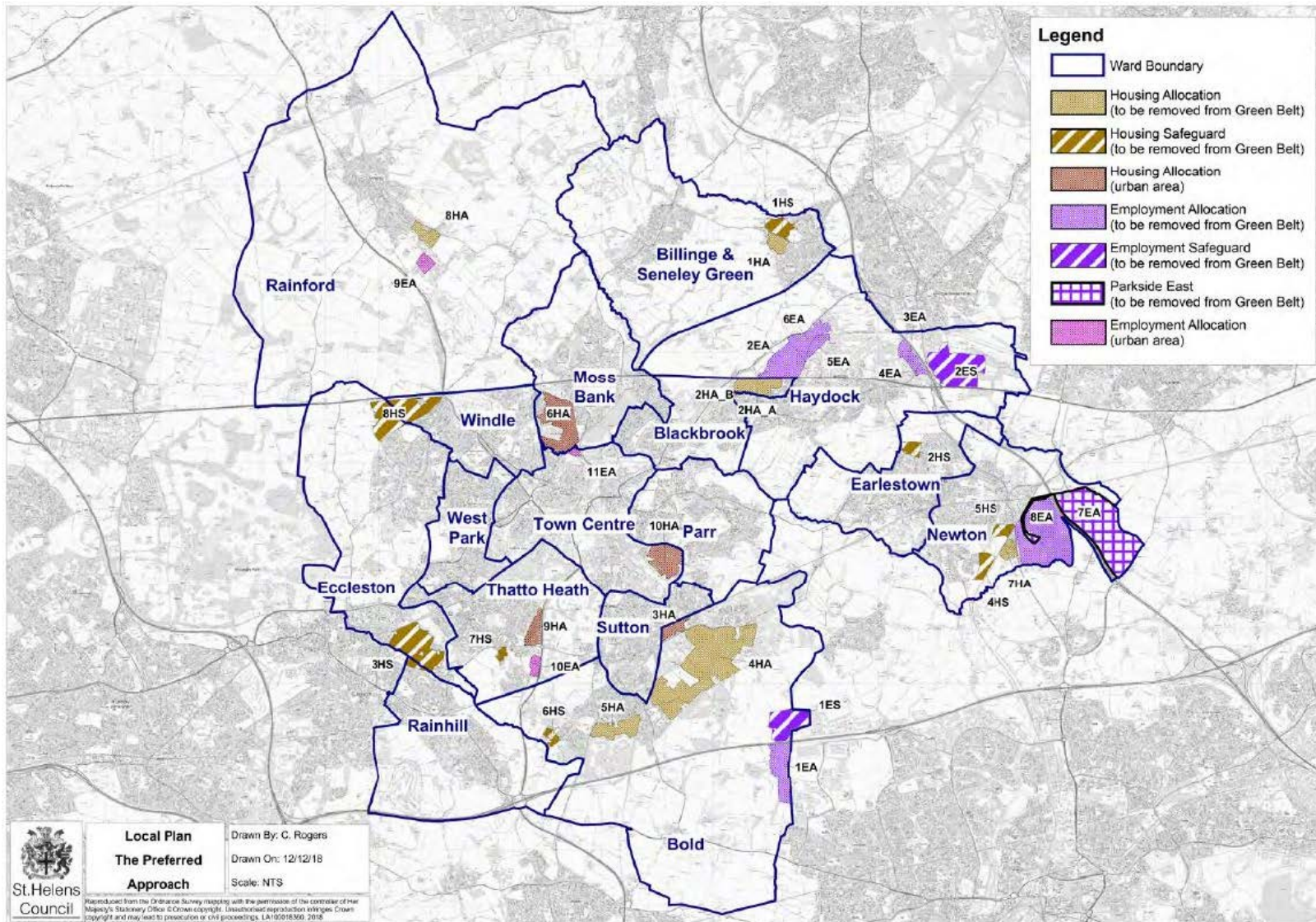
#### The site options

- 3.4.7 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.

- 3.4.8 Two sites for Gypsy and Traveller accommodation were also identified.
- 3.4.9 A total of sixteen sites were identified as reasonable alternatives for employment uses. One further site for potential leisure use was identified.
- 3.4.10 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.
- 3.4.11 Each site option has been appraised against a site appraisal framework as set out in **Appendix II of the SA Report**.
- 3.4.12 Detailed proformas for each site option, including a map of the site location and boundaries are contained within a separate document **Technical Appendix A**.

The preferred approach

3.5.1 Figure 3.1 below illustrates the Council's preferred approach to site selection. These sites are central to the achievement of the spatial strategy.



### Rationale for site selection

- 3.5.2 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) or the St. Helens Green Belt Review (2016 / 2018).
- 3.5.3 The Green Belt Review considered the suitability of broad areas and then where appropriate, assessed individual sites. The reasonable alternatives have then been subject to appraisal against the SA site assessment framework.
- 3.5.4 There are specific reasons for each site being allocated or not (as presented in the full SA Report). However, this non-technical summary only provides an outline of the main reasons that sites have been selected or not (as a collective).

### Employment Sites

- 3.5.5 The main reasons for the selection of employment sites are that they form part of a larger allocation of employment land in an attractive location for employment growth. Additionally, these sites are also well connected to transport infrastructure for individuals to commute to and from these locations.
- 3.5.6 A number of sites were not considered suitable for allocation for employment use mainly due to them making a strong contribution to the green belt and thus not suitable for release, access issues and being distant to important transport infrastructure or other facilities.

### Housing sites

- 3.5.7 In summary, the main reasons the housing sites have been proposed for allocation are as follows:
- The site currently has or has had planning consent for housing and remains suitable.
  - The sites have good links to existing facilities within walking distance such as schools, doctors surgeries, and shops.
  - The sites have good access to public transport infrastructure.
  - The release of greenbelt land at particular sites is considered to represent exceptional circumstances.
- 3.5.8 In summary, the reasons that sites have been rejected include the following:
- High ecological importance or of biodiversity value.
  - Poor access to local services such as doctors surgeries, schools, and shops.
  - Unacceptable impacts on landscape and built environment.
  - Deliverability and / or viability issues
  - The sites perform a strong role in terms of their contribution to Green Belt function.



# **Appraisal of the Plan**

**04**



---

## 4 APPRAISAL OF THE PLAN

---

### 4.1 Introduction

- 4.1.1 This section presents a summary of the sustainability appraisal findings associated with the Plan. This is an appraisal of the 'whole plan' rather than just the individual policies.
- 4.1.2 This is important in order to identify where the effects of policies could combine to generate significant effects, and where policies could mitigate any potential negative effects generated through other aspects of the Plan.
- 4.1.3 It is important to present this holistic view, in order to give a more accurate picture of the significant effects of the Plan. This also includes consideration of cumulative and synergistic effects.
- 4.1.4 The effects are summarised under each of the SA topics, stating the nature of the effects (i.e. positive or negative) and their significance.

### 4.2 Biodiversity and Geodiversity

- Development on allocated sites could have minor negative effects on local wildlife sites and features such as trees. Core policies in the Plan should help to ensure that effects are managed though.
- With regards to development in general, 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 is likely to be protected and enhanced
- Site specific policies should lead to improvements along Rainford Brook and Clipsey 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.

### 4.3 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 **minor negative effect** on soil resources.
- Though there is one site that involves Grade 1 agricultural land, the strategy generally avoids the most sensitive areas. Furthermore, the overall amount of land affected is relatively low.
- The Plan promotes the regeneration of land, particularly brownfield land in the urban area. This would generate **minor positive effects** with regards to land use.

### 4.4 Traffic, Congestion and Air Quality

- The Plan directs the majority of new housing and employment land to areas with strong road links, which would be expected to lead to continued use of cars. This could lead to minor negative effects upon levels of congestion with knock-on adverse effects upon air quality.
- 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 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 somewhat. 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 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.
- 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.

### 4.5 Natural Resources

- The Plan is driven by economic growth, which is likely to lead to increased generation of waste and the use of natural resources. However, this is unlikely to be significantly beyond the baseline position.
- 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 much of the Borough's watercourses are vulnerable to nitrates within surface water run-off, changes in land use (from agricultural) could help to reduce this problem in the longer term, which is a **positive minor effect**.

#### 4.6 Climate Change and Energy

- Overall, the Plan should help to tackle climate change and facilitate adaptation to climate change. In the main, this would be achieved through the encouragement of high levels of energy efficiency and adaptation measures in new development.
- 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 whether this would be achieved.

#### 4.7 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.
- 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 Management Plan.

#### 4.8 Landscape

- The effect on the character of landscapes differs across the borough. Where the sensitivity is low-moderate, effects are neutral (or positive) such as in Bold. Where there is greater sensitivity the effects are more likely to be negative, especially where there is a high amount of development land allocated in Haydock and Newton-le-Willows.
- It ought to be possible to secure mitigation and enhancement through other plan policies though, which should reduce the potential for significant effects.
- The Plan encourages the regeneration of brownfield land and buildings, and seeks to protect the vitality of town centres. This ought to improve townscape and landscape character, particularly in the urban area.

- 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.
- The plan 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.
- 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.
- It should be acknowledged that **minor 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.

#### 4.9 Built and Natural Environment

- Overall, the Plan is predicted to have mixed effects on heritage.
- The continued focus on regeneration as a key element of the strategy should ensure that **minor positive effects** are generated with regards to the built environment. In the longer term, these effects could potentially be significant from a borough-wide perspective as the cumulative effects of regeneration were realised.
- Any negative effects are generally predicted not to be significant from a borough-wide perspective.
- 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 effects. Furthermore, the plan sets out a range of measures that could help to protect and enhance the historic environment.
- Whilst some **minor negative effects** could remain, these would likely be limited in extent.

#### 4.10 Health and Wellbeing

- 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. 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 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.

#### 4.11 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.
- 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.

#### 4.12 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.
- 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 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.



# **Mitigation and Enhancement**

**05**

## 5 MITIGATION AND ENHANCEMENT

### 5.1 Introduction

- 5.1.1 The policies for the Plan were appraised in the SA before they were 'finalised'. This allowed for mitigation and enhancement measures to be identified and changes made to the policies as the Council considered appropriate at early stages of plan making.
- 5.1.2 Table 5.1 below sets out a summary of the recommendations that have been made throughout the SA process. The implications of the changes have also been summarised.

*Table 5.1: Mitigation and enhancement measures*

SA Recommendations	Implications for the SA findings
Make greater reference to the role that ecological networks and greenways can play in securing more resilient habitats to the effects of climate change.	Minor improvements with regards to biodiversity resilience ( <i>This change was actioned</i> ).
Site specific mitigation measures should be identified to manage potential impacts on the setting of heritage assets in Billinge.	Negative effects associated with development at the allocated site in Billinge would be avoided ( <i>The site was subsequently removed</i> )
Ensure that there are site specific measures to protect the setting of Dial Wood House, which is adjacent to a proposed site allocation.	Potential negative effects on the setting of a listed building would be minimised. The likelihood of significant effects occurring would therefore be lower.
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).	Negative effects would be offset somewhat with regards to soil resources. This change has not been actioned.
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.	Effects are more beneficial with regards to flood risk, but not to a significant degree.



SA Recommendations	Implications for the SA findings
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.	Greater likelihood that negative effects on biodiversity will be avoided and enhancements secured ( <i>change can be made as a modification if deemed helpful</i> )
Opportunities for district heating ought to be explored for any town centre developments that create a significant source or demand for heat.	The significant positive effects predicted for LPC13 would be strengthened ( <i>changes made accordingly</i> )
A recommendation is to encourage design that is adaptable over time and allows for retrofitting of low carbon energy technologies.	
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 likelihood of significant negative effects upon landscape character ought to be lower ( <i>change can be made as a modification if deemed helpful</i> )
Site 5EA 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.	The extent and likelihood of negative effects occurring as a result of development here is less likely ( <i>change can be made as a modification if deemed helpful</i> )
At Site 6HA, it may be beneficial to incorporate public realm features in development that reflect the industrial legacy of the site.	The effects upon the character of the built environment are more likely to be positive ( <i>change can be made as a modification if deemed helpful</i> )

- 5.1.3 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. Where changes have not be made, there is an acknowledgement that further changes could be made through the modifications process if deemed necessary (though these would usually only be made in the interest of securing a 'sound' Plan).



# **Monitoring**

**6**

## 6 MONITORING

### 6.1 Monitoring significant effects

- 6.1.1 It is beneficial to track the performance of the Local Plan to ensure that anticipated positive effects are generated and unexpected adverse effects do not arise. As part of the SA process, there is a particular requirement to monitor the baseline for sustainability factors when significant effects have been identified.
- 6.1.2 Table 6.1 below sets out monitoring measures under each SA topic which are intended to monitor any significant effects as well as tracking the baseline position more generally.
- 6.1.3 At this stage the monitoring measures have not been finalised, as there is a need to take account of consultation feedback and explore the feasibility of collecting information for the proposed measures. The monitoring measures will be finalized once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.

*Table 6.1: Summary of significant effects and potential monitoring measures*

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><b>Minor negative effects</b> are predicted due to a loss of agricultural land.</p> <p><b>Minor positive effects</b> 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>Positive effects are predicted with regard to a reduction in road freight.</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> <p>Cycle and footpaths created</p>

SA Topics	Proposed monitoring measures
<p><b>Natural resources</b></p> <p>Overall, <b>neutral effects</b> 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). 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. 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><b>Minor negative effects</b> 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><b>Minor negative effects</b> are predicted as development could have effects upon the setting of some heritage assets.</p> <p>Potential <b>minor positive effects</b> 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>



# **Next Steps**

**7**

---

## 7 NEXT STEPS

---

### 7.1 Plan finalisation and adoption

- 7.1.1 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.
- 7.1.2 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.
- 7.1.3 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'.
- 7.1.4 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).
- 7.1.5 Upon adoption of the Plan, an SA Statement must be prepared that sets out:
- *How SA findings and the views of consultees are reflected in the adopted Plan,*
  - *Measures decided concerning **monitoring**.*

## **About AECOM**

AECOM (NYSE: ACM) is built to deliver a better world. We design, build, finance and operate infrastructure assets for governments, businesses and organizations in more than 150 countries.

As a fully integrated firm, we connect knowledge and experience across our global network of experts to help clients solve their most complex challenges.

From high-performance buildings and infrastructure, to resilient communities and environments, to stable and secure nations, our work is transformative, differentiated and vital. A Fortune 500 firm, AECOM companies had revenue of approximately US\$19 billion during the 12 months ended June 30, 2015.

See how we deliver what others can only imagine at [aecom.com](http://aecom.com) and [@AECOM](https://twitter.com/AECOM).

Address: Bridgewater Street,  
Whitworth Street,  
Manchester, M1 6LT

Design, Planning and  
Economics  
(0161) 907 3500