



St. Helens Local Plan Scoping Consultation Document

January 2016



1. Introduction

What this consultation is about

1.1 The Council declared its intention to prepare a new Local Plan for St. Helens in its Local Development Scheme (LDS) of November 2015¹. To ensure the Plan is prepared on a sound footing, the Council is undertaking a consultation on the proposed scope of the Plan. This is the first consultation stage of the Local Plan preparation process. The Council wants as many people as possible to be involved in the preparation of the Plan. Your comments are encouraged and this document sets out a series of questions to guide responses.

1.2 This consultation document is seeking views on several aspects of the preparation of the St.Helens Local Plan. The new Local Plan will set out where different types of development will or will not be acceptable in principle and general policies for assessing most planning applications. For example, it will identify sites for new homes (“housing allocations”) and sites of local wildlife interest to be preserved. Together with the Joint Merseyside and Halton Waste Local Plan and the Bold Forest Park Area Action Plan, it will form the St.Helens Local Plan, which will inform decisions on planning applications. It will replace the St.Helens Local Plan Core Strategy, adopted in October 2012 and the Saved Policies of the 1998 St.Helens Unitary Development Plan.

1.3 The new Local Plan will apply to the whole of St.Helens and key subject matter will include:

- the vision and objectives for development in the Borough up to 2038;
- the overall spatial strategy including the amount, form and distribution of development;
- strategic policies guiding the amount, form and location of new development;
- site allocations for new development including (amongst other topics), housing, employment, retail, and leisure, identifying key areas for protection, setting out changes to the Green Belt and designating areas where particular policies apply; and
- detailed policies to be applied when considering applications for development.

1.4 In October 2012, the Council adopted a Local Plan Core Strategy for St. Helens. This followed several years of preparation, consultation and independent Examination. It was envisaged that the Core Strategy would be supported by three further Local Plan documents:

- Allocations Local Plan – which would allocate land for development;
- Sustainable Development Local Plan – which would set out detailed planning policies; and
- Bold Forest Area Action Plan – which would set out extra policies to apply in the Bold Forest Park area.

¹ The Local Development Scheme explains the content of the Plan in more detail and is available to view here: <http://www.sthelens.gov.uk/what-we-do/planning-and-building-control/planning-policy/local-development-scheme/>

1.5 The Core Strategy set out the strategy for development in the Borough up to 2027, and while it is still a sound and robust Local Plan, some issues have moved on from when the Core Strategy started preparation in 2005. There has been a large increase in the demand for employment land as the economy has started to recover, and the success of the Borough in recycling previously developed (“brownfield”) sites means there is less land available for new homes and businesses. The Core Strategy acknowledged that Green Belt land was likely to be needed to meet housing land need, and the Council now thinks it is needed to meet employment land needs as well.

1.6 The Council has decided to consolidate the Core Strategy and the proposed Allocations and Sustainable Development Management Local Plans into one Local Plan document and the Bold Forest Park Area Action Plan will continue to be prepared separately. It will result in the full replacement of the current UDP and UDP Proposals Map.

Other documents being consulted on

1.7 At the same time, the Council is also consulting on the following documents:

- Sustainability Appraisal Scoping Report – Sustainability Appraisal (SA) is the appraisal of the economic, environmental and social effects of a Local Plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development. SA is required by national and European Laws. The Scoping Report sets out the scope of what will be included within the SA of the St. Helens Local Plan;
- Call For Sites – for people to suggest sites for development or for protection from development, in urban areas or in the Green Belt, for housing, employment uses, open space/recreation, nature conservation, etc.; and
- Bold Forest Park Area Action Plan Publication Version – the Area Action Plan will set out extra policies to be applied in the Forest Park area. The Area Action Plan aims to encourage recreation and leisure and economic growth in the area around Bold and Sutton.

1.8 All the above documents can be found by visiting the following webpage:
www.sthelens.gov.uk/planningpolicy

Who this consultation is aimed at

1.9 It is aimed primarily at organisations and professionals who have experience or specialist knowledge of the issues of development in St.Helens, but comments from other groups and individual members of the public are welcome. We have contacted organisations we believe are likely to have the most to contribute to this consultation.

How you can make comments and when the consultation ends

1.10 Please use the Consultation Response form to send comments to the Development Plans team by post, by email or by hand by 12:00 noon Wednesday 2nd March 2016. It is available here: <http://www.sthelens.gov.uk/planning-policy>

2. Process and Timeframes

The process

2.1 Following this consultation, the Council will continue to engage with key stakeholders where necessary in the production of a “Preferred Options” version of the Local Plan, and make it available for comment later in 2016. The Preferred Options document will set out the Council’s preferred options for development targets, site allocations and planning policies, plus other reasonable alternative options that it has considered, and the reasons for selecting the preferred option. Sustainability Appraisal will be used to assist the Council in choosing its preferred option. This identifies positive or negative, temporary or long term, strong or weak impacts in terms of the environment, social issues and the economy, and suggests ways to improve outcomes. The Council will then consider the consultation responses to the Preferred Options and then move towards submitting the final version of the Local Plan for examination by an Independent Planning Inspector. Before it is submitted, it will be published so that people can make comments on it for the Inspector to consider. This is expected to occur in summer 2017.

Q1. *Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations?*

Timeframe for the Local Plan

2.2 National planning policy expects our Local Plan to plan for at least a 15 year time horizon. If the Local Plan is adopted in 2018 as programmed, this would mean it would need to have an end date of 2033. Plans that try to look ahead further than 15 years are difficult to prepare with any level of confidence because it is hard to predict and make accurate judgements about what changes will take place and what development will be needed so far in the future.

2.3 It is proposed that the end date of the Local Plan is 2033 and that the Local Plan safeguards land for 5 years beyond the Plan period to 2038. Although the Local Plan will cover the period up to 2033, it will be subject to review before that date.

Q2. *Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date*

3. Context, Key Issues and Evidence Base

Context

Place

3.1 Located midway between Liverpool and Manchester, St. Helens enjoys a strategic position at the heart of the North West. An extensive road, bus and rail network provides excellent accessibility for people travelling to and from St.Helens.

3.2 The Borough's history is inextricably linked with the industrial revolution, coal mining and a world famous glass industry, which employed many of the local residents. From the late 1970s onwards these industries began to decline in importance, with a corresponding reduction in jobs and business opportunities. The legacy of heavy industry and the fundamental shift in employment patterns has been at the heart of many of the challenges facing the Borough since this time.

3.3 However, through the creation of strong public and private sector partnerships St Helens has undergone considerable positive change, with the Council at the forefront of successful efforts to regenerate the economy, infrastructure and environment. In recent years we have seen the transformation of the Borough with the completion of the new Saints stadium 'Langtree Park', renewed transport facilities such as Central Station, the development of new business premises, the new Town Centre College Campus, improvements to our parks and open spaces, and significant levels of new housing.

Environment

3.4 St. Helens Borough covers an area of 136 square kilometres, of which 65% is made up of Green Belt land. 7% of the Borough's total land area is made up of open spaces and the Borough has 16 parks and gardens.

Social

3.5 The resident population of St.Helens is 177,188 (2014 mid-year estimate, ONS) with the population expected to grow steadily over the next 10-20 years albeit at a slower rate than the North West and England. Through the 1980's, 1990's and the early years of the 2000's, St Helens had a consistently declining population, reducing from 190,800 persons in 1981 to 180,100 in 1991 to 176,800 in 2001. However, since 2007, the local population has increased at a modest average population growth rate of 0.2 percent per annum.

3.6 St. Helens has an aging population structure similar to England, but with a higher proportion of people aged 65 years and over and proportionally fewer people of working age (16-64 years). Over the next 25 years, the number of residents in their 80s is expected to almost double, from 6,700 in 2012 to 12,800 in 2037. The number of residents in their 90s is expected to almost triple from 3,600 to 9,700.

3.7 St. Helens is ethnically less diverse than many areas, with 96.6% of the population (Census, 2011) identifying themselves as white, compared to 79.8% nationally and 87.1% in the North West.

3.8 Life expectancy at birth for males is 78.1 years and for females 81.6 years. Whilst life expectancy rates in St.Helens are improving they are still considerably below the national averages, 83.1 years (females) and 79.4 years (males) (Public Health Outcomes Framework, 2011-13).

3.9 The two main causes of death in St. Helens are cancers (28%) and cardiovascular diseases (CVD) (25%) including heart diseases and strokes. The three-year CVD early mortality rate has almost halved from 169.5 per 100,000 people in 2001-03 to just 90 per 100,000 in 2010-12. The rate of early deaths due to cancer in St.Helens has fallen in recent years and is now statistically similar to England. However, early mortality rates due to respiratory disease are significantly worse than England, and alcohol misuse remains a problem locally.

3.10 The prevalence of children who are overweight (including obese) in Reception Year and Year 6 is 25.9% and 36.7% respectively, which is significantly higher than the national averages (22.5% Reception Year, 33.5% Year 6).

3.11 Overall St.Helens is now ranked as the 36th most deprived local authority in England out of 326. Its relative position has deteriorated since the 2010 Index of Deprivation where St.Helens was ranked as the 51st most deprived area. Relative deprivation within the Borough continues to grow, with some areas getting more deprived relative to others. There are now a total of 28 LSOAs within the Borough that fall within the 10% most deprived LSOAs nationally, compared to 24 in 2010. A total of 47 LSOAs within the Borough fall within the 20% most deprived nationally, compared to 43 in 2010.

3.12 Crime rates in St.Helens have reduced in recent years and are performing relatively well compared to neighbouring authorities and those in its most similar family group.

Economy

3.13 At 75% the economic activity rate in the Borough exceeds the regional average (74.7%), however it is lower than the national average (77.6%). The employment rate (67.2%) in the Borough is below both regional (69.8%) and national averages (72.9%).

3.14 The unemployment rate (8.9%) in the Borough is significantly higher than regional (6.0%) and national averages (5.6%). In 2014 7.3% of the economically active population in St Helens were self-employed, compared with 8.7% regionally and 10.3% nationally.

St. Helens' Labour Market Indicators

Labour Market Indicators	St.Helens (%)	North West (%)	England (%)
Economic activity	75.0	74.7	77.6
Employment	67.2	69.8	72.9
Self-employed	7.3	8.7	10.3
Unemployment	8.9	6.0	5.6
Economically inactive	25.0	25.3	22.4

Source: NOMIS (ONS) – rate as % of population aged 16-64 years. Period: Apr14 – Mar15

3.15 The median gross weekly full-time pay for working residents of St Helens was £474 in 2014, compared with £485 for the North West region and £521 for Great Britain. The median gross weekly full-time pay for workers working in St Helens was £438 and also lower than the comparable medians for North West (£483) and Great Britain (£520).

3.16 The National Vocational Qualification (NVQ) level attained by the working age population of St. Helens is slightly below regional and national averages. At 26.6%, the proportion of working age residents qualified to NVQ Level 4 and above (equivalent to degree level) is considerably below the regional averages (30.9%). The proportion of residents without any qualification is also lower than the regional and national levels – 11.6% compared to 10.6% and 8.6%.

3.17 At 26.7% the number of residents in St. Helens without access to private transport (car or van) is lower than the regional average of 28% but higher than the national average of 25.8%.

Housing

3.18 Affordability of market housing for sale is an issue in the Borough with lower quartile house prices over four times the lower quartile household income in Borough. According to the 2011 Census, 30% of the Borough's housing stock is terraced, 46% semi-detached, 14% detached and 9% is flats. At 46% St. Helens has a significantly higher number of semi-detached properties than the regional (36%) and national averages (31%), but at 14% has a lower number of detached properties than the regional (18%) and national averages (23%). The proportion of owner occupation in St. Helens (67.8%) is higher than regional averages (65%).

What issues the Local Plan will be addressing

3.19 An SA Scoping Report has been prepared to consider what issues the Local Plan should address and what the SA should address. The SA Scoping Report is available to comment on as part of this consultation (see section 8 for more information). Following a comprehensive context review of evidence and policy, the SA Scoping Report has identified several key crosscutting sustainability issues for St.Helens in, which can be summarised as:

- A small economy with low Gross Value Added and employment levels, educational underachievement, low work productivity, low wages, unemployment, economic inactivity and deprivation
- Poor health and low life expectancy
- A need to increase access to recreation opportunities, access to open space and health facility provision
- An aging population profile
- Contaminated land legacy from industry
- The need to provide a range of employment opportunities
- Maintain and improve river and ground water quality, agricultural land quality, ecological assets and historic assets
- Address Climate Change through adaptation and tackle higher than average CO2 emissions, including encouraging renewable energy
- Provide adequate market and affordable housing together with ancillary services such as retail and leisure, whilst reducing impact on water resources
- Encourage sustainable and inclusive patterns of transport
- Reduce impact of development on Air Quality

Q3. *Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this?*

Proposed Key Issues for the Local Plan

3.20 Building on the issues identified in the context section above and the cross-cutting issues identified in the SA Scoping Report, it is proposed that the Key Issues for the Local Plan will be:

- Strengthen and Diversify the Local Economy
- Deliver Sustainable Communities
- Reduce Impact of Climate Change
- Maximise Accessibility and Social Inclusion
- Sustaining Population Recovery
- Tackle Social Deprivation
- Reduce Poor Health
- Meet Local Housing Needs
- Reduce Crime
- Management of the Rural Economy
- Protect and where possible Enhance the Town, district and local Centres

- Deliver Sustainable Development
- Encourage sustainable transport through active travel, the substitution of private car use with public transport wherever practical and more efficient freight transport
- Deliver key sub-regional and local strategies, including the St.Helens Plan
- Reduce Worklessness and Develop Entrepreneurial Culture
- Reduce Vacant and Derelict Land
- Protect and Enhance the Environment
- Minimise Pollution

Q4. *Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.*

Evidence base for the Local Plan

3.21 Key existing evidence base documents for the Local Plan include:

- Mid-Mersey Strategic Housing Market Assessment (2015)
- St. Helens Employment Land Needs Study (2015)
- Allocations Local Plan Economic Evidence Base Paper (2015)
- Merseyside Gypsy and Traveller Accommodation Assessment (2014)
- Strategic Flood Risk Assessment Level 1 and Level 2 Part 1 (2014)
- St Helens & Earlestown Retail & Town Centre Uses Study (2011)
- Landscape Character Assessment (2006)
- Open Space Study (2006), Sports Facilities Strategy (2009), Playing Pitch Strategy (2002)
- Phase 1 Habitat Survey (2001)

All the documents are available on the LDF evidence base web page:

<http://www.sthelens.gov.uk/what-we-do/planning-and-building-control/planning-policy/information-and-monitoring/>

3.22 The Preferred Options Local Plan will have the following extra evidence base:

- Green Belt review – to consider which parcels of land will cause least harm to the Green Belt if developed, along with an assessment of development potential
- Strategic Flood Risk Assessment Level 2 Part 2 – to update our information on flood risk to take account of a wide range of flooding, take account of climate change and consider how development sites are affected
- Liverpool City Region Transport Model Report for St. Helens– to understand the impact of planned and potential development sites on main roads in the Borough
- Open Space, Sport and Recreation Assessment– which will include a Playing Pitch Assessment and a Playing Pitch Strategy, an Open Space Assessment, a Built and Indoor Sport Facilities Assessment and a Golf Course Assessment.
- Local Centre Boundary Reviews – to review the boundaries of the smaller centres

- Minerals Safeguarding Areas - mapping and evidence gathering about the extent of surface mineral resources
- Infrastructure Delivery Plan – to collate existing knowledge and evidence on delivery of infrastructure
- Whole Plan Viability Assessment – consider the economic viability of housing, employment and retail in different parts of the Borough and the viability impact of proposed planning policies.
- Renewable Energy Study – to assess if there are any suitable areas for renewable energy development in St. Helens.

Q5. *Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan?*

4. Spatial Vision, Strategic Aims and Objectives

Spatial Vision

4.1 The new Local Plan will contain a vision which 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.

4.2 The Core Strategy Spatial Vision is:

“In 2027, St.Helens will be a regenerated Borough. Taking advantage of its location between Liverpool and Manchester, it will have a vibrant economy, a healthy, safe and attractive environment and inclusive, sustainable communities.

The Town Centre and its surrounding area will be the vibrant focus of the Borough, with expanded shopping and leisure facilities, a new stadium for St.Helens Rugby League Football Club and a redeveloped St.Helens College.

The majority of new housing developed, including affordable housing, will be developed in the core settlement of St.Helens, with particular priority on creating sustainable communities in the deprived areas, including parts of Parr, Thatto Heath, Four Acre and St.Helens Town Centre.

Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development, together with a Strategic Rail Freight Interchange at Parkside¹

“[Footnote 1: “The implementation of the SRFI is dependent on a suitable scheme gaining consent”]

Q6. *Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required.*

Strategic Aims and Objectives

4.3 A number of strategic aims and objectives were established in the Core Strategy to demonstrate how the Spatial Vision can be achieved. Objectives are used as a basis to measure the success of a Local Plan in achieving the Vision. The following strategic aims and objectives were established:

- **Strategic Aim 1: Regenerating St.Helens**
 - Strategic Objective 1.1: To secure the regeneration of the Borough by: steady, sustainable population growth; reducing deprivation through

directing development and investment where it is most needed; and by giving priority to development of derelict and vacant sites.

- **Strategic Aim 2: Ensuring Quality Development in St.Helens**

- Strategic Objective 2.1: To ensure that new development is of a high quality.
- Strategic Objective 2.2: To mitigate the effects of, and minimise the impact of, development on climate change.
- Strategic Objective 2.3: To contribute to the development of stronger and safer communities within St.Helens.

- **Strategic Aim 3: Creating an Accessible St.Helens**

- Strategic Objective 3.1: To improve access for all by facilitating sustainable transport choices, development in accessible locations, an integrated public transport network, and targeted improvements to the transport.

- **Strategic Aim 4 Providing Quality Housing in St.Helens**

- Strategic Objective 4.1: To ensure a sufficient number of new and improved dwellings to meet local needs and delivering sustainable communities.

- **Strategic Aim 5: Ensuring a Strong and Sustainable St.Helens Economy**

- Strategic Objective 5.1: To provide and protect sufficient land and premises to meet local employment needs and support the implementation of the City Growth Strategy.
- Strategic Objective 5.2: To support the development of the tourism, leisure and rural economy.
- Strategic Objective 5.3: To enhance the vitality and viability of St.Helens and Earlestown Town Centres, District and Local Centres and safeguard and enhance St.Helens Town Centre's role as a sub-regional shopping centre, by securing major town centre developments.

- **Strategic Aim 6: Safeguarding and Enhancing Quality of Life in St.Helens**

- Strategic Objective 6.1: To ensure the provision of community facilities, including health, education, leisure and culture and encourage their integration to increase convenience and reduce the need to travel.
- Strategic Objective 6.2: To safeguard the quality of the environment, protecting and enhancing local character and distinctiveness, together with biodiversity and geodiversity.
- Strategic Objective 6.3: To protect and enhance the multi-functional network of green spaces throughout the Borough and, in partnership, promote positive use and management whilst improving their biodiversity and increasing tree and woodland planting.

- **Strategic Aim 7: Meeting St.Helens' Resource and Infrastructure Needs**

- Strategic Objective 7.1: To ensure that St.Helens' infrastructure needs for the future are fully met and that valuable resources within the Borough are safeguarded or used in a sustainable manner.

Q7. *Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.*

5. Call for Sites

5.1 If you are aware of any site either brownfield or greenfield, in the urban area or in the Countryside (Green Belt) that may have development potential or has special value that means you think it should be protected from certain types of development, or you are a landowner, developer or a business and have a site you would like to bring to our attention, please complete a Call for Sites Form which is available here: <http://www.sthelens.gov.uk/what-we-do/planning-and-building-control/planning-policy>. Please provide enough information to enable us to assess the site. A clear location map showing the precise boundaries of the site must accompany each form.

5.2 The Council undertook a Call for Sites exercise in summer 2013. This gave any landowner wishing to see their sites considered for development the opportunity to submit them to us for consideration. A large number of sites were submitted. The suitability of all of the sites submitted will be considered as part of the preparation process for the new Local Plan.

5.3 If you have previously submitted a site for consideration during previous Call for Sites consultations or your site is in the Strategic Housing Land Availability Assessment (SHLAA) 2013² then there is no need to resubmit your site unless you have or additional information to provide.

² The SHLAA (2013) is available to view here: <http://www.sthelens.gov.uk/what-we-do/planning-and-building-control/planning-policy/strategic-housing-land-availability-assessment/>

6. Scope of Policies

Policies to be included in the Local Plan

6.1 After considering the requirements of national planning policy and guidance, draft Key Issues for the Local Plan and through experience of how the 1998 Unitary Development Plan and 2012 Core Strategy policies have worked in practice, Council planners have developed a draft list of policies and policy areas for the new Local Plan. The proposed list of policies and policy areas are set out in Appendix A.

6.2 The strategic and core policies will steer and shape future development in the Borough and will seek to both promote new development for example, new homes, shops, jobs, leisure and recreation and protect land from inappropriate development. They could, for example, specify sites where houses or warehouses or large shopping development should go, or where land should be reserved for new cycle paths or railway stations.

6.3 The development management policies will provide more specific policy to help guide decisions on planning applications. Potential policies include one to control the creation of new hot food takeaways near schools and one to control advertising in the Borough.

Q8. *Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say?*

Q9. *Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this?*

If there are any sites you are aware of that you think should change the use of, please use the Call For Sites form to inform us.

7. Development Needs

Housing Needs

7.1 Housing is one of the main issues that any Local Plan has to set policies for. The amount of new homes to be built in the Borough will affect a wide range of issues including jobs, schools, shops and recreation. A number of factors are driving the need for more housing in St. Helens including:

- Natural population increase (i.e. births exceeding deaths);
- The trend for smaller households, including more people living alone;
- Existing shortfalls in housing, particularly affordable housing; and
- The ability to service the economy with sufficient people of working age.

7.2 The new Local Plan will set a housing target that says how many homes need to be built within the Borough over the Plan period (expected to be up to 2033 plus safeguarded land). National planning policy expects our Local Plan to fully meet “objectively assessed needs³” for market and affordable housing in the Borough, taking account of household and population projections, need for all types of housing and housing demand.

7.3 We have recently carried out an assessment of our objectively assessed needs for housing, in a Study called a Strategic Housing Market Assessment (SHMA), with neighbouring authorities Halton and Warrington. The SHMA identifies the number of new houses needed to be built in the Borough by looking at factors such as the make-up of the population, the housing market, the economy, and the need for affordable housing. The SHMA has identified an objectively assessed need for St. Helens as **451 homes per year** up to 2037.

7.4 The objectively assessed need is informed by an assessment of the number of jobs⁴ in the Borough and how these are expected to grow in the future. In 2014 there were estimated to be 70,313 jobs in the Borough. Between 2011 and 2037 jobs are forecast to grow 7%, or by approximately 5124 jobs in the Borough. It is important that sufficient economically active people are able to fill these jobs or the economic growth of the Borough will be constrained.

7.5 The SHMA suggests that a higher number of new homes above the objective assessed needs could be required to support economic growth if the Council decides to plan for higher levels of job growth than what the baseline economic growth forecast for the Borough is suggesting.

7.6 Over the last ten years (2005-2015) there were 4,180 (net) new homes built in the Borough at an average of 418 (net) new homes per annum, with the highest number built in a single year being 632 in 2014/15.

³ “Objectively assessed” means resulting from an assessment that looks only at need for development. It does not take account of constraints on accommodating that development, e.g. flooding, physical capacity, policy designations etc., which are matters that must be considered later, when setting the levels of development sought in policy.

⁴ The SHMA uses a Cambridge Econometrics Baseline Local Authority Forecast (June 2015) to estimate the likely number of jobs that will be created in the borough over the new Local Plan period

Q10. *What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens?*

7.7 The identified objectively assessed housing need of 451 new homes per year from the SHMA is not a target that will be automatically incorporated into the new Local Plan. In accordance with national policy and guidance, the objectively assessed needs figure of 451 will be tested against land supply, infrastructure capacity, environmental constraints, the Council's economic growth aspirations, and sustainability appraisals in order to arrive at a housing target within the Local Plan, which may be higher or lower than the objectively assessed housing need identified in the SHMA.

Q11. *Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target?*

Employment Land Needs

7.8 One of the most important decisions that the Council will make through the Local Plan relates to the overall scale of economic growth that should be planned for in the Borough for the Plan (expected to be up to 2033 plus safeguarded land). National planning policy requires us to plan for and accommodate all foreseeable types of economic growth. The Local Plan can support the Borough's economy by:

- setting out a clear economic vision and strategy for the Borough which positively and pro-actively encourages sustainable economic growth;
- identifying sites for new development to meet anticipated needs over the Plan period;
- supporting existing business sectors and identifying and planning for new or emerging sectors likely to locate in the Borough.

7.9 For the Local Plan to adequately plan for economic growth it is necessary to understand the amount of new employment land (for offices, factories and warehouses) that is needed. As with housing needs, national planning policy expects our Local Plan to fully meet objectively assessed needs for economic development in the Borough, taking account of market intelligence, market signals and the locational requirements of particular types of business.

7.10 We have recently carried out an assessment of our objectively assessed needs for employment land in an Employment Land Needs Study 2015 (ELNS). The ELNS found that St Helens' key location on the M6 and M62 motorways means that it is ideally positioned in the North West to provide a critical role in the large-scale logistics sector. The ELNS has identified an employment land objectively assessed needs

baseline of 174ha (gross) for St. Helens from 2012⁵ up to 2037; this translates into a requirement of 6.96 ha per annum when broken down on a pro-rata basis. The ELNS has also sought to consider the potential of SuperPort⁶ and a Strategic Rail Freight Interchange at the former Parkside Colliery increasing demand for employment land in St Helens, particularly in the large-scale logistics sector. Accounting for the potential uplift in employment land demand due to these major projects, the ELNS concludes that St Helens has an overall employment land objectively assessed need of 214ha (gross) from 2012 up to 2037 when SuperPort and multiplier effects of Parkside are taken into account; this translates into a requirement of 8.56ha per annum when broken down on a pro-rata basis. The identified objectively assessed need would translate into an employment land requirement of 178.5ha from 2012 up to 2033 (expected to be the end date of the Plan) as the Council will seek to make up for any unmet employment land needs from 2012 in the new Local Plan.

Q.12 *What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens?*

7.11 The identified objectively assessed housing need of 178.5 ha up to 2033 is not a target that will be automatically incorporated into the new Local Plan. In accordance with national policy and guidance the objectively assessed needs figure of 178.5ha will be tested against land supply, infrastructure capacity, environmental constraints, the Council's economic growth aspirations, and sustainability appraisals in order to arrive at an employment land requirement within the Local Plan, which may be higher or lower than the objectively assessed employment land need identified in the ELNS.

Q.13 *Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement?*

Green Belt Release

7.12 The Green Belt in the Borough of St.Helens covers most of the countryside around the main towns and villages, covering individual buildings and even small settlements such as Kings Moss and Bold Heath. 65% of the total land area in the Borough is made up of Green Belt land. The Green Belt has several purposes, including helping urban land be regenerated by encouraging the recycling of land and to stop the unrestricted sprawl of large built up areas. Any decision to remove land from the Green Belt and allocate it for development has to be strongly justified. The Green Belt in St.Helens has not been substantially altered since the Merseyside Green Belt Local Plan first established it in 1983. Several authorities surrounding St.Helens,

⁵ The ELNS has a forecasting base date of 2012, as this was considered the most appropriate date to start the forecasting from as this is when the Core Strategy was adopted. The level of employment land take-up from 2012 has been influenced by the Core Strategy policies and thus it was considered that to include post 2012 take-up rates in an historic baseline take-up scenario could potentially distort the actual historic baseline position.

⁶ SuperPort is the enhancement of sea and air ports and freight facilities along the River Mersey and Manchester Ship Canal. A key part is the new Liverpool 2 deep water container port at Seaforth.

including Halton, Knowsley, West Lancashire and Wigan, have recently or are in the process of amending their Green Belt to accommodate development.

7.13 The Core Strategy contained a brownfield land focused spatial strategy, with 80% of new housing expected to be delivered on brownfield land. The Core Strategy only allows for land to be released from the Green Belt in years 11-15 of the Plan period (post 2022) for housing use only. The Core Strategy did not envisage a need to release Green Belt land for employment uses, and it only allows for a strategic review of the Green Belt following sub-regional Green Belt work, this position was reflective of Regional Spatial Strategy policy at the time. A sub-regional Green Belt Review has not taken place and instead individual authorities such as Halton, Knowsley and Sefton have undertaken their own local Green Belt review.

7.14 All sites in the urban area that the Council had previously reviewed for housing potential are being assessed and the results of the assessment will be published in a new SHLAA later in 2016. Several sites that were expected to come forward by now have not done so, or at least not as quickly as expected. Since the adoption of the Core Strategy national planning policy and guidance have placed increased importance on demonstrating immediate viability of land supply, and this means that the amount of deliverable brownfield housing land in the Borough is likely to be lower than originally envisaged.

7.15 Since the adoption of the Core Strategy there has been a slow take-up of employment land within St. Helens, with the Borough experiencing a net loss of 0.64ha since 2012. In light of this low take-up, in 2014 the Council commissioned consultants AECOM and DTZ to provide an expert view of market demand for employment land in St.Helens.

7.16 The AECOM Local Plan Economic Evidence Base Paper (2015) concludes that large scale logistics is the most active market in the region and a particular opportunity for St Helens. However, none of the sites identified in the evidence base that supported the Core Strategy as suitable for large scale distribution and manufacturing uses, satisfy the criteria now suggested as being preferred by the market for large scale uses. Consequently, there is currently zero provision of suitable land for large scale distribution uses within the Borough's identified employment land supply. This shortage of available land to build large distribution facilities has meant that in recent years, when demand for such premises has been high, occupiers have had to locate elsewhere. It is important to note, however, that smaller employment sites still have an important role to play in accommodating smaller scale employment development.

7.17 Given the need to accommodate an increased amount of housing land in the Green Belt and sooner than the Core Strategy envisages, and given the need to provide an expanded portfolio of employment sites to meet all of market needs and to make up for the loss of employment land, the ongoing Green Belt review will need to be more comprehensive than originally envisaged in the Core Strategy. Green Belt release is now needed to meet both housing and employment needs.

Q14. *Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?*

Q15. *How can the Council encourage the development of brownfield land to meet housing and employment needs?*

Safeguarding Green Belt land for post 2033 housing development needs

7.18 Government guidance states that change to the Green Belt should take a long term view so that they last beyond the Plan period. The intention is to ‘safeguard’ some current Green Belt land to meet the housing and employment needs of the five year period beyond 2033.

7.19 The amount of land required for housing needs for 2033 – 2038 at a hypothetical rate of 451 net dwelling per annum (based on the objectively assessed needs identified in the SHMA) would require approximately 100 hectares of land. This is based on a reasonable density of 30 dwellings per hectare and a net developable area of 75%, with landscaping, open space, access roads, etc on the remaining 25%.

Q16. *Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why?*

Safeguarding Green Belt land for post 2033 employment development needs

7.20 As with housing, a five year safeguarded land supply will need to be taken into account for employment. The objectively assessed needs identified in the ELNS of 178.5ha from 2012 up to 2033 (expected to be the end date of the Plan), translates into a requirement of 8.5ha per annum when broken down on a pro-rata basis, using this as a hypothetical employment land requirement would give a requirement of 42.5ha (gross) for five years of safeguarded employment land.

Q17. *Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why?*

Other land requirements

Retail and commercial leisure

7.21 The most recent St. Helens and Earlestown Retail & Town Centre Uses Study (2011) concluded that 20,000 square metres of new floorspace for comparison goods (i.e. not food) is required in St.Helens Town Centre up to 2027.

Open Space, Sport and Recreation

7.22 The 2006 Open Space Study and the 2002 Playing Pitch Assessment found surpluses as well as shortfalls in several parts of the Borough for different types of

open space. The results of the planned new Open Space, Sport and Recreation Audit and the Playing Pitch Strategy which are both due to be complete in early 2016 will be used to determine if new facilities are needed, sites should be improved or reconfigured to improve capacity or if existing sites are surplus to requirements.

Q18. *Are there any other forms of development that need to be accommodated in the Local Plan?*

8. Sustainability Appraisal Scoping Report

8.1 As mentioned earlier in this document, the Council is also consulting on a draft Sustainability Appraisal (SA) Scoping Report. SA is the appraisal of economic, environmental and social effects and is required by national and European law.

8.2 The first stage of the SA is to consider the scope of the appraisal process. A draft Scoping Report has been produced which reviews relevant plans, policies and programmes that relate to St. Helens, presents relevant baseline information about the present state of the Borough and identifies local sustainability issues covering social, environmental and economic issues. The Scoping Report sets out a draft sustainability framework for appraising the new Local Plan.

8.3 The draft SA Scoping Report is available to view here:
www.sthelens.gov.uk/planningpolicy.

Q19. *Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report?*

Q20. *Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?*

Q21. *Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan?*

Appendix A – Potential Policy Areas and Policy Content for the Local Plan - January 2016

Policy Area	Notes – reason why, what will it do, etc.
Strategic Policies	
Overall Spatial Strategy	Set outs how new development will be distributed across the Borough. Will include key diagram which identifies locations for strategic growth and development.
National Planning Policy Framework: Presumption in Favour of Sustainable Development	Model policy that reflects the NPPF's presumption in favour of sustainable development.
Housing and Employment Requirement	Identify requirement for amount of new houses and employment land required.
Housing, Employment and Mixed Use Allocations	Allocations for housing, employment and mixed use sites.
Safeguarded Land	Identify land to be safeguarded for five years beyond the Plan period.
Extent of the Green Belt	Key policy incorporating minor and major changes to Green Belt.
Specific Policies for Strategic Sites	Identify specific requirements for the development of strategic sites if required.
Area Strategies	
St.Helens Core Area Strategy	Area specific strategy for the Core Area of St. Helens (similar to that identified in the Core Strategy).
St.Helens Central Spatial Area Strategy	Area specific strategy for the Central Spatial of St. Helens (similar to that identified in the Core Strategy).
Newton-le-Willows and Earlestown Strategy	Area specific strategy for Newton-le-Willows and Earlestown (similar to that identified in the Core Strategy).
Haydock and Blackbrook Strategy	Area specific strategy for Haydock and Blackbrook (similar to that identified in the Core Strategy).
Rural St.Helens	Area specific strategy for the rural area of St. Helens (similar to that identified in the Core Strategy).
Core Policies	
Economic Development	
A Strong and Sustainable Economy	Identify how the Council will seek to strengthen the local economy and deliver sustainable economic growth in the Borough. Identify locations where tourism development will be supported. Outline the Council's approach to rural economic diversification.

Homes and Communities	
Housing Mix	Identify the type and mix of housing to be provided in the Borough including the Council's approach to self-build.
Affordable and specialist housing needs	Outline the Council's requirements for affordable and specialist housing needs including housing for the elderly population.
Gypsies, Travellers and Travelling Showpeople	Identify sites to be allocated for new provision, the criteria to be applied to planning applications for new sites and the approach to protecting existing sites.
Retail and Town Centres	
Town Centres, District Centres, Local Centres and outside Defined Centres	Identify St. Helens town centre boundary, St. Helens primary shopping area, Earlestown town centre boundary, district and local centre boundaries and set out appropriate uses in, on edge of, and outside of these areas. Retail Impact Assessment thresholds. Applying the sequential test (exemptions).
Natural and Historic Environment	
Trees and Woodlands	Outline how the Council will seek to protect and enhance the Borough's trees and woodlands (similar to the Core Strategy Policy CQL2).
Biodiversity and Geological Conservation	Outline how the Council will seek to protect, manage and enhance species, habitats and geological resources. Outline the Council's approach to protecting and enhancing nationally and locally important sites, including local nature reserves, local geological and wildlife sites, ecological networks, corridors, buffers and expansion areas and nature improvement areas.
Landscape Character	Outline how the Council will seek to protect and enhance landscape character.
Historic Environment	Outline how the Council will seek to protect and enhance the Borough's historic assets including archaeological assets, locally important buildings and conservation areas (similar to Core Strategy Policy CQL4).
Minerals	Outline the Council's approach to securing a sustainable supply of minerals (including commitment to apportionment, duty to co-operate, encouragement of secondary and recycled sources and local aggregate assessment). Set out criteria to apply within Mineral Safeguarding Areas.
Flood Risk and Surface Water	Outline the Council's approach to development in flood risk areas. Outline the Council's requirements for surface water management.

Infrastructure	
Infrastructure and Developer Contributions	Outline the Council's approach to infrastructure provision, requirements for developer contributions and approach to CIL.
Transport and Accessibility	Sets out the Council's key priorities for transport and when Transport Assessments will be required for new development. Will seek to address accessibility issues including making development accessible to wide range of types of transport. Safeguarded rail links and the strategic road network to be identified.
Green Infrastructure	Outline the Council's approach to the protection, management and enhancement of green infrastructure in the Borough, including new links e.g. between Bold Forest Park and Sankey Valley, access to greenspace and greenways and protection and enhancement of strategic routes - footpaths and cycleways. Playing fields, children's play areas, allotments - protection of existing and support for new provision. Consider whether Local Green Space designations are required.
Social Infrastructure	Set out the Council's approach to the protection and enhancement of social infrastructure.
Waste	Set out how the Council will promote sustainable waste management in accordance with the waste hierarchy.
Low Carbon and Renewable Energy Development	Outline the Council's approach to low carbon and renewable energy development and identify any appropriate locations for wind energy development and decentralised energy networks in the Borough.
Development Management Policies	
General design section or policies to include:	
Quality of Design	Sets out the design and amenity requirements that all planning applications for new development will be assessed against.
Development in the Green Belt	Green Belt development.
Telecommunications	To introduce design criteria.
Hazardous Substance Consent/Hazardous development	Approach to new development requiring Hazardous Substance Consent.
Public Realm; Public Art	Value of provision and expectations of contribution.

Development adjacent to Green Belts	Special considerations in sensitive locations.
Shop fronts	Criteria for consideration.
Adverts	Criteria for consideration.
Lighting	Criteria for provision, mitigation of negative impacts on neighbours and sensitive habitats.
Noise and Vibration	Protection of amenity. Requirement for noise assessments where necessary.
Air Quality	Setting criteria for determining when an Air Quality assessment is needed. Due consideration to the Government air quality objectives, especially within Air Quality Management Areas. Mitigating/offsetting measures to reduce emissions or pollution from the development. Assessment of effectiveness of mitigating measures. Take into consideration the Air Quality Action Plan and Air Quality Strategy. Exposure to future occupants.
Temporary facilities in connection with leisure	Identify circumstances when exception to general design policy is acceptable and preferred options for provision.
Amusement arcades	Appropriate locations and design criteria.
Taxis	Appropriate location of taxi booking offices.
Hot food shops; restaurants; cafes	Restrict Hot Food Takeaways around schools; require adequate amenity safeguards e.g. fume extraction.
Housing design section or policies to include:	
Character and Character Areas	Development to be appropriate to existing character.
Garden Sizes	Adequate size.
Bin Stores	Facilities for all domestic storage needs.
Street Scene	Integration of parking.
Lifetime Homes	Criteria to meet standards.
Re-use of buildings - Vacant floor space	Supported subject to criteria.
Garden/Tandem/Backland Development	Criteria against which such proposals will be considered.
Public Open Space Provision	Standards for provision in new development.
Householder Development	Criteria against which householder proposals will be considered including balconies; granny annexes; etc.
Houses in Multiple Occupation	Minimum standards to be met by such applications.
Minerals	
Minerals: development management criteria (including Review of Mineral Permissions)	Criteria against which applications would be considered.
Minerals: restoration and aftercare	Standards to achieve acceptable scheme.

Please contact us to request a translation of Council information into Braille, audio tape or a foreign language.

Contact Centre,

Wesley House, Corporation Street,
St.Helens, WA10 1HF

Tel: 01744 676789

Minicom: 01744 671671

Fax: 01744 676895

Email: contactcentre@sthelens.gov.uk
www.sthelens.gov.uk



St. Helens Council

Chief Executive's Department

Development Plans

Town Hall

Victoria Square

St. Helens WA10 1HP

Tel: 01744 676190

Minicom: 01744 671671

Email: planningpolicy@sthelens.gov.uk

→ www.sthelens.gov.uk



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thedesigstudio@sthelens.gov.uk

1500594R