

<u>KEY DECISION</u> Yes
<u>DATE FIRST PUBLISHED</u> 13 November 2018

## ST HELENS LOCAL PLAN

### WARDS AFFECTED

All

### EXEMPT/CONFIDENTIAL ITEM

NO

## 1. PROPOSED DECISION

1.1 It is recommended that Cabinet make the following recommendations to Council:

- (1) approve the 'submission draft' version of the St Helens Borough Local Plan: 2020-2035 (the 'Plan' - see appendices 1 to 3 of this report);
- (2) agree that the Plan be published with its supporting documents (referred to in paragraphs 3.1 to 3.12 of this report) in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended);
- (3) agree that the Plan and all relevant supporting documents be submitted, after the end of the publication period, to the Government in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended);
- (4) authorise the Strategic Director (Place Services) to make any necessary minor editorial changes to the Plan and supporting documents before they are published and/or submitted in accordance with recommendations (2) and (3) above, with any substantive changes to the Plan to be agreed in consultation with the Cabinet Member - Balanced Development, Housing and Economic Opportunity; and
- (5) resolve to bring the St Helens Local Development Scheme 2018 (see paragraphs 3.11 and 3.12 of this report) into effect from 1 January 2019.

## 2. RATIONALE FOR THE DECISION

### Context

- 2.1 National planning policy stresses the role of Local Plans in delivering a vision for the sustainable development and growth of local areas. Local Plans, due to their role as the statutory 'development plan' also play a crucial role in the determination of planning applications and in shaping the wider corporate priorities of the Council.
- 2.2 The existing 'development plan' for the Borough of St Helens consists of:
- the 'saved' policies of the St Helens Unitary Development Plan ('UDP') (1998);
  - the St Helens Core Strategy (2012);
  - the Bold Forest Park Area Action Plan (2017); and
  - the Merseyside and Halton Joint Waste Local Plan (2013).
- 2.3 The Council's Cabinet resolved (at its meeting on 18 November 2015) to start the process of preparing a new Local Plan which would entirely replace the 'saved' UDP policies and the Core Strategy. The rationale for this decision included that these documents no longer fully reflected the changing requirements of national policy or the up-to-date evidence of needs for housing or employment development, for example the needs of the growing logistics sector.

The process of preparing the new St Helens Borough Local Plan

- 2.4 The steps which must be undertaken when preparing a new Local Plan are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 2.5 The Council carried out an initial consultation on the scope of the emerging new Local Plan in early 2016. It then, between November 2016 and January 2017, consulted on the St Helens Local Plan Preferred Options document (see paragraphs 2.14 to 2.22 below for further details).
- 2.6 The anticipated next steps (subject to the necessary approvals being obtained for this report and with indicative future timescales) are set out below:
1. publication of the Plan and all relevant supporting documents (Regulation 19) (January 2019);
  2. period of 8 weeks within which individuals and organisations may submit any representations on the Plan and its supporting documents (January 2019 until early March 2019) *(NB whilst the minimum statutory length of this period is 6 weeks it is recommended that an extended period of 8 weeks is given to ensure all parties have a good opportunity to input into the process)*;
  3. submission of the Plan and its supporting documents to the Secretary of State (Regulation 22) (summer 2019);

4. independent examination by a Government Inspector (this is expected to start in summer 2019 when the Plan is submitted under step 3 and is likely to include extensive public hearings);
  5. publication of the Inspectors Report (2020); and
  6. adoption of the Plan by the Council (2020).
- 2.7 The steps and timescales set out above are on the basis that the process will run as currently expected. The detail of the steps to be undertaken may also vary. For example, if modifications are proposed to the Plan after it has been published, such modifications would themselves need to be subject to public consultation. This would normally occur during the examination process i.e. during step 4 above.

#### National legal and policy requirements

- 2.8 The new Local Plan must, before being adopted by the Council, be found to be legally compliant and 'sound' by the Government Inspector following its independent examination.
- 2.9 The Inspector will assess the Plan against the 'soundness' tests and related requirements set out in the National Planning Policy Framework (NPPF). The NPPF was first introduced in 2012 and substantially revised in July 2018. It requires the Plan to be:
- positively prepared (with regard to evidenced development needs);
  - justified;
  - effective; and
  - consistent with national policy.
- 2.10 National policy (for example in the Housing White Paper 2017) also urges that local plans are prepared promptly. The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 require the Council to review its adopted local plans no more than 5 years following their adoption.

#### The 'duty to cooperate' with other public bodies

- 2.11 Section 33A of the Planning and Compulsory Purchase Act 2004 requires the Council to co-operate with other public bodies in relation to strategic matters addressed in the Local Plan, such as housing, employment and infrastructure needs. 'Other public bodies' in this context include: the Liverpool City Region Combined Authority; neighbouring local authorities; and various other statutory bodies. Council officers have undertaken extensive work in relation to this duty building upon existing well-established joint working arrangements. This work has included for example the commissioning of joint evidence concerning housing and employment needs and land supply across the Liverpool City Region (see paragraphs 2.30 to 2.39 of this report).

- 2.12 The revisions to the NPPF introduced in July 2018, indicate that the Council should publish at least one Statement of Common Ground (SOCG), agreed with relevant neighbouring authorities and/or other public bodies before publishing its Local Plan. The role of SOCGs is to document evidence of cross-boundary matters being addressed in the Plan and current progress in considering these. Officers are currently working to finalise an SOCG between St Helens and Warrington, reflecting for example the strong housing market inter-action between the two authorities and site specific matters (e.g. Parkside and Omega extension). An SOCG is also being prepared for the Liverpool City Region (including West Lancashire).
- 2.13 Whilst these SOCG documents have yet to be finalised and formally approved by the relevant neighbouring authorities and other bodies, it is considered reasonable (given the strong evidence of joint working that can be demonstrated and that the specific requirements concerning SOCGs are still fairly new) to maintain progress on the Plan pending their finalisation.

Consultation on the Preferred Options (November 2016/January 2017)

- 2.14 The St Helens Local Plan Preferred Options document 2016 set out a draft strategy including a vision, 7 strategic aims (supported by 14 strategic objectives) and 40 draft policies. Its approach included (amongst other things):
- delivery of 10,830 dwellings from 1 April 2014 until 31 March 2033 at an average of 570 dwelling completions per year;
  - delivery of 306.9 hectares of employment land up to 2038;
  - support for the regeneration of St Helens and Earlestown town centres and other smaller centres in the Borough; and
  - a wide range of other policies covering (for example): the spatial strategy; transport; infrastructure funding; green infrastructure; housing mix (including affordable housing); biodiversity; and various other matters.
- 2.15 The Preferred Options document aimed to continue the Council's longstanding commitment to securing regeneration of sites (including 'brownfield' sites) in existing urban areas. However, to fully meet housing and employment development needs it also proposed to remove 25 sites from the Green Belt to meet development needs before 2033 (16 of which were for housing; 9 for employment) and a further 26 sites to be removed from the Green Belt but 'safeguarded' to meet potential longer term needs (mostly for housing) after 2033.
- 2.16 Notwithstanding these proposals, most of the Borough's land area (about 56%) was proposed to remain as Green Belt. About 65% of the Borough currently has this designation (the highest proportion of any district on Merseyside).
- 2.17 An extensive consultation exercise took place on the Preferred Options document (together with supporting evidence documents) over 8 weeks between 5 December 2016 and 30 January 2017. A total of 5,695 responses were received, of which:



- 5,565 responses were predominantly from the general public; and.
  - 130 responses were received from: statutory bodies; neighbouring authorities; parish councils; landowners and planning agents/site promoters; and from issue-specific stakeholder groups.
- 2.18 In considering the consultation responses it is important to stress that the Council must consider the issues raised in the context of relevant evidence and the legal and national policy tests referred to earlier.
- 2.19 The responses to the Preferred Options consultation raised a large variety of points. The St Helens Local Plan Preferred Options: Report of Consultation (attached as appendix 4 to this report) sets out:
- which bodies and persons were invited to make representations;
  - how those bodies and persons were invited to make such representations;
  - a summary of the main issues raised by those representations; and
  - how those main issues have been addressed in the Plan.
- 2.20 The Report of Consultation addresses the points raised by respondents according to which part of the Preferred Options document they refer to. The points raised fall under the following broad categories:
- broad strategic issues including: the general principle of releasing Green Belt to meet development needs; housing; the economy and employment; physical infrastructure; social infrastructure; the built and natural environment; and social and health issues;
  - Area specific issues relating to: Rainford and Crank; Newton-le-Willows; Eccleston; Billinge and Seneley Green (including Garswood); Haydock; Rainhill; Windle; Bold (including Sutton Manor and Clock Face); Moss Bank; Thatto Heath; West Park; Blackbrook; Sutton; Parr; St. Helens Town Centre; and Earlestown;
  - Issues concerning individual Plan policies; and
  - the quality of the Local Plan consultation process.
- 2.21 Members are advised to view the Report of Consultation for details of the consultation responses. Of the 5,565 responses from the general public, 4,910 respondents gave an address in St Helens Borough. A substantial proportion of the responses related to the issue of Green Belt release. The number of respondents from each part of the Borough (according to the addresses given on the responses, which do not necessarily correspond with ward boundaries) is set out in Appendix 5 to this report.
- 2.22 To complete the 'submission draft' version of the Plan (see paragraphs 2.23 to 2.78 below), officers have carefully weighed the issues raised in response to the consultation (summarised in the Report of Consultation) alongside updated evidence and the changing requirements of Government policy, including the new NPPF published in July 2018.

### The 'submission draft' version of the Plan

- 2.23 Approval is now sought for the 'submission draft' version of the Local Plan to be published under the Regulations. The Plan (see appendices 1 to 3 of this report) comprises a written statement and Policies Map (showing proposed site allocations for development and other land use designations). A wide range of supporting documents have also been produced which provide evidence (see section 3 of this report). The following paragraphs summarise key elements of the Plan and how these respond to key issues, including those raised in the Preferred Options consultation.

### Plan period

- 2.24 The revised NPPF (July 2018) requires the Plan to look ahead for at least 15 years from its adoption. For this reason, and as the Plan is now expected to be adopted in 2020, the Plan period extends to 2035 (and not 2033 as previously proposed).

### Vision and objectives

- 2.25 Chapters 1 and 2 set out the role and structure of the Local Plan and key issues, opportunities and challenges facing the Borough. Chapter 3 sets out a vision which describes the type of place that St Helens and its settlements should be at the end of the Plan period (in 2035). Compared to the version consulted upon at Preferred Options stage the vision has been revised to stress the need for a balanced and inclusive approach to regeneration and growth. It also places further emphasis on protecting and enhancing the built heritage and environment of the Borough.
- 2.26 Chapter 3 also sets out 7 strategic aims and 17 objectives. The aims are as follows:
- Supporting Regeneration and Balanced Growth
  - Ensuring Quality Development
  - Promoting Sustainable Transport
  - Meeting Housing Needs
  - Ensuring a Strong and Sustainable Economy
  - Safeguarding and Enhancing Quality of Life
  - Meeting Resource and Infrastructure Needs.

### Spatial strategy and core development principles

- 2.27 Policy LPA01 of the draft Plan (in line with advice in the NPPF) sets out how the Council will work proactively to secure development that improves the economic, social and environmental conditions in the Borough.
- 2.28 Policy LPA02 sets out the spatial strategy. This includes (in summary):
- New development to be delivered in sufficient quantities to meet needs and to be distributed in a range of locations across the Borough (appropriate to

its scale and nature) and which will provide good levels of accessibility between homes, jobs and key services via sustainable modes of transport;

- Urban regeneration and the re-use of previously developed (brownfield) land in Key Settlements will remain priorities;
- The proportion of housing and employment development needs up to 2035 which cannot be met by developing land in urban areas is to be met by removing selected sites from the Green Belt;
- To comply with national Green Belt policy when the Green Belt is being reviewed, some other sites are to be removed from the Green Belt and 'safeguarded' to meet potential development needs after 2035; and
- Various other provisions linking to other aspects of the Plan.

- 2.29 Policy LPA03 'Core Principles' requires new development to (in summary): meet the challenges of population growth; improve economic wellbeing; contribute to inclusive communities; contribute to a high quality environment; minimise the need to travel and maximise use of sustainable transport; and minimise St Helens carbon footprint.

#### Employment development needs and land supply

- 2.30 Policy LPA04 'A strong and sustainable economy' identifies that at least 215.4 hectares of land should be developed for employment uses in St Helens between 2018 and 2035. This is based on evidence including the St Helens Employment Land Needs Assessment update 2018 and development completions data. The proposed approach will also help meet employment land needs across the City Region and West Lancashire as a whole, as identified in the draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) 2017.

- 2.31 The Plan will address an identified shortage of large sites, suitable for the needs of the growing logistics sector and the clear evidence of market demand in the Borough e.g. related to the opportunity at Parkside and recent planning permissions at Florida Farm North and Penny Lane (Haydock). It also takes into account the need for flexibility and choice in site supply and the strategic location of St Helens in relation to the motorway and rail networks.

- 2.32 To meet the needs identified above the draft Plan (Policy LPA04) proposes to allocate 11 sites for employment development before 2035. These are listed below:

- Site 1EA - Omega South Western Extension;
- Sites 2EA, 5EA and 6EA - 3 sites to the west of Haydock Industrial estate (the largest of which is Florida Farm North);
- Sites 3EA and 4EA - 2 sites to the north and south of Penny Lane (east of Haydock Industrial Estate);
- Sites 7EA and 8EA - 2 sites at Parkside (East and West of the M6);
- Site 9EA - Sandwash Close (Rainford);
- Site 10EA - Land at Lea Green Farm West, Thatto Heath; and
- Site 11EA - Gerards Park (College Street, St Helens).

- 2.33 The largest of the proposed site allocations for employment development are at Parkside West and Parkside East. These sites are capable of providing transformational employment opportunities that will make a major contribution to the economic development of St. Helens, the Liverpool City Region and beyond. Parkside West is identified as being suitable for 'general industrial' or 'warehousing and distribution' uses. Parkside East would be subject to its own policy (LPA10). This establishes firstly that the site is suitable for use as a Strategic Rail Freight Interchange or for other rail enabled employment uses. It also indicates that (to ensure a suitably flexible approach to the delivery of the site) part of it could be developed for non-rail enabled employment uses, provided that at least 60 hectares of the site is reserved for the provision of infrastructure to link to the rail system. This approach is justified by the unique combination of locational advantages of this site, including its ready accessibility to both the West Coast and east-west ('Chat Moss') rail lines and to the motorway system.
- 2.34 Of the sites allocated for employment (see paragraph 2.32), all but the last 3 would be released from current designation as Green Belt. This is justified because of the limited land supply (particularly for large employment sites with good access to transport routes) which exists in urban areas in St Helens and in nearby districts and the opportunity provided at Parkside.
- 2.35 The land at Omega South Western Extension (site 1EA) has been identified, following discussions with Warrington Council officers carried out under the 'duty to cooperate', as being allocated to help meet the employment land needs of Warrington (rather than St Helens). This is due to its location immediately next to, and with its access to be provided through, the existing Omega employment area in Warrington.
- 2.36 A key change compared to the previous Preferred Options consultation proposals relates to land north east of junction 23 of the M6. Whereas the Preferred Options document proposed that this site be allocated for employment development before 2033, it is now proposed that it be removed from the Green Belt but safeguarded to meet potential employment needs after 2035. This change of approach will have the benefit of avoiding narrowing down the options for the development of a scheme to improve junction 23 of the M6. The significant improvement of this junction is identified as a key infrastructure priority within the Plan, which would bring substantial benefits to the Borough and the wider transport network.
- 2.37 The need for this new approach is also evidenced by the St Helens Council Transport Impact Assessment 2018. This confirms that junction 23 currently experiences queues and delays during peak periods and that this situation is likely to substantially worsen as the Plan period progresses without effective mitigation being undertaken. It is also not considered essential for the land north east of junction 23 to be developed before 2035 to meet evidenced needs for employment development within that period.
- 2.38 Several of the sites are (due to their size) designated as 'Strategic Employment Sites' by Policy LPA04.1, the development of which will need to meet specified requirements and be informed by a single master plan for each site. The

development of all the sites would also be subject to consideration of infrastructure impacts at the time of any planning application.

2.39 Policy LPA04 sets out other measures to promote employment including (in summary):

- protecting existing sites and premises from proposals for other uses except where (for example) they are no longer suitable for employment uses;
- supporting the re-use and reconfiguration of employment areas and the recycling of land within them for employment use;
- supporting diversification of the rural economy; and
- supporting (subject to specified criteria) the enhancement and expansion of tourism resources and facilities; and encouraging use of local suppliers and training opportunities.

#### The Objectively Assessed Need (OAN) for new housing

2.40 A central aim of national planning policy is to boost significantly the supply of housing. Local Plans must:

- identify the scale and mix of housing which is likely to be needed over the Plan period;
- identify a sufficient supply and mix of sites to meet needs, taking account of their availability, suitability and likely economic viability for development; and
- ensure that a 5 year 'deliverable' supply (taking account of factors such as viability, landowner intentions and potential slippage whilst necessary infrastructure is provided) can be provided at all times.

2.41 The revised NPPF (July 2018) requires the Plan to be informed by a nationally set standard method for calculating the Objectively Assessed Needs (OAN) for housing. The figure obtained using the method is to be treated as a minimum unless exceptional circumstances can be demonstrated. The method uses (as its starting point) the projected average household growth (as set out in projections published every 2 years by the Office of National Statistics), to which it applies an 'uplift' to account for affordability issues to derive an annual housing need figure for the local authority. This can then be extended to cover the period covered by the Plan

2.42 The 2016 based sub-national household projections published in September 2018 showed a rate of household growth across the country (including in St Helens) which was substantially lower than the rate shown in the previous (2014 based) projections. In response, the Government has issued a consultation document confirming that the 2014 based (and not the 2016 based) projections should be used for the purposes of applying the standard method. Applying the standard method in this way would result in a minimum annual housing need figure for St Helens of 468 new dwellings per annum.

- 2.43 However, a key disadvantage of relying on the figure of 468 new dwellings per annum for the Local Plan is that it makes no allowance for increased housing need that is likely to result from accelerated employment growth associated with the development of employment sites allocated in the Plan. In addition the figure does not make any allowance for the risk that affordability data to be published in spring 2019 would, if it continues the long term trend, see a decline in affordability and therefore an increase in the amount of housing required under the standard method.
- 2.44 For these reasons, the figure of 468 new dwellings per annum is considered to under-estimate housing need.
- 2.45 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.
- 2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum.

#### Housing land supply

- 2.47 In identifying sites, substantial priority has been given to sites within the existing urban areas. However, there remains insufficient capacity within the existing urban areas to meet needs, particularly when the challenging viability of developing some urban sites is taken into account due to factors such as ground conditions. In accordance with the NPPF, the supply also allows for the fact that slippage in delivery of development is likely to occur on some sites. For these reasons several sites – albeit a reduced number compared to those proposed at Preferred Options stage - are proposed to be removed from the Green Belt to meet housing needs.
- 2.48 The sites to be removed from the Green Belt would, it is estimated, be capable of providing 2,056 dwelling completions before 2035. This would represent 22% of the total of 9,234 dwellings needed between 2016 and 2035 (see paragraph 2.46 above). The remainder of the needs during this period would be met from various sources within the existing urban areas (such as completions from 1 April 2016 until 31 March 2018, extant planning permissions as at 1 April 2018 and other sites identified in the St Helens Strategic Housing Land Availability Assessment).

- 2.49 The largest site proposed for removal from the Green Belt to accommodate new housing is at Bold urban extension. This site represents a major growth opportunity, able to accommodate over 2,900 dwellings (with most of these being delivered after 2035). It has the potential to become an attractive new suburb complementing the 'town in the forest' principles of the Bold Forest Park Action Plan. Due to the size of the site and number of different land owners involved it is proposed that the Council should lead the preparation of a formal master plan, to be ultimately adopted as a Supplementary Planning Document, to guide its development.
- 2.50 The full list of sites to be allocated for housing development before 2035 is set out below with estimated capacities. In addition to the sites listed, smaller urban sites will continue to form an important part of the supply. It should also be noted that (since the Preferred Options stage) the assumed density of development on some sites has been increased, to provide for a more efficient use of land in line with the revised NPPF (July 2018).

Site name	Potential dwelling completions – before 31.3.2035	Potential dwelling completions – after 31.3.2035
<b><u>Site allocations from within the current urban area</u></b>		
Former Penlake Industrial Estate	337	-
Land north of Elton Head Road, Sutton Heath	350	-
Moss Nook Urban Village, Watery Lane, Moss Nook	800	-
Land east of City Road, Cowley Hill	540	276
<b><u>Site allocations on land removed from the Green Belt</u></b>		
Land South of Billinge Road, Garswood	216	-
Bold Forest Garden Suburb	480	2,508
Land South of Gartons Lane, Bold	520	49
Land at Florida Farm (south of A580), Slag Lane, Blackbrook	400	122
Former Red Bank Community Home, Winwick Road, Newton-le-Willows	181	-
Land South of Higher Lane and east of Rookery Lane, Rainford	259	-

Sites proposed to be removed from the Green Belt and 'safeguarded' to meet development needs after 2035

- 2.51 The NPPF requires that, when local authorities are undertaking a Green Belt Review, they must ensure that areas of safeguarded land are identified between the urban area and the new Green Belt boundary, to meet longer term development needs stretching ‘...*well beyond the Plan period*’. Safeguarded land is not allocated for development and planning permission for its permanent development should only be granted following a future Local Plan review.
- 2.52 To address these requirements, the Plan safeguards the following sites for potential future employment development after 2035:
- Omega North Western Extension, Bold (29.98 hectares); and
  - Land north east of junction 23 M6, south of Haydock racecourse, Haydock (55.9 hectares).
- 2.53 The following sites would be safeguarded for potential housing development after 2035 (the site capacities are indicative only):
- Land North of Billinge Road, Garswood (ca 283 dwellings)
  - Land between Vista Road and Belvedere Road, Earlestown (ca 178 dwellings)
  - Eccleston Park Golf Club, Rainhill Road, Eccleston (ca 956 dwellings)
  - Land east of Newlands Grange, Newton-le-Willows (ca 256 dwellings)
  - Land west of Winwick Road, Newton-le-Willows (ca 191 dwellings)
  - Land East of Chapel Lane, Sutton Manor (ca 113 dwellings)
  - Land south of Elton Head Road, Thatto Heath (ca 84 dwellings)
  - Land south of A580 between Houghtons Lane and Crantock Grove, Windle (ca 1,027 dwellings).

Summary of changes made to the proposed development requirements and site allocations since the ‘Preferred Options’ stage

- 2.54 Key changes made to the proposed development requirements and site allocations since the Preferred Options consultation can be summarised as follows:
- the annual minimum housing requirement has reduced from 570 to 486 dwellings per annum;
  - the employment site to the north east of the M6 junction 23 has been moved back from being an allocated site (for development before 2035) to be safeguarded for potential development after 2035;
  - there is now a clearer focus on specific growth locations (e.g. the Bold urban extension);
  - the assumed density of development on some housing sites has been increased;
  - the overall amount of Green Belt to be lost has been substantially reduced;
  - the number of sites to be removed from the Green Belt has been substantially reduced (see appendix 6 of this report for site specific details);



- some housing sites have been moved from being allocated for development before 2035 to being safeguarded for potential development after 2035; and
- the Plan proposals have been refined to take account of updated evidence of infrastructure issues.

### Transport

- 2.55 Policy LPA07 'Transport and Travel' promotes the use of sustainable forms of transport (such as walking, cycling and public transport) and requires new development to include suitable provision for vehicle charging points. It also identifies the need to improve linkages between areas of high deprivation and areas of employment growth, the need to secure improved motorway capacity and infrastructure (particularly at the M6 Junction 23 and M62 Junction 7) and new rail infrastructure such as a new station at Carr Mill.

### Developer contributions and infrastructure

- 2.56 Policy LPA08 'Developer Contributions' confirms that (subject to compliance with relevant legislation) development proposals will be expected to contribute to the provision, enhancement or replacement of infrastructure to meet needs arising from the proposal. In this context, infrastructure can include:

- Physical infrastructure such as roads, railways, sewers and water supplies;
- Social infrastructure, such as education and health establishments, neighbourhood retail or leisure uses, built sports and recreation facilities, cultural, emergency service and community facilities and institutions;
- 'Green Infrastructure', such as parks and playing fields; and
- 'Digital infrastructure', such as telephone and internet facilities.

- 2.57 Policy LPA08 also recognises the need to be realistic when asking developers to fund infrastructure particularly given the challenging levels of viability on some sites. To address this it sets out the following hierarchy to be used in such circumstances:

1. top priority will be given to contributions which are essential for public safety (for example essential highway works or flood risk mitigation);
2. second priority will be given to contributions to provide affordable housing or to address local infrastructure deficiencies (e.g. in schools or open spaces); and
3. third priority will be given to other contributions which do not fall into these categories.

- 2.58 The requirements on developers set by Policy LPA08 would (depending on the nature of specific cases) be primarily delivered via agreements entered into under Section 106 of the Planning Act or planning conditions. Both of these mechanisms are subject to limitations. For example, Section 106 obligations must meet the statutory tests of being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and

reasonably related in scale and kind to the development. Nevertheless, it is likely that in some cases infrastructure provided within the scope of the policy and of the legal limitations would also deliver wider benefits, for example where a new development triggers a need for a new or improved item of infrastructure which would be available for use by the wider community.

#### Green Infrastructure

- 2.59 Policy LPA09: 'Green Infrastructure' aims to strengthen and enhance the Borough's network of urban and rural green spaces, to encourage their use for sport, recreation, and as 'green lungs', walking and cycling routes.
- 2.60 Policy LPC06 'Biodiversity and Geological Conservation' sets out protection for: supporting habitats for European nature conservation sites in the wider City Region; Sites of Special Scientific Interest; Local Wildlife Sites and Priority Habitats. Reference is made to current work to address cumulative effects of development within the Liverpool City Region (due to recreational pressure) on the European-designated wildlife sites in the Mersey Estuary and coast.
- 2.61 Policy LPC07 'Greenways' requires that greenways will be protected and where possible enhanced. Policy LPC08 'Ecological Network' establishes that the Council will, working where necessary with other organisations, seek to strengthen the role of wildlife corridors and 'stepping stone' habitats. It also supports the role of the Liverpool City Region Nature Improvement Area which includes parts of St Helens such as the Sankey Valley and in the Bold area.
- 2.62 Policy LPC09 'Landscape Protection and Enhancement' requires development as appropriate to conserve, maintain, enhance and/or restore landscape features. Policy LPC10 'Trees and Woodland' sets out measures to increase the tree cover across the Borough and to protect and enhance trees, woodlands and hedgerows. It establishes that where any tree is justifiably lost as a result of new development its replacement will normally be required on at least a 2 for 1 ratio.

#### Health and wellbeing

- 2.63 Policy LPA11 'Health and Wellbeing' sets out criteria to ensure that new development protects or enhances health and wellbeing. These include for example the provision of safe and attractive green spaces; designing out crime; providing opportunities for physical activity within new development; and controlling the location of hot food takeaways.

#### Housing mix and affordable housing

- 2.64 Policy LPC01 'Housing Mix' requires new housing to include a range of types, tenures and sizes of homes to meet the needs of different population groups. It requires that at least 20% of new dwellings on greenfield sites (of more than 25 dwellings) should (subject to viability) be designed to the 'accessible and adaptable' standard set out in Building Regulations, and that at least 5% should be 'wheelchair accessible'. These requirements (together with a requirement for 5% of new dwellings on such sites to be bungalows) respond to the needs of the Borough's expanding population of elderly people.

- 2.65 Policy LPC01 also sets out controls over proposals for homes in multiple occupation including the need to maintain an adequate mix of different types of housing in the area, provide adequate car parking and protect the amenity of nearby occupiers.
- 2.66 Policy LPC02 'Affordable Housing Provision' sets targets for the provision of affordable housing within proposals for new open market housing of 11 units or more. In summary:
- at least 30% of new dwellings on greenfield sites in all parts of the Borough apart from those with the lowest viability (the town centre and Parr) must be 'affordable'; and
  - at least 10% of new dwellings on brownfield sites in the areas with highest development viability (Eccleston, Rainford and Rainhill) must be 'affordable' (these areas are therefore the areas where the highest overall proportion of affordable housing will be sought).
- 2.67 These targets are subject to consideration of viability in individual cases. In response to the revised NPPF (July 2018) the policy requires that where affordable housing is required at least 10% of the overall number of homes to be provided on the site should be available for affordable home ownership (as opposed to social or affordable rented units).

#### Retail and town centres

- 2.68 Policy LPC04 'Retail and Town Centres' identifies a hierarchy of town, district and local centres in the Borough. It also guides proposals for retail, leisure and other main town centre uses towards these centres with a particular focus on St Helens (as the principal town centre) and Earlestown (serving the town of Newton-le-Willows and surrounding areas). In accordance with national policy, proposals for 'town centre' uses outside existing centres must demonstrate that any need cannot be more suitably met within or on the edge of an existing centre and that they would not cause substantial harm to any existing centre.
- 2.69 Policy LPB01 'St Helens Town Centre and Central Spatial Area' encourages new development which will help deliver the Council's town centre strategy. It also identifies the primary shopping area and scope for future retail, leisure and cultural development in the 'area of opportunity' on the southern side of the town centre. In line with national planning guidance, the Policy aims to enable a diverse range of suitable uses within the town centre and immediately surrounding area and also encourages the provision of improved linkages with Ravenhead Retail Park, the Saints Stadium and other key facilities.
- 2.70 Policy LPB02 'Earlestown town centre' promotes Earlestown (within the town of Newton-le-Willows) as the second town centre in the Borough and supports the delivery of a Council-led strategy to guide its future regeneration and development.

#### Gypsies and Travellers

- 2.71 National planning policy requires the Plan to effectively address the accommodation needs of gypsies and travellers. Policy LPC03 'Gypsies, Travellers and Travelling Show People' therefore allocates 2 sites off Sherdley Road. One of these (with an indicative capacity of 8 pitches) would provide permanent pitches and the other (with an indicative capacity of 3 pitches) would provide for transit (limited length of stay) needs. These sites have been identified for these uses for a substantial period of time and were included in the Preferred Options document.
- 2.72 This Policy also sets out criteria against which to assess any applications for development of gypsy and traveller facilities.

#### Historic Environment

- 2.73 The Local Plan vision recognises and values the Borough's unique heritage, focused on the glass, rail, and coal mining industries. Policy LPC11 Historic Environment confirms that the Council will promote the conservation and enhancement of heritage assets (such as Listed Buildings and Conservation Areas) and their settings.

#### Flood risk

- 2.74 Policy LPC12: 'Flood Risk and Water Management' confirms that new development that may cause unacceptable flood risk on the site or elsewhere will not be allowed. The Policy also sets out measures for example to address water quality issues and to help deliver 'slow the flow' initiatives set out in the Sankey Valley Catchment Plan (approved by Cabinet on 20 June 2018).

#### Renewable and low carbon development

- 2.75 Policy LPC13 'Renewable and Low Carbon Energy Development' sets out criteria against which to assess proposals for low carbon or renewable energy (such as wind farms or solar farms). It encourages new development to use energy efficiently and where feasible incorporate renewable and low carbon energy generation.

#### Minerals and waste

- 2.76 Policy LPC14 'Minerals' establishes (in accordance with national policy) that the Borough will contribute where practicable to meeting sub-regional needs for mineral production and processing. It also sets out environmental and other criteria against which to assess proposals for the exploration, extraction, storage, processing and/or distribution of minerals. Proposals for the development of oil and gas resources (including coal bed methane, coal mine methane, shale gas and oil) will be required to demonstrate the highest levels of environmental, health and social protection and benefit consistent with prevailing national policy and regulation.
- 2.77 Policy LPC15 'Waste' promotes the sustainable management of waste and links to the more detailed requirements set out in the Merseyside and Halton Joint Waste Local Plan 2013 (or any document which may supersede this).

### Other development management policies

- 2.78 Policies LPD01 to LPD10 (inclusive) set out further criteria covering (for example): design quality; open space requirements; householder developments; barn conversions; digital communications (e.g. mobile telephone antennae); advertisements; air quality; and hot food takeaways. The provisions of the Plan also address other forms of pollution such as noise.

### 3. FACTS SUPPORTING THE PROPOSED DECISION

- 3.1 The Local Plan is based upon a comprehensive evidence base, including many documents which were made available at 'Preferred Options' stage in 2016 and others which have been progressed subsequently. Subject to approval of this report, all the documents listed below must be made available for the public to view and comment on, along with any other relevant documents, when the Plan itself is published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

#### St Helens Green Belt Review 2018

- 3.2 This document replaces an earlier draft Green Belt review published with the Preferred Options. It provides a robust justification for the selection of sites to be removed from the Green Belt to meet needs for housing and employment development.

#### Sustainability Appraisal

- 3.3 The sustainability appraisal considers the effects of the emerging Plan against a range of economic, social and environmental issues. It also incorporates a Strategic Environmental Assessment, which is a legal requirement and which assesses the impacts of the Plan on the environment, the alternative options which have been assessed in finalising the Plan, and the measures which have been taken to mitigate the impacts.

#### Habitats Regulations Assessment (HRA)

- 3.4 The Habitats Regulation Assessment process is also a legal requirement and assesses the impacts of the Plan on biodiversity interests including designated European conservation sites in nearby districts and their supporting habitat. The Plan has been revised in response to the HRA process for example to address cumulative visitor pressure on the coastal European conservation sites, and to control air quality impacts on Manchester Mosses Special Area of Conservation (SAC).

#### St Helens Employment Land Needs Assessment

- 3.5 The St. Helens Employment Land Needs Study 2015 is available to view on the Council's website. An update to this evidence provides an up-to-date assessment of employment land needs in St Helens and an estimate of potential job generation within the sites allocated for employment development.

St Helens Strategic Housing Market Assessment

- 3.6 The Mid Mersey Strategic Housing Market Assessment 2016 is available to view on the Council website. An update to this evidence revises the assessment of housing needs in the Borough and examines different scenarios concerning the overall number of new dwellings required, the levels of affordable housing required and the mix of different types and tenures which are required.

St Helens Retail and Leisure Study 2018

- 3.7 This document assesses the needs for new retail development and other forms of town centre development. It also provides a health check of each of the Borough's town, district and local centres.

St Helens Local Plan Transport Impact Assessment 2018

- 3.8 The Transport Impact Assessment assesses the impacts of the site allocations which were proposed at Preferred Options stage on the road network, and in relation to sustainable transport modes (walking, cycling and public transport). Its findings have been used to inform the site allocations and policies of the Plan.

St Helens Local Plan Economic Viability Assessment

- 3.9 The Economic Viability Assessment considers the impacts of the Plan policies on development viability and the viability of the proposed site allocations. Its findings have been used to ensure that the Plan is effective having regard to these issues.

St Helens Infrastructure Delivery Plan (IDP) 2018

- 3.10 The IDP identifies key infrastructure implications arising from the Plan proposals and sets out a delivery schedule which identifies (as far as possible at this stage) when key infrastructure items may be delivered. The Infrastructure Delivery Plan is attached as appendix 7 to this report.

Revised St Helens Local Development Scheme (LDS) 2018

- 3.11 The Planning and Compulsory Purchase Act 2004 requires the Council to prepare and maintain a 'Local Development Scheme' (LDS). The LDS must set out: which development plan documents the Council intends to prepare; their subject matter; their geographical coverage; and the timetable for their preparation and revision. The Council's existing LDS was agreed by Cabinet on 18 November 2015 and covers a period of 3 years. A revised LDS has been prepared (see appendix 8 of this report). This formally sets out the revised timetable for preparation of the new Local Plan summarised in paragraph 2.6 of this report. Whilst there has been some delay in timescales this has enabled the

Plan to respond to the new NPPF (published in July 2018) and the changing requirements concerning housing need (see paragraphs 2.40 to 2.46 of this report).

- 3.12 In accordance with the Planning and Compulsory Purchase Act 2004, recommendation 5 of this report seeks approval to bring the revised LDS into effect and states a date from which the new LDS is to be effective (1 January 2019).

#### 4. IMPLICATIONS/RELEVANCE TO MEETING SAVINGS TARGETS/ PLANNING FOR 2020

- 4.1 The Local Plan has the potential, once adopted, to have significant positive impacts on a number of corporate priorities including planning for 2020. These specific benefits include the potential to:

- support the continued balanced growth of the Borough, both in the short-term and long-term;
- enable the delivery of higher levels of economic growth than currently supported under the existing Core Strategy;
- create more job opportunities to bring more people of working age back into employment or offer greater choice to the existing workforce, thus reducing the need to travel out of the Borough for work and reduce dependency on benefits;
- improve physical and mental health and wellbeing, for example by enabling greater levels of access to suitable housing and job opportunities and improvements in the quality of greenspace;
- increase access to affordable housing and specialist housing;
- encourage inward investment by providing increased certainty to developers and occupiers of sites;
- enable investment in suitable infrastructure linked to the delivery of new development; and
- accelerate income to the community and the Council, due to an increase in the supply of sites available for development, which in turn can generate increased New Homes Bonus, Council Tax, and Business Rates.

#### 5. RISKS

##### 5.1 Risks Associated with the Proposed Decision

The following risks have been identified as being associated with the Proposed Decision:

- 5.2 Risk of Government intervention: The Government has confirmed (for example in a Written Statement made by the Secretary of State for Communities and Local Government to the House of Commons on 16 November 2017) that local plans must be reviewed as quickly as possible and that it will use statutory powers to intervene where Councils fail to make sufficient progress in this regard. This means that the Government could take over the process of preparing the Plan if it

is not progressed sufficiently quickly. The Council would lose control of the process in such circumstances. It is therefore important to progress the Plan expediently to minimise any risk of intervention.

- 5.3 Statements of Common Ground with other public bodies: As stated in paragraph 2.12 of this report, the Council has worked extensively on an on-going basis with neighbouring local authorities and other public bodies in compliance with the 'duty to cooperate'. The revised National Planning Policy Framework (July 2018) introduces a new requirement that plan-making authorities should prepare and maintain one or more Statements of Common Ground documenting the cross-boundary matters being addressed and progress in cooperating to address these. Progress has been made to prepare two Statements of Common Ground affecting St Helens, one covering the Liverpool City Region and one covering cross boundary issues with Warrington. However, these documents remain in draft form at present and it is important (to comply with the NPPF) that progress is maintained to finalise at least one Statement of Common Ground early in 2019.
- 5.4 The need to provide certainty for local communities - Significant elements of the adopted 'development plan' in St Helens are over 5 years old and/or are out of date. The preparation of the Local Plan within an appropriate timescale is therefore necessary to provide clarity to local communities and developers about where new homes and employment buildings should be located, so that development is planned rather than the result of speculative planning applications.
- 5.5 Reputational Risk and volume of responses to public consultation: The Preferred Options consultation gave rise to a considerable public response and it is anticipated that the next stages could also be contentious. The issue of Green Belt release in particular continues to be controversial and the proposed approach, whilst reducing the level of Green Belt release compared to the proposals in the Preferred Options document, is likely to be met by continued opposition and lobbying against the Plan. It is therefore important that there is effective communication with the public and other stakeholders. This should: set out how the Council has considered the consultation feedback received from earlier stages; ensure that people effectively understand the Plan (including the reasons for the revisions that have been made); and ensure that people understand how they may engage with the remainder of the process leading up to adoption of the Plan.
- 5.6 Changes to planning legislation and policy: The national planning policy situation (for example in relation to the method by which housing needs are calculated) remains changeable. It will be necessary to address any changes to national policy or legislation as the Plan moves through its remaining stages.
- 5.7 Changes to evidence base: Any further changes which take place to the evidence which underpins the Plan (for example in relation to housing or employment needs or land supply) will need to be taken into account as the Plan progresses.
- 5.8 Infrastructure: The level of development proposed would generate extra demands on existing infrastructure (e.g. transport, schools, health services,



utilities, green infrastructure and recreational facilities). There are also likely to be circumstances in which new infrastructure is required. Whilst substantial work has been undertaken to ensure that the delivery of the Plan proposals would be supported by suitable infrastructure, there will be a need for on-going engagement with infrastructure providers as the Plan is implemented to monitor progress in relation to this issue.

5.9 Should this Risk be added to the Corporate Risk Register?

No

6. OTHER IMPLICATIONS

- 6.1 Legal – It is a legal requirement to have a Local Plan in place and to keep it under review. The Plan must meet ‘soundness’ tests set out in the NPPF, including the need to accommodate objectively assessed needs for development. The Plan must also satisfy other legal requirements such as the ‘duty to cooperate’ with neighbouring authorities and other public bodies. Failure to meet these requirements would lead to a high risk that the Council could not adopt the Plan or that any decision to do so would be subject to legal challenge.
- 6.2 Financial – The forthcoming stages in the preparation of the Local Plan (particularly the examination in public scheduled to take place in 2019) will require suitable funding to cover the cost of staffing, consultancy work, the Inspectors fees etc. A separate delegated executive decision is being prepared to address this matter.
- 6.3 Human Resources – This report has no implications for human resources. The staffing support for the Development Plans team will be kept under review as the Local Plan progresses through its next stages including the examination in public in 2019 (see paragraph 6.2 above).
- 6.4 Land and Property (Asset) – The Council has an ownership interest in all or part of 4 of the sites proposed for housing allocation in the ‘submission draft’ version of the Plan. The Plan will also, through its role as part of the statutory ‘development plan’, guide the future development and use of all Council-owned buildings and sites in the Borough.
- 6.5 Anti-Poverty – The Plan is likely to assist the Council’s aims to address poverty by making available land for new development to provide a wider range of job opportunities and through its requirements concerning affordable housing and housing mix.
- 6.6 Effects on existing Council Policy – As it would (once adopted) form a new ‘development plan’ document the Local Plan will form a key element of the Council’s policy framework. The Plan will replace some elements of the current ‘development plan’, namely the St Helens Core Strategy 2012 and the ‘saved’ policies of the St Helens Unitary Development Plan 1998.

- 6.7 Effects on other Council Activities – The Local Plan will, through its role as the statutory ‘development plan’ guide all Council activities which impact on the use and development of land.
- 6.8 Human Rights – None.
- 6.9 Equalities – A Community Impact Assessment of the Plan is attached as appendix 9 to this report. This identifies that the Plan would bring a range of benefits to the community as a whole, for example by balancing the needs for new development with the need to preserve and enhance the environment. No adverse impacts on specific population groups, identified by reference to the protected characteristics set by the Equalities Act 2010 (for example race, disability, gender, age, sexual orientation, religion) have been identified. The Plan will also have specific benefits for some groups. For example, by allocating sites for use by gypsies and travellers the Plan will help meet their specific needs. The policies concerning housing mix will ensure that some housing is designed or can be readily adapted to meet the needs of the less mobile and older age groups (see paragraph 2.64 of this report).
- 6.10 Asset Management – No implications except those related to land and property (detailed in paragraph 6.4 above).
- 6.11 Health – The Plan contains a range of policies which will promote better levels of health and well-being, for example by: ensuring that new development is served by a sufficient range and quality of greenspaces; promoting the use of walking and cycling; and ensuring that new development does not cause substantial harm to air quality (particularly in Air Quality Management Areas) or in respect of other forms of pollution. It is also considered likely that the Plan policies which promote the delivery of higher levels of employment development and a better choice of housing will indirectly have a beneficial effect on health.

## 7. PREVIOUS APPROVAL/CONSULTATION

- 7.1 The ‘submission draft’ version of the Local Plan has been developed having regard to the feedback from extensive previous public consultation. This feedback is referred to, along with the previous decisions by the Council’s Cabinet in relation to the emerging Plan, in section 2 of this report and summarised in the Report of Consultation (appendix 4 to this report).

## 8. ALTERNATIVE OPTIONS AND IMPLICATIONS THEREOF

- 8.1 As the preparation of a revised Local Plan is a statutory duty, it is not a realistic option to substantially delay the preparation of the Plan.
- 8.2 In preparing the ‘proposed submission’ version of the Local Plan, officers have refined a range of options which were set out in the Preferred Options document 2016. This process has taken account of up-to-date evidence, the outcomes of the consultation on the Preferred Options and the requirements of national policy including the revised NPPF (July 2018). A sustainability appraisal has been undertaken which has robustly assessed the emerging Plan (including alternative policy approaches and sites) against a range of economic, social and

environmental objectives. Having regard to all these factors, a number of adjustments have been made to the Plan (summarised in section 2 of this report)

- 8.3 The strategy set out in the 'proposed submission' version of the Plan (see appendices 1 to 3 of this report) will meet the substantial development needs of the Borough whilst addressing the resultant pressures on infrastructure and the environment.

## 9. APPENDICES

Appendix 1	St Helens Local Plan 2020-2035: submission draft version (written statement)
Appendix 2	St Helens Local Plan 2020-2035: submission draft version - Policies Map (north)
Appendix 3	St Helens Local Plan 2020-2035: submission draft version - Policies Map (south)
Appendix 4	St Helens Local Plan: Preferred Options – Report of Consultation - TO FOLLOW
Appendix 5	Number of responses to Preferred Options consultation by geographical area
Appendix 6	Changes to housing and employment site allocations compared to those in the 'Preferred Options' proposals
Appendix 7	St Helens Local Plan: Infrastructure Delivery Plan 2018
Appendix 8	St Helens Local Development Scheme 2018
Appendix 9	Communities Impact Assessment

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## BACKGROUND PAPERS

The following list of documents was used to complete this report and they are available for public inspection for four years from the date of the meeting, from the Contact Officer named above:

1. St Helens Green Belt Review 2018
2. St Helens Council Transport Impact Assessment 2018
3. St Helens Strategic Housing Market Assessment Update 2018
4. St Helens Employment Land Needs Study Addendum Report 2018

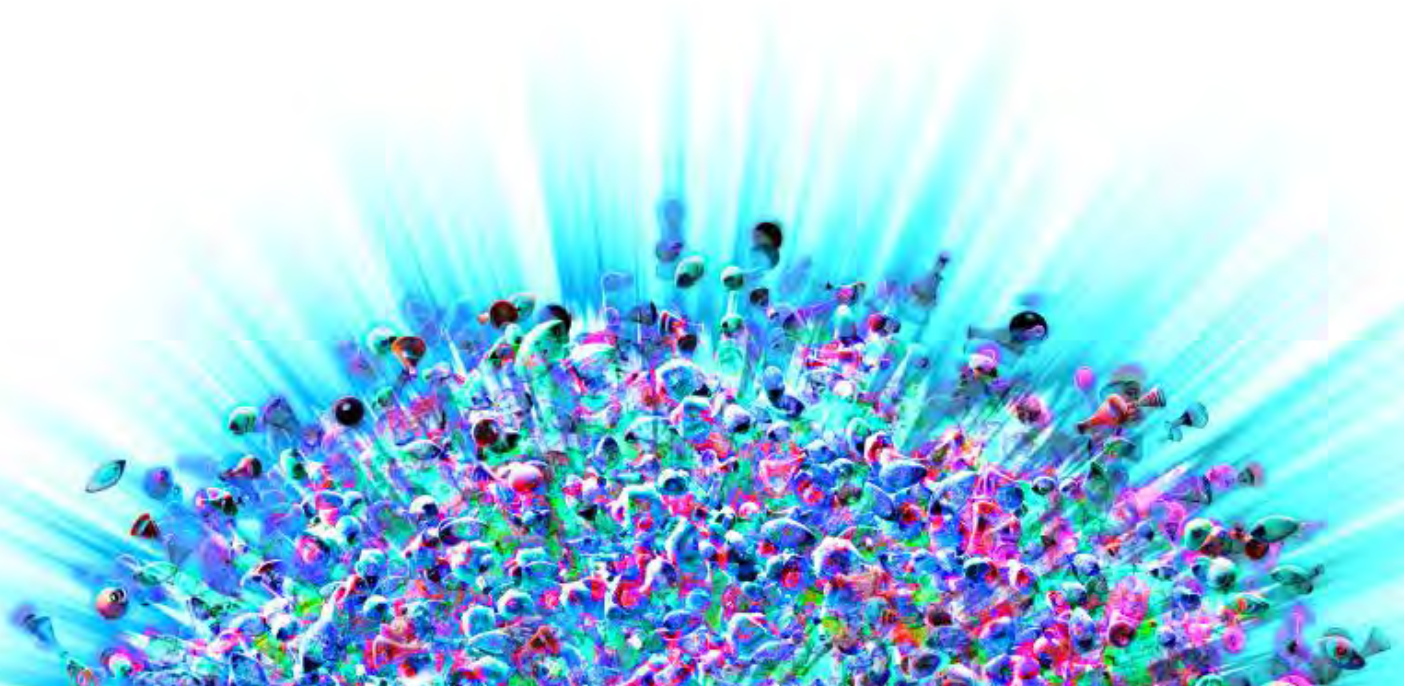
# **Appendix 1 - Part 1**

St. Helens Cabinet Report 12.12.2018

ST. HELENS BOROUGH LOCAL PLAN 2020 - 2035

**PROPOSED SUBMISSION DRAFT  
DECEMBER 2018**

# **A BALANCED PLAN FOR A BETTER FUTURE**



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## **1. Introduction**

### **1.1 What is the St.Helens Borough Local Plan?**

- 1.1.1 The St.Helens Borough Local Plan sets out the framework for the growth and development of the Borough. It identifies how and where new development and regeneration should take place and thereby promotes and manages the future development of the Borough. It will also shape the investment plans of the Council, other public and voluntary organisations, and the private sector.
- 1.1.2 The Local Plan includes:
- the vision and objectives for the development of the Borough up to and beyond 2035;
  - strategic policies guiding the amount, form and location of new development;
  - site allocations for new housing, employment and other forms of development; and
  - local policies with additional requirements to guide the consideration of planning applications for new development, and details of where these will apply.

### **1.2 What is the Plan trying to achieve?**

- 1.2.1 St.Helens Council has worked for many years with other stakeholders to create a modern, distinctive, economically prosperous and vibrant Borough, in which key environmental assets are protected and enhanced. The Local Plan will play an important role in achieving these aims.

### **1.3 Relationship to other planning documents**

- 1.3.1 This Local Plan forms a key part of the statutory 'development plan' for St.Helens Borough. Other 'development plan documents' include:
- the Joint Merseyside and Halton Waste Local Plan 2013, which sets out the planning strategy and site allocations for the sustainable management of waste across Halton, Knowsley, Liverpool, Sefton, St.Helens and Wirral; and
  - the Bold Forest Park Area Action Plan 2016, which sets out a strategy for the sustainable development and regeneration of several communities and adjacent countryside in the southern part of the Borough.
- 1.3.2 Other development plan documents may be adopted during the lifetime of the Plan.
- 1.3.3 The Council's Policies Map is a separate document that is updated as necessary when each Local Plan is adopted. It identifies, on an Ordnance Survey map base, areas that are allocated for development or covered by specific designations, for

example to recognise their environmental character. The Policies Map has been updated for adoption of this Plan.

- 1.3.4 National legislation also allows neighbourhood plans to be prepared for specific parts of the Borough. To date no neighbourhood plans have been prepared in St.Helens Borough. Government policy requires any neighbourhood plan that is prepared to be in conformity with the strategic policies of the Local Plan.
- 1.3.5 The policies of the Local Plan replace all the policies in the St.Helens Local Plan Core Strategy 2012 and the previously ‘saved’ policies of the St.Helens Unitary Development Plan (UDP) 1998. No part of the Core Strategy or UDP documents will remain extant from adoption of this Plan.
- 1.3.6 None of the policies in the Joint Merseyside and Halton Waste Local Plan 2013 or Bold Forest Park Area Action Plan 2016 will be replaced by this Local Plan. These documents will remain fully in place beyond adoption of this Plan.
- 1.3.7 The Council has also adopted a range of Supplementary Planning Documents (SPDs). These provide further guidance and can be area or theme-based. The Council proposes to review some existing SPDs after this Plan is adopted, and prepare further SPDs as appropriate.
- 1.3.8 The Council also has a duty to regularly prepare Monitoring Reports that assess the effectiveness of adopted planning policies in addressing the key economic, social and environmental issues facing St.Helens Borough. The Statement of Community Involvement sets out how the Council will engage stakeholders when preparing new planning policies and determining planning applications. The Local Development Scheme sets out which planning policy documents will be produced by the Council, including a timetable for their preparation.
- 1.3.9 A number of published evidence base studies have played a key role in shaping the Local Plan and are referred to in relevant parts of this Plan. The Council’s Infrastructure Delivery Plan (IDP) identifies the key items and types of infrastructure that must be provided, how and when each item is to be provided, and by whom.
- 1.3.10 Further details concerning the role of these and other documents prepared by the Council are set out on its website at <https://www.sthelens.gov.uk/>.

## **1.4 Preparing the Local Plan**

- 1.4.1 The Council has undertaken extensive consultation with the local community and other stakeholder groups as it has prepared the Local Plan. This included an initial consultation on the scope of the Local Plan (in 2013) and then consultation on the Local Plan Preferred Options (in late 2016 / early 2017). Separate documents set out how this consultation was undertaken and with whom, the key issues raised in the responses and how these have been addressed in the Plan.

## **1.5 Sustainability Appraisal and Habitats Regulation Assessment**

- 1.5.1 A key role of the Local Plan is to promote sustainable development. This means promoting:
  - social progress that meets the needs of everyone;

- effective protection of the environment;
- prudent use of natural resources; and
- high levels of economic growth and employment.

- 1.5.2 To ensure that the Plan is truly sustainable it has been subject to a robust process of sustainability appraisal as it has been prepared. The outcomes of this process are set out in a separate sustainability appraisal report.
- 1.5.3 As required by relevant legislation, the Plan has also been subject to a process of Habitats Regulation Assessment as it has been prepared. This has assessed and, as appropriate, addressed the effects of the Plan on certain areas in the Liverpool City Region that have been recognised at the European level for their nature conservation significance. The outcomes of this exercise are set out in a separate Habitats Regulation Assessment report.

## **1.6 National and regional context**

- 1.6.1 A range of existing and emerging policy documents have influenced the development of the St.Helens Borough Local Plan. The National Planning Policy Framework (NPPF) that was updated in 2018 aims to promote sustainable development and growth while making the planning system less complex and more accessible. The Local Plan has been prepared to accord with the tests of 'soundness' set out in the NPPF. It has also had regard to the Government's online Planning Practice Guidance.
- 1.6.2 At the regional level, the North West Regional Spatial Strategy (RSS) was revoked in 2013.

## **1.7 The Liverpool City Region**

- 1.7.1 St.Helens Borough forms one of 6 local authority areas within the Liverpool City Region (the others being Halton, Knowsley, Liverpool, Sefton and Wirral). The City Region authorities have worked closely together for many years on strategic planning matters, and these working relationships were formalised by the creation of a City Region Cabinet in 2009 and then the City Region Combined Authority in 2014. Key documents prepared at a City Region level include the Liverpool City Region Growth Strategy, Merseyside Local Transport Plan, Liverpool Airport Masterplan and the Liverpool City Region Ecological Framework. The Liverpool City Region Combined Authority is also preparing a Spatial Development Strategy that will help to shape the development of the City Region. There are also close working relationships between St.Helens Borough and other neighbouring districts including West Lancashire, Warrington and Wigan.
- 1.7.2 The individual local authorities within and around the Liverpool City Region have also either recently prepared or in the process of preparing their own Local Plans. In accordance with the 'duty to cooperate' the Council has worked closely with these other Councils and other public bodies in addressing key strategic planning issues such as housing, the economy, infrastructure and strategic environmental assets. This has been, for example, by either commissioning evidence on a shared basis or closely involving partners as evidence has been gathered. The

results of this cooperation have underpinned the approach to key issues in this Plan.

- 1.7.3 The Local Plan also relates closely to a range of more local strategies such as the St.Helens Housing Strategy, the St.Helens Plan, and the St.Helens Economic Regeneration Strategy.

## 1.8 Structure and form of the Local Plan

- 1.8.1 Chapters 1, 2 and 3 of this Local Plan set out, respectively, the context for the Plan, key issues and opportunities facing the Borough and its overall vision, aims and objectives. The policies of the Plan are then presented in chapters 4 ('Core Policies'), 5 ('Area Policies'), 6 and 7 (that set out a range of policies on thematic topics) and 8 ('Development Management Policies'). Each policy is presented in a box with its supporting text underneath, and a further box identifying links to the relevant aims and objectives of the Plan. Those policies that are strategic in nature are marked as such in their policy box. The Plan is also supported by a range of appendices.

## 1.9 Future review of the Local Plan

- 1.9.1 In accordance with national planning legislation, the Local Plan will be subject to regular monitoring and will be reviewed no more than 5 years after its date of adoption. This will ensure that planning policies in St.Helens Borough remain responsive to the development needs of the Borough.

## 1.10 Relationship to the development management process

- 1.10.1 It is likely that most of the policies in this Plan will be delivered via individual development proposals that will require a planning application. Planning applications are themselves subject to consultation processes before being decided. When determining planning applications, the Council will assess them against all the relevant policies of this Plan and other documents referred to above.
- 1.10.2 It is important that developers discuss their proposals with the Council at an early stage, so that any issues concerning the acceptability of their proposals can be addressed before a planning application is submitted.

### **IMPORTANT NOTE: INTERPRETATION OF THE PLAN POLICIES**

**National planning law requires that decisions concerning planning applications must be made in accordance with the 'development plan' unless material considerations indicate otherwise. In this context, the 'development plan' for St.Helens Borough includes all the policies of this Local Plan together with other 'development plan' documents (such as those listed earlier in this section). These policies must therefore be read as a whole.**

**Proposals that may comply with one policy may not necessarily comply with others. In assessing such cases, decision makers will need to weigh up the factors involved, to ensure that a balanced decision is made. Depending on the nature and location of the proposal, other factors such as national policy requirements may also be relevant.**

## **1.11 Further Information**

- 1.11.1 Further information about the Local Plan and related matters is set out on the Council website at <https://www.sthelens.gov.uk/>.



## 2. St.Helens Borough Profile

### 2.1 Sub-regional context

- 2.1.1 Located between Liverpool and Manchester, St.Helens Borough enjoys a strategic position at the heart of the North West and Merseyside conurbation.
- 2.1.2 The economy of the Borough is closely linked with that of the rest of the Liverpool City Region and West Lancashire. It shares a housing market with Halton and Warrington and there are also links, for example, in terms of journeys to work, with Wigan, Salford and Manchester. Key opportunities in the surrounding area include the growth of Liverpool Superport, Liverpool John Lennon airport and enhanced transport linkages driven by the emerging 30 year vision of Transport for the North (TfN).

**Figure 2.1: St.Helens Borough and its sub-regional context**



## 2.2 Place

- 2.2.1 The urban form of St.Helens Borough can be traced back to its history of coal mining, railways and world famous glass industries. Driven by rapid population growth during the 18th and 19th centuries, St.Helens (and the related areas of Haydock, Newton-le-Willows and Rainhill) grew to form substantial urban areas. Within the northern part of the Borough are a number of villages and hamlets that originally formed to serve the surrounding agricultural uses. Within the southern part of the Borough a number of communities that originally served the coal mining industry have in some cases merged to form part of the core urban area of St.Helens.
- 2.2.2 In recent decades the traditional industries have declined in importance, with a corresponding reduction in jobs and business opportunities, and the creation of a legacy of derelict and (in some cases) contaminated land. These issues lie at the heart of many challenges facing the Borough.
- 2.2.3 However, in recent years St.Helens Borough has also undergone considerable positive change, with successful efforts to regenerate the economy, infrastructure and environment. Key achievements have included the completion of a new stadium for the Saints Super League team, improvements to railway stations, new business premises, the new Town Centre College Campus, improved parks and open spaces, reclamation of former collieries and some other industrial sites, and significant levels of new housing. Big attractions include The Dream - a 20m high artwork on a reclaimed colliery overlooking the M62 – and the nationally significant Haydock Park Racecourse.

## 2.3 Demographic trends

- 2.3.1 The resident population of St.Helens Borough, that totalled 179,331 in 2017<sup>1</sup>, is expected to grow steadily, albeit at a slower rate than in the North West and England. The Borough has an aging population with a higher proportion of people aged 65 years and over, and proportionally fewer people of working age between 16 to 64 years old than the nation as a whole. The number of residents in their 80s is expected to almost double to 12,800 in 2037, and the number of residents in their 90s is expected to almost triple to 9,700<sup>2</sup>.
- 2.3.2 The Borough is ethnically less diverse than many areas, with 96.6% of the population<sup>3</sup> identifying themselves as white, compared to 79.8% nationally and 87.1% in the North West.

## 2.4 Economy and Skills

- 2.4.1 The economy of St.Helens Borough has many strengths and opportunities, and recent years have seen the creation of new or improved employment floorspace,

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<sup>1</sup> 2017 Mid-year Estimate, Office of National Statistics (ONS)

<sup>2</sup> St.Helens Joint Strategic Needs Assessment 2017

<sup>3</sup> 2011 Census

for example alongside the A570 St.Helens Linkway. Due to its location and excellent transport connectivity the Borough has great potential to increase its economic competitiveness, including in the growing logistics sector.

Self-employment levels have increased and business survival rates at 5-years after start-up have improved in recent years<sup>4</sup>.

- 2.4.2 Notwithstanding these opportunities, St.Helens Borough is ranked as the 36th most deprived out of 326 local authorities in England<sup>5</sup>. Its relative position has deteriorated since the 2010 Index of Deprivation that ranked the Borough as the 51st most deprived area. Deprivation levels in some parts of the Borough have also worsened relative to others. The proportion of children in low income families is higher than those in England and the North West as a whole. St.Helens Borough still has levels of dependency on benefits that are above regional and national averages<sup>6</sup>.
- 2.4.3 The unemployment rate in St.Helens Borough is (according to data in Table 2.1) lower than regional and national averages. However, the economic activity and employment rates in the Borough remain lower than both the regional and national averages. Furthermore, economic inactivity (e.g., due to sickness) is much higher than the North West average and pay levels in the Borough are also lower than elsewhere.

**Table 2.1: Labour Market Indicators in St.Helens Borough<sup>7</sup>**

Labour Market Indicators	St.Helens Borough (%)	North West (%)	England (%)
Economic activity	73.1	76.5	78.6
Employment	70.1	73.0	75.1
Self-employed	12.1	12.5	14.4
Unemployment	3.6	5.1	4.3
Economically inactive	26.9	23.5	21.6

- 2.4.4 The proportion of residents without any qualifications is also higher than the regional and national levels at 12.4% compared to 9.0% and 7.6% respectively<sup>8</sup>. Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages.

<sup>4</sup> Business Registers Unit (BRU)

<sup>5</sup> Index of Multiple Deprivation 2015

<sup>6</sup> Department for Work and Pensions (DWP)

<sup>7</sup> Source: NOMIS (ONS) – rate as % of population aged 16-64 years. Period: Jan'17 – Dec'17

<sup>8</sup> NOMIS – Jan'17 – Dec'17



## 2.5 Housing

- 2.5.1 In 2011, 30% of the Borough's housing stock was terraced and 9% flats. The percentage of semi-detached houses (46%) was significantly higher than the regional and national averages (36% and 31% respectively). The percentage of detached houses (14%) was significantly lower than the regional and national averages (18% and 23% respectively). The proportion of dwellings in owner occupation in St.Helens Borough (67.8%) was higher than the regional average (65%)<sup>9</sup>.
- 2.5.2 The proportions of different types of dwelling in the Borough in 2011 were similar to those that existed in 2001, albeit with a small increase in the percentage of detached dwellings and flats/apartments and a corresponding decrease in the relative percentage of semi-detached and terraced properties. These changes reflect the new build aspirational housing projects undertaken across the Borough, stock clearance of older properties and a tendency by Registered Social Landlords to build smaller housing units in recent years.
- 2.5.3 Affordability of market housing for sale is an issue in the Borough with lower quartile house prices over four times greater than the lower quartile household income in the Borough<sup>10</sup>.

## 2.6 Health and Wellbeing

- 2.6.1 Life expectancy in St.Helens Borough, recently measured at 77.46 years for males and 80.95 years for females, is considerably below the national averages<sup>11</sup>. The two main causes of death in St.Helens are cancer (27.2%) and circulatory disease (21.9%). Furthermore, over 71% of the 18+ adult population in the Borough – considerably higher than the national average - is estimated to be classed as overweight or obese<sup>12</sup>. This has been identified as a growing problem, in particular for children and young adults.
- 2.6.2 Crime rates in St.Helens Borough have reduced in recent years and are performing relatively well compared to neighbouring authorities, national averages and those in other local authority areas with similar characteristics<sup>13</sup>. It is considered important to maintain this progress.

## 2.7 Transport

- 2.7.1 St.Helens Borough has an extensive and well used bus and rail network, with ten railway stations that provide regular connections to neighbouring towns and cities, and direct trains as far afield as North Wales and Blackpool. Nevertheless, a need has been identified to improve aspects of the public transport network, and walking and cycling facilities.

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9 2011 Census

10 Department for Communities and Local Government (DCLG) Housing and Market and House Prices

11 ONS Life Expectancy Data 2014-2016

12 Public Health England – 2016-2017

13 Police UK

- 2.7.2 The Borough also enjoys a strategic position at the heart of the regional road network, between the core cities of Manchester and Liverpool, with easy access to the M58 to the north, the M62 to the south and the M6 to the east. However, highways in the Borough are also under increasing pressure as traffic flows continue to rise; this leads to local congestion and capacity issues at peak times at various junctions.
- 2.7.3 The Council is working closely with infrastructure and service providers to identify and address these issues, including (in appropriate cases) through the use of contributions from developers linked to future development. Current proposals for new infrastructure are set out in the St.Helens Infrastructure Delivery Plan 2018.

## 2.8 Town centres

- 2.8.1 St.Helens town centre plays an important sub-regional role as the Borough's principle town centre providing a range of retail and other services for the Borough. This is complemented by the roles played by Earlestown town centre (within the town of Newton-le-Willows) and a range of smaller district and local centres. A key challenge is for the town and other centres to diversify their role in response to changing economic circumstances including competition from retail parks and internet shopping.

## 2.9 Heritage Assets

- 2.9.1 The Borough boasts a varied and unique built environment, based upon its history connected with the railways, mining, glass and other industries. Existing heritage assets make a valuable contribution to economic and social wellbeing and a focus for heritage led regeneration and tourism development. They include: 148 Listed Buildings (Grade I, Grade II\* and Grade II), 12 Scheduled Monuments (four of which are identified on Historic England's "at risk" register), one Registered Battlefield, eight Conservation Areas and two Registered Parks and Gardens. There are also a number of areas of known or potential sites of archaeological interest and above-ground assets of local interest that may not meet the criteria for statutory designation but that merit local protection.

### Green Infrastructure, Outdoor Sport and Leisure

- 2.9.2 Despite the urban character of much of the St.Helens Borough, over half of its area is rural or semi-rural in nature, and 7% of it constitutes open green spaces within the urban areas. The Borough benefits from an extensive network of open countryside and green spaces, much of which is accessible to local residents providing opportunities for formal and informal recreation, and improved health and quality of life. Certain spaces provide valuable nature conservation habitats, including for example 120 designated Local Wildlife Sites. Open spaces also play a role in helping to manage flood risk including in the Sankey Catchment that covers much of the Borough.
- 2.9.3 Landscape improvement programmes have enabled the addition of a number of sites, including Bold Forest Park in the south of the Borough, Carr Mill Dam and Stanley Bank in the north. All these sites have had significant investment that has improved access to allow public access for walking, cycling and horse riding. The Mersey Forest and related initiatives have played a major role in securing the

environmental regeneration of parts of the Borough, in a manner that is consistent with the vision of creating a 'Town in the Forest'

## 2.10 Key Issues

2.10.1 Based upon the issues identified in the Council's Local Plan Scoping Consultation Document and the Sustainability Appraisal Scoping Reports, and comments received from stakeholders, it has been identified that the Local Plan should seek to address the following:

- i) Deliver sustainable communities;
- ii) Strengthen and diversify the local economy;
- iii) Deliver sustainable development;
- iv) Meet local housing needs;
- v) Meet employment needs;
- vi) Protect and where possible enhance the town, district and local centres;
- vii) Manage the rural economy;
- viii) Improve health;
- ix) Maximise accessibility and social inclusion;
- x) Sustain population recovery;
- xi) Reduce crime;
- xii) Encourage the use of sustainable transport;
- xiii) Manage and enhance the environment;
- xiv) Recognise and support community and cultural facilities; and
- xv) Manage river catchments and enhance biodiversity.

### 3. St.Helens Borough in 2035

#### 3.1 Spatial Vision

- 3.1.1 The vision of the Local Plan describes the type of places that the Borough of St.Helens and its constituent settlements should be in 2035. It is that:

By 2035, St.Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest.

A range of high quality new employment development will have taken place, making use of the Borough's excellent transport links and location between Liverpool, Greater Manchester and other areas in the North West and beyond. Established employment areas will continue to provide affordable accommodation for a wide range of employers. The rural economy will have been sustained and diversified.

The town centres of St.Helens and Earlestown and the Borough's network of smaller centres will have adapted to changing economic conditions and provide a wide range of vibrant shopping, leisure and other uses.

Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice. Effective use shall have been made of the Borough's stock of brownfield land to help meet these needs.

The Borough's housing will be well connected to employment areas, local facilities, attractions and green spaces in a way that will encourage walking, cycling and the use of public transport. Health will have been further improved by encouraging active life styles with a wide range of sporting, community and leisure opportunities.

The Borough's unique heritage, linking to its historic role in the glass, rail, coal mining and other industries, and its wide range of important natural environmental assets will be both recognised and valued. Its network of green spaces and wider cultural and leisure offer, epitomised by features such as the Sankey Valley, Bold Forest Park, 'the Dream', St.Helens Rugby League Stadium, World of Glass and Haydock Racecourse, will be retained and strengthened.

## 3.2 Strategic Aims and Objectives

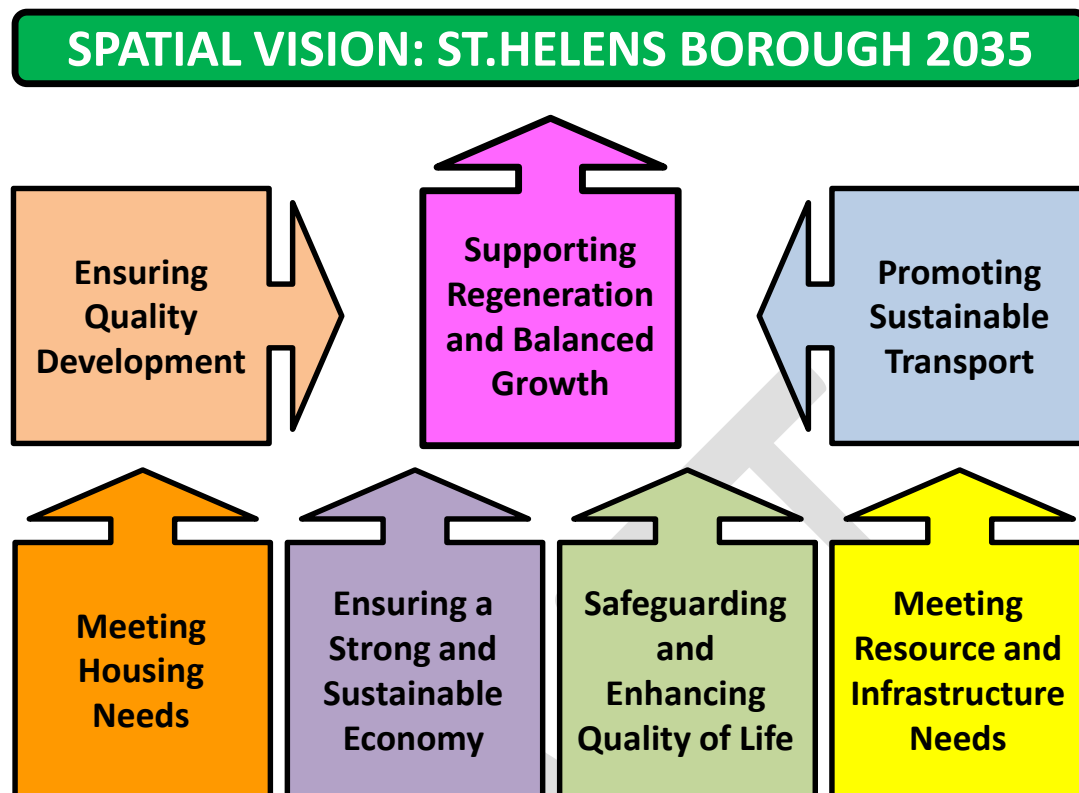
3.2.1 In order to achieve the vision the following strategic aims and objectives will be pursued.

STRATEGIC AIM	STRATEGIC OBJECTIVE
1. Supporting Regeneration and Balanced Growth	<p>1.1 To promote regeneration by enabling steady and sustainable economic and population growth.</p> <p>1.2 To reduce deprivation by ensuring that new development and investment can benefit deprived communities.</p> <p>1.3 To help meet development needs by ensuring the efficient re-use of previously developed land.</p>
2. Ensuring Quality Development	<p>2.1 To promote the creation of a well-designed environment by supporting proposals for high quality development.</p> <p>2.2 To mitigate the effects and minimise the impacts of land use changes on climate change by requiring well-designed developments in suitable locations.</p> <p>2.3 To contribute to the development of stronger and safer communities by prioritising new development and investment that can benefit those who are disadvantaged.</p>
3. Promoting Sustainable Transport	<p>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 network.</p>
4. Meeting Housing Needs	<p>4.1 To enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings.</p>

STRATEGIC AIM	STRATEGIC OBJECTIVE
5. Ensuring a Strong and Sustainable Economy	<p>5.1 To maximise the contribution of St.Helens to the economy of the Liverpool City Region and adjacent areas, and meeting local employment needs, by ensuring an adequate supply of employment land and premises.</p> <p>5.2 To support the wider Borough by aiding the development of the tourism, leisure and rural economies.</p> <p>5.3 To enhance the vitality and viability of town, district and local centres, and the role of St.Helens as a sub-regional shopping centre, by enabling appropriate development in those locations.</p> <p>5.4 To utilise the Borough's strategic location in relation to the rail network by facilitating rail-enabled employment development.</p>
6. Safeguarding and Enhancing Quality of Life	<p>6.1 To increase convenience and reduce the need to travel by ensuring appropriately located, integrated provision of a wide range of community facilities.</p> <p>6.2 To safeguard the quality of the environment by protecting and enhancing local character and distinctiveness, the historic environment, biodiversity and geodiversity.</p> <p>6.3 To protect and enhance the multi-functional network of green spaces throughout the Borough by promoting positive use and management whilst improving their biodiversity and increasing tree and woodland coverage.</p>
7. Meeting Resource and Infrastructure Needs	<p>7.1 To mitigate development impacts by ensuring that local and strategic infrastructure needs are fully met.</p> <p>7.2 To acknowledge the value of resources within the Borough by safeguarding them or promoting their use in a sustainable manner.</p>

3.2.2 The Spatial Vision will be delivered via progress towards the achievement of the strategic aims and objectives. How these relate is illustrated in Figure 3.1.

Figure 3.1: Interrelationship of Vision, Aims and Objectives



### 3.3 Ensuring delivery of the aims and objectives

- 3.3.1 The aims and objectives sets out above will be primarily delivered via the application of the policies in chapters 4 to 8 (inclusive) of this Plan. The table in Appendix 2 sets out which policy (or policies) will be most important in delivering each objective. The monitoring framework in Appendix 3 identifies key targets that must be met if specific policies of the Plan are to be successful, how progress is to be measured, and what remedial actions will be undertaken if progress is not made at the required rate.



## 4. Core Policies

### 4.1 Policy LPA01: Presumption in Favour of Sustainable Development

#### **Policy LPA01: Presumption in Favour of Sustainable Development**

1. In line with national planning policy, there will be a presumption in favour of sustainable development. The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the Borough.
2. Planning applications that accord with the policies in this Local Plan (and any relevant policies in other adopted development plans or Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no relevant development plan policies, or the policies that are most important for determining the application are out of date, planning permission will be granted unless to do so would be inconsistent with the presumption in favour of sustainable development as set out in national policy.

### 4.2 Policy LPA01: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	All
<b>Strategic Objectives Met</b>	All
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> </ul>

### 4.3 Reasoned Justification

- 4.3.1 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development, which is to be seen as a 'golden thread' that runs through plan-making and decision taking. Policy LPA01 supports this presumption and all development within the Borough will be considered against this policy.
- 4.3.2 The operation of the policy will be guided by paragraph 11 of the NPPF (as revised in July 2018) or any successor to this. This establishes, for example, that where there are no relevant development plan policies or where relevant policies that are most important for determining a planning application are out of date, permission will be granted unless specific circumstances apply. These circumstances include (in summary) that the application of specified policies in the NPPF provide a clear reason for refusal or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.



## 4.4 Policy LPA02: Spatial Strategy

### **Policy LPA02: Spatial Strategy**

1. The sustainable regeneration and growth of St.Helens Borough through to 2035 and beyond will be focussed (as far as practicable, having regard to the availability of suitable sites) on the Key Settlements, namely St.Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill.
2. New development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movements between homes, jobs and key services and facilities to be made by sustainable non-car modes of transport.
3. The re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites. This will be encouraged by setting lower thresholds for developer contributions on previously developed sites to reflect the higher costs and lower sales values typically associated with redeveloping such sites.
4. This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035 in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances.
5. Substantial new employment development (set out in Policy LPA04 and excluding town centre uses) will take place on large sites that are capable of accommodating large employment buildings (over 9,000m<sup>2</sup>) and are close to the M6 and M62. High quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth. Existing employment areas will be retained where they are suitable and viable for this use in order to maintain a diverse portfolio of accessible employment opportunities across the Borough. Suitable development that would diversify the rural economy will also be supported.

6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond. Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.
7. The preferred locations for new town centre development shall be within St.Helens Town Centre (as the Borough's principal town centre), Earlestown town centre, and the Borough's network of district and local centres, in line with Policies LPB01, LPB02 and LPC04.
8. The quality of life, health and wellbeing of St.Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:
  - a) taking steps to maintain, enhance, connect and / or expand the Borough's network of ecological, open space and recreational sites and greenways in accordance with Policy LPA09 'Green Infrastructure';
  - b) seeking improvements to the quality of open space within and around new development;
  - c) requiring new development proposals to mitigate their contribution to climate change and to adapt to its impacts;
  - d) supporting the delivery of landscape reclamation and improvement projects in locations such as the Bold Forest Park and Sankey Valley Park; and
  - e) requiring development to support healthy lifestyles in accordance with Policy LPD11.
9. The provision of a convenient, safe and sustainable transport network, and the delivery of improvements to the network, will be required in line with Policy LPA07.
10. New development that would deliver regeneration within the key settlements and accord with other Plan policies will be supported. Regeneration in these settlements will also be promoted by (in addition to the measures set out above) focussing available resources on its effective delivery and preventing development that would adversely impact upon or jeopardise the delivery of regeneration proposals.

#### 4.5 Policy LPA02: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	All
<b>Strategic Objectives Met</b>	All
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Development management process</li> <li>• Funding programmes</li> <li>• St.Helens Infrastructure Delivery Plan</li> </ul>

#### 4.6 Reasoned Justification

- 4.6.1 Policy LPA02 underpins the other policies in the Plan, setting out how development will be distributed across the Borough up to 2035 and beyond. It aims to meet the needs of the Borough's residents, businesses, workers and visitors whilst minimising adverse impacts and wherever possible enhancing the natural environment.

##### Sub-regional context

- 4.6.2 In preparing this Plan, the Council has cooperated extensively with nearby districts in the Liverpool and Greater Manchester City Regions, and in Warrington and West Lancashire. The following key conclusions have been drawn from this process:
- None of the neighbouring districts have identified a need for St.Helens Borough to accommodate any of their housing development needs;
  - No spare site capacity has been identified in any neighbouring local authority areas to accommodate any of the housing needs arising in the Borough;
  - A need has been identified within the Liverpool City Region as a whole (including St.Helens Borough) to accommodate the growth of the logistics and warehousing sector (associated with underlying economic trends and the growth of the port of Liverpool), with a particular focus on the need for large scale units of over 9,000m<sup>2</sup>;
  - Warrington Council has identified scope for a site at Omega South West within St.Helens Borough to be developed to help meet its employment needs;
  - All of the immediately neighbouring districts to St.Helens Borough have (due to restrictions on the supply of land in their existing urban areas) recently undertaken or are in the process of undertaking Green Belt reviews to meet their development needs.

### Key Settlements and spatial areas in St.Helens Borough

- 4.6.3 The largest settlements within the Borough provide, or are large enough to provide, a range of facilities and services to meet many day to day household needs and are shown on the Key Diagram as Key Settlements. The Key Settlements are of varying scales and roles as follows.

### Key Settlements and spatial areas

- **St.Helens Core Area** – centred around the Principal Town Centre of St.Helens and including the surrounding built up area from Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East, it forms the largest Key Settlement of the Borough.  
  
It includes St.Helens Central Spatial Area – an area immediately surrounding St.Helens town centre, including industrial and business areas and the Ravenhead and St.Helens out-of-centre retail parks.
- **Blackbrook and Haydock** – located to the east of St.Helens Core Area, this Key Settlement contains the significant Haydock Industrial Estate and the local centre of Clipsley Lane.
- **Newton-le-Willows and Earlestown** – the largest distinct Key Settlement after the Core Area, and contains Earlestown town centre, known for its markets, and the local centre of Newton.
- **Rainford** – the largest village in the north of the Borough, this Key Settlement contains a local shopping centre and also acts as a service centre for the distinct settlement of Rainford Junction to the north (where there is a train station with links to Wigan and Liverpool).
- **Billinge** – a village that forms a Key Settlement in the north of the borough with a distinct shopping centre.
- **Garswood** – a village in the north of the Borough that has some shops and services. Whilst it has no distinct central shopping / service centre it is large enough to form a Key Settlement.
- **Rainhill** – a village in the south of the Borough with a local centre that is physically linked to neighbouring urban areas and is a Key Settlement.

### Other settlements

The following are not Key Settlements, have only limited opportunities for development, and require sustainable transport links to the Key Settlements and employment sites to be maintained and enhanced:

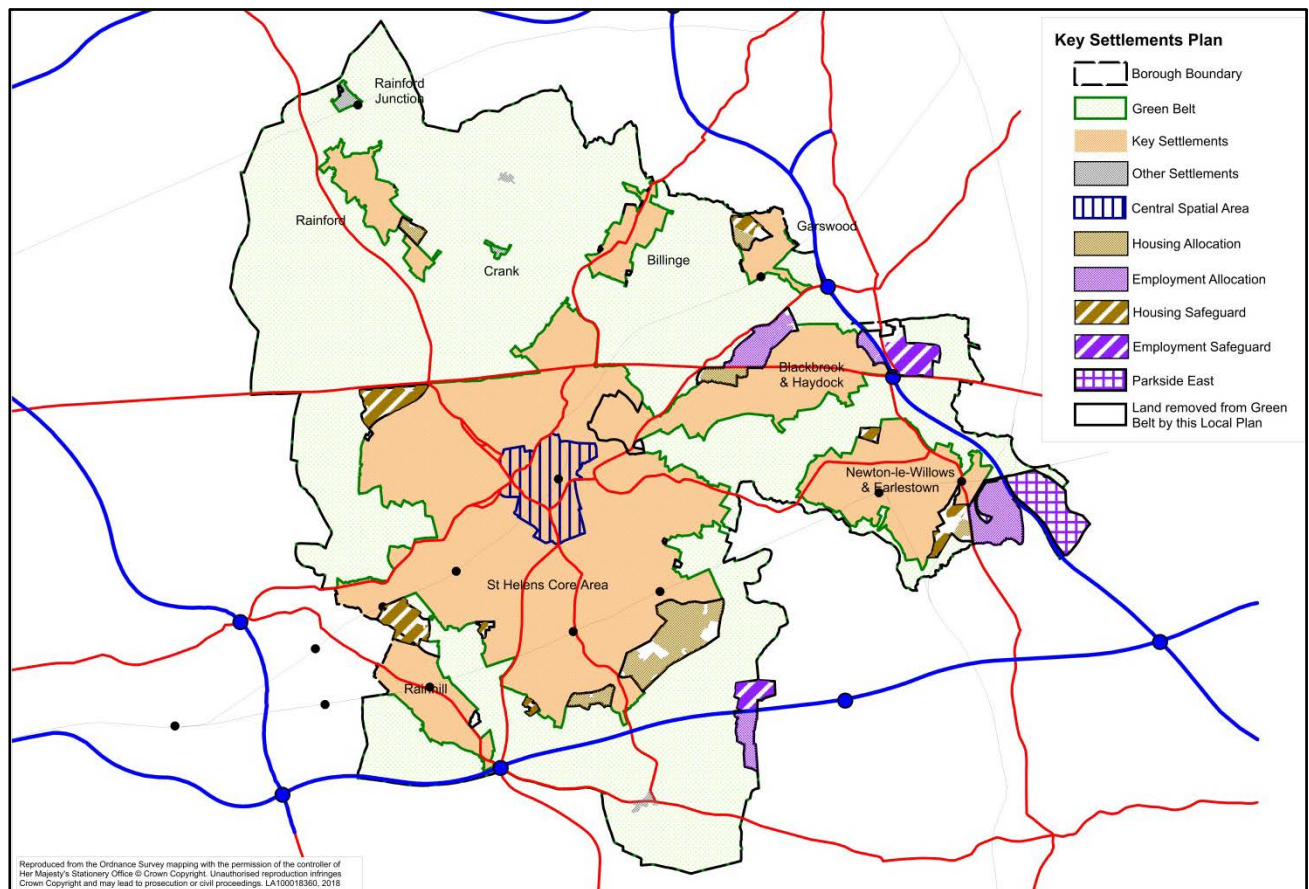
- **Rainford Junction** – a satellite settlement that is physically separate from Rainford but functionally reliant on Rainford for day-to-day services, and is excluded from the Green Belt.
- **Crank** – a small village/hamlet to the north of the Borough, with a tightly defined developed area, that is excluded from the Green Belt.
- **Bold Heath** – a small village/hamlet in the south of the Borough with an open low density character that is ‘washed over’ by the Green Belt.
- **Kings Moss** – a small village/hamlet to the north of the Borough that has weak boundaries around it and is ‘washed over’ by the Green Belt.

#### Development needs in St.Helens Borough

- 4.6.4 The Borough has economic activity and employment rates, skills levels and average wages that are below national averages. Recent rates of employment development and investment have been substantially below those achieved in the 1990s. It has also become clear that the existing available stock of employment land and premises in St.Helens Borough is not sufficient in terms of amount, site size, site location and site characteristics to meet market requirements, leading to missed investment and job opportunities.
- 4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development, due to its location close to the M6, M62 and A580 and to major north-south and trans-Pennine rail routes. There is also a unique opportunity to develop land at Parkside for rail enabled and other employment development. The needs for employment development are set out in further detail in Policy LPA04.
- 4.6.6 This Plan addresses these issues by providing sufficient employment land on a variety of sites to meet the needs of modern businesses. This will encourage inward investment, allow businesses to expand, retain and create jobs, and increase employment rates. It will also enable St.Helens Borough’s residents to work closer to home and so reduce the currently extensive numbers of people who need to commute to other locations, or move away to find work. The Plan’s approach accords with that of the Liverpool City Region growth strategy.
- 4.6.7 The Borough also has a substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth. The primary focus of new housing development in recent years has been on Previously Developed Land (‘PDL’ or ‘brownfield land’) in urban areas. Such locations tend to be well served by existing infrastructure and services and can be developed whilst minimising impact on the environment outside urban areas. However, every update of the St.Helens Strategic Housing Land Availability Assessment (SHLAA) since 2010 has found that there is inadequate land in the urban areas to meet housing needs in the longer term. Housing needs are set out in further detail in Policy LPA05.



**Figure 4.1: Key Settlements Plan**



### Spatial Strategy for meeting development needs (including Green Belt review)

- 4.6.8 The Council aims to ensure that the housing and employment needs of St.Helens are met in full within the Borough. New housing will be provided within, on the edge of or close to each Key Settlement insofar as this is acceptable and practicable taking account of environmental and infrastructure constraints and the need to maintain an effective Green Belt, the settlement size, projected future population growth, past rates of housing delivery in relation to settlement size, and availability of services.
- 4.6.9 The Council will also give continued priority to the development of suitable and available sites within urban areas. However, due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2035. Some other sites have been removed from the Green Belt but, rather than being allocated for development, have been 'safeguarded' to meet potential longer term development needs after 2035. This will ensure that the changes to the Green Belt endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs.
- 4.6.10 The sites that have been removed from the Green Belt have been selected following a comprehensive Green Belt Review. This has identified sites on the basis of their scope to be developed whilst minimising harm to the overall function

of the Green Belt, and their suitability for development in other respects. The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment. Further details of this process are set out in the St.Helens Green Belt Review 2018. Small changes have also been made to the boundary of the Green Belt to amend minor anomalies, for example where the original Green Belt boundary no longer follows the edge of the built up area.

- 4.6.11 New employment development falling within use classes B1, B2 and B8 will be primarily focussed on large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand. Due to their peripheral location, improved road, public transport and active travel links will be required between these sites and residential areas in the Key Settlements, in particular to provide links to the proposed new employment areas from areas of deprivation. Existing employment areas will be retained and protected through Policy LPA04 to maintain a distribution of accessible employment sites across the Borough unless they are no longer suitable and viable for this use.
- 4.6.12 The interconnected sites of Parkside West and East benefit from a location at the heart of the north-west motorway network and access to the national rail freight network, presenting an opportunity to provide an employment development that will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort. Policies LPA04, LPA04.1 and LPA10 set out details of the proposed development of these sites. The Council will also support steps to improve transport linkages linking Parkside to the rest of the Borough and surrounding boroughs to facilitate sustainable access for the workforce.

#### Protection of remaining areas of Green Belt from 'inappropriate development'

- 4.6.13 Following the adoption of this Plan, over half of the land area of the Borough will remain in the Green Belt. Land remaining in the Green Belt will continue to be strictly protected from inappropriate development, such as most forms of housing and employment development, in accordance with national policy.
- 4.6.14 The Government attaches great importance to the protection of the Green Belt, with the fundamental aim being to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belt include its openness and permanence. The NPPF sets out the purposes of Green Belt, which are:
- a) to check the unrestricted sprawl of large built-up areas;*
  - b) to prevent neighbouring towns merging into one another;*
  - c) to assist in safeguarding the countryside from encroachment;*
  - d) to preserve the setting and special character of historic towns; and*
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
- 4.6.15 Many forms of development are classified as being inappropriate within the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special

circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

#### The role of town, district and local centres

- 4.6.16 The Plan also aims to support existing town, district and local centres by preventing new development outside their boundaries that may harm their vitality and viability. Proposals for new retail and other town centre uses will be focussed towards existing centres appropriate to their type and scale, thereby maximising their accessibility by existing public transport and active travel provision and facilitating linked trips. The preferred location for new comparison retail and intensive 'town centre' leisure development will be St.Helens town centre. Further details of these matters are set out in Policies LPB01, LPB02 and LPC04.

#### Green infrastructure

- 4.6.17 Within and outside the Key Settlements open space and greenways provide spaces for nature, opportunities for recreation, exercise and relaxation, ecological linkages and active travel routes. Open spaces and landscaping, including those provided within development sites also provide opportunities to adapt to climate change by storing flood water, reducing urban heat islands, capturing carbon and improving air quality. Whilst public funding support to create and manage open spaces, flood water storage and greenways is limited, the development of sites for housing or employment uses, including on sites released from the Green Belt, is likely to present opportunities for such provision.

#### Transport provision

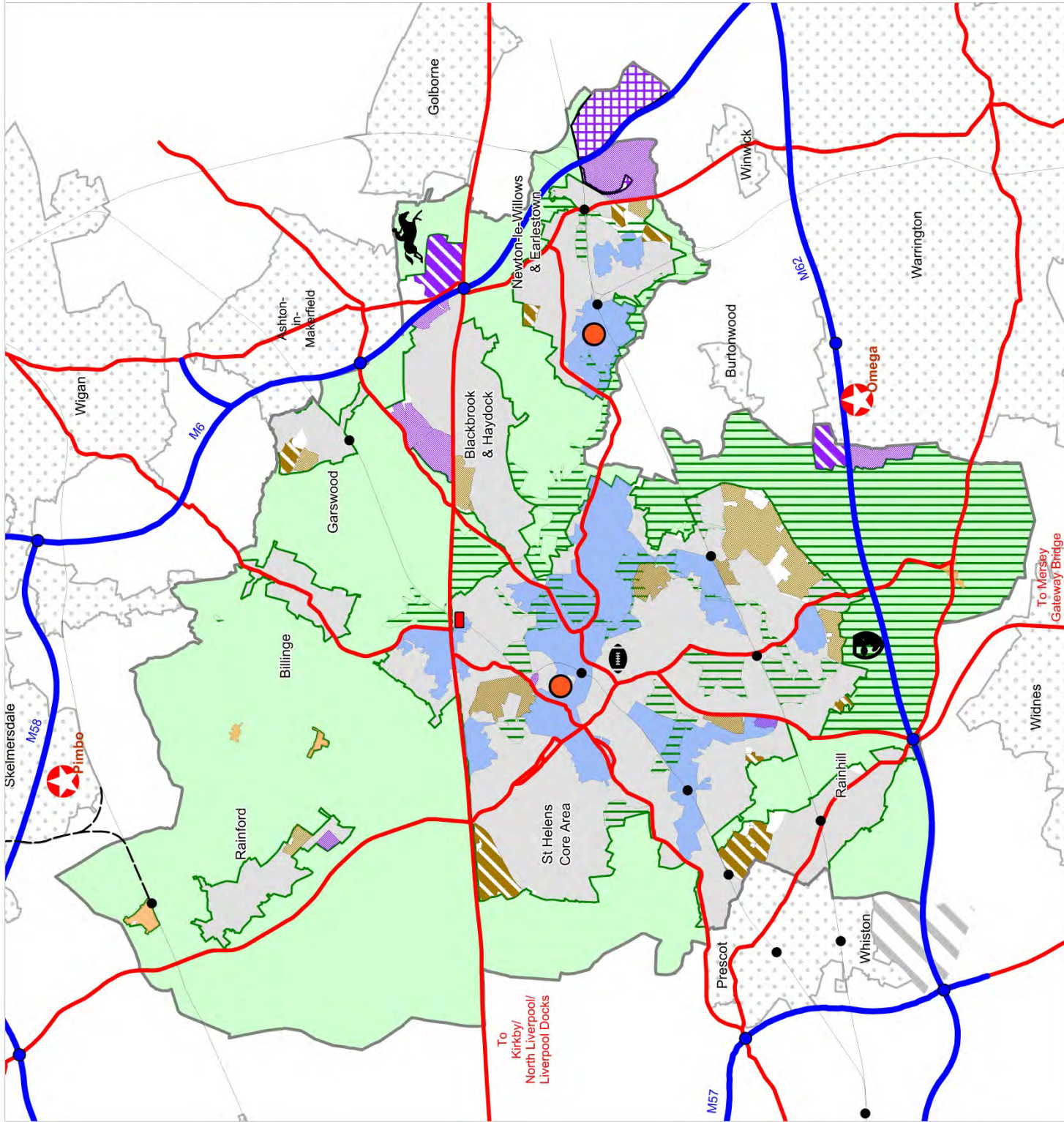
- 4.6.18 This Plan aims to protect existing transport infrastructure and secure improvements to provide efficient travel linkages within the Borough and to link the Borough with other areas. It also seeks to ensure that development does not prevent improvements to Junction 23 of the M6 and other road and public transport infrastructure from being implemented. Enhancing linkages between areas of deprivation and employment areas particularly by public transport, walking and cycling is a key priority. Further details of the Plan's approach to transport issues are set out in Policy LPA07.

#### Supporting regeneration

- 4.6.19 As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area. It is also pursuing opportunities to enhance town centres in the Borough, for example through the creation of the St.Helens Town Centre Strategy. In addition the Council intends to work pro-actively with partner organisations where necessary to secure the suitable regeneration of other town, district and local centres and of existing housing and employment areas, particularly in less affluent areas.



**Figure 4.2: Key Diagram**



## 4.7 Policy LPA03: Development Principles

### **Policy LPA03: Development Principles**

New development in St.Helens Borough will be required to support the following development principles where relevant:

1. Create sustainable communities with a strong sense of place.
2. Meet the challenges of population retention and growth by:
  - a) Providing for a mix of types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations;
  - b) Maintaining and where possible enhancing accessibility to a good range of services and facilities; and
  - c) Providing and contributing to assessed infrastructure and service requirements where appropriate.
3. Improve the economic well-being of the Borough's residents by:
  - a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people;
  - b) Contributing to the reduction of socio-economic inequality including health inequalities within St.Helens Borough, and between the Borough and other parts of the UK; and
  - c) Contributing to and complementing the regeneration of the Borough.
4. Contribute to inclusive communities by seeking to address the requirements of:
  - a) An ageing population, particularly in terms of housing, health and wellbeing;
  - b) Children, young people and families;
  - c) People with special needs, including those with a disability; and
  - d) The specific identified needs of minority groups in the Borough, including Gypsies, Travellers and Travelling Show People.
5. Contribute to a high quality built and natural environment by:
  - a) Securing high quality design in all development and a high standard of amenity for all existing and future occupants of land and buildings;
  - b) Taking account of the Borough's landscape character and townscape, and the distinctive roles and settings of different areas of the Borough, in the location and design of new development;

- c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments;
  - d) Protecting and enhancing the quality of the Borough's natural resources including water, air, land and biodiversity; and
  - e) Making effective use of land, buildings and existing infrastructure (including through the remediation of contaminated land).
6. Minimise the need to travel and maximise the use of sustainable transport by:
- a) Guiding development to sustainable and accessible locations or locations that can be made sustainable and accessible;
  - b) Encouraging a shift towards more sustainable modes of transport for people, goods and freight and encouraging the use of lower carbon transport;
  - c) Encouraging safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling between homes and employment; and
  - d) Supporting the provision and retention of shared space, community facilities and other local services (such as local shops, health facilities, education provision, meeting places, sports venues, cultural buildings, public houses and places of worship).
7. Promote healthy communities by improving access and opportunities for formal and informal recreation (including through the use of green infrastructure), improving cycling and walking routes, and minimising air, soil and water pollution.
8. Lower St.Helens Borough's carbon footprint and adapt to the effects of climate change by:
- a) Contributing to reductions in carbon dioxide emissions from all sources;
  - b) Meeting appropriate standards for sustainability and energy efficiency and promoting the use of renewable energy and sustainable construction;
  - c) Assessing and addressing the impact of climate change through mitigation and / or adaption measures;
  - d) Using water, energy, minerals and waste resources in an efficient and effective way;
  - e) Ensuring that all new development addresses the need to mitigate and where appropriate adapt to flood risk; and
  - f) Making best use of existing building materials (including historic features and materials) in order to reduce waste and lower energy consumption.



#### 4.8 Policy LPA03: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	All
<b>Strategic Objectives Met</b>	All
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Development management process</li> <li>• St.Helens Infrastructure Delivery Plan</li> </ul>

#### 4.9 Reasoned Justification

- 4.9.1 Policy LPA03 sets out the development principles that underpin this Local Plan. They represent a sustainable and balanced approach to the provision of new development and respond to:
- a) The Strategic Aims and Objectives identified in chapter 3 of this Plan;
  - b) The Borough's key sustainability issues outlined in chapter 2 of this Plan and the St.Helens Local Plan Sustainability Appraisal Scoping Report (2015); and
  - c) The requirements of national planning policy and guidance.
- 4.9.2 The principles provide the basis for more detailed policies that follow in this Plan.

## 4.10 Policy LPA04: A Strong and Sustainable Economy

### **Policy LPA04: A Strong and Sustainable Economy**

1. The Council will work with partner organisations to:
  - a) help deliver the Liverpool City Region's needs for economic growth, job creation and skills development;
  - b) maximise the economic opportunities presented by St.Helens Borough's location in relation to strategic road and rail routes;
  - c) ensure the necessary infrastructure is provided to support business needs (see LPA 08); and
  - d) support the creation of and expansion of small businesses.
2. The Council will aim to deliver a minimum of 215.4 hectares of land for employment development between 1 April 2018 and 31 March 2035 to meet the needs of St.Helens Borough.
3. The sites as shown in Table 4.1 and on the Policies Map are allocated for development for the employment uses indicated:
4. Proposals to develop or re-develop any of the above allocated sites for uses not listed in Table 4.1 will be refused, unless it has been demonstrated that:
  - a) the site is no longer both suitable and viable for an employment use identified in Table 4.1; and
  - b) the site has been offered for employment use on the open market at a reasonable price in a manner and for a period agreed with the Council; and
  - c) the results of the marketing exercise have been transparently shared with the Council; and
  - d) no employment use can be delivered as part of a mixed use scheme on the site.
5. Other sites and buildings that are currently or were last used for employment use (or for sui generis use generating employment), including those in the employment areas listed in Appendix XX, will be protected from changes to other uses, unless justified. Changes of use of such sites and buildings will be justified and permitted where it is demonstrated either that:
  - a) the land or building (or any part of it) is no longer suitable and economically viable for B1, B2 or B8 use in accordance with the Local Economy Supplementary Planning Document (SPD); or

- b) the land use planning benefits of the proposed development would outweigh the benefits of retaining the site or building in its existing use (including vacant buildings and sites).
- 6. Proposals for the re-use, re-configuration or re-development for B1, B2 or B8 uses of land or buildings used for B1, B2 or B8 uses (including where such proposals would lead to a more intensive use of the land or buildings) will be supported, subject to compliance with other policies in the Plan.
- 7. The Council will support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan.
- 8. The Council will support the protection, creation, enhancement and expansion of tourism, cultural and visitor resources, facilities and attractions by favourably considering proposals that are appropriate to the local character and appearance of the area and that will:
  - i) increase the range and quality of the accommodation offer in the Borough:  
or
  - ii) enhance an existing tourist or visitor attraction; or
  - iii) attract investment to the Borough and create or safeguard jobs; or
  - iv) enable the economic or physical regeneration of a site or area; or
  - v) improve the quality and diversity of the Borough's visitor offer; or
  - vi) help to maintain existing natural, historical or cultural assets.
- 9. The Council will prevent the unjustified loss of existing tourism, cultural and visitor resources assets.
- 10. The Council will support the use of local suppliers of goods and services and the creation of apprenticeships and training opportunities for local people in accordance with the requirements of the Local Economy SPD.

**Table 4.1: Allocations for Employment Development**

Policies Map Site Reference Number	Site Name	Indicative Site Area (hectares)	Appropriate Use(s)
1EA	Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington)	31.22	B2, B8
2EA	Florida Farm North, Slag Lane, Haydock	36.67	B2, B8
3EA	Land North of Penny Lane, Haydock	11.05	B2, B8
4EA	Land South of Penny Lane, Haydock	2.16	B2, B8
5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	B2, B8
6EA	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	20.58	B2, B8
7EA	Parkside East, Newton-le-Willows	64.55	See Policy LPA10
8EA	Parkside West, Newton-le-Willows	79.57	B2, B8
9EA	Land to the West of Sandwash Close, Rainford	6.96	B2, B8
10EA	Land at Lea Green Farm West, Thatto Heath	3.84	B1, B2, B8
11EA	Gerards Park, Phases 2 and 3, College Street, St.Helens Town Centre	0.95	B1, B2, B8
<b>TOTAL</b>		<b>265.3</b>	

#### 4.11 Policy LPA04: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 5
<b>Strategic Objectives Met</b>	SO 1.1, SO 1.2, SO 5.1, SO 5.2, SO 5.3, SO 5.4
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Maintaining employment land supply</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

#### 4.12 Reasoned Justification

- 4.12.1 The Council's City Growth Strategy (2008-18) and Council Plan 2017-2020 recognise the need to work in partnership with local communities and businesses to deliver economic growth, to strengthen the local business base, and to increase aspiration, skills and employment in the Borough.
- 4.12.2 The provision of new well-located employment land and floorspace is essential to the Borough's future economic prosperity. Policy LPA04 therefore allocates sufficient land to meet anticipated development needs within the B1 (business), B2 (general industrial) and B8 (storage and distribution) use classes during the Plan period. The NPPF requires the Council to plan for and accommodate all foreseeable types of economic growth. Policy LPA04 therefore identifies a range of locations, types and sizes of employment sites to meet the needs of specific sectors of the business community and to protect existing areas where employment continues to be the most appropriate use.

##### Liverpool City Region

- 4.12.3 St.Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016).

##### Employment Land Requirement

- 4.12.4 The NPPF requires the Local Plan to address objectively assessed needs (OAN) for economic development, taking account of market intelligence, market signals and the locational needs of different types of business.
- 4.12.5 The Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (2017) indicate that the Borough, due to its location on the M6 and M62 motorways, is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector. The ELNS suggests that whilst traditionally St.Helens Borough has been a manufacturing centre, with the largest land uses including class B2 (general industrial) operations, a strong shift to B8 (storage and distribution) uses is expected to occur during the Plan period.
- 4.12.6 The ELNS Addendum Report identified employment land OAN on the basis of historic trends, the need for a 5 year buffer to ensure choice and flexibility, and the potential for SuperPort and a future Strategic Rail Freight Interchange (SRFI) at



the former Parkside Colliery to increase demand for employment land in the Borough, particularly in the large-scale logistics sector. It identifies an employment land OAN of up to 239ha from 2012 to 2037. It also splits this overall need indicatively into individual use types, based on sectoral forecasts from Cambridge Econometrics and Oxford Economics and the market drivers underpinning local employment land demand, as set out in Table 4.2.

**Table 4.2: St.Helens Borough Estimated Employment Land Needs 2012-2037**

Employment Type	Hectares
B1(a) Office	10-15
B1(b) Research and development	1-4
B1(c) Light Industry	15-20
B2 General industrial	55-70
B8 Storage and Distribution	110-155
<b>Total employment needs</b>	<b>190-239</b>

- 4.12.7 Based on the OAN identified in the ELNS Addendum Report up to 2037, the OAN requirement for 2012-2035 has been calculated as a minimum of 227.4ha as shown in Table 4.3. This figure has been calculated by projecting forward the historic 5.8ha per annum growth scenario for the 1997-2012 period (referred to in the ELNS Addendum Report) from the base date of 2012 to the end date of the Plan (2035), and then adding a 5 year buffer to the baseline OAN (to ensure adequate choice and flexibility) and the recommended allowance for SuperPort and Parkside SRFI of 65ha from the ELNS Addendum Report.

**Table 4.3: Objectively Assessed Need for new employment land - 2012-2035**

Local Plan Objectively Assessed Needs Requirement 2012-2035	Hectares
Baseline OAN 2012 to 2035 (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)	133.4
5 year Flexibility Buffer	29
Allowance for SuperPort and Parkside SRFI	65
<b>Total</b>	<b>227.4</b>

- 4.12.8 The residual requirement for employment land (i. e., the minimum supply from new sites that must be provided for in the Plan) has then been calculated by allowing for take-up of employment land since 2012 against the OAN (227.4ha) and the existing supply of developable employment land in the Borough as shown in Table 4.4. Once an allowance of 2.7ha for take up and 9.34ha for the existing developable employment land supply in the Borough has been applied the residual requirement is 215.4ha.

**Table 4.4: Residual Employment Land Requirement - 2018-2035**

<b>Local Plan Employment Land Residual Requirement</b>	<b>Hectares</b>
Local Plan OAN 2012-2035 including 5 year buffer and allowance for Parkside SRFI and SuperPort	227.4
Take-up between 1 April 2012 and 31 March 2018	2.7
Existing Supply of Developable Employment Land (31 March 2018)	9.3
<b>Total Residual Requirement (2018 – 2035)</b>	<b>215.4</b>

- 4.12.9 The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 2035. This approach is in line with the ELNS Addendum Report and is because the land take-up scenarios (from which the OAN is derived) are based on employment land gains only. It also cannot be assumed that losses of, for example, employment land that is not readily developable for employment uses and / or that has been vacant for a long time, needs to be replaced.

[The Liverpool City Region Strategic Housing and Employment Land Assessment \(SHELMA\)](#)

- 4.12.10 The draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) - published for stakeholder consultation in October 2017 – considers the need for employment development across 7 local authorities in the Liverpool City Region and West Lancashire. Together these authority areas are identified as the Functional Economic Market Area (FEMA).
- 4.12.11 The draft SHELMA identifies that, across the FEMA as a whole, at least 397ha of land is required for large scale B8 development (capable of accommodating units of over 9,000m<sup>2</sup>) between 2012 and 2037. However, it does not apportion this need between districts as it states that such apportionment should be guided by the distribution of suitable sites. The draft SHELMA also assesses the need for B1, B2 and for smaller scale B8 development (of less than 9,000m<sup>2</sup>). Unlike those for large scale B8 uses these needs are apportioned at a district level, and for St.Helens Borough are identified as totalling at least 61.4ha of land between 2012 and 2037.
- 4.12.12 Following the expected finalisation of the SHELMA, the Council will continue to work collaboratively with the Liverpool City Region and West Lancashire authorities in order to progress the matters addressed within it including the required distribution of land for large scale B8 warehousing. Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling 215.4ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough's needs for B1, B2 and small scale B8 uses and a substantial proportion of the sub-regional need for large scale B8 uses identified to date in the FEMA as a whole. This reflects the strategic location of St.Helens Borough in relation to the motorway and rail networks linking the Liverpool City Region to the rest of the country.

### Employment Land Allocations

- 4.12.13 To strengthen the local economy, St.Helens Borough needs to build on those sectors where the Borough enjoys a competitive advantage. As identified above one such sector is logistics and distribution, where the Borough's location in relation to the M6 and M62 motorways makes it particularly attractive for development. Market needs for the large scale distribution sector (for units of above 9,000m<sup>2</sup>) generally focus on sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in this Plan.
- 4.12.14 The total supply of allocated employment sites will (at 234.08ha – excluding site 1EA) slightly exceed the residual employment land requirement identified in Table 4.4. However, this is justified by:
- i) the need to reverse the suppression of employment land take-up the Borough has experienced since 2005, caused by an inadequate supply of market attractive sites; and
  - ii) the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above that identified in the ELNS Addendum Report and factored into the employment land requirement.

### Helping to meet Warrington's Employment Land Needs

- 4.12.15 St.Helens and Warrington Councils have identified, under the duty to cooperate, that the emerging Warrington Local Plan is unlikely to be able to accommodate all of Warrington's employment land needs for 2017-2037 within its administrative boundary. St.Helens Council has therefore agreed to allocate 31.22ha (site 1EA) of land adjoining the existing Omega South employment area to help Warrington Council to meet these needs.

### Alternative Uses on Employment Sites

- 4.12.16 Existing employment sites in urban areas will still have an important role to play in accommodating employment development during the Plan period. Policy LPA04 therefore seeks to protect the employment role of such sites. During the Plan period however some older employment areas may become no longer suitable for this use or may have an altered economic role. Alternative uses on existing or former employment sites may be acceptable where continued employment use would be unacceptable on environmental grounds, or where the site is not well located in relation to the transport network or surrounding land uses, or where the community benefits of the proposed development would outweigh the potential loss of employment on the site caused by ceasing an existing use. The community benefits of a scheme could be wide-ranging and it is the responsibility of the applicant to clearly set out these benefits to support their proposal. The Council will determine the significance of community benefits of proposals on a case by case basis.
- 4.12.17 Alternative uses may also be appropriate where there is no current or likely future market demand for employment uses on the site and / or its reuse for such purposes would not be viable currently or in the long term. The Local Economy Supplementary Planning Document (2013) outlines the evidence applicants will be

required to provide in relation to the marketing and viability of employment sites before their loss for other uses can be supported.

Use of Local Suppliers and Training and Education

- 4.12.18 The St.Helens City Growth Strategy aims to increase economic activity. The Council will seek to achieve this by helping applicants and the end users of suitable development schemes, for example by directing them to local recruitment services and apprenticeship schemes and to sources of information on local suppliers of goods and services. Applicants will also be encouraged to provide training and job opportunities for local people and to use locally sourced goods and services in line with the guidance in the Local Economy SPD (2013).

## 4.13 Policy LPA04.1: Strategic Employment Sites

### **Policy LPA04.1: Strategic Employment Sites**

1. The following sites allocated under Policy LPA04 shall constitute Strategic Employment Sites:
  - 1EA: Omega South Western Extension, Land north of Finches Plantation, Bold;
  - 2EA: Land at Florida Farm North, Slag Lane, Haydock;
  - 6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock;
  - 7EA: Parkside East, Newton-le-Willows; and
  - 8EA: Parkside West, Newton-le-Willows.
2. Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least:
  - a) amount of development and proposed uses;
  - b) phasing of development across the whole site;
  - c) indicative layout and design details for the whole site, that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;
  - d) measures to provide good levels of accessibility to the whole site by public transport, pedestrian and cycling links;
  - e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;
  - f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way;
  - g) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;
  - h) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;
  - i) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and
  - j) how development of the site as a whole would comply with other relevant policies of the Local Plan.

3. Detailed development proposals within a Strategic Employment Site must be accompanied by a comprehensive package of training schemes and / or other measures to enable local residents (including unemployed and disadvantaged people) to access and benefit fully from the employment opportunities provided at the Site.
4. Development within Strategic Employment Sites will be required, subject to compliance with Policy LPA08, to provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on- or off-site and must be provided in time to meet the needs of the development. Where the specific development proposal would only cover part of the Strategic Employment Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in part 2 of this Policy.
5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix XX (in the case of sites 1EA,6EA,2EA and 8EA) and Policy LPA10 (in the case of site 7EA).

#### 4.14 Policy LPA04.1: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 2, SA 3, SA 5, SA 7
<b>Strategic Objectives Met</b>	SO 1.1, SO 2.1, SO 3.1, SO 5.1, SO 5.4, SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Masterplanning process</li> </ul>

#### 4.15 Reasoned Justification

- 4.15.1 The sites covered by Policy LPA04.1 are considered to be strategic as, given their scale, they will play a significant role in the delivery of the overall strategy of the Plan. It is anticipated that during the Plan period these sites will deliver most of the new employment land required to meet need. To ensure that the sites are developed to their full potential it is essential that development proposals within them are informed by a comprehensive and suitable masterplan for the site as a whole. The masterplan must identify any new, expanded or enhanced infrastructure that is needed to serve the development as a whole. A comprehensive approach will also be followed to securing any necessary developer contributions required to deliver such infrastructure.

- 4.15.2 Non-strategic sites that are allocated in Policy LPA04 are not considered large enough to warrant a strategic allocation. Whilst such sites are anticipated to yield less employment floorspace compared to strategic sites, their allocation will support the overall delivery of employment land, and they will play a key role in ensuring the supply of sites balances the phased delivery that typically results from the build out of large strategic employment sites.

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## 4.16 Policy LPA05: Meeting St.Helens Borough's Housing Needs

### **Policy LPA05: Meeting St.Helens Borough's Housing Needs**

1. In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St.Helens, at an average of at least 486 dwellings per annum.
2. The housing requirement will be met from the following sources:
  - a) Completions;
  - b) Sites with planning permission;
  - c) Housing allocations shown on the Policies Map and listed in Table 4.5;
  - d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and
  - e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions / changes of use.
3. New development should optimise the amount of housing developed on a site. New development should therefore aim to achieve the following minimum densities:
  - a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St.Helens or Earlestown Town Centres;
  - b) at least 30 dph on sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and
  - c) at least 30 dph on other sites that are within an existing urban area.Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area.
4. The delivery of new housing development will be monitored annually to ensure that:
  - a) an adequate supply of new housing is provided at all times in accordance with the Housing Delivery Test set out in national policy; and
  - b) there is a deliverable supply of housing that is sufficient to provide at least 5 years' worth of new housing development against the housing requirement. The 5 year land supply to be maintained shall include any buffer that is required under national policy. If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, a partial or full plan review will be considered to bring forward additional sites.



**Table 4.5: Sites allocated for new housing development**

Site ref.	Name	Area (hectares)	NDA	Minimum Density (units per hectare)	Indicative site capacity (new dwellings)		Total
					Before 31.03.35	After 31.03.35	
1HA	Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood	9.58	75%	30	216	0	216
2HA	Land at Florida Farm (South of A580), Slag Lane, Blackbrook	23.19	75%	30	400	122	522
3HA	Former Penlake Industrial Estate, Reginald Road, Bold	10.66	75%	42	337	0	337
4HA	Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	132.86	75%	30	480	2,508	2,988
5HA	Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold	21.67	75%	35	520	49	569
6HA	Land East of City Road, Cowley Hill, Town Centre	31.09	75%	35	540	276	816
7HA	Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows	8.03	75%	30	181	0	181
8HA	Land South of Higher Lane and East of Rookery Lane, Rainford	11.49	75%	30	259	0	259
9HA	Former Linkway Distribution Park, Elton Head Road, Thatto Heath	12.39	75%	38	350	0	350
10HA	Moss Nook Urban Village, Watery Lane, Moss Nook	26.74	75%	40	802	0	802
Totals					4,085	2,955	7,040

#### 4.17 Policy LPA05: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 4
<b>Strategic Objectives Met</b>	SO 1.1, SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Provision of a 5+ year deliverable housing land supply</li> <li>• Facilitating housing delivery</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

#### 4.18 Reasoned Justification

- 4.18.1 National planning policy requires Local Plans to provide for the delivery of a wide choice of new housing in sufficient quantities to meet needs. The requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet the full Objectively Assessed Need (OAN) for new housing in the Borough. To identify the OAN for new housing the Council has taken into account a range of evidence as follows.

##### Quantifying the OAN for new housing in St.Helens Borough

- 4.18.2 National planning policy requires Local Plans to use the nationally defined standard method to identify housing OAN unless exceptional circumstances justify an alternative approach. It also indicates that alternative approaches identifying a higher need than that indicated by the standard method will in principle be considered sound.
- 4.18.3 The standard method uses household growth projections over a 10 year period as its starting point, to which it applies an 'uplift' to account for affordability issues to derive an annual housing need figure, that can be applied to the whole Plan period.
- 4.18.4 The most recent sub-national household projections, which have a base date of 2016, were published in September 2018. However, the Government has published draft proposals the effect of which (in the context of St.Helens Borough) is that calculation of housing need based upon the standard method should be "informed" by the 2014 based and not the 2016 based household projections. Application of the national standard method using this approach would generate a housing need of 468 new dwellings per annum.
- 4.18.5 A key disadvantage of relying on the standard method to identify housing is that it does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development in Policy LPA04. This employment growth is likely to lead to increased housing need. In addition, the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method. To address these points the Council has considered a range of other evidence to identify the housing OAN, as follows.

- 4.18.6 The Mid Mersey Strategic Housing Market Assessment (SHMA) 2016 confirmed that the local authority areas of St.Helens, Warrington and Halton comprise a single Housing Market Area and that St.Helens also has significant housing market and migration linkages with Knowsley and Wigan. The draft Liverpool City Region SHELMA, published in 2017, assessed housing needs across the whole City Region and West Lancashire but excluding Warrington.
- 4.18.7 The St.Helens SHMA update 2018 used more recently published household and population projections, together with updated data linked to the development of the employment site allocations in Policy LPA04 of this Plan, to assess the housing OAN figures. It does so by assessing a range of demographic and economic led scenarios, for example: using assumptions concerning the expected rate of jobs growth; the numbers of supporting jobs that would be generated; employment rates; and commuting patterns.
- 4.18.8 Whilst the scenarios in the SHMA update 2018 indicate a range of annual housing needs figures, the scenario that is considered to be the most realistic gives rise to a need figure of 486 net new dwelling completions per annum.

The housing requirement

- 4.18.9 It has been established (see the supporting text to Policy LPA02) that the Borough does not need to accommodate any housing needs arising in any neighbouring local authority area, and that no neighbouring local authority has capacity within their urban area(s) to accommodate any of the housing needs arising in St.Helens Borough. As a result, and as no constraints have been identified that prevent the OAN from being met in full in the Borough, the housing requirement figure set out in Policy LPA05 equates to the identified OAN (of 486 dwellings per annum) for new housing. This requirement is net of (i.e., in addition to) dwellings required to replace any demolition losses that may take place during the Plan period. As it is an annual average it can be expected that variations in delivery over this period will occur.

Housing land supply

- 4.18.10 In accordance with Policy LPA02, a key priority is to maximise housing delivery on previously developed ('brownfield') land within existing urban areas. The St.Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 identifies that sites in the urban area (as at 1 April 2017) had a total capacity of 7817 dwellings. This figure includes sites with planning permission or under construction and other sites identified as suitable for housing and an allowance of 93 units per annum from small windfall sites of less than 0.25 hectare based upon past delivery. The largest SHLAA sites are allocated as sites 3HA, 9HA and 10HA in Policy LPA05.
- 4.18.11 Some of the SHLAA sites are subject to physical or other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities. An allowance of 15% has been made for reduced delivery on the SHLAA sites over the later years of the SHLAA period. Total delivery from sites in the urban area is expected to fall substantially short of the total housing delivery required under Policy LPA05. As a result, the proposed land supply includes a number of allocated sites that have been released from previous designation as Green Belt. This element of the supply includes a contingency of 20% to allow for potential delays in development,

for example to allow for the provision of essential infrastructure in currently undeveloped areas and other issues that may affect supply. The overall contribution from the different sources of land is summarised in Table 4.6.

#### Distribution of housing

- 4.18.12 In accordance with Policy LPA02, the housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold. In total, the allocated brownfield sites (3HA, 6HA, 9HA and 10HA) have an estimated capacity of 2,029 dwellings in the Plan period. The location of sites that have been released from the Green Belt has been determined by the St.Helens Green Belt review. In total, the former Green Belt sites (1HA, 2HA, 4HA, 5HA, 7HA, and 8HA) have an estimated capacity of 2,056 dwellings in the Plan period. Whilst this process has constrained the ability to identify suitable sites in some key settlements, all settlements will have opportunities for housing development either within them or nearby.

#### Density

- 4.18.13 To ensure that land is used efficiently, Policy LPA05 encourages the use of high densities in appropriate locations for example on sites that are close to town or district centres or to public transport facilities. Densities of less than 30 dwellings per hectare are discouraged except where there is a legitimate planning reason for them, for example to ensure that development integrates successfully with the prevailing built form of the area.
- 4.18.14 The density of development on each allocated site should be at or above the minimum figures given in Table 4.5. The stated capacities of each site listed in the table are indicative and do not represent either maximum or minimum figures. The actual capacity will be determined at planning application stage having regard to the acceptability of the proposals against relevant national and local policies.

#### Small sites

- 4.18.15 The Council is keen to promote the role of small sites in helping to meet its housing requirement. The St.Helens Brownfield Register 2017 identifies 62 sites, with a combined capacity of 852 dwellings that are no larger than one hectare in size. This represents just over 10% of the total requirement for new housing from the date of the Register onwards. Further contributions in this respect can be anticipated from small greenfield sites identified (in the St.Helens SHLAA 2017) and from the 'small sites' windfall allowance of 93 units per annum set out in the SHLAA.

**Table 4.6: Housing land requirements and supply – 2016 until 2035**

Requirements	Dwellings
St. Helens housing requirement (19 years from 1/4/2016 to 31/3/2035) at average of 486 per year	9,234
Expected completions by 1/4/2020	1,989
Residual requirement over Local Plan period from 1/4/2020 to 31/3/2035	7,245 <sup>14</sup>

<sup>14</sup> This figure is calculated by subtracting the figures in rows b and c from the overall requirement (row a)

Requirements	Dwellings
Anticipated supply	
Total SHLAA supply– 1/4/2017 until 31/3/2035	7,817 <sup>15</sup>
...consisting of:	
Large sites (0.25ha or 5 units and above) - planning permission not started as of 1/4/2017	1,581
Large sites with planning permission under construction as of 1/4/2017	654
Large sites with planning permission but stalled as of 1/4/2017	289
Large sites - identified by 2017 SHLAA, no planning permission as of 1/4/2017	4,107
Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance)	1,395
Estimated SHLAA supply – 1/4/2020 until 31/3/2035	6,344
SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)	794
Residual SHLAA capacity over 15 year Plan period (1/4/20 - 30/3/35)	5,550
Required capacity to be found on Green Belt land	1,695
Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays in lead-in times to start of housing delivery)	2,034
<b>Total capacity of allocated sites removed from the Green Belt (sites 5HA to 13HA inclusive) (1/4/20 - 30/3/35)</b>	<b>2,172</b>
<b>Total supply over plan period</b>	<b>7,722</b>

#### Permission in Principle

- 4.18.16 Under recent legislation, Permission in Principle (PiP) provides a new mechanism under which development including the provision of new homes may be permitted on suitable brownfield sites. The Council can grant PiP for a site upon receipt of a valid application or by entering a site in Part 2 of its brownfield land register subject to various statutory requirements being met. Whilst this power has not (as at the end of 2018) been applied to any sites in St.Helens Borough, the Council will continue to assess the merits of using the PiP mechanism in the future to boost housing delivery.

#### Re-use of vacant dwellings

- 4.18.17 Council tax data confirms that in October 2017, 936 dwellings in St.Helens Borough met the Government criteria for being long term vacant for six months or longer. The Council uses a number of methods in line with its Empty Homes Strategy to enable and encourage private owners to bring vacant dwellings back

15 The SHLAA supply figure (row e) includes planning permissions, windfall allowance, allocated sites 1HA to 4HA and other sites. It includes the figures for the period up to 2032 in figure 4.3 of the Strategic Housing Land Availability Assessment 2017 and an additional allowance for the years from 2032 to 2035.

into use. As a result, the Council has enabled over 400 vacant dwellings to be brought back into use since April 2014. However, whilst this activity makes a contribution to meeting housing needs it must be balanced against the fact that the Council has only limited control over the overall number of vacant dwellings, which is affected by landowner decisions and other factors. For this reason, the housing supply figures in Table 4.6 do not include an assumed contribution to the overall supply of housing from trends in the numbers of vacant dwellings.

#### Phasing of delivery and housing trajectory

- 4.18.18 To ensure flexibility and choice in the housing market, Policy LPA05 does not phase the release of allocated housing sites into different parts of the Plan period up to 2035. However, in accordance with Policy LPA08 the timing of delivery of some sites is likely to be influenced by the availability of any necessary infrastructure to serve the needs of the development.
- 4.18.19 The trajectory set out in Table 4.7 identifies at what stages delivery of new housing required over the Plan period can be anticipated. It is assumed that most sites allocated in Policy LPA05 will be developed in their entirety within the Plan period. Where a longer delivery schedule is expected (extending beyond 2035) the expected delivery within the Plan period has been estimated on the basis of assumptions concerning the number of developers who would be likely to be active on each site and the likely delivery rates from each.

**Table 4.7: Housing Trajectory**

Year	Allocated Sites	Other Supply	Total
2020/21	0	581	581
2021/22	0	467	467
2022/23	160	584	744
2023/24	160	584	744
2024/25	160	584	744
2025/26	200	584	784
2026/27	181	584	765
2027/28	136	294	430
2028/29	101	294	395
2029/30	160	294	454
2030/31	160	294	454
2031/32	160	294	454
2032/33	160	138	298
2033/34	160	138	298
2034/35	160	138	298

- 4.18.20 The delivery of housing will be monitored over the Plan period. If at any stage delivery falls below 95% of the required level over the previous three years, the Council will prepare an action plan (in accordance with the Housing Delivery Test set out in national planning policy) to address the causes of under-delivery. If delivery or current deliverable land supply falls substantially below the required level, the Council may undertake a Local Plan review to bring forward additional sites such as those that are safeguarded under Policy LPA06.



## 4.19 Policy LPA05.1: Strategic Housing Sites

### **Policy LPA05.1 Strategic Housing Sites**

1. The following sites allocated under Policy LPA05 shall constitute Strategic Housing Sites:
  - 2HA: Land at Florida Farm (South of A580), Slag Lane, Blackbrook
  - 3HA: Former Penlake Industrial Estate, Reginald Road, Bold
  - 4HA: Land bounded by Reginald Road / Bold Road / Travers Entry / Gorsey Lane / Crawford Street, Bold (Bold Forest Garden Suburb)
  - 5HA: Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold
  - 6HA: Land at Cowley Street, Cowley Hill, Town Centre
  - 9HA: Former Linkway Distribution Park, Elton Head Road, Thatto Heath
  - 10HA: Moss Nook Urban Village, Watery Lane, Moss Nook
2. Any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan covering the whole site that must set out details of at least:
  - a) amount of development and proposed uses;
  - b) phasing of development across the whole site;
  - c) indicative layout and design details for the whole site that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;
  - d) measures to provide good levels of accessibility to the whole site from the surrounding area by public transport, pedestrian and cycling links;
  - e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;
  - f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage in a holistic and integrated way;
  - f) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;
  - g) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;
  - h) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and
  - i) how development of the site as a whole would comply with other relevant policies of the Local Plan.

3. Detailed development proposals within a Strategic Housing Site will be required, subject to compliance with Policy LPA08, to provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on- or off-site and must be provided in time to meet the needs of the development. Where the specific development proposal would only cover part of the Strategic Housing Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in part 2 of this Policy.
4. The masterplans for each Strategic Housing Site, and any planning application for development within any other allocated housing site, must address the indicative requirements set out in Appendix XX.

#### 4.20 Policy LPA05.1: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 2, SA 4, SA 5, SA 6
<b>Strategic Objectives Met</b>	SO 1.1, SO 2.1, SO 4.1, SO 5.1, SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Masterplanning process</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

#### 4.21 Reasoned Justification

- 4.21.1 The sites in Policy LPA05.1 are considered to be strategic as, given their scale (with an indicative capacity of more than 300 dwellings each), they will play a significant role in the delivery of the overall strategy of the Plan. It is anticipated that during the Plan period these sites will deliver the bulk of housing required to meet need. Other sites identified for allocation within Policy LPA05 are not considered large enough to warrant a strategic allocation. Whilst such sites are anticipated to yield smaller numbers of homes compared to strategic sites, their allocation will support the overall delivery of housing and they will be a key part of the supply balancing out the phased delivery that is likely to result from the build out of the large strategic housing sites.



## 4.22 Policy LPA06: Safeguarded Land

### Policy LPA06: Safeguarded Land

1. The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond the Plan period. Such Safeguarded Land is not allocated for development in the Plan period. The future uses for which the sites are safeguarded are listed in Tables 4.7 and 4.8.
2. Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused.
3. Other forms of development on Safeguarded Land will only be permitted where the proposal is:
  - a) necessary for the operation of existing permitted use(s) on the land; or
  - b) for a temporary use that would retain the open nature of the land and would not prejudice the potential future development of the land for the purposes stated for each site in Tables 4.7 and 4.8.
4. Development on any other site that would prevent or limit development of Safeguarded Land for its potential future uses identified in Tables 4.7 and 4.8 will not be permitted.

**Table 4.7: Safeguarded Land for Employment**

Reference Number	Site Name	Area (hectares)
1ES	Omega North Western Extension, Bold	29.98
2ES	Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock	55.90
<b>Employment Total</b>		<b>85.88</b>

**Table 4.8: Safeguarded Land for Housing**

Ref.	Site Name	Area (hectares)	NDA <sup>16</sup> (indicative)	Density (dwellings per hectare)	Capacity <sup>17</sup> (indicative)
1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	12.58	75%	30	283
2HS	Land between Vista Road and Belvedere Road, Earlestown	8.04	75%	30	181
3HS	Former Eccleston Park Golf Club, Rainhill Road, Eccleston	48.86	65%	30	956 <sup>18</sup>
4HS	Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	9.76	75%	35	256
5HS	Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows	6.82	75%	35	179
6HS	Land East of Chapel Lane and South of Walkers Lane, Sutton Manor	4.66	75%	30	105
7HS	Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath	3.72	75%	30	84
8HS	Land South of A580 between Houghtons Lane and Crantock Grove, Windle	49.75	65%	30	1,027
<b>Housing Total</b>					<b>2,641</b>

<sup>16</sup> 'NDA' is the estimated 'net developable area' of each site

<sup>17</sup> The capacity of each safeguarded site would be assessed further prior to any decision to allocate it for development in a future Local Plan.

<sup>18</sup> The capacity of 3HS may be capped in the region of 500 until highways capacity issues in the area are addressed

## 4.23 Policy LPA06: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 4, SA 5, SA 6
<b>Strategic Objectives Met</b>	SO 1.1, SO 4.1, SO 5.1, SO 6.2
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Future review of Local Plan (to consider any need to release safeguarded land for development)</li> </ul>

## 4.24 Reasoned Justification

- 4.24.1 In accordance with Policy LPA02 'Spatial Strategy', the sites listed in Tables 4.7 and 4.8 have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 2035. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2035. The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St.Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8. This is to ensure that they could potentially be used for these purposes in the future.
- 4.24.2 The development of the safeguarded sites for the purposes in Tables 4.7 and 4.8 will only be acceptable if a future Local Plan confirms that such development is both acceptable and required. The case for developing the sites is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity and any other factors that may affect the delivery of the sites at that time.
- 4.24.3 The estimated combined capacity of the 2 sites (1ES and 2ES) safeguarded for employment use is 85.88ha. Of these sites, Site 1ES would form an extension to Omega North in Warrington whilst Site 2ES would form an easterly expansion of Haydock Industrial Estate, albeit on the opposite side of the M6. The timing, form and extent of any development that may be acceptable in the future on these sites is likely to be influenced by the need to ensure a phased approach to meeting overall employment needs and the extent to which current constraints affecting these sites have been overcome. In the case of Site 1ES, these include the need to ensure that the site can be satisfactorily accessed from the highway across land outside the site and that the site can be developed, in conjunction with other sites, without causing unacceptable impacts on the highway network in Warrington. In the case of Site 2ES, the form and extent of any development that may be acceptable in the future is likely to be influenced by its interrelationship with Junction 23 of the M6, where a need for substantial improvements (likely to include enlargement of the junction) to enhance junction capacity within the Plan period has been identified (see Policy LPA07).
- 4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,641 dwellings. To this can be added the indicative post-2035 delivery of 2,995

dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 2035. Further contributions are likely to be made from windfall sites and other sources after 2035. It should also be noted that household growth rates in St.Helens Borough are currently projected to reduce in the years up to and after 2035, meaning that it is likely that post-2035, housing needs may be lower than between 2020 and 2035.

- 4.24.5 The safeguarded housing sites have been identified in a range of locations across the Borough. Although the safeguarded sites may be suitable for development in the future they are not identified for development in the Plan period due to the need to ensure a suitably phased release of housing sites to meet needs, and the need to overcome specific constraints affecting individual sites. Further information concerning these constraints is set out in the St.Helens Green Belt Review 2018.

## 4.25 Policy LPA07: Transport and Travel

### **Policy LPA07: Transport and Travel**

1. The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:
  - a) Secure the delivery of new or improved road, walking, cycling, and / or bus infrastructure where required;
  - b) Ensure new development is sufficiently accessible by road transport, walking, cycling and public transport;
  - c) Secure improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7;
  - d) Improve the accessibility of jobs, homes and services by all modes of transport and protect opportunities to achieve such improvements
  - e) Secure the delivery of: a new station at Carr Mill; any necessary improvements to local stations and rail lines; the proposed Skelmersdale Rail Link; and any infrastructure required to deliver HS2 or HS3 (Northern Powerhouse Rail); and
  - f) Protect former railway lines and corridors from development that could hinder their future re-use for sustainable modes of transport.
2. All proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement.
3. New development will only be permitted if it would:
  - a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network
  - b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services;
  - c) provide appropriate provision of charging points for electric vehicles;
  - d) enable good levels of accessibility by walking and cycling between homes, jobs and services;
  - e) provide for safe and convenient pedestrian, cycle and vehicular access and movement to, from and within the development;
  - f) include adequate access arrangements for emergency, service and refuse collection vehicles; and
  - g) provide sufficient on-site parking for persons of limited mobility, service vehicles, and cycles that must at least meet the Council's minimum standards, and adequate parking for all other vehicles.

4. To minimise air and noise pollution and carbon emissions, non-residential forms of development that would generate a significant amount of transport movement by employees or visitors must be supported by suitably formulated Travel Plans.
5. Development that would generate significant movement of freight must be located where there is a safe, convenient and environmentally acceptable access route to a suitable part of the Key Route Network. The part of the Network that is marked as 'Key Route Network – non freight' on the Policies Map shall not be regarded as suitable in this context. Access into a new development (of any land use) directly from the Key Route Network will only be allowed if this would not unduly restrict the capacity of the road or cause harm to highway safety, and where no more suitable alternative exists.
6. Direct access from new development on to the Strategic Road Network will only be permitted where agreed by Highways England.
7. Where rail facilities are available or would be made so as part of a development generating significant movement of freight this will be regarded as a benefit.
8. Development proposals must not prevent or jeopardise the implementation of planned transport schemes unless it has been demonstrated to the satisfaction of the Council that: the transport scheme is no longer required; there is a feasible and viable alternative to it; or the benefits of the proposed development would outweigh those of the planned transport scheme. Planned transport schemes include, but are not limited to proposals for new or upgraded footpath, cycle path, bridleway, road, rail, bus and / or other public transport facilities that would be on the same site as, adjacent to or be otherwise affected by the development.
9. Further details of the operation of this Policy, for example those related to the Council's vehicle and cycle parking standards, standards for vehicle charging point provision, and to the requirements concerning transport assessments, transport statements and travel plans will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document.

## 4.26 Policy LPA07: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 3
<b>Strategic Objectives Met</b>	SO 3.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Liverpool City Region: A Transport Plan for Growth and supporting strategies</li> <li>• Merseyside Local Transport Plan 2011</li> <li>• St.Helens Infrastructure Delivery Plan</li> </ul>

## 4.27 Reasoned Justification

- 4.27.1 An effective transport network is needed to support a strong economy and a strong community. Quality environments that are conducive to walking and cycling can contribute to a healthier lifestyle. The measures and priorities identified in Policy LPA07 should help support economic growth, improve access to employment and services and support a healthier lifestyle. These priorities reflect those in 'A Transport Plan for Growth' (published by the Liverpool City Region Combined Authority) and its supporting strategies.

### Carbon Emissions and air quality

- 4.27.2 Transport is a major source of carbon dioxide emissions which, in turn, is a major cause of climate change. Therefore transport can play a key part in the development of a low carbon economy. Many of the priorities identified in this Policy will play an important part in helping to de-carbonise transport. Measures to reduce the need to travel, widen travel choice and reduce dependence on the private car, alongside investment in low-carbon vehicle technologies are an important part of helping to meet national climate change targets. Similarly they form an important part of the Council's drive to tackle air quality issues, particularly (but not exclusively) within Air Quality Management Areas some of which adjoin major roads (see Policy LPD09 for further details).

### Transport Assessments

- 4.27.3 Development proposals that are likely to generate a significant number of trips require close scrutiny to identify the highway issues and solutions associated with them. In such cases, a more detailed assessment of the extent to which the development will contribute to the following aims, in the form of a Transport Assessment, may be requested:
- Enabling access by all users or occupiers of the development to a suitable range of viable means of transport;
  - Limiting any harm from traffic in respect of safety issues, noise and air pollution or to local amenity; and
  - Ensuring safe and easy access to and from the development for all of its users.



### Travel Plans

- 4.27.4 A Travel Plan can help reduce the number of car trips to a development. Travel Plans aim to reduce the number of journeys needed, where possible, and to encourage choice and the use of sustainable means of transport by the occupiers of new developments. This includes, for example, car-sharing, working from home, awareness-raising campaigns or subsidised public transport season tickets. Travel Plans should be used to ensure that travel demand arising from new development will make the best use of sustainable transport.

### Merseyside Local Transport Plan

- 4.27.5 The Merseyside Local Transport Plan 3 (LTP3) provides a long-term strategy and delivery programme of transport investment and service improvements. It aims to give Merseyside a safer, more sustainable, efficient and integrated transport network, accessible to all. The Plan is operational from 2011 until 2024 and covers Liverpool, Knowsley, Sefton, St.Helens Borough and the Wirral.
- 4.27.6 LTP3 has the following vision:
- “A city region committed to a low carbon future, which has a transport network and mobility culture that positively contributes to a thriving economy and the health and wellbeing of its citizens and where sustainable travel is the option of choice”*

### A Transport Plan for Growth

- 4.27.7 The Liverpool City Region Combined Authority document ‘A Transport Plan for Growth’ 2015/16, aims to improve the social, environmental and economic wellbeing of the City Region, by delivering a world-class transport network. It brings together the existing Local Transport Plans of Merseyside and Halton. The Transport Plan for Growth has been developed to provide a clear vision for a successful transport provision in the City Region, and act as an investment plan to promote and support economic growth. The City Region authorities will continue to work together to produce a new Local Transport Plan for the whole area from 2025.

### Key Route Network

- 4.27.8 The Key Route Network in the Liverpool City Region establishes the same standards of road and traffic management and maintenance of the most important roads in the City Region providing a consistent and integrated network. The Network in the Borough includes lengths of the A570, A580 and A58. Whilst much of the Network is suitable for the movement of freight, this does not apply to the length of the A58 linking St.Helens to Prescot. The Network is substantially based upon the Strategic Freight Route identified in the Merseyside Freight Strategy (LTP3 Annex 4, 2011), and is shown on the Policies Map and illustrated in the Key Diagram.

### Highway Improvement Lines

- 4.27.9 Highway Improvement Lines identify land set aside for possible future highway use in the Borough.



Supporting Supplementary Planning Guidance

- 4.27.10 A new Supplementary Planning Document will be prepared to support the implementation of this Policy. The existing Ensuring Choice of Travel SPD will be updated as part of this process.

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## 4.28 Policy LPA08: Infrastructure Delivery and Funding

### **Policy LPA08: Infrastructure Delivery and Funding**

#### Protection, improvement and provision

1. The Council will seek to ensure satisfactory provision of all forms of infrastructure that are required to serve the needs of the local community by:
  - a) Protecting existing infrastructure from loss where there is an identified need for it;
  - b) Supporting the improvement of existing infrastructure where there is an identified need for such improvement;
  - c) Safeguarding land for planned new or improved infrastructure where there is an identified need for it;
  - d) Seeking developer contributions in accordance with clauses 2 to 7 below; and
  - e) Requiring new community facilities and other social infrastructure to be located where they would be accessible by a choice of sustainable modes of transport and, where possible, clustered with other such facilities.

#### Developer Contributions

2. Subject to compliance with relevant legislation and national policy, development proposals will be expected to include or contribute to the provision, improvement or replacement of infrastructure that is required to meet needs arising from the development proposal and / or to serve the needs of the wider area. This may include direct provision of on-site or off-site infrastructure and / or financial contributions that will be secured by:
  - a) Section 106 planning obligations (or other legally binding agreements); and / or
  - b) A tariff based system such as the Community Infrastructure Levy.
3. Where the suitability of development depends upon the provision of additional or improved infrastructure or service capacity, that development should be phased to coincide with the provision of such infrastructure or capacity.
4. In applying this Policy, regard will be had to relevant evidence including the latest version of the St.Helens Infrastructure Delivery Plan.

#### Economic Viability

5. When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development. In this context, consideration will be given to plan-level economic viability evidence and any site specific development appraisal that may have been submitted to determine the ability of the development scheme to support the required level of contributions.

#### Hierarchy of Developer Contributions

6. Decision makers will, as a general rule, apply the following hierarchy for developer contributions in cases where viability constraints can be demonstrated (with i) being the highest priority):
  - i) contributions that are essential for public safety (for example essential highway works or flood risk mitigation) or to achieve a minimum acceptable level of design quality;
  - ii) contributions that are necessary to provide affordable housing or to address a local infrastructure requirement or deficiency that would be caused or exacerbated by the development, for example education needs or green space provision in areas of deficit; and
  - iii) contributions that would not fall into categories i) or ii) as set out above.
7. Decisions on planning applications may deviate from the above hierarchy where a specific need to do so has been identified. The Council will provide further guidance in a future Developer Contributions Supplementary Planning Document and in the Infrastructure Delivery Plan (including any future updates to this).

#### 4.29 Policy LPA08: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	All
<b>Strategic Objectives Met</b>	All
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Public and private sector investment plans</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

### 4.30 Reasoned Justification

- 4.30.1 The provision of high quality infrastructure is a key element in the delivery of successful, sustainable communities. In this context, the term 'infrastructure' (which is defined in full in Appendix XX) includes:
- i) Physical infrastructure such as roads, railways, sewers and water supplies;
  - ii) Social infrastructure such as education and health establishments, neighbourhood retail or leisure uses, built sports and recreation facilities, cultural, emergency service and community facilities and institutions;
  - iii) Green Infrastructure such as parks and playing fields; and
  - iv) Digital infrastructure such as telephone and internet facilities.
- 4.30.2 Working with infrastructure providers and other partner organisations, the Council will seek to ensure that sufficient infrastructure is available to support new development. This will be done by supporting the effective protection and management of existing infrastructure (including effective demand management) and where necessary the provision of new or improved infrastructure, particularly in areas that are expected to accommodate major development. This can include the provision of wholly new road or other infrastructure, or investment in existing infrastructure to cope with additional demand, for example the expansion of local schools to cope with additional students arising from a new large housing development in the local area.
- 4.30.3 Where proposed development would result in the loss of built sports and recreational facilities, decision makers will follow the approach set out in the NPPF informed by the most up-to-date local needs assessment for built sports facilities.
- 4.30.4 Infrastructure may also need to be replaced or repaired during its operational lifetime, or to be upgraded to take account of new technologies, for example in relation to energy production and digital infrastructure. It will be necessary for local delivery partners to work closely together to ensure that a sufficient level of infrastructure provision is available.
- 4.30.5 Many forms of development have some impact on the need for infrastructure, services and amenities and should therefore (subject to national legislation and policy) contribute towards their costs of provision. Hence, it is appropriate for the Council and other decision makers to consider the mechanisms by which such contributions can be sought from developers.
- 4.30.6 The Council has no proposals, at the time of adoption of this Plan, to introduce a Community Infrastructure Levy (CIL). This means that developer contributions will in most cases be sought via planning obligations entered into under Section 106 of the Planning Acts. The National Planning Practice Guidance sets out various circumstances in that 'tariff style' planning obligations should not be sought from small scale and / or self-build development. For example, contributions should not be sought from developments of 10 dwellings or less, and that have a maximum combined gross floorspace of no more than 1,000m<sup>2</sup> (gross internal area). The Council will comply with the up-to-date version of national guidance in operating Policy LPA08.

- 4.30.7 To support Policy LPA08 and comply with national policy, the Council, through a process of engagement with key infrastructure providers, has prepared a St.Helens Infrastructure Delivery Plan. This will be updated and revised in future years in line with the Borough's changing needs for, and opportunities to provide, required infrastructure.
- 4.30.8 The Mid Mersey Water Cycle Study 2011 identified that further investigation is required to determine headroom capacity within the St.Helens waste water treatment plant. United Utilities has a responsibility to ensure that there is sufficient water treatment capacity to accommodate the needs of the area in a way that protects environmental assets, including the coastal and estuarine designated European ecological sites (see Policy LPC06 for further details). The Council will continue to identify any development pressures at an early stage so that appropriate steps can be taken to ensure that sufficient headroom is provided for the future levels and locations of development identified within the Plan.
- 4.30.9 To support Policy LPA08, the Council has published a Borough-wide economic viability assessment. This helps to identify the level and range of developer contributions (including 'in kind' contributions or financial contributions) that can be sought without prejudicing the financial viability of different types of development in different areas. It is anticipated that in some cases, development-level economic viability assessments may also be submitted by developers to account for site-specific circumstances and costs. Developers will be expected to fund these assessments, which must be undertaken objectively and transparently, and will be scrutinised before a decision is taken on the proposal.

## 4.31 Policy LPA09: Green Infrastructure

### **Policy LPA09: Green Infrastructure**

1. Green Infrastructure in St.Helens Borough comprises a network of multi-functional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside areas. This network is capable of delivering a wide range of environmental and quality of life benefits for local communities and forms an important element of the Liverpool City Region (LCR) Ecological Network.
2. The Council will work with other organisations where necessary to:
  - a) expand tree cover in appropriate locations across the Borough to improve landscape character, water and air quality and the value of trees to wildlife;
  - b) strengthen and expand the network of wildlife sites, corridors and stepping stone habitats to secure a net gain in biodiversity;
  - c) improve and increase the connectivity of the Greenway network;
  - d) increase the accessibility of open space within walking distance of housing, health, employment and education establishments to promote healthy lifestyles;
  - e) reduce the risk of flooding, improve river water quality and riverine and riparian habitats within the Sankey Catchment; and
  - f) ensure that development proposals on strategic employment and housing sites incorporate holistic Green Infrastructure Plans.
3. Developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites.
4. Development that would contribute to or provide opportunities to enhance the function of existing green infrastructure and its connectivity from residential areas, town, district and local centres, employment areas and other open spaces, will be encouraged. Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused. The only exceptions to this will be where it has been demonstrated that: appropriate protection or retention of Green Infrastructure assets cannot be achieved; the development would bring benefits that would over-ride the resultant harm; and there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation and / or as a last resort compensatory provision will be required.

#### 4.32 Policy LPA09: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Creation of new Local Nature Reserves</li> <li>• Mersey Forest Plan/Town in the Forest Initiative</li> <li>• Development management process</li> <li>• Development of the Sankey Canal Corridor as a multi-functional green corridor</li> <li>• Enhancement and restoration of the Liverpool City Region (LCR) Ecological Network and the LCR Nature Improvement Area</li> <li>• Sankey Catchment Action Plan</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

#### 4.33 Reasoned Justification

- 4.33.1 Policy LPA09 aims to protect, enhance and sustain the Borough's natural assets and increase accessibility to them and connectivity between them, whilst protecting and enhancing landscape character, to ensure that the natural environment underpins the quality of life. The Green Infrastructure network in the Borough has a wide range of functions and values for recreation and tourism, air quality, public access, health, heritage, biodiversity, water management and landscape character; providing a sense of place, distinctiveness and quality of life. Much of the network (such as Bold Forest Park and the Sankey Valley Park) is influenced by the town's industrial past of coal mining, glass making and chemical production and has a strong heritage value. Mossland has historically been drained for agriculture and the remnant stock (including **Kings Moss and Colliers Moss Common**) provide multi-functional benefits for water management, carbon storage and biodiversity. The Liverpool City Region Ecological Network (see Policy LPC08 for further details) and the 25-year Environment Plan target habitat creation and restoration of mossland areas in the borough.
- 4.33.2 The Green Infrastructure network includes (in addition to urban greenspaces, trees, and water bodies etc.) the countryside around the towns, which accounts for around 50% of the Borough's land area. This is predominantly productive farmland. The importance of countryside around the Borough's more urban locations was recognised by the pilot study 'Countryside In and Around Towns'<sup>19</sup> undertaken with the Countryside Agency (now Natural England) in 2006. In

<sup>19</sup> **Evidence base document**



implementing Policy LPA09 (in both urban and rural areas) the Council will seek to liaise closely with, and where necessary work in partnership with, landowners.

- 4.33.3 Open space forms a part of Green Infrastructure and for the purposes of this policy includes formal intensively managed open space such as parks, sports grounds, amenity Greenspace, play areas, allotments, cemeteries and church yards. It also includes natural and semi-natural open space that is less- intensively managed with more attention given to natural habitats of value to wildlife. Many of these form greenway links between the countryside and urban areas. The NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- 4.33.4 St.Helens Council commissioned studies in 2006<sup>20</sup> and 2016<sup>21</sup> to examine the provision of open space in the Borough. In accordance with the NPPF, the studies have identified specific needs and local standards of provision (that are informed by community and stakeholder consultation concerning existing levels of provision and accessibility). These studies have also identified surpluses and deficits against these standards.
- 4.33.5 The 2016 study concluded that in overall terms there is a sufficient quantity of open space; however, there are areas where there are deficiencies in the quantity, quality and / or accessibility of open spaces. Policy LPA09, in combination with other Plan policies (e.g., Policy LPC05) address this by seeking to ensure the protection and provision of open space to meet the communities' needs and safeguard the visual amenity and character of the built up area.
- 4.33.6 The NPPF 2018 requires development plans to *"take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."* The local authorities in the City Region have worked together to prepare the LCR Ecological Network as a joint evidence base and to plan for biodiversity at a landscape- scale.
- 4.33.7 The Government's 25 year Environment Plan has a target to increase the coverage of woodland in England by up to 12% by 2060. This would involve planting 180,000ha by the end of 2042. The Government supports the development of the Northern Forest along the M62 Corridor, through the partnership of the Community Forests and the Woodland Trust. The Mersey Forest Plan sets local targets for woodland cover including in St.Helens Borough. Policy LPA09 seeks to promote a joined up approach that will support delivery of these other strategies.

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#### 4.34 Policy LPA10: Parkside East

##### **Policy LPA10: Parkside East**

The Parkside East site (identified as Site 7EA in Policy LPA04) shall be considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes.

2. The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would:
  - a) bring significant inward investment, local employment and training benefits for the local community; and
  - b) (i) be rail served (i.e., requiring on-site access to a railway); or  
(ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings and landscaping), on at least 60 hectares of the site, at any time in the future.
3. Proposals for development within site 7EA will be required to:
  - a) Satisfy the masterplanning requirements set out in Policy LPA04.1
  - b) Create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles;
  - c) Mitigate any adverse impacts on the surrounding strategic and local road network;
  - d) Comply with Policy LPC11 in relation to the protection of designated heritage assets;
  - e) Achieve direct rail access to and from the Liverpool / Manchester ('Chat Moss') and the West Coast Main Lines (unless agreed otherwise by the Council);
  - f) Be designed to minimise impacts on residential amenity;
  - g) Establish and implement a Travel Plan that incorporates measures to encourage travel to/from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy LPA07;
  - h) Make provision for the positive management of existing and new environmental assets; and

- i) Put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to and employment at the site.
4. That part of site 7EA which falls to the west of the M6 is safeguarded from all forms of development so that it may provide future siding facilities in connection with the development of an SRFI or other rail enabled development within the part of the site which falls to the east of the M6 (see policies map).

#### 4.35 Policy LPA10: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 3, SA 5
<b>Strategic Objectives Met</b>	SO 1.1, SO 3.1, SO 5.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Liverpool City Region Combined Authority funding</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

#### 4.36 Reasoned Justification

- 4.36.1 There is a long standing history of developer interest in providing a Strategic Rail Freight Interchange (SRFI) on land within and close to the former Parkside Colliery. There have been a number of planning applications for such a use and the area was highlighted as a potential location for this use in the now withdrawn Regional Spatial Strategy for the North West (2008).  
[National Policy Statement for National Networks \(2015\)](#)
- 4.36.2 The National Policy Statement for National Networks (NPS) 2015 recognises that the railway network forms a vital part of the UK's transport infrastructure that must:  
*"... provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life".*
- 4.36.3 The NPS strongly supports the development of an expanded network of SRFIs to help promote economic development (by responding to the changing needs of the logistics sector and addressing growth in movement of freight by rail) and addressing climate change. The NPS also stresses that SRFIs should be located near to business markets such as major urban centres or groups of centres and be linked to key supply chain routes. It suggests that SRFI capacity needs to be provided at a wide range of locations to provide the flexibility needed to match the changing demands of the market.

#### Transport for the North

- 4.36.4 The Transport for the North (TfN) Freight and Logistics Report (2016) concludes that 850ha of land should be developed for rail and / or water connected Multimodal Distribution Parks (MDPs) between 2016 and 2033. This is required to reduce the cost of freight transport, expand market share in the logistics sector and attract private inward investment to the North.
- 4.36.5 The Draft TfN Strategic Transport Plan (2018) identifies that the growth of the freight and logistics sector will be crucial to support the transformational economic growth ambitions of the North. It also identifies the need for improvements in the arrangements for interchanging goods movements between road and rail, and supports the development of sites with multi-modal access.
- 4.36.6 The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres). The report identifies four main principles for investing in and enhancing rail freight interchange infrastructure, including north-south and east-west connectivity and intermodal connectivity. These principles will be used to guide Strategic Development Corridor studies to be undertaken by TfN to produce a prioritised programme of investment.

#### Liverpool City Region Growth Plan and Strategic Economic Plan (2016)

- 4.36.7 The LCR Growth Plan and Strategic Economic Plan (2016) identifies logistics as one of six growth sectors. Due to its location with good access to the M6 and two major railway lines, the Parkside site has substantial scope to help grow the logistics sector by being developed as an SRFI. The LCR Freight and Logistics Strategy is being prepared to maximise the contribution made by the freight and logistics sector to the economic growth of the City Region. This is expected to present a suite of interventions to capitalise on this opportunity. The LCR Combined Authority is also continuing to explore options to progress the design of the required rail connections to the Parkside site.

#### Parkside Link Road scheme

- 4.36.8 The Parkside Link Road will comprise a 3.5km length of single / dual carriageway road that will provide access to the Parkside East and West sites (sites 7EA and 8EA) from M6 Junction 22 and the local road network, using the existing A573 Parkside Road bridge over the M6. The Council is in the process of securing funding to progress the delivery of the link road scheme.

#### Parkside Logistics and Rail Freight Interchange Study (AECOM and Cushman & Wakefield 2016)

- 4.36.9 The Parkside Logistics and Rail Freight Interchange Study 2016 investigated delivery options for road and rail-linked logistics development on land at Parkside East and West. It confirmed, having regard to the results of consultation with relevant industry stakeholders, that there is a clear demand for a new SRFI in the North West. It also identified that, due to its geographical location and specific characteristics Parkside is uniquely placed to satisfy this demand. In particular the opportunities for rail access from the site are considered to be second to none in the North West with access being easily achievable to both the West Coast Mainline and to the East-West ('Chat Moss') line between Liverpool and

Manchester. This will allow train movements to/from the north, south, east and west to be catered for at the site.

- 4.36.10 The Study also identified that the development of an SRFI at Parkside would bring substantial benefits in terms of modal shift of freight movement (from road to rail) and therefore of reducing carbon emissions, when compared with the development of purely road based logistics uses of an equivalent scale.
- 4.36.11 The Study indicates that, based on evidence available when it was completed, the Parkside site could viably deliver a medium (8 trains per day) to large (12 trains per day) facility. The Study concludes that to deliver a viable SRFI at Parkside, land on both the west and east side of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

#### Other potential employment uses

- 4.36.12 The strategic location of the Parkside East site next to major north-south and east-west rail routes also makes it attractive to a range of other rail enabled uses such as the manufacture and maintenance of rolling stock, and other industrial uses that require access to rail to serve their markets. The Parkside East site will be considered suitable in principle for these uses provided they bring significant inward investment and / or local employment and training opportunities the benefits of which would outweigh any impact that the proposal would have on the scope to develop an SRFI at this location.
- 4.36.13 The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.

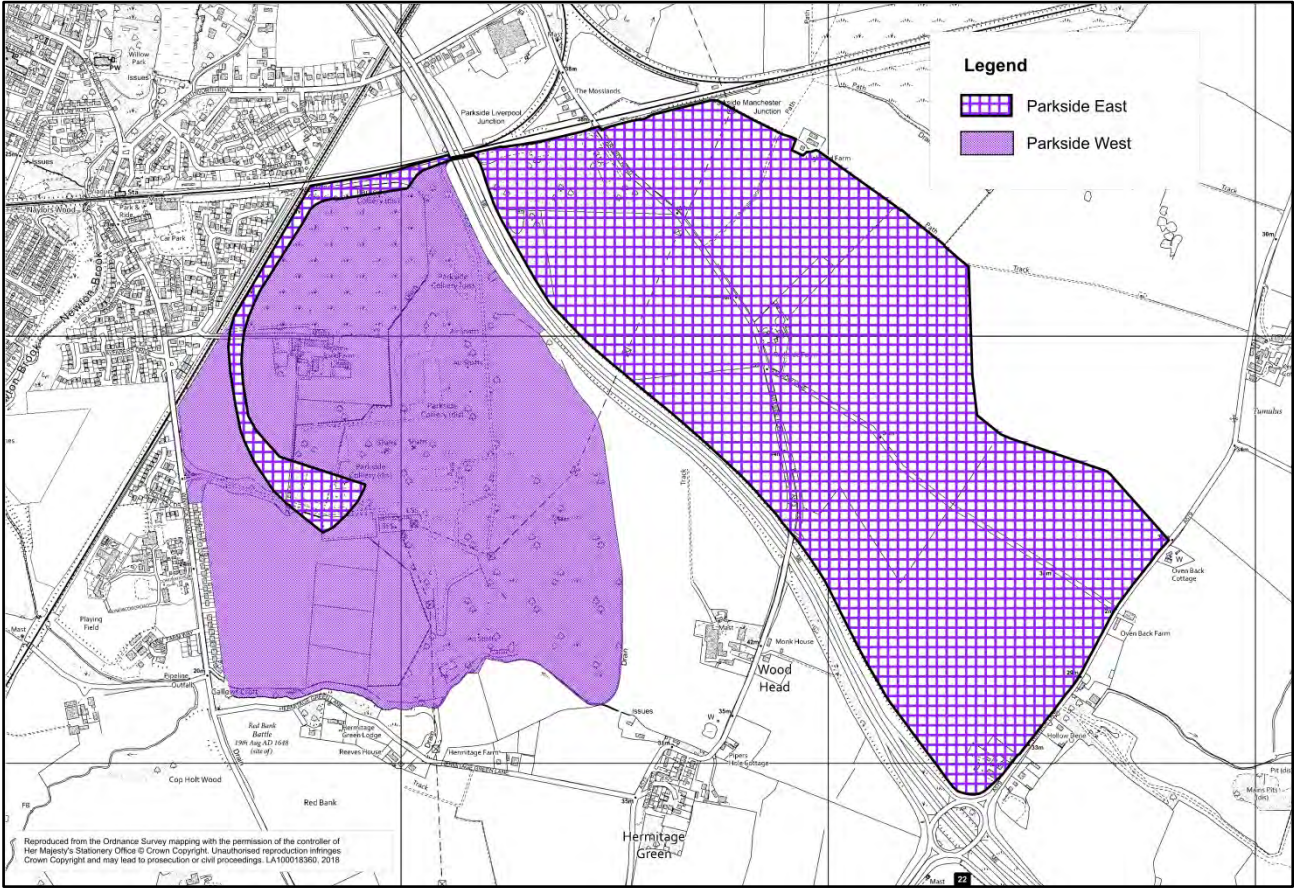
#### Justification for removing Site 7EA from the Green Belt

- 4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).
- 4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.
- 4.36.16 Taking into account the above factors, the land identified in Figure 4.3 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and



road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site.

Figure 4.3: Parkside East and Parkside West



#### 4.37 Policy LPA11: Health and Wellbeing

##### **Policy LPA11: Health and Wellbeing**

The Council will work with its health and wellbeing partners to promote public health principles, maximise opportunities for people to lead healthy and active lifestyles, and reduce health inequalities for residents within the Borough. Planning decisions and processes will be used to:

1. Encourage improved access to a choice of homes and jobs that meet the needs of the area;
2. Ensure the provision of easy-to-maintain, safe and attractive public areas and green spaces to serve new development that minimise the opportunity for and fear of crime and that promote social cohesion and mental wellbeing;
3. Encourage people to be physically active by providing opportunities for walking, cycling, outdoor recreation and sport including, where appropriate, the provision of opportunities for physical activity within the design of new development;
4. Guide the location of food and drink uses such as hot food takeaways, drinking establishments, restaurants, cafes and other uses that may have negative health impacts having regard to their impact on other land uses in the local area;
5. Maximise the levels of accessibility between homes, educational establishments, jobs, public transport services, health and other services, recreational opportunities and community, cultural and leisure facilities;
6. Encourage measures to achieve affordable warmth;
7. Promote active design principles as established by Sport England; and
8. Manage air quality and pollution.

#### 4.38 Policy LPA11: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.2, SO 6.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Hot Food Takeaway SPD</li> </ul>



### 4.39 Reasoned Justification

- 4.39.1 Decisions that influence how the built and natural environment is managed and developed can have both negative and positive impacts on the health and wellbeing of local people. The planning process can help to promote the health and wellbeing of residents, workers and visitors in the Borough through its role in shaping the built and natural environment. This can influence people's ability to follow healthy behaviours and can have positive impacts by reducing inequalities. Therefore it is important that health matters are considered at an early stage in the design of development schemes.
- 4.39.2 The NPPF requires Local Plans to enable and support healthy lifestyles and encourages local planning authorities to engage relevant health organisations in the preparation of Local Plans.
- 4.39.3 Key health and wellbeing issues faced by the Borough's residents include:
- life expectancy levels that are lower than the national averages;
  - an ageing local population (which is associated with a variety of health related problems);
  - economic activity rates that are lower than regional and national averages;
  - limited levels of physical activity; rising levels of obesity (in adults and children);
  - mental health issues;
  - in-work poverty; and
  - incidences of alcohol-related harm.
- 4.39.4 There are also significant inequalities in health outcomes and lifestyle factors between people living in different areas of the Borough. The St.Helens People's Board (which covers the statutory functions of the Health and Wellbeing Board and the Community Safety Partnership) is responding to these issues in a variety of ways. These include the implementation of the St.Helens People's Plan 2017-2020, within which a key focus is the establishment of the "*St.Helens Cares*" integrated operating model for health and social care in the Borough.
- 4.39.5 Policy LPA11 sets out a range of measures that the Council will use to address health and related issues. In combination with other policies within this Plan, such as LPA02, LPA07, LPA08, LPA09, LPD09 and LPD10, Policy LPA11 seeks to promote healthier communities and reduce health inequalities in the Borough.
- 4.39.6 Active Design has been developed by Sport England supported by Public Health England, and sets out ten principles. These are arranged under the headings of:
- Activity for all;
  - Walkable communities;
  - Connected walking & cycling routes;
  - Co-location of community facilities;
  - Network of multifunctional open space;
  - High quality streets and spaces;
  - Appropriate infrastructure;

- Active buildings;
- Management, maintenance, monitoring & evaluation; and
- Activity promotion & local champions.

4.39.7 Further details of Active Design are set out in the Sport England document 'Active Design: Planning for health and wellbeing through sport and physical activity' 2015. Active design principles will be applied as appropriate to new development proposals in the Borough to help provide opportunities for active and healthy lifestyles.

4.39.8 Further guidance to support the implementation of Policy LPA11 may be set out in a future Supplementary Planning Document.

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## 5. Area Policies

### 5.1 Policy LPB01: St.Helens Town Centre and Central Spatial Area

#### **Policy LPB01: St.Helens Town Centre and Central Spatial Area**

1. The Council will promote the Central Spatial Area as an accessible and welcoming destination for new development that accords with clauses 2 to 9 below and that would help create a high quality built environment. Development that would support the delivery and implementation of the Council-led strategy for the future regeneration and development of St.Helens Town Centre will be supported.
2. Proposals for retail and leisure development will be directed to suitable locations within the Town Centre and then other sequentially preferable sites in line with Policy LPC04 and national policy. A town centre 'area of opportunity' for future retail, leisure and cultural development is shown indicatively on the Policies Map. Development that would result in significant harm to the Town Centre's vitality and viability or prejudice planned investment within it will be resisted.
3. Proposals for change of use of units in the Primary Retail Frontages in St.Helens town centre will be refused unless they would be to Class A1 retail use or another main town centre use or uses that would contribute positively to the overall vitality and viability of the centre. Development proposals within the Primary and Secondary Frontages that would not result in an active ground floor use with a window display frontage will be refused.
4. New development proposals will be required, where appropriate having regard to their location, nature and scale, to facilitate linked trips between the Primary Shopping Area and other existing and proposed developments within the St.Helens Central Spatial Area, including: Asda on Kirkland Street; The Range on Chalon Way; St.Helens and Ravenhead Retail Parks; Linkway West; Tesco Extra on Linkway; and St.Helens RLFC Stadium.
5. Regular health checks will be undertaken to monitor the vitality and viability of St.Helens Town Centre.
6. Proposals for housing or a mix of housing and other suitable use(s) within or on the edge of the Town Centre will be supported where they would avoid prejudicing the retail and service role of the Town Centre.
7. New development in the vicinity of St.Helens Canal will be required as appropriate to improve the public realm by retaining and enhancing the existing waterway, positively integrating with the canal and securing improvements to Green Infrastructure in line with Policy LPA09.

8. Pedestrian and vehicular accessibility within and around the Town Centre will be managed in line with the road-user hierarchy set out in the Liverpool City Region: Transport Plan for Growth in order to:
  - i) maintain pedestrian priority within the Town Centre and extend pedestrian links to adjacent areas;
  - ii) make suitable provision for cyclists;
  - iii) support the Town Centre as the hub of the public transport network in St.Helens Borough; and
  - iv) make appropriate provision for cars and service vehicles.

## 5.2 Policy LPB01: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 3, SA 5, SA 6
<b>Strategic Objectives Met</b>	SO 1.1, SO 3.1, SO 5.2, SO 5.3, SO 6.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• St. Helens Infrastructure Delivery Plan</li> <li>• St. Helens Town Centre Strategy</li> <li>• Transport investment programmes</li> </ul>

## 5.3 Reasoned Justification

- 5.3.1 The St.Helens Central Spatial Area (as shown in Appendix XX) includes the Town Centre and its surrounding hinterland. This includes residential, retail and leisure uses that link to the central retail core.
- 5.3.2 The St.Helens Borough Council Retail and Leisure Study Final Report May 2017 assessed the Borough's future retail and leisure needs. It found that the Town Centre's market share for comparison goods expenditure has decreased from 28.2% in 2011 to 20.4% in 2017 whilst the market shares for Ravenhead and St.Helens Retail Parks have increased significantly.
- 5.3.3 Based on an assessment of the expected levels of population and expenditure growth, a requirement for additional comparison goods floorspace across the Borough is identified from 2023 onwards. This will correspond to an approximate need for between 3,000m<sup>2</sup> and 6,200m<sup>2</sup> of new floorspace by 2028 rising to between 9,200m<sup>2</sup> and 21,200m<sup>2</sup> by 2033 (it should be noted however that long term estimates should be viewed cautiously due to the difficulties in predicting the economy's performance over time).
- 5.3.4 To meet this need and address the weakening of the town centre's comparison goods market share in recent years, the Council will continue to pursue 'town centre first' principles in line with national policy and seek to accommodate as

much of this additional floorspace within St.Helens town centre as possible. A health check of the town centre carried out as part of the study reported that 15.8% of the total units were vacant, which is significantly greater than the national average vacancy rate of 11.2%. Therefore it is sensible to prioritise the re-occupation of vacant units in the first instance to boost the health of the town centre.

- 5.3.5 The same town centre first approach will apply to locating future leisure based development to provide for diversification in the town centre's offer to the public and so improve its vitality and viability.
- 5.3.6 A Town Centre Strategy to provide a comprehensive approach to the future of St.Helens Town Centre underwent public consultation during August - October 2017. The Strategy set out a vision for the future of the town centre detailing thematic initiatives to deliver this.
- 5.3.7 The Council's future aspirations to improve the offer of St.Helens town centre as set out within the Strategy include the provision of new retail and leisure floorspace, subject to the appropriate policy tests. It is considered that this approach, along with steps to encourage the reuse of vacant floorspace, will address the identified quantitative and qualitative needs of residents in the Borough.
- 5.3.8 The Council will support initiatives and schemes that will help to implement the Strategy by revitalising and enhancing the Town Centre's retail, leisure and cultural offer. The 'Area of Opportunity', referred to in the Strategy, has been identified due to the potential to reconfigure and / or redevelop land and premises close to Church Square and Chalon Way for suitable town centre uses.
- 5.3.9 To guide the application of the policies concerning main town centre uses, a Primary Shopping Area and Primary and Secondary Retail Frontages have been identified in line with the definitions in the NPPF (see Appendix XX).
- 5.3.10 The first preference for the location of new retail development is within the Primary Shopping Area. Proposals for retail uses that are in an edge or out-of-centre location in relation to the Primary Shopping Area will require a Sequential Assessment in accordance with national policy and Policy LPC04.
- 5.3.11 For all non-retail Main Town Centre uses (as defined by the NPPF) the preferred location is within the Town Centre. Proposals for such uses in an edge or out-of-centre location in relation to the Town Centre boundary will require a Sequential Assessment in accordance with national policy and Policy LPC04.
- 5.3.12 All Main Town Centre uses in an edge or out-of-centre location that meet the thresholds in Policy LPC04 will also require an Impact Assessment in accordance with national policy.
- 5.3.13 The Primary Retail Frontages are areas where there should be a particular focus on retail uses. This is because such uses are a key driver of footfall and help to draw shoppers into the centre. Proposals for non-retail uses in these frontages will be resisted unless their approval would be consistent with the aim of maintaining and enhancing the overall functionality, vitality and viability of the town centre. Specific considerations to be taken into account when assessing such proposals in the Primary Retail Frontage include the existing proportion of retail uses, the nature of the proposed use and the location of the unit affected within the Primary Retail Frontage.

- 5.3.14 The Secondary Frontages will provide greater opportunities for a diversity of uses such as restaurants, cinemas and non-retail business uses such as banks, estate agents and other services. The Council will resist proposals within the primary or secondary frontages that would result in the loss of an active ground floor use with open display windows.
- 5.3.15 Within the Central Spatial Area, facilities such as the Asda on Kirkland Street, The Range on Chalon Way, Ravenhead Retail Park, St.Helens Retail Park, Linkway West, Tesco Extra on Linkway and St.Helens Rugby League Football Club's Stadium perform a key function in retaining local retail expenditure and attracting visitors to the town. The Council will continue to promote better integration of these outlying facilities with the Town Centre and its retail core by, for example, encouraging the provision of improved pedestrian routes and bus services.
- 5.3.16 Continuous monitoring of the vitality and viability of the Town Centre will provide the Council with regular and up-to-date data on occupancy and vacancy rates and enable effective monitoring of policies to ensure they are performing effectively.
- 5.3.17 To enhance the vitality of the Town Centre and promote the health of the local community in line with the NPPF, the Council will support mixed-use schemes where they would not restrict the availability of viable retail floorspace. In particular, schemes that would upgrade the quality of the existing office stock will be encouraged even where this would lead to an overall net loss of office floorspace.
- 5.3.18 The Liverpool City Region: Transport Plan for Growth and associated documents set out a road-user hierarchy in order to reduce carbon emissions, reduce the risk of road traffic incidents and promote active travel. In line with this hierarchy the Council will, insofar as this is practicable and consistent with safety considerations, promote measures to prioritise road traffic within and around the town centre in the following order (highest priority first):
- a) pedestrians;
  - b) cyclists;
  - c) public transport users; and
  - d) access traffic.

The objectives of this approach are to support the amenity of the town centre, encourage visitors and attract further businesses to the area.

## 5.4 Policy LPB02: Earlestown Town Centre

### Policy LPB02: Earlestown Town Centre

1. The Council will seek to safeguard and enhance the function and role of Earlestown Town Centre as the second town centre within the Borough.
2. Main town centre uses will be directed to suitable locations within the defined Town Centre first and then other sites in accordance with the sequential approach set out in Policy LPC04 and national policy. The preferred location for new retail development shall be within the defined Primary Shopping Area.
3. Development that would result in a significant adverse impact on the Town Centre's vitality and viability or planned investment within it will be resisted in accordance with Policy LPC04 and national policy.
4. The delivery and implementation of a Council-led strategy to provide a framework for the future regeneration and development of the town centre will be supported.

## 5.5 Policy LPB02: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 5
<b>Strategic Objectives Met</b>	SO 1.1, SO 5.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Earlestown Town Centre Strategy</li> </ul>

## 5.6 Reasoned Justification

- 5.6.1 Earlestown is recognised as the second town centre in the Borough's hierarchy of centres as set out in Policy LPC04. It is highly accessible from the surrounding residential areas and from other parts of the Newton-le-Willows area. Earlestown town centre contains a railway station and bus station that provide access to local and regional destinations.
- 5.6.2 The St.Helens Retail and Leisure Study (WYG, 2017) identified that the town has a reasonable provision of goods and services for a centre of its size, although it has a relatively limited comparison goods offer. Its convenience goods offer is significantly strengthened by the presence of the Tesco supermarket in the town centre that generates linked trips to other activities. Earlestown is, however, poorly represented by national multiple retailers. The Study concluded that the town centre provides a local community focus and its retail and service offer is sufficient to meet the day to day needs of the surrounding community.



- 5.6.3 The Council will seek to safeguard this important role and function by applying the 'town centre first' approach to ensure that Earlestown remains the Borough's second centre providing a highly sustainable location for retail and other services.
- 5.6.4 A Primary Shopping Area (PSA) has been defined to direct retail uses to the 'heart' of the centre in the first instance that is considered important for Earlestown. The PSA reflects Earlestown's core shopping area, which is situated along the pedestrianised Market Street and the adjoining Bridge Street. These two streets contain the highest density of retail and service uses within the town centre. The PSA also includes Tesco, Wilkinsons and Home Bargains and incorporates Market Square. These retailers act as key drawing factors to the centre and are considered to function as part of the retail core.
- 5.6.5 The preferred location for new retail development is within the Primary Shopping Area. Proposals for retail uses that are in an edge or out-of-centre location in relation to the PSA will require a sequential assessment in accordance with national policy and Policy LPC04.
- 5.6.6 The preferred location for all non-retail main town centre uses (as defined in Annex 2 of the NPPF) is within the town centre boundary. Proposals for non-retail main town centre uses that are in an edge or out of centre location in relation to the town centre boundary will require a sequential assessment in accordance with national policy and Policy LPC04.
- 5.6.7 All main town centre uses in an edge or out of centre location that meet the thresholds in Policy LPC04 will also require a town centre impact assessment in accordance with national policy and Policy LPC04.
- 5.6.8 To provide a focus for future development of the town centre and positively promote Earlestown as a location to live, the Council and its partners intend to bring forward a dedicated town centre strategy. This will include initiatives to:
- Enhance the Town Centre as a shopping destination and increase the vibrancy of the town's market;
  - Protect and enhance the town's built heritage;
  - Promote Earlestown as a key commuter settlement with its direct rail connectivity to Liverpool, Manchester and Chester;
  - Increase the number and variety of residential units by encouraging mixed use development that makes a positive contribution to the economic role of the town centre; and
  - Link the town centre with the new homes to be provided through the redevelopment of Deacon Trading Estate and other housing developments.

## 6. Homes and Communities

### 6.1 Policy LPC01: Housing Mix

#### **Policy LPC01: Housing Mix**

1. New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes consistent with relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA).
2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:
  - a) at least 20 % of the new dwellings across the whole site must be designed to the "*accessible and adaptable*" standard set out in Part M4(2); and
  - b) at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard set out in Part M4(3).

If the standards in Part M4(2) or Part M4(3) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above.

3. As a general guideline, at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows.
4. Exceptions to clauses 1 to 3 above may be made where the applicant has submitted an independent viability assessment, prepared by a suitably qualified person, which clearly demonstrates that meeting the requirements would render the scheme un-viable. In such cases the Council will weigh any benefits of allowing the scheme in the form submitted against the extent of any failure to meet the requirements in full.
5. The Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible by walking and public transport to a suitable range of services to meet the needs of future occupiers.
6. The Council will support the delivery of suitably designed and located self and custom build schemes in the Borough where they would conform with all relevant local and national policies.
7. Proposals for the change of use or sub-division of existing buildings to form flats or Houses in Multiple Occupation (HMOs) will be granted permission provided they would:

- a) retain a suitable mix of housing types to meet needs in the area;
- b) avoid harming the character and / or appearance of the area;
- c) avoid harming the amenities enjoyed by occupiers of neighbouring residential properties;
- d) provide satisfactory levels of amenity for their future occupier(s) in terms of outlook and natural light; and
- e) comply with parking standards referred to in Policy LPA07 and to be set out in the future review of the Council's Ensuring a Choice of Travel SPD.

## 6.2 Policy LPC01: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 4
<b>Strategic Objectives Met</b>	SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Responding to housing needs identified in SHMA updates</li> <li>• Partnership working e.g., with Registered Providers</li> </ul>

## 6.3 Reasoned Justification

- 6.3.1 National planning policy requires the Council to plan for the delivery of a wide choice of high quality homes within sustainable, inclusive, mixed communities, based on sound evidence and to identify the size, type, tenure and range of housing that is required. The Council is seeking to achieve a mix of housing that reflects St.Helens Borough's housing needs. In accordance with national planning policy, this includes providing housing for different groups including those who require affordable housing, families with children, older people, people with disabilities and people wishing to commission or build their own homes.
- 6.3.2 The Mid Mersey Strategic Housing Market Assessment (SHMA) 2016 assessed the need for different types of housing in the Borough. This has been updated by the St.Helens SHMA Update 2018.
- [Split between market and affordable homes](#)
- 6.3.3 The St.Helens SHMA Update 2018 identifies that there is a need for 1,987 affordable housing units to be delivered in the Borough between 2016 and 2033 at an average of 117 units per year. It is considered reasonable at this stage to extend this assessment of annual need up until the end of the Plan period (2035). Of the overall housing provision of 9,234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,223 (24%) should be affordable. The amount of

affordable housing to be delivered is also likely to be affected by economic viability issues. Policy LPC02 sets out in further detail the requirements for affordable housing of different tenures and in different areas of the Borough.

#### Size of homes needed

- 6.3.4 The St.Helens SHMA Update 2018 identifies that the greatest need within the market and affordable home ownership sectors is for dwellings of 2 and 3 bedrooms; whilst within the affordable rented sector the greatest need is for dwellings of 1 or 2 bedrooms. It is acknowledged, however, that these are minimum sizes to meet the range of needs that are identified. Table 6.1 summarises the range of sizes identified as being needed in the SHMA update that will guide the Council's assessment of planning applications in line with clause 1 of Policy LPC01. These needs will be kept under review as the Plan period progresses and each planning application will be considered on its own merits, taking into account relevant evidence including the most up-to-date SHMA.

**Table 6.1: Estimated Size of Homes Needed 2014-2037**

	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	25-30%	50-55%	15-20%
Low-cost home ownership	10-15%	35-40%	40-45%	5-10%
Affordable housing (rented)	30-35%	30-35%	25-30%	5-10%

#### Special needs housing (including 'accessible and adaptable' and 'wheelchair user' housing)

- 6.3.5 National planning policy and legislation also encourages the Council to ensure that a proportion of new homes are accessible and can be readily adapted for the needs of all population groups. The St.Helens SHMA update 2018 identifies that, between 2016 and 2033, the population of the Borough that is aged 65+ is likely to increase by 27.3% and that at least 85% of the Borough's population growth over this period will be in this age group (Table 6.2).

**Table 6.2: Projected change in population of older persons (2016 to 2033)**

	Under 65	65-74	75-84	85+	Total	Total 65+
St.Helens Borough	-1.9%	13.2%	33.4%	83.7%	4.0%	27.3%
North West	-1.2%	21.2%	37.9%	68.8%	5.0%	32.5%
England	2.6%	26.2%	44.5%	73.1%	9.0%	38.3%

- 6.3.6 The SHMA Update 2018 also identifies that between 1,215 and 1,241 specialist housing units for older people are needed between 2016 and 2033 and that there is a need for 6-7% of all dwellings to be for wheelchair users.
- 6.3.7 National Planning Practice Guidance advises that, to effectively address needs for specialist housing, it is necessary to balance the scale of the needs against the impact that making suitable provision can have on the viability of new housing development. Having regard to these factors (including the findings of the St.Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the

new homes will be constructed to 'accessible and adaptable' standards, as contained in Part M4(2) of the Building Regulations, and that at least 5% of the new homes should be designed to the 'wheelchair user dwellings' standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility.

- 6.3.8 The SHMA Update 2018 also identifies that bungalows are often the first choice for older people seeking suitable accommodation and there is generally high demand for such accommodation when it becomes available. As the population ages, many older residents wish to downsize locally but have a limited range of suitable housing stock to move into. Therefore, the Council will require that, as a general guideline, at least 5% of the market homes provided on developments of 25 or more dwellings on green-field sites should be bungalows.

#### Self and Custom Build

- 6.3.9 Self-build and custom house-building are defined in the Housing and Planning Act 2016 as:

*“... the building or completion by— (a) individuals, (b) associations of individuals, or (c) persons working with or for individuals or associations of individuals of houses to be occupied as homes by those individuals ...”*

- 6.3.10 Although the terms are used interchangeably, “custom build” is where a person commissions a specialist developer to help to deliver their home, while “self-build” is where a person is more directly involved in organising and constructing their home. Both routes require significant input from the prospective home owner in the design of the dwelling.
- 6.3.11 In accordance with the Self-build and Custom Housebuilding Act 2015, the Council maintains a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects.
- 6.3.12 The Mid Mersey SHMA 2016 and the St.Helens SHMA update 2018 did not identify a specific quantum of demand for self-build in the Borough and as at August 2018 there has been very limited demand to be included on the Self-Build Register. However, it is anticipated that as the Register becomes more established, demand for self and custom build plots could increase. Further evidence of need for self and custom build plots will be informed by future SHMAs and updates to the Register. In accordance with national planning policy, legislation and guidance, the Council will support the delivery of housing to meet the needs of people wishing to build their own homes on suitable sites that meet all other applicable policy requirements.

#### Flats and Houses in Multiple Occupation

- 6.3.13 The sub-division of existing dwellings into flats or to form Houses in Multiple Occupation(HMOs) can make an important contribution to meeting specific needs, for example for single persons or couples. However, it is important that such proposals should be consistent with the latest evidence of housing needs in the area, and avoid causing an unacceptable loss of family housing. It is also important that they avoid harming the character or appearance of the area for

example by leading to excessive hard surfacing of garden areas to form car parking. Such proposals should also be suitably designed to provide acceptable living conditions for their occupants, for example in terms of outlook and daylight/sunlight, and avoid harming the living conditions of neighbouring occupiers. Further guidance concerning such proposals will be set out in a future Supplementary Planning Document.

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## 6.4 Policy LPC02: Affordable Housing

### **Policy LPC02: Affordable Housing**

1. The Council will support the delivery of affordable housing by encouraging new provision by Registered Providers of Social Housing;
2. Proposals for new open market housing developments of 11 units or more will be required to contribute as follows:
  - i) at least 30% of new dwellings provided on greenfield sites in Affordable Housing Zones 2 and 3 must fall within the definition of 'affordable housing';
  - ii) at least 10% of new dwellings provided on brownfield sites in Affordable Housing Zone 3 must fall within the definition of 'affordable housing'.
3. The types of affordable housing to be provided on any site must be informed by the latest evidence concerning need. Where an affordable housing requirement is triggered in line with clause 2 above:
  - a) At least 10% of the overall number of homes to be provided should be available for affordable home ownership (unless this would significantly prejudice the ability to meet the identified needs of specific groups); and
  - b) Any remaining proportion of the affordable housing to be provided should be for affordable rented accommodation.
4. The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development. Any relaxation of the affordable housing requirements set out in clause 2 or 3 of this policy will only be supported if (a) it is fully justified by an independent site-specific viability appraisal and (b) the benefits of proceeding with the development outweigh the failure to provide the full affordable housing contribution.
5. Any affordable housing provision must be within the application site unless the applicant has demonstrated either that:
  - a) insufficient local need exists to justify on-site provision; or
  - b) that there would be overriding benefits by making alternative provision 'off site' in which case a commuted sum in lieu of on-site provision will be required. The level of any such commuted sum should be in accordance with guidance set out in the Affordable Housing SPD.



6. Where affordable housing is to be provided on site, adequate provisions must be made, for example through conditions and / or a Section 106 agreement, to ensure that such housing is made available in perpetuity for occupation by persons who are in affordable housing need, or for any subsidy to be recycled to support affordable housing provision elsewhere.

## 6.5 Policy LPC02: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 4
<b>Strategic Objectives Met</b>	SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Partnership working e.g., with Registered Providers</li> <li>• Affordable Housing SPD</li> </ul>

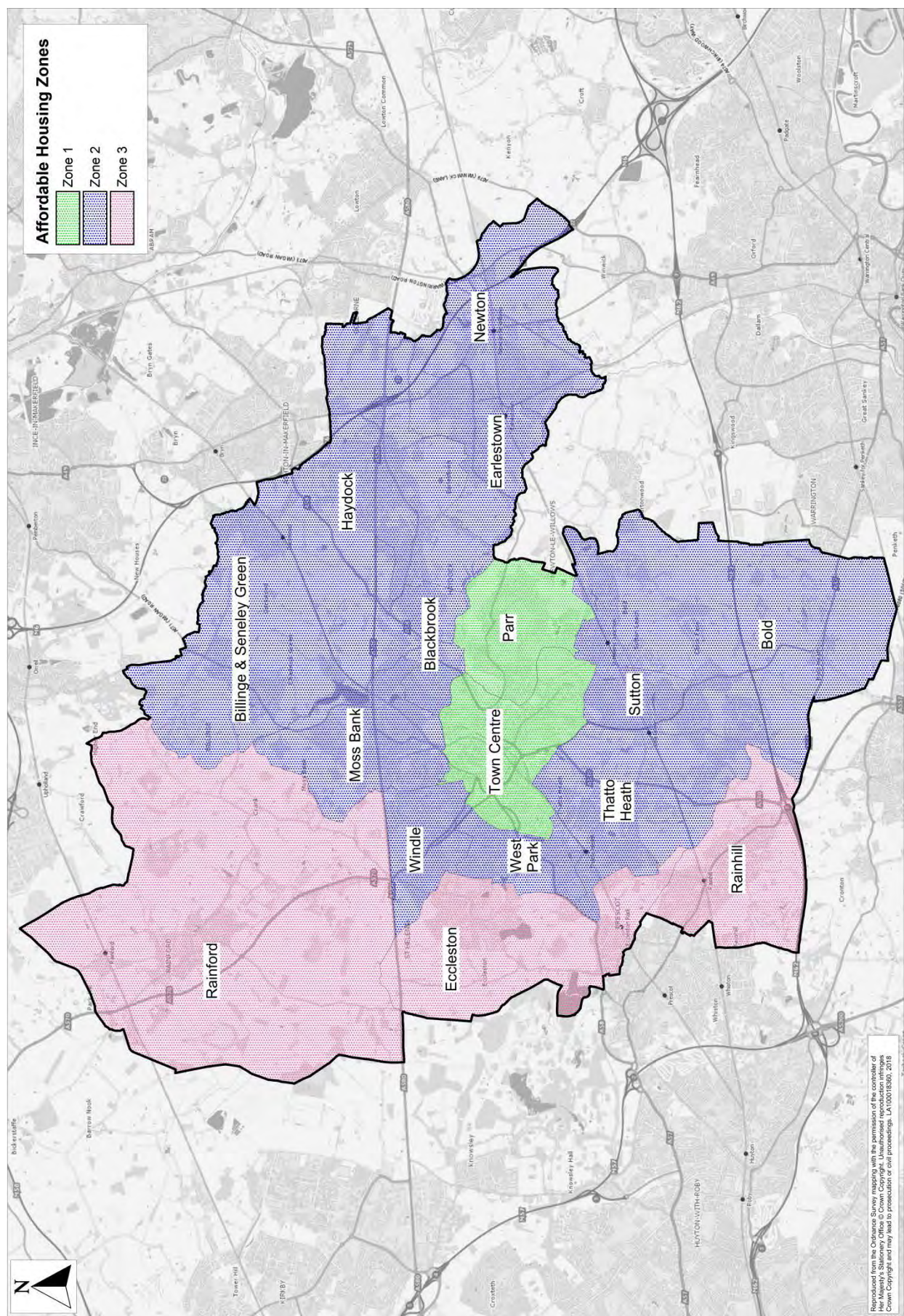
## 6.6 Reasoned Justification

- 6.6.1 The National Planning Policy Framework confirms that planning policies should identify the amount and type of affordable housing that is required. It also confirms that policies for developer contributions (including towards affordable housing) should not undermine the deliverability of the Plan. As stated earlier, the St.Helens SHMA Update 2018 has identified a need for 117 new affordable units per year between 2016 and 2033. Policy LPC02 sets out the circumstances in which affordable housing provision to help meet this need will be required and indicates the quantities that will be sought from open market housing development.

### Economic Viability

- 6.6.2 The provision of affordable housing linked to open market housing development must be realistic with regard to economic viability, but flexible to variations between sites and changes in market conditions over the Plan period.
- 6.6.3 The St.Helens Local Plan Economic Viability Report 2018 demonstrates that there are geographical disparities in viability and this has informed the zonal approach proposed. Policy LPC02 contains three separate affordable housing zones that follow ward boundaries as presented in Figure 6.1 and Table 6.3.

Figure 6.1: Affordable Housing Zones





**Table 6.3: Affordable Housing Zone Requirements**

<b>Affordable Housing Zone</b>	<b>Areas include</b>	<b>Affordable Housing Requirement</b>
1	Town Centre and Parr wards	No affordable housing requirement due to viability constraints
2	Blackbrook, Bold, Earlestown, Haydock, Sutton, Thatto Heath, West Park Billinge & Seneley Green, Moss Bank, Newton, Windle	<ul style="list-style-type: none"> <li>• 30% requirement on greenfield sites</li> <li>• 0% requirement on brownfield sites</li> </ul>
3	Eccleston, Rainford, Rainhill	<ul style="list-style-type: none"> <li>• 30% requirement on greenfield sites</li> <li>• 10% requirement on brownfield sites</li> </ul>

#### Tenure of affordable housing to be provided

- 6.6.4 Annex 2 of the NPPF defines the term ‘affordable housing’ as including (in summary): affordable housing for rent; starter homes; discounted market sales housing; and other affordable routes to home ownership.
- 6.6.5 St.Helens has for many years had an identified need for further provision of social and affordable rented housing. This is confirmed in the St.Helens SHMA 2016 and SHMA update 2018. More recently, however, the revised NPPF (July 2018) has widened the definition of affordable housing to include a greater range of affordable home ownership products. The revised NPPF (July 2018) also states that where major development involving the provision of housing is proposed (subject to various exclusions) at least 10% of the homes should be available for starter homes or other forms of affordable home ownership. The Housing and Planning Act 2016 requires the Council to promote the delivery of starter homes in its area. Currently starter homes are broadly defined as market housing with a 20% reduction on the normal market price, with specific age restrictions and the cost of which is capped at £250,000.
- 6.6.6 The St.Helens SHMA update 2018 indicates that the additional categories of affordable home ownership introduced in the revised NPPF (July 2018) are likely to make only a limited contribution towards meeting affordable housing needs in the Borough (due to the availability of existing second hand homes at affordable prices). However it acknowledges that providing some affordable home ownership properties could assist in helping households move out of the private rented sector. The SHMA 2016 also identified a need for intermediate housing (that can provide a form of affordable home ownership).
- 6.6.7 Having regard to all these factors Policy LPC02 requires that – where affordable housing is to be required (or contributed towards) as part of a wider scheme – at least 10% of the overall housing provision resulting from the proposals should be for affordable home ownership. In assessing the precise types of affordable housing to be provided on each site, the Council will take into account the SHMA, any other evidence of need, and the latest definition of affordable housing set by the Government. It is anticipated that there will be an on-going need for affordable

rented housing, as starter homes and other forms of affordable home ownership are unlikely to replace the need for these forms of rented accommodation.

Site specific viability assessments

- 6.6.8 If a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.

Implementation of Policy LPC02

- 6.6.9 The St.Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02.

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## 6.7 Policy LPC03: Gypsies, Travellers and Travelling Show People

### Policy LPC03: Gypsies, Travellers and Travelling Show People

1. The following sites are allocated for the provision of pitches to meet the Borough's need for Gypsy and Traveller accommodation over the Plan period, and are identified on the Policies Map:

Site Ref	Site Location	Size (hectares)	Type of Site	Indicative Number of Pitches
<b>GTA01</b>	Land north of Sherdley Road and west of Sutton Heath Road, Sherdley Road, Thatto Heath	0.39	Permanent	8
<b>GTA02</b>	Land adjacent to land east of Sherdley Road Caravan Park, Sherdley Road, Thatto Heath	0.09	Transit (Limited length of stay)	3

2. Site GTA01 is suitable for the provision of permanent Gypsy and Traveller pitches including amenity buildings. Site GTA02 is suitable for the provision of transit (limited length of stay) accommodation for Gypsies and Travellers. Development, either within these sites or on adjacent land, will not be permitted if it would not be compatible with the intended use of site GTA01 or GTA02 for Gypsy and Traveller Accommodation.
3. The loss of an existing site or pitch that is or was last used to provide accommodation for gypsies or travellers, or for travelling show people, to another land use will not be permitted unless:
  - a) The level of provision of the type of facility that would be lost would, following implementation of the proposal, significantly exceed the Council's latest assessment of need (across the Borough as a whole) and remain so for the remainder of the Plan period, and the site has been marketed for its existing or most recent use for a substantial period of time and in a manner agreed with the Local Planning Authority; or
  - b) The proposed loss of the existing site, pitch or plot is necessary to provide essential improvements to the accommodation for gypsies, travellers or for travelling show-people within the site; or
  - c) The site is unsuitable for its existing use and alternative accommodation, of a scale, quality and suitability to meet needs at least equivalent to those that would be lost, would be provided.

4. Proposals for new, re-configured or expanded sites for gypsies and travellers or travelling show people will only be permitted where they would:
  - a) have a suitable and safe site layout and design, including adequate internal circulation, parking and amenity spaces, marked pitches and amenity buildings/facilities, all of which should accord with any relevant national government guidance and be informed where possible by the outcome of consultation with local users;
  - b) provide for suitable physical environmental conditions within the site for example in relation to ground conditions and flood risk;
  - c) provide adequate levels of amenity and privacy for occupiers of each plot/pitch;
  - d) avoid causing harm to the living conditions of occupiers of neighbouring properties;
  - e) respect the character of the local built and / or natural environment;
  - f) provide for access by road that would be suitable for all types of vehicles and caravans likely to access the site; and
  - g) be served by safe and convenient access by walking or public transport to a local, district or town centre, education and health facilities, and employment opportunities in the surrounding area.
5. In addition to meeting the criteria in clause 4, any proposals to provide accommodation for travelling show people must:
  - a) be located and designed so as to avoid causing disturbance to occupiers of adjacent properties for example due to noise from the maintenance and / or testing of equipment; and
  - b) avoid prejudicing the operations of existing employment uses.

Conditions and / or Section 106 obligations may be used to limit the hours within which equipment can be tested.

## 6.8 Policy LPC03: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 2, SA 3, SA 4, SA 6
<b>Strategic Objectives Met</b>	SO 1.1, SO 2.1, SO 3.1, SO 4.1, SO 6.2
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Funding of additional Gypsy &amp; Traveller permanent pitch provision</li> <li>• Funding of Gypsy &amp; Traveller transit pitch provision</li> </ul>

## 6.9 Reasoned Justification

- 6.9.1 National Planning Policy for Traveller Sites (PPTS) requires local authorities to assess Gypsy and Traveller and Travelling Show People accommodation needs and ensure steps are taken to meet those needs, including where necessary through the allocation of sites in the Local Plan.
- 6.9.2 The Merseyside and West Lancashire Gypsy & Traveller Accommodation Assessment (GTAA) was undertaken in 2014 and included extensive fieldwork by interviewers to understand current and future housing need from the members of the Gypsy & Traveller community living in caravans and in “bricks and mortar” houses.
- 6.9.3 The GTAA found that across Merseyside and West Lancashire as a whole there was a need for 42 net additional permanent pitches between 2013/14 and 2032/33, of which 8 should be in St.Helens Borough. Of the 8 permanent pitches required in the Borough: 6 were required between 2013 and 2018; 1 between 2018 and 2023; and 1 between 2023 and 2033. The GTAA also found a need for 3 transit pitches to be provided in the Borough (capable of accommodating 6 touring caravans) for Gypsies and Travellers for the period 2013 to 2033. The GTAA did not identify a need for accommodation for Travelling Show People.
- 6.9.4 A permanent pitch acts as a main place of residence, with the occupier being able to go off site to travel for periods of time during the year. Each pitch should have enough space on which to site a permanent static caravan and a touring caravan, and adequate access to utilities and an amenity building (containing a toilet, bathroom and possibly a utility/sitting room) and space for vehicles (including a commercial vehicle). A transit pitch is for occupation on a short term, temporary basis by Gypsies and Travellers who are travelling away from their “home” pitch. A transit pitch needs to have enough space for a touring caravan plus a towing vehicle and access to utilities provision.
- 6.9.5 In August 2015, the Government changed the definition of ‘travellers’ for planning purposes so that it no longer includes persons who have given up a nomadic way of life. However, it is still necessary to give adequate weight to the preferences of many Gypsies, Travellers and Travelling Show People to live in caravans. Whilst the Housing and Planning Act 2016 removed the need for a separate GTAA to be undertaken, it did not remove the need to assess the accommodation needs of Gypsies, Travellers and Travelling Show People as part of the plan making



process. The Merseyside and West Lancashire GTAA remains an important source of evidence to underpin the St.Helens Borough Local Plan.

- 6.9.6 Planning permission was granted in 2016 for 12 pitches on land east of the Sherdley Road Caravan Park. This would more than meet the need for 8 permanent pitches identified in the GTAA. However, the net need for new pitches changes each year as occupancy of sites alters and pitches are gained and lost, and a rise in the numbers of occupiers on non-authorised sites indicates that the overall net need for new pitches in the Plan period is likely to have risen to about 18 pitches by 2016. The existing permission for 12 pitches would therefore be likely on its own to fall short of meeting needs. For this reason Policy LPC03 allocates an additional site (referenced GTA01) to the west of the existing Council owned Sherdley Road Caravan Park for the delivery of additional permanent provision.
- 6.9.7 Site GTA01 satisfies the criteria for site provision set out in Policy LPC03 and is considered to be deliverable by the Council. Its estimated capacity of 8 pitches is capable, in combination with the site with existing planning permission, of meeting the total estimated net need for permanent site provision over the Plan period. However, the Council will keep the need and supply of sites under regular review to ensure that needs can be met over the Plan period. Site GTA02 has been allocated to meet the need for transit site provision set out in the GTAA.
- 6.9.8 No provision has been made to meet needs beyond the Plan period as the GTAA found that looking ahead that far to assess needs was difficult. Accordingly, the preferred approach is for needs beyond the Plan period to be reviewed in the future taking account of relevant circumstances at the time.

## 6.10 Policy LPC04: Retail and Town Centres

### **Policy LPC04: Retail and Town Centres**

1. Proposals for retail, leisure and other main town centre uses will be directed towards the Borough's defined centres as listed below and as shown on the Policies Map:
  - a) Principal Town Centre: St.Helens
  - b) Town Centre: Earlestown
  - c) District Centres: Rainhill and Thatto Heath
  - d) Local Centres: Billinge; Chain Lane; Clipsley Lane; Denton's Green; Eccleston; Fingerpost; Marshall's Cross; Newton-le-Willows; Newtown; Rainford; and Sutton
2. Planning permission will only be granted for development that is appropriate in terms of its scale and nature relative to the role and function of each centre.
3. Proposals for main town centre uses will be subject to a sequential approach to development in line with national policy. This will require development for such uses to be located as a first preference in suitable locations within Town, District or Local Centres and then (as a second preference) in edge of centre locations. Only if suitable sites in such locations are not available should out of centre sites be considered. The Primary Shopping Area (PSA) shall be the preferred location for proposed retail development in St.Helens and Earlestown, with 'edge of centre' in the context of such proposals being defined as locations that are well connected to and up to 300 metres from the PSA.
4. When considering proposals in out of centre locations, preference will be given to accessible sites that are well connected to a defined centre as listed in Part 1 of this policy.
5. The sequential approach will not apply to applications for small scale rural offices or other small scale rural development.
6. All proposals for retail development that would not be located within a defined centre must be accompanied by an assessment of their likely impact on existing centre(s) if they would be above the floorspace threshold for the area in which they would be located as set out below:

Location of proposal	Floorspace threshold (gross)
Within 800m of the boundary of Earlestown Primary Shopping Area or of a District Centre	300m <sup>2</sup>
Within 800m of the boundary of a Local Centre	200m <sup>2</sup>
All other cases	500m <sup>2</sup>

All proposals for leisure uses that would fall outside of a defined centre must be accompanied by an assessment of their likely impact on existing centre(s) if they would be above the size threshold for the area in which they would be located as set out below:

Location of proposal	Floorspace threshold (gross)
Within 800m of the boundary of Earlestown Town Centre or of a District Centre	300m <sup>2</sup>
Within 800m of the boundary of a Local Centre	200m <sup>2</sup>
All other cases	500m <sup>2</sup>

8. Where more than one impact threshold applies, the lower impact threshold will take precedence.
9. Impact assessment thresholds will apply to applications for new floorspace, changes of use and variations of condition to remove or amend restrictions on how units may operate.

## 6.11 Policy LPC04: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 1, SA 5
<b>Strategic Objectives Met</b>	SO 1.1, SO 5.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Earlestown Town Centre Strategy</li> <li>• St. Helens Town Centre Strategy</li> <li>• Town centre health checks</li> </ul>

## 6.12 Reasoned Justification

### Network and Hierarchy of Centres

- 6.12.1 In defining the Borough's Town, District and Local centres, the Council recognises the importance that these centres play at the heart of local communities and it will seek to support appropriate investment within them. The boundaries of each centre are shown on the Policies Map and in Appendix XX. The network and hierarchy of centres within the Borough are defined in accordance with the findings of the St.Helens Retail and Leisure Study 2017, which undertook health checks of each centre to assess their role and functionality. Centre boundaries will be kept under review in line with the NPPF to reflect changing needs.
- 6.12.2 St.Helens remains the top tier town centre performing an important role and containing a good representation of retail, leisure, and civic uses that cater for many of the needs of the Borough's residents. As such, it forms the Principal Town Centre in the Borough. Earlestown, as a second tier Town Centre, contains a reasonable provision of goods and services, and is highly accessible from the surrounding residential areas. Rainhill and Thatto Heath District Centres provide accessible locations with sufficient levels of retail and service provision and community facilities to meet day to day needs of local residents. The twelve Local Centres cater for day to day shopping needs of the local communities providing an important local service to meet the needs of residents within the surrounding catchments.

### Sequential Approach

- 6.12.3 To ensure the vitality and viability of the Borough's centres is maintained and enhanced the Council will continue to apply the 'Town Centre First' principle when considering development proposals for retail and other main town centre uses, that will be directed to defined centres in the first instance.
- 6.12.4 In line with the NPPF, a sequential assessment will be required to support any planning application for a main town centre use that is not in an appropriate location within an existing centre.
- 6.12.5 The preferred location for retail proposals in St.Helens or Earlestown (i.e., the 'in-centre' location for the purposes of operating the sequential approach) shall be the Primary Shopping Area. Within the District and Local Centres, the preferred location for retail development shall comprise all areas within the defined centre boundary. For all non-retail main town centre use proposals, the preferred

location shall comprise all areas within the defined Town, District or Local Centre boundaries.

- 6.12.6 This approach is consistent with NPPF definitions. A sequential assessment must, where required, set out why sequentially preferable i.e., more central locations have been ruled out. When considering alternative sites, the suitability, availability and viability of the site should be assessed, with particular regard to the nature of the need that is to be addressed.
- 6.12.7 When considering how the sequential test should be applied, the Council will take account of planning practice guidance and only require assessments that are proportionate and appropriate to the size and scale of the development proposed.
- 6.12.8 It is recognised that certain main town centre uses have particular market and locational requirements that mean that they may only be accommodated in specific locations. In the case of proposals for small scale shops and services in predominantly residential areas serving a localised catchment, it may not be reasonable to expect the same customer base or market to be served from premises within a defined centre or on the edge of it. Where this can be fully justified and the proposal is in a highly and safely accessible location (including by walking and cycling) a sequential assessment of alternative locations may not be required.

#### Impact Assessment

- 6.12.9 In line with the NPPF, the St.Helens Retail and Leisure Study 2017 recommends that a range of locally set thresholds be used to identify when proposals for main town centre uses outside existing centres must be accompanied by a town centre impact assessment. These thresholds relate to the size and proximity of the proposal to the centres as set out in parts 6 and 7 of Policy LPC04.
- 6.12.10 In the case of District and Local Centres the lower local impact thresholds of 200m<sup>2</sup> and 300m<sup>2</sup> referred to in Policy LPC04 will apply to proposals on sites that are less than 800m from the nearest part of the boundary of the relevant centre. The distance of 800m is broadly commensurate with the potential walk-in catchments of smaller centres and is identified by Guidelines for Providing for Journeys on Foot (The Institution of Highways & Transportation, 2000) as being the 'preferred maximum' acceptable walking distance to a centre. Beyond 800m from the District and Local centres, the higher threshold of 500m<sup>2</sup> will apply.
- 6.12.11 Where an impact assessment is required, the applicant should agree its scope with the Council at an early stage to ensure it is proportionate to the scale of the proposed development and provides the required information to identify the effects of the development on the centre. The Council will take account of planning practice guidance when considering such assessments.

## 7. Environment and Resources

### 7.1 Policy LPC05: Open Space

#### Policy LPC05: Open Space

1. The Council will seek to ensure that the Borough's network of open spaces is protected, managed, enhanced and where appropriate expanded. To achieve this, it will support the implementation of programmes and strategies to manage and enhance all forms of open space, including where applicable through the use of Green Flag or similar designations.
2. Development proposals that would result in the loss of open space will only be permitted where:
  - a) it has been clearly demonstrated that the open space is (having regard to the standards referred to in Table 6.9) surplus to requirements; or
  - b) the open space that would be lost would be replaced by new provision that is equivalent or better in terms of quantity and quality in a suitable location; or
  - c) the proposed development is for alternative sports and / or recreational provision, the benefits of which would clearly outweigh the loss of the existing open space.
3. New residential development will be required to contribute towards the provision, expansion and / or enhancement of open space to meet needs in accordance with Policies LPA08 and LPD03.

### 7.2 Policy LPC05: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.1, SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Developer Contributions Supplementary Planning Document (SPD)</li> <li>• Development management process</li> <li>• Ongoing assessment of need for open spaces</li> <li>• St. Helens Open Space Sport and Recreation Assessment (OSSRA) and the St. Helens Playing Pitch Strategy</li> </ul>

### 7.3 Reasoned Justification:

- 7.3.1 Policy LPC05 seeks to ensure the protection and management of the Borough's existing open spaces in the most effective way. It also enables the provision and / or enhancement of open space where this is needed. Planning can be a key mechanism in the delivery and implementation of strategies and programmes to maintain and enhance open spaces, directing any improvements to the right places. Where relevant, the Council will seek to ensure that development proposals support the vision, aims and objectives of any such strategy or programme.
- 7.3.2 Open space fulfils a variety of important functions of value to the public. For example, it provides opportunities for: formal and informal recreation and activities; play and social interaction; environmental enhancement and attractiveness; wildlife conservation; education; food growing; and quiet contemplation. It provides strong health and well-being benefits for local people.
- 7.3.3 The Borough's open spaces, many of which are identified on the Policies Map, are categorised under the following typologies:
- parks and gardens;
  - natural and semi-natural greenspaces;
  - amenity greenspace;
  - provision for children and young people (including equipped play areas);
  - allotments;
  - cemeteries and churchyards; and
  - outdoor sports and recreation facilities (such as playing fields, golf courses, bowling greens, tennis courts and recreational water bodies).
- 7.3.4 The Council will resist development proposals that would result in the loss of open space unless at least one of the criteria in part 2 of Policy LPC05 has been satisfied. When assessing if a proposal would comply with these criteria, the Council will take account of the most recent assessment of the Borough's open space, sports and recreation provision and needs. At the time of publication, the St.Helens Open Space Sport and Recreation Assessment (OSSRA), completed in 2016, provides the most up-to-date evidence. It comprises: an Open Space Assessment; a Playing Pitch Assessment, Strategy and Action Plan; and a Built and Indoor Sports Facilities Assessment with Golf Course Addendum.
- 7.3.5 With regard to criterion 2a), the onus will be on the applicant to demonstrate clearly that the open space is surplus to requirements. To decide whether a surplus exists, consideration will be given to the quantity, quality and accessibility of existing open space provision in relation to the application site, having regard to the standards set out in Table 7.1 and the most recent open space assessment. Proposals for new development on open space, that is in use or was most recently used for outdoor sport, will be determined with regard to the most recent assessment of existing and future demand for the sport(s) concerned within an appropriate catchment and the current capacity to meet this demand. For residential development proposals, any impact on existing open space provision that would be caused by the resultant increased population must be factored into the assessment. The Council will keep the standards of provision referred to



above under review and if necessary publish revised standards in a future Local Plan or Supplementary Planning Document.

- 7.3.6 With regard to criterion 2b), any replacement open space provision will be expected to be of equivalent (or greater) quantity and quality, and capable of serving a similar catchment in terms of accessibility to that which would be lost. In determining if a proposal to provide replacement open space would be acceptable, consideration will be given to the most up-to-date qualitative and quantitative assessment of open spaces and accessibility levels. For proposals involving replacement outdoor sports provision, the latest evidence on sports facilities provision and needs (including, where relevant, the most up-to-date playing pitch strategy) will be considered to determine if the new provision is appropriate to meet any displaced demand for the sport(s) involved. Where appropriate, the Council may seek to secure replacement open space provision through a Section 106 agreement in line with Policy LPA08.
- 7.3.7 With regard to criterion 2c), proposals for the replacement of existing outdoor sports provision with alternative sports facilities will need to demonstrate that sufficient benefits to sport will result that clearly outweigh any harm caused by loss of the existing facility. In determining the acceptability of such proposals, consideration will be given to the most recent evidence on sports facilities provision and needs (including, where relevant, the most up-to-date playing pitch strategy), to ensure that the new alternative provision is appropriate to meet identified sport facilities needs of the Borough.
- 7.3.8 In accordance with legal requirements, the Council will consult Sport England concerning relevant development proposals affecting playing fields and other sporting facilities.
- 7.3.9 It should be noted that some open space sites, including for example many small areas of amenity greenspace or natural and semi-natural greenspace of under 0.2ha in size, are not shown on the Policies Map. All open spaces that are of public value, whether or not they are shown on the Policies Map, are protected by Policy LPC05. This will also apply to any new areas of open space to be created as a result of new residential development.
- 7.3.10 Although Policy LPC05 only applies to outdoor areas and facilities, in accordance with national planning policy built (i.e., indoor) sports and recreation facilities are afforded equal protection. Where development proposals would result in the loss of built sports and recreational facilities, Policy LPA08 will apply and the Council will follow the approach set out in the NPPF informed by the most up-to-date local needs assessment for built sports facilities.
- 7.3.11 Where new residential development would result in a deficiency of open space or sports and recreation facilities in the locality, or be in a location where a deficiency already exists, it will be expected to include new, expanded or enhanced open space provision in accordance with Policy LPD03 (Open Space and Residential Development). Any requirement for new sports facilities will be additional to this.
- 7.3.12 Where identified shortfalls in outdoor sports and recreation provision would be exacerbated by the additional demand generated by housing development, contributions will be sought towards the enhancement of existing facilities or provision of new facilities in the area to address this shortfall, as informed by the Playing Pitch Strategy and Action Plan (or any future update to this).

**Table 7.1: Open Space Standards**

<b>Open Space Typology</b>	<b>Quantity standard</b> (minimum number of hectares per 1,000 population)	<b>Accessibility Standard</b> (maximum distance between dwelling and nearest open space of this type)	<b>Quality standard</b>
Parks and gardens	0.8	1.2km	To be determined in a Supplementary Planning Document
Natural and semi-natural open space	2	1.2km	To be determined in a Supplementary Planning Document
Amenity greenspace	1	400m	To be determined in a Supplementary Planning Document
Provision for children and young people	0.1	800m	To be determined in a Supplementary Planning Document
Allotments	0.1	1.2km	To be determined in a Supplementary Planning Document
Outdoor sport	Refer to needs assessment and site-specific recommendations in the Council's latest Playing Pitch Strategy and Action Plan		

- 7.3.13 The Council intends to set out further guidance regarding its requirements for open space provision and enhancement in a future Supplementary Planning Document.

## 7.4 Policy LPC 06: Biodiversity and Geological Conservation

### **Policy LPC06: Biodiversity and Geological Conservation**

#### European sites

1. Development that is likely to have a significant effect (either alone or in combination with other plans or projects) on one or more internationally important site(s), including any areas of supporting habitat that are functionally linked to the site(s), must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided, or where this is not possible, be mitigated to protect the integrity of the site(s). Development that would adversely affect the integrity of one or more internationally important site(s) will only be permitted where there are no alternative solutions or there are imperative reasons of overriding public interest, and where suitable compensatory provision has been made. Any mitigation or compensatory provision must be assessed in a project-related Habitats Regulations Assessment and be fully functional before any likely adverse effect arises.

#### Other protected sites, habitats and species

2. Development that would cause significant harm to a Site of Special Scientific Interest (SSSI), Local Wildlife Site, Local Nature Reserve, Local Geological Site, Priority Habitat(s), legally Protected Species and / or Priority Species, that would not be adequately mitigated or as a last resort compensated, will be refused.
3. Development that would be likely to cause any harm to ecological or geological interests will only be permitted in:
  - a) Sites of Special Scientific Interest where there are no alternatives and where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) ecological network; and
  - b) Local Sites (Local Wildlife Sites, Local Nature Reserves and Local Geological Sites) and Priority Habitats: where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site (or Priority Habitat) and its broader contribution to the LCR Ecological Network.

#### Mitigation, replacement or other compensatory provision

4. Where necessary to avoid harm, appropriate mitigation, replacement or other compensatory provision will be required. The location of such measures will be targeted, using the following sequential approach (with (a) being the preferred approach and (d) being the least preferred):
  - a) On the development site;

- b) Locations within the immediate locality and /or supporting LCR Ecological Network;
- c) Locations that fall within the LCR Nature Improvement Area and within the Borough; and lastly
- d) Locations that fall within the LCR Nature Improvement Area but outside the Borough.

#### Evidence requirements

- 5. Development proposals that would affect a nationally or locally designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and /or compensation proposals, and of any proposed management measures.
- 6. Designated sites are shown on the Policies Map. Plan policies will also apply to any other sites that may be recognised during the Plan period as being of nature conservation importance, including land provided as compensation.

## 7.5 Policy LPC06: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Creation of new Local Nature Reserves</li> <li>• Mersey Forest Plan/Town in the Forest Initiative</li> <li>• Development management process</li> <li>• Development of the Sankey Canal Corridor as a multi-functional green corridor</li> <li>• Enhancement and restoration of the Liverpool City Region (LCR) Ecological Network and the LCR Nature Improvement Area</li> <li>• Sankey Catchment Action Plan</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

## 7.6 Reasoned Justification:

- 7.6.1 The Liverpool City Region (LCR) authorities have identified an Ecological Network that includes a Core Biodiversity Area of designated nature and geological sites, Priority Habitats, wildlife corridors and stepping stone habitats. The LCR Nature

Improvement Area (NIA) identifies opportunities for further habitat restoration, creation or enhancement, focussed within 17 Nature Improvement Focus Areas, 2 of which are located wholly or in part within St.Helens Borough. The following hierarchy of sites and habitats are found in the Borough:

- Functionally Linked Land (FLL) for sites of international nature importance (European Sites) including the Ribble and Alt Estuaries Special Protection Area (SPA), Martin Mere SPA, the Mersey Estuary SPA, Liverpool Bay SPA and the Manchester Mosses Special Area of Conservation;
- Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest;
- Sites of local nature and geological importance, which in St.Helens Borough include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs); and
- Priority habitats and species, and legally protected species.

7.6.2 Policy LPC06 sets out how sites, habitats and species within this hierarchy will be protected and managed with the objective of ensuring that there will be no net loss of the ecological resource. The policy will also guide how appropriate mitigation, replacement or other compensation measures should be identified.

#### Internationally important sites

7.6.3 Part 1 of Policy LPC06 sets out the requirements for developments that fall within St.Helens Borough but that may affect the internationally important nature sites in nearby districts. These sites include the sites of international nature importance listed in paragraph XX above. Any development that may affect such a habitat (for example by affecting an area of supporting habitat, some of which cover parts of the Borough) must be accompanied by sufficient information to enable a Habitat Regulations Assessment to be undertaken. This process includes 'Appropriate Assessment' of any significant effects and specific monitoring and / or mitigation or compensation where required. Alternative solutions to be considered may include alternative locations for the proposed development, different scales or designs of development, alternative processes, or not going ahead with the development and should be considered at the earliest stage. Planning proposals should also consider potential impacts arising from, for example, other sources of pollution, increased human disturbance (including the impact of cumulative recreational pressure on the internationally important sites) or hydrological changes.

7.6.4 The Local Plan includes several site allocations for development that have been identified (in the Habitats Regulations Assessment of the Plan) as being most likely to provide functionally linked land connected to an internationally important site. These include: sites **2EA**, **7EA** and **8EA** (allocated for employment development) and sites **1HS**, **4HS**, **5HS**, **7HS** and **8HS** (safeguarded for housing development). It is possible that other sites may also provide such habitat. Where it is possible that a site may provide supporting habitat, proposals for development will be required to contain sufficient evidence (such as a wintering birds survey), to enable their significance to the European sites to be ascertained, and any necessary mitigation or compensation measures to be identified.

7.6.5 It has been identified that new housing development in the Borough, particularly when considered cumulatively, may cause ecological effects on the Sefton Coast

SAC and other designated European sites around the Liverpool City Region due to increased recreational pressure. The Council is working with other local authorities and partner organisations in the City Region to quantify these effects and to identify a strategic and consistent approach to any mitigation that is required. This may include the use of developer contributions (if these are shown to be necessary to mitigate the effects of development in different parts of the City Region on the European sites). Any such contributions linked to development in St.Helens Borough will be proportionate to the identified scale of its impacts. The Council will use this approach, subject to agreement of its details, to address this issue.

#### Nationally and locally important sites and species

- 7.6.6 Parts 2-4 of Policy LPC06 set out the requirements for development that would affect nationally and locally important sites and species, including how any benefits from such development will be weighed against its impact on nature conservation interests and the ecological network as a whole.
- 7.6.7 For Sites of Special Scientific Interest, significant harm includes adverse effects on the site's notified special interest features. The advice of suitably competent persons should be sought by applicants and the decision maker in relation to this policy. The focus of significant harm and the approach regarding avoidance, mitigation, replacement or other compensatory provision to secure no net loss of biodiversity is in line with principles set out in the NPPF, Planning Practice Guidance 06/2005 Biodiversity and Geological Conservation, and Biodiversity 2020: A strategy for England's wildlife and ecosystems services.
- 7.6.8 The Council and other public bodies have a duty, under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to conserve biodiversity when carrying out their normal functions. This duty includes Priority Habitats and Species, that are defined as "*habitats and species of principal importance*" for the conservation of biodiversity in England. The Secretary of State has identified, in accordance with Section 41 of the Act, 65 Priority Habitats and 1,150 Priority Species. Priority habitats sit outside the hierarchy of designated sites and may be of national (e.g., ancient woodland) or local importance.
- 7.6.9 The Priority Species in St.Helens Borough include Great Crested Newt, Brown Hare, Hedgehog, and Common Lizard. Legally protected species are those that have specific protection under legislation and include badgers, bats and water voles.
- 7.6.10 Development proposals and decisions on planning applications should also take into account the fact that some habitats such as ancient woodland and veteran trees are irreplaceable because of their age and complexity and cannot be re-created once they are lost.

#### Mitigation and Compensation

- 7.6.11 Part 4 of Policy LPC06 sets out the approach to mitigation, and as a last resort, compensation. Here, compensation means compensatory provision and may include a financial contribution towards delivery of compensatory measures where appropriate. It is crucial to the priority of 'no net loss' that appropriate mitigation or, as a last resort, compensatory provision is made. The Nature Conservation SPD sets out in more detail how this should be achieved.



- 7.6.12 It is important that the location of appropriate mitigation, replacement or other compensatory provision follows the sequential approach set out in the Policy. This seeks to target measures as closely as possible to the development site. In some instances, the immediate locality may include nearby sites outside the Borough.
- 7.6.13 As stated earlier, some proposed development sites have been identified as supporting species important to the designation of internationally important sites. The Nature Conservation SPD sets out more detail about how the provision of functionally linked compensatory habitat for the loss of supporting habitat for Pink Footed Geese and other bird species should be achieved.
- 7.6.14 To comply with the Conservation of Habitats and Species Regulations 2017, compensation for internationally important sites must be made before development begins. More information is set out in the Habitats Regulation Assessment of the Local Plan and the St.Helens Nature Conservation Supplementary Planning Document (SPD). For other designated sites, habitats or species, mitigation, replacement or compensation can take place during the development process. This compensation may be provided by the applicant or through another person or organisation, such as a local land manager and is sometimes termed 'biodiversity offsetting'. The Nature Conservation SPD includes examples of how habitat for mitigation or compensation can be provided and managed.

#### Enhancement

- 7.6.15 The Local Plan encourages opportunities to secure measurable biodiversity gain within development sites, for example through the design of open space, landscaping or sustainable drainage schemes. These opportunities range, for example, from significant habitat creation within larger sites to bat boxes or tree planting on smaller urban sites. The sequential approach for the location of appropriate mitigation, replacement or other compensatory provision should be followed for such enhancements. The LCR ecological framework provides more information about the LCR Nature Improvement Area (NIA) and NIA Focus Areas.

#### Information requirements and further guidance

- 7.6.16 An Ecological Appraisal, which should be carried out in accordance with up-to-date British Standards by a suitably experienced ecologist, must support planning applications for development that would affect one or more of: a site that is designated for its nature importance; a Priority Habitat; or a Priority or Protected Species. Further guidance concerning the operation of Policy LPC06 will be set out in the Council's Nature Conservation SPD.



## 7.7 Policy LPC07: Greenways

### Policy LPC07: Greenways

1. The Council will work with other organisations to protect and enhance the strategic network of greenways shown on the Policies Map. Its objectives in this regard will be to:
  - a) provide a continuous off-road network of footpath, cycle and bridleway routes that will be publicly accessible and that will provide linkages between main urban areas and between urban areas and the countryside;
  - b) give additional definition and protection to the network of wildlife corridors and historic and archaeological resources;
  - c) contribute to the sub-regional network of cross boundary green infrastructure corridors; and
  - d) support economic development by improving the appearance of the area and helping people to travel sustainably between homes and workplaces.
2. Development proposals that would affect a Greenway will be refused if they would:
  - a) prejudice the continuity of public access to the greenway;
  - b) harm the integrity of the Greenway in terms of off-road linkages, character or amenity;
  - c) harm the appearance of the Greenway; or
  - d) impair the integrity of the Greenway as a wildlife corridor or its resilience to development pressures and climate change.

## 7.8 Policy LPC07: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 6
<b>Strategic Objectives Met</b>	SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Funding for new greenways</li> </ul>

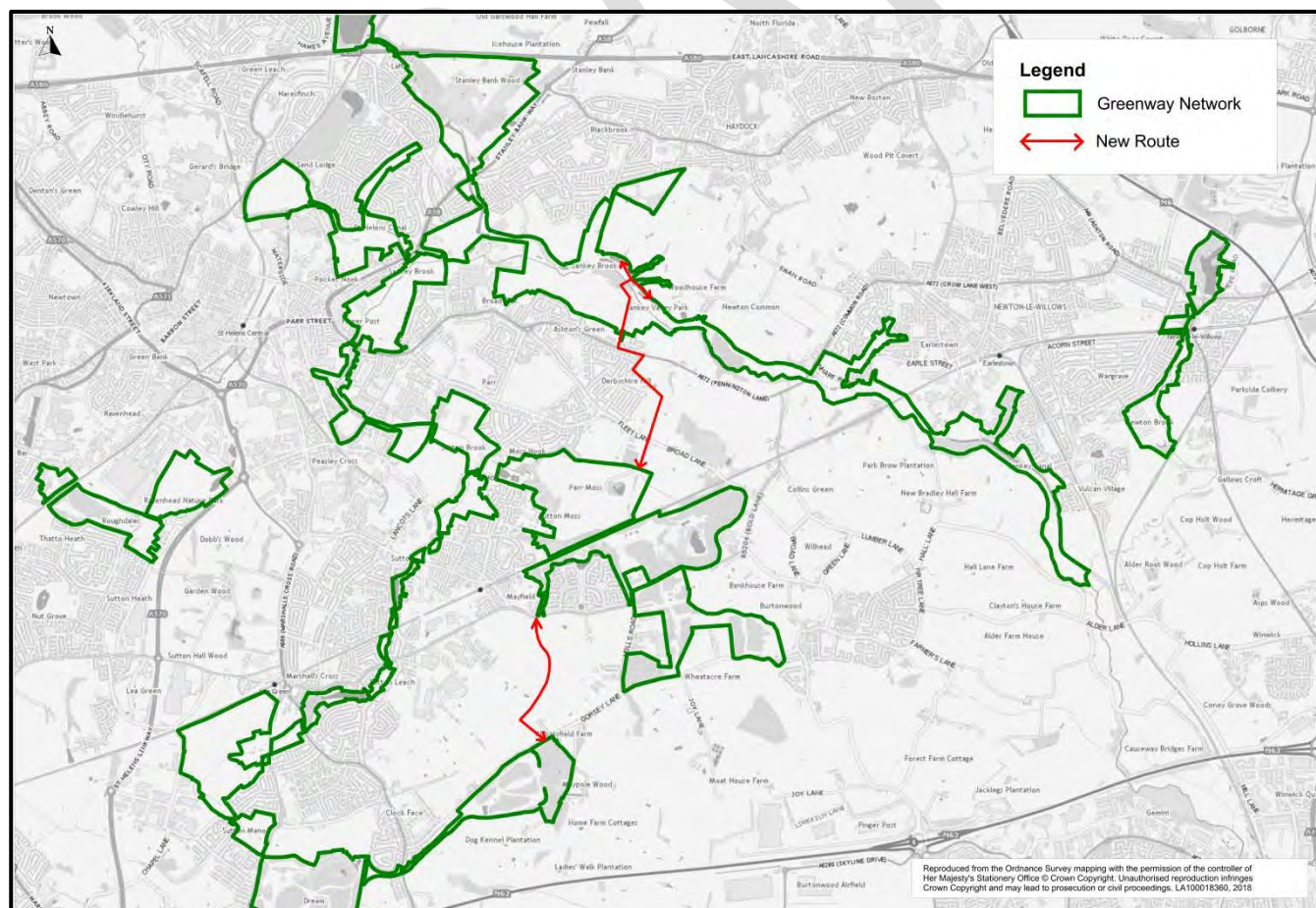
## 7.9 Reasoned Justification

- 7.9.1 The Borough has a long association with Greenways. The initial network was identified in the St.Helens Unitary Development Plan adopted in 1998. Greenways

provide the fundamental connectivity to the Green Infrastructure Network in St.Helens Borough and are also key components of its ecological network.

- 7.9.2 The NPPF advises that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- 7.9.3 Greenways provide a range of benefits to the community such as sustainable access between homes, local services and employment sites and a healthy form of recreation. They also provide wildlife habitat and corridors, enhance the landscape and townscape and help the Borough to adapt to the effects of climate change. The European Greenways Association defines greenways as “*communications routes*” reserved exclusively for non-motorised journeys, developed in integrated manners that enhance both the environment and the quality of life of the surrounding area (Lille Declaration: European Greenways Association 12 September 2000).
- 7.9.4 Existing greenways are shown on the Policies Map. The Council will also use its planning and other powers to expand the network. Such expansion is likely (subject to the availability of funding and other feasibility requirements being met) to include new routes between Colliers Moss Common and the Sankey Valley, and between Maypole Wood and Colliers Moss Common. These potential new routes are shown indicatively on Figure 7.2. The Council will also continue to consider the scope for other new greenways to be created.

**Figure 7.2: Potential New Greenway Routes**



## 7.10 Policy LPC08: Ecological Network

### Policy LPC08: Ecological Network

1. The Council will, working where necessary with other organisations, seek to ensure greater resilience of the natural environment and secure a net gain in biodiversity. To this end it will seek to strengthen those elements of the Liverpool City Region (LCR) Ecological Network, including wildlife sites, wildlife corridors, and 'stepping stone' habitats that fall within the Borough.
2. The LCR Nature Improvement Area (NIA) is an area within which particular priority will be given to habitat management, enhancement, restoration, and creation. Development within the part of the NIA that lies within St.Helens Borough will be permitted where it would:
  - a) enable or contribute towards the effective functioning of the NIA; and
  - b) contribute to the creation and / or management of habitats as set out in the NIA Focus Area Profiles.

## 7.11 Policy LPC08: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 6
<b>Strategic Objectives Met</b>	SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Enhancement and restoration of the Liverpool City Region (LCR) Ecological Network and the LCR Nature Improvement Area</li> <li>• Encouraging landscape protection and enhancement</li> </ul>

## 7.12 Reasoned Justification

- 7.12.1 Policy LPC08, together with other Plan policies and the St.Helens Nature Conservation Supplementary Planning Document (SPD) seeks to enhance the Borough's natural assets by encouraging the restoration or enlargement of natural habitats and other landscape features, and the creation of new habitats where appropriate.
- 7.12.2 The Liverpool City Region Ecological Network draws together the evidence (for example concerning site designated for their nature conservation value and Priority Habitats) and indicates strategic priorities and opportunities in St.Helens Borough and across the Liverpool City Region.

- 7.12.3 Nature Improvement Areas (NIAs) have been recognised by the Government as a principle mechanism for restoring and managing wildlife. They are intended to achieve significant enhancement to ecological networks by providing opportunities to improve existing nature conservation sites, build ecological connectivity through habitat creation and restore ecological processes. Delivering at a landscape-scale, these areas should connect with their local economies and communities.
- 7.12.4 The Liverpool City Region NIA, in line with national planning policy is an integrated and prioritised framework for targeting opportunities for habitat creation and enhancement in the area where greatest gains are likely to be achieved. This may include biodiversity offsetting, mitigation, compensation or changes in land management. Therefore the NIA offers a solution that will enable sustainable growth and housing needs to be met without compromising the natural assets of the Borough or the Liverpool City Region.
- 7.12.5 There are seventeen NIA Focus Areas across the city region, two of which are in St.Helens Borough namely: Knowsley and Sefton Mosslands; and Blackbrook and Sankey Valley Corridor. When taken together they combine to form the LCR NIA. The LCR Ecological Network and NIA boundary will be kept up-to-date, thereby enabling future opportunities for suitable ecological off-setting and enhancement to be taken into account. Future reviews of the LCR Ecological Network will be in accordance with an agreed monitoring process. Each NIA Focus Area has been mapped and is also supported by a detailed NIA Focus Area Profile that will be used to inform decisions on planning applications. The NIA Focus Area maps and profiles are included within the Ecological Network evidence base.

## 7.13 Policy LPC09: Landscape Protection and Enhancement

### Policy LPC09: Landscape Protection and Enhancement

1. Proposals for new development must, as appropriate having regard to their scale and nature:
  - a) seek to conserve, maintain, enhance and / or restore any landscape features that are important to the character of the local area;
  - b) demonstrably form the best option for meeting the aims of the development whilst minimising impacts on the landscape and appearance of the area and respecting local distinctiveness;
  - c) be informed by relevant guidance including the St.Helens Landscape Character Assessment and the Merseyside Historic Character Study; and
  - d) include assessments of the impact of the proposal on the landscape and appearance of the area, carried out in accordance with any relevant best practice guidelines.
2. Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm. Where the development would (despite any such measures) cause significant harm but also bring significant benefits, suitable compensation measures may be sought. If significant harm cannot be avoided, suitably mitigated or compensated, planning permission will be refused unless the development would bring exceptional benefits that would outweigh the harm.

## 7.14 Policy LPC09: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 6
<b>Strategic Objectives Met</b>	SO 6.2,
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	• Development management process

## 7.15 Reasoned Justification

- 7.15.1 The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The European Landscape Convention was ratified by the UK Government and came into force in 2007. The Convention acknowledges that the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas. The



Convention's definition of landscape protection is *"to conserve and maintain the significance or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and / or from human activity."*

- 7.15.2 Natural England's National Character Areas (56) Lancashire Coal Measures, (32) Lancashire and Amounderness Plain and (60) Mersey Valley provide a high level overview of the landscape around the Borough and act as a starting point to the understanding of the area's landscape character and heritage.
- 7.15.3 The St.Helens Landscape Character Assessment (2006) provides a more detailed overview of the landscape character of the Borough and provides borough-wide guidance on landscape and visual sensitivity, woodland planting and landscape strategies. The Character Assessment (or any future replacement) should be used as a context for site-specific assessments of development proposals.
- 7.15.4 The Merseyside Historic Landscape Character Study provides further context for how development should reflect, safeguard and enhance landscape heritage and local distinctiveness.

## 7.16 Policy LPC10: Trees and Woodland

### **Policy LPC10: Trees and Woodland**

1. The Council will, working where necessary with the Mersey Forest and other partner organisations, seek to increase the extent of tree cover across the Borough and to protect and enhance the multi-purpose value of trees, woodlands and hedgerows.
2. New development, as appropriate having regard to its scale and nature, will be required to include the planting of new trees, woodlands, hedgerows and / or financial contributions towards off-site provision. Arrangements should be made for any tree(s) or hedgerow(s) that are planted to be replaced in the event of failure or damage within a prescribed period.
3. Proposals for new development will only be permitted if they would conserve, enhance and / or manage existing trees, woodlands and hedgerows as appropriate, for example by being laid out to provide adequate spacing between existing trees and buildings and including long term management proposals.
4. Any development proposal that would affect a site containing tree(s) or woodland must be accompanied by a tree survey and an arboricultural constraints/implications report, produced to the current British Standard, to enable the effect of the development on the tree(s) to be properly assessed and appropriate tree protection measures to be identified. Any approved tree protection measures must then be maintained throughout the period of any demolition and / or construction works.
5. Development resulting in the loss or deterioration of any area of ancient woodland or of any ancient or veteran tree will be refused unless there are wholly exceptional circumstances in which the need for, and benefits of, the development would clearly outweigh any resultant loss and a suitable mitigation strategy exists.
6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period.



7. Proposals that would enhance the value and / or contribution of woodland in respect of: recreational or educational needs; health; the landscape or townscape; heritage; biodiversity; tourism; and / or economic regeneration will be supported.

## 7.17 Policy LPC10: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 6
<b>Strategic Objectives Met</b>	SO 6.2, SO 6.3
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Bold Forest Park Area Action Plan</li> <li>• Mersey Forest Plan/Town in the Forest Initiative</li> <li>• Development management process</li> <li>• Enhancement and restoration of the Liverpool City Region (LCR) Ecological Network and the LCR Nature Improvement Area</li> <li>• Trees and Development and Nature Conservation SPDs</li> </ul>

## 7.18 Reasoned Justification

- 7.18.1 The Council supports the development of the Mersey Forest as part of the wider Northern Forest along the M62 corridor, as a key measure to ensure the Borough and the wider region is attractive and resilient to climate change.
- 7.18.2 Trees and woodlands are an integral component of Green Infrastructure forming part of the network of natural habitats and improving the visual appearance of the countryside and urban areas. They also provide opportunities for the positive use of the Green Infrastructure for recreation, education, health, biodiversity, regeneration and mitigation of adverse effects caused by climate change, air pollution and water run-off. Their value is recognised in the Regional Forestry Framework Woodland Strategy, St.Helens Landscape Character Assessment, North Merseyside Biodiversity Action Plan and Targets, Town in the Forest Initiative and Policy for Nature St.Helens.
- 7.18.3 The successful retention of healthy trees and planting of new trees as part of a new development can have numerous benefits for the community. In particular, trees can:
- enhance landscape character (in areas where trees are appropriate as guided by the St.Helens Landscape Character Assessment)
  - be a vital component of Green Infrastructure;

- help to create a more positive image of an area and thereby encourage economic regeneration and inward investment;
- soften and screen buildings;
- enhance property prices;
- provide a vital role in respect of biodiversity and the urban ecosystem by helping to support a great variety of wildlife;
- save energy consumption through their moderation of the local climate;
- produce oxygen and help to lock up carbon emissions that contribute to global warming;
- help to stabilise ground;
- absorb water, control run-off and so help reduce flood risk;
- reduce noise by acting as a sound barrier;
- help to filter out pollution;
- provide shade;
- help alleviate the effects of extreme temperature and help to filter out harmful ultra violet radiation;
- help to improve mental wellbeing and reduce the stress of urban living; and
- form an important part of the heritage of an area.

- 7.18.4 The Council is a longstanding partner in the Mersey Forest, that was established in 1991 with a vision to “*get more from trees*” to help make Merseyside and North Cheshire one of the best places in the country to live. Since then around 3,000ha of woodland or nine million trees have been planted. Woodland cover has doubled, from 4% to 8%, at a rate of three times the England average. The maturing woodland, including the former colliery sites now collectively known as Bold Forest Park, provides a recreation resource for much of the borough and neighbouring authorities. The Mersey Forest Plan is a long term and strategic guide to the work of the Forest and its partners. In accordance with national planning policy it forms a material consideration in deciding planning applications.
- 7.18.5 National policy also requires local planning policies and decisions to contribute to and enhance the natural local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital – including the economic and other benefits of trees and woodland.
- 7.18.6 Woodlands have a wide range of benefits recognised in both the Mersey Forest Plan and the North West Regional Forestry Framework. Of particular significance in St.Helens is the contribution to urban regeneration. The Local Plan will be instrumental in delivering the St.Helens Woodland Strategy that was prepared in response to the City Growth Strategy objective of creating the Town in the Forest.
- 7.18.7 The North West Regional Forestry Framework is part of a wider national agenda on the protection, conservation and management of trees and woodlands across the UK. The Framework recognises the diverse, habitat rich and thriving 'green tourism' opportunities of trees and woodlands and sets out 'An Agenda for Growth' to help shape the woodland and forestry sector over the next 20 years.

- 7.18.8 Town in the Forest (2006) recognises the importance of St.Helens Borough undergoing an urban renaissance and utilising the urban fringe as a mechanism for urban renewal, through the development of linear forests in urban areas and connecting to community woodlands on the periphery.
- 7.18.9 All trees have a potential value to the character and amenity of the area. While particularly important trees will continue to be protected by Tree Preservation Orders, Policy LPC10 recognises that other trees affected by development should be identified, safeguarded, and where necessary, replaced.
- 7.18.10 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011) builds on the Natural Environment White paper and provides a comprehensive picture of how the Government will implement our international commitments. It aims to halt overall biodiversity loss and support healthy, well-functioning ecosystems and establish coherent ecological networks. In relation to forestry it aims to bring a greater proportion of existing woodlands into sustainable management and expand the area of woodland in England.
- 7.18.11 The Government's 25 Year Environment Plan (2018) has policies that include embedding an 'environmental net gain principle for development, including housing and infrastructure. As well as a focus on woodland to maximise its many benefits, including supporting the development of a new Northern Forest and larger scale woodland creation, it aims to create more green infrastructure and secure more tree planting in and around towns and cities. The value of trees in the landscape is also recognised in the St.Helens Landscape Character Assessment (2006).
- 7.18.12 All trees that are to be retained on site should be protected throughout the period of development activity by protection measures. Proposals must also be supported by clear tree surveys, arboricultural implications / constraints plans, and tree protection plans. All work must comply with relevant British Standards that are extant at the time that the development is proposed and / or takes place.
- 7.18.13 The St.Helens Trees and Development SPD (2008) sets out further guidance to enable delivery of high quality developments that include new tree planting and the protection of existing trees as an integral part of their design. As woodlands are an important natural asset they are also subject to the controls set out in Policy LPC06. The St.Helens Nature Conservation SPD provides further guidance on the Council's approach, crucial parts of which are to ensure that appropriate mitigation or, as a last resort, compensation for any harm or loss to habitat(s) is made.

## 7.19 Policy LPC11: Historic Environment

### **Policy LPC11: Historic Environment**

1. The Council will promote the conservation and enhancement of the Borough's heritage assets and their settings in a manner that is appropriate to the significance of each asset. These include designated heritage assets such as Scheduled Monuments, Registered Battlefields, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and non-designated above ground assets and areas of archaeological interest.
2. All proposals for development that may affect a heritage asset or its setting should be accompanied by an Assessment of Significance that should form part of a Design and Access Statement and / or a Heritage Impact Assessment and clearly set out the significance of the heritage asset including any contribution made by its setting. The proposals should demonstrate how they respond to the significance of the asset. Merseyside Historic Environment Record (HER) should be consulted as a minimum.

#### Development affecting heritage assets

3. Development proposals that would lead to substantial harm to (or total loss of significance of) a designated heritage asset will be refused permission unless it can be demonstrated that: (a) the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or total loss; or (b) all the other exceptions set out in paragraph 195 of the National Planning Policy Framework (or any successor national policy that supersedes this paragraph) apply.
4. Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use.
5. Development involving harm to or loss of any non-designated heritage asset (such as any building identified on a Local List prepared by the Council) will be refused unless any public benefit from the development would outweigh such harm or loss.
6. Development and other works will be required to preserve or enhance the appearance, character and setting of all heritage assets (whether designated or not) by using good design and appropriate materials, detailing, scale, massing, siting, layout and landscaping.
7. Where the complete or partial loss of any heritage asset is justified, the asset's significance must be recorded to a standard agreed by the Council and made publicly available.

Areas of archaeological interest

8. Any development proposal that may affect one or more asset(s) of archaeological interest (whether designated or not) must include an appropriate desk-based assessment and where necessary a field evaluation, carried out by a suitably qualified person(s). Such evidence should identify any likely features of archaeological interest within or close to the site and how these would be affected by the proposal.
9. Development proposals affecting archaeological remains may be required (depending on the significance of the remains) to preserve the remains in situ or to secure the appropriate excavation and recording of the significance of the remains by a suitably qualified person.

Other implementation measures

10. The Council will:
  - a) prepare, update and promote the implementation of Heritage Asset Appraisals and Management Plans and give appropriate weight to these in development control decisions;
  - b) work with partner organisations to interpret and educate the public about the heritage of the Borough;
  - c) take appropriate measures to improve public access to heritage assets; and
  - d) seek to secure the effective conservation and use of all heritage assets that are 'at Risk' within the Borough.

## 7.20 Policy LPC11: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 6
<b>Strategic Objectives Met</b>	SO 6.2
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Maintaining employment land supply</li> <li>• Facilitating housing delivery</li> <li>• Partnership working to secure conservation, recording and interpretation of heritage assets</li> </ul>

## 7.21 Reasoned Justification

- 7.21.1 St.Helens Borough has a unique heritage, based upon its history connected with the railways, mining, glass and other industries. The Local Plan has a key role in improving the appearance and character of the built environment, and ensuring that it can be used in a way that adapts to changing social, economic and environmental requirements. Policy LPC11 sets out how the Council will seek to conserve the Borough's historic environment and promote awareness of its shared heritage.
- 7.21.2 National planning policy requires the Local Plan to set out a positive strategy for the conservation and enjoyment of the historic environment, and that planning applications should describe the significance of any heritage assets affected, including any contribution made by their setting. Development that would cause substantial harm to a designated heritage asset must be refused unless such harm would be necessary to achieve substantial public benefits or other very specific circumstances set out in national policy apply. Designated heritage assets in St.Helens Borough include those set out in clause 1 of Policy LPC11.

### Listed Buildings

- 7.21.3 The Borough of St.Helens contains 148 Listed Buildings. Whilst Earlestown railway viaduct is the only Grade I structure, the Borough has 12 Grade II\* structures including Scholes Hall and the Statue of Queen Victoria in Victoria Square. The Council has a statutory duty to ensure the preservation of buildings listed under Part 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest. Buildings and structures within the curtilage of listed buildings are also protected under the Act.
- 7.21.4 There are tight planning controls over development involving the alteration or loss of a listed building or land in its curtilage. Most new development affecting the exterior of a listed building or within the curtilage of a listed building requires planning consent. Works affecting the interior or exterior of a listed building, curtilage building or structure, normally require listed building consent. A comprehensive description and list of all listed buildings and other nationally designated heritage assets is set out on Historic England's website



### Scheduled Monuments

- 7.21.5 A scheduled ancient monument is defined by the Ancient Monuments and Archaeological Areas Act 1979 as any structure, or site of a structure, above or below ground that is considered by the Secretary of State to be of public interest by reason of its historic, architectural, traditional, artistic or archaeological importance. An application must be made to Historic England for any proposed works affecting a scheduled monument, in addition to any need for planning permission. All scheduled monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance, will be given the strictest protection. Development proposals that would result in substantial harm to or total loss of significance of any scheduled monument, or any associated feature contributing to their significance including their setting, will be refused except in wholly exceptional circumstances. Historic England's Heritage List for England identifies 12 Scheduled Monuments in the Borough, four of which are on their 'at risk' list.

### Registered Battlefield – Battle of Winwick

- 7.21.6 The Battle of Winwick (also known as Battle of Red Bank) took place in 1648 and has been identified as being an important component of Oliver Cromwell's victory in Lancashire, which ended the Second English Civil War. The site of the battle has been designated as a registered battlefield by Historic England, recognising its significance as a turning point at this key point in British history, and reflecting the military tactics of the time and comprising a likely final resting place for those that died during the battle. The battlefield is subject to the strong protection given to designated heritage assets set out in national policy and clause 3 of Policy LPC11.

### Registered Parks and Gardens

- 7.21.7 Parks and gardens of national historic importance are designated as Registered Parks and Gardens and included in a register maintained by Historic England. There are currently two Registered Parks and Gardens in the Borough at Taylor Park (which was part of the former Eccleston Estate) and St.Helens Cemetery in Windle.
- 7.21.8 New development must promote the enjoyment, landscape character and interest of these areas by respecting their layout, design, character, appearance and setting. It should also avoid causing harm to key views from or towards these landscapes or prejudicing their future restoration.

### Conservation Areas

- 7.21.9 The Planning (Listed Building and Conservation Areas) Act 1990 places statutory duties on Local Planning Authorities relating to the designation and ongoing review of Conservation Areas and adoption of policies to ensure their conservation and enhancement. There are currently eight Conservation Areas in St.Helens Borough. Proposals for development affecting a Conservation Area should preserve or enhance those elements that have been identified as making a positive contribution to the character and special architectural or historic interest of the area. These elements may include buildings, boundary features, other structures, landscape features, open spaces and the setting. Where proposals would lead to harm to a Conservation Area, then the harm will be identified as being either substantial or less than substantial based on the relative significance of the element affected and its contribution to the significance of the Conservation Area

as a whole. Development causing such harm will be subject to the tests set out in Policy LPC11 and national policy.

Non-designated buildings and other structures

- 7.21.10 The Borough contains a number of buildings and other structures that are not formally designated as heritage assets, but that nevertheless contribute to the character of the area. Policy LPC11 confirms that development that would cause harm to or loss of non-designated assets will be refused unless any public benefit from the development would outweigh such harm or loss. Development proposals that are likely to affect one or more non-designated assets will be required to include the evidence referred to in clause 2 of Policy LPC11.

Archaeological sites

- 7.21.11 Due to the long and complex history of the Borough, some sites (in addition to those affected by the formally designated Battlefield and Scheduled Monuments referred to earlier) are likely to contain remains of archaeological interest. Where a development would be likely to affect any site with potential to include archaeological interest (whether the site is formally designated or not), the Council will require the submission of an appropriate desk-based assessment and, where necessary, a field evaluation, demonstrating the level of such interest and how it would be affected. Planning conditions and / or agreements will be used as necessary to secure the appropriate preservation and / or recording of any remains, with the preferred solution depending upon the degree of significance of the asset.

Design of development affecting heritage assets

- 7.21.12 Particular attention must be paid to the design of any works affecting a heritage asset. For example on Listed Buildings and buildings in a Conservation Area, particular attention must be paid to the design and materials used in the walls, roof, doors and other detailing. The design of any windows must be carefully assessed, having regard to the importance of the building, the character and appearance of the area, the details of any opening mechanism, the appearance of 'joints' and the design of glazing bars and horns.

Historic environment records and the interpretation of heritage assets

- 7.21.13 The Merseyside Historic Environment Record is the central heritage asset database for the Liverpool City Region and should be consulted by developers when designing their proposals.
- 7.21.14 St.Helens Council has a strong record of working with partner organisations to engage communities in their local heritage and further the understanding of the development of St.Helens as a town of the industrial revolution. Key partners in this context include Community Archaeology, the Museum of Liverpool, Merseyside Archaeological Society, Merseyside Industrial Heritage Society, Sankey Canal Restoration Society, St.Helens History Society and developers. It will continue to work with these bodies in this regard.

## 7.22 Policy LPC12: Flood Risk and Water Management

### **Policy LPC12: Flood Risk and Water Management**

#### **Flood Risk**

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
  - a) the St.Helens Strategic Flood Risk Assessment;
  - b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
  - c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
  - a) within flood zones 2 or 3; or
  - b) on a site of 1 hectare or larger within flood zone 1; or
  - c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
  - d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
  - a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
  - b) any applicable Exception Test required by national policy has been passed; and
  - c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):
  - a) Be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;

- b) protect heritage assets (such as buried archaeology);
  - c) Be fully described in the development proposal; and
  - d) Be funded by the developer, including long-term maintenance.
5. Any proposal for major development on a site that would abut, run alongside or straddle any watercourse in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.
6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

#### Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

#### Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):
- a) An adequate soakaway or other form of infiltration system;
  - b) An attenuated discharge to watercourse;
  - c) An attenuated discharge to public surface water sewer;
  - d) An attenuated discharge to public combined sewer.
9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.

10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.
11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.
12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.
13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.

#### Protection of water and waste water assets

14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.

## 7.23 Policy LPC12: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6, SA 7
<b>Strategic Objectives Met</b>	SO 2.2, SO 6.2, SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Enhancement and restoration of the Liverpool City Region (LCR) Ecological Network and the LCR Nature Improvement Area</li> <li>• Sankey Catchment Action Plan</li> </ul>

## 7.24 Reasoned Justification

### Flood Risk

- 7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.
- 7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.
- 7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

### Sankey Catchment Action Plan

- 7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.
- 7.24.5 As part of a catchment based approach, the Sankey Catchment Partnership has produced the Sankey Catchment Action Plan. This identifies that there is an overall need within the catchment to attenuate approximately 720,000m<sup>3</sup> of flood water in a 1 in 100-year event. The Action Plan aims to:



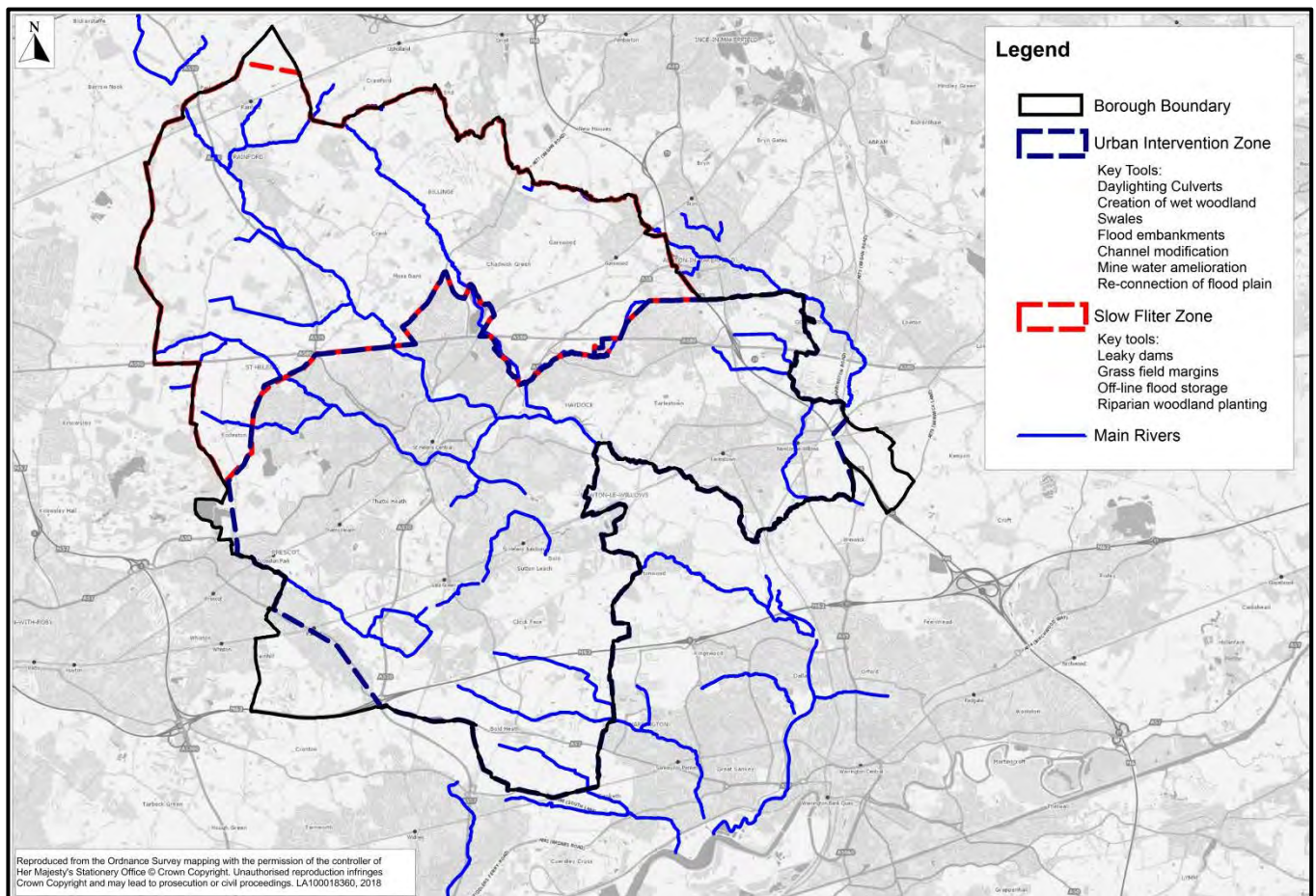
- reduce the reactive nature of the catchment by “*Slowing the Flow*” in the rural headwaters, filtering agricultural run-off and improving water quality and wildlife habitats;
- address issues in the urban areas of the catchment such as inadequately designed connections; and
- remove pinch-points that can contribute to poor water quality and localised flooding.

- 7.24.6 The Liverpool City Region Ecological Network Nature Improvement Area (NIA) identifies the Black Brook and Sankey Valley Corridor, Knowsley and St.Helens Mosslands as NIA Focus Areas (see Policy LPC08 for further details). The Focus Area profiles<sup>22</sup> identify re-naturalising rivers and brooks and restoration of mossland as habitat creation priorities along with enhancing the biodiversity value of watercourses through habitat management and creation.
- 7.24.7 Development alongside or close to water courses can make a significant contribution to slowing the flow by temporarily attenuating flood water. For this reason, proposals for major development that would abut, straddle or run alongside any watercourse will (unless this is not feasible or viable) be expected to include suitable measures in accordance with the Sankey Catchment Action Plan. The measures that are likely to be considered suitable will vary according to the part of the Borough and the site type – with “*Slow the Flow*” measures, such as off-line flood storage, being generally suitable in the north of the borough and “*Urban Intervention Zone*” measures such as “*daylighting*” (opening up to the surface) of culverts being generally suitable in the centre and south of the Borough.
- 7.24.8 The “*Slow the Flow*” and “*Urban Intervention*” Zones are shown on the Policies Map and indicatively in Figure 7.3. It should be noted that, whilst clause 5 of Policy LPC12 relates to all water courses; Figure 7.3 only shows main rivers.
- 7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, “*safeguarding land from development that is required ( ... ) for current and future flood management*”.
- 7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

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<sup>22</sup> <http://www.lcreconet.uk/mdocuments-library/>

**Figure 7.3: Sankey Catchment Action Plan - Strategic Approach**



7.24.11 The St.Helens Strategic Flood Risk Assessment (SFRA) 2014 has informed the sequential, risk-based approach taken by the Council to the proposed geographical distribution of new development in the Local Plan. A Preliminary Flood Risk Assessment of the Sankey Catchment carried out in 2017 helped to update the flood risk database. The Lead Local Flood Authority also holds records of incidents of flood events within the Borough as required by the Flood Water Management Act 2010.

#### Site Specific Flood Risk Assessment

7.24.12 Part 4 of Policy LPC12 sets out the circumstances in which developers will need to undertake site specific Flood Risk Assessments. They include where the site is: within Flood Zone 2 or 3; is above 1 hectare in area and in Flood Zone 1; or is above 0.5 hectare and in a Critical Drainage Area (which is an area notified by the Environment Agency as having critical drainage problems). Whilst no Critical Drainage Areas have been identified in the Borough at the time of writing it is possible that this situation may change in the future.

7.24.13 Where a site-specific flood risk assessment is required, applicants should enter into early discussions with the Council and the Environment Agency to establish the requirements of the assessment. It will be the applicant's responsibility to fully assess flood risk and to propose measures to mitigate and manage flood risk during the lifetime of the development.

### Sequential and Exception Test

- 7.24.14 The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development will not be permitted in areas of medium or high risk if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. If, following application of the Sequential Test, it is not considered reasonably possible consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, the Exception Test will be applied.
- 7.24.15 For the Exception Test to be passed:
- a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
  - b) a site specific flood risk assessment must demonstrate that the development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible will reduce overall flood risk.
- 7.24.16 Further information in relation to the application of the Sequential and Exception Test is available in the St.Helens Strategic Flood Risk Assessment and in national Planning Practice Guidance.

### Water Quality

- 7.24.17 There is increasing concern for the protection of the water environment, which not only serves as a source of water but provides essential habitats and a valued resource for leisure and recreation. Under the European Union Water Framework Directive (relevant requirements of which have been incorporated into national regulations) water bodies must meet a range of chemical and ecological criteria to protect aquatic ecosystems and drinking water resources. All water bodies in the country are required to achieve a 'good' ecological status by 2027 at the latest. Therefore, it is important that new development does not cause detrimental environmental impacts that will hinder the ability of water bodies in the Borough to meet this target.

## 7.25 Policy LPC13: Renewable and Low Carbon Energy Development

### **Policy LPC13: Renewable and Low Carbon Energy Development**

1. Proposals for development that would produce and / or distribute decentralised, low carbon or renewable energy will be permitted provided that they would:
  - a) avoid causing unacceptable harm to: the appearance or character of the surrounding landscape; natural resources; biodiversity; geodiversity; water or air quality; aviation or road safety; public amenity; or the living conditions of occupiers of any nearby dwellings;
  - b) comply with relevant national and local policies concerning new development in the Green Belt; and
  - c) comply with Policy LPC11 'Historic Environment'.

When proposals are being assessed against these criteria, regard will be had to any environmental, social and / or economic benefits that the proposals would provide, and their number, scale, siting, design and any cumulative impact in conjunction with other proposals.

2. Proposals that would otherwise result in an unacceptable impact under clause 1) above must be mitigated by appropriate measures agreed by the Council. All proposals must be accompanied by information that shows how the local environment would be protected, and how the site would be restored when energy production or distribution ends.
3. Relevant evidence that will be taken into account in assessing the suitability of any proposals under clause 1) above will include (alongside any other relevant material): the Liverpool City Region Renewable Energy Capacity Study 2010; any document(s) that may supersede this; the Merseyside Historic Landscape Characterisation Study; the evidence base for the Merseyside and Halton Joint Waste Local Plan; and the St.Helens Landscape Character Assessment.



4. New developments for housing, employment or other uses will be required to meet high standards of sustainable design and construction and minimise carbon emissions. To this end they should use energy efficiently and where feasible incorporate decentralised energy systems that would use or generate renewable or other forms of low carbon energy. Large scale schemes that would generate a significant source or demand for heat should also be supported by evidence considering the feasibility of serving the development by means of a district heating scheme. Proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s).

## 7.26 Policy LPC13: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6, SA 7
<b>Strategic Objectives Met</b>	SO 2.2, SO 6.2, SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Funding of low carbon energy initiatives</li> <li>• Liverpool City Region Renewable Energy Capacity Study 2010</li> <li>• St. Helens Infrastructure Delivery Plan</li> </ul>

## 7.27 Reasoned Justification

- 7.27.1 One of the core principles set out in the NPPF is to support the transition to a low carbon future in a changing climate and to encourage the use of renewable energy resources. The NPPF indicates that planning has a key role to play in supporting the delivery of renewable and low carbon energy by reducing greenhouse gas emissions and encouraging energy production from such sources.
- 7.27.2 Proposals for renewable energy related development can in some cases have a significant effect on the local area. For example, large scale renewable energy developments are likely to be prominent in the landscape. In such cases the Council will carefully weigh up the environmental, social and economic benefits of the proposals against any effects on the local area for example on the landscape, heritage assets or Green Belt. The NPPF recognises that many forms of renewable and low carbon energy related developments will constitute inappropriate development in the Green Belt, requiring the developer to demonstrate that special circumstances, such as major benefits to the environment, exist.

- 7.27.3 Planning permissions for renewable energy schemes will, in most cases, be conditioned to require the removal of infrastructure and reinstatement of the development site should the development cease to be operational and where it is not feasible for the infrastructure to be re-used thereafter, for example for a commercial or community renewable or decentralised energy scheme.

Wind Energy

- 7.27.4 National planning policy states that proposals involving one or more wind turbines should not be considered acceptable unless they are in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan and (following consultation) it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.
- 7.27.5 The Liverpool City Region Renewable Energy Capacity Study 2010 assessed the scope for large scale wind and other forms of renewable energy generation across the City Region. Although it identified some areas of search for wind energy development, none of these were in St.Helens Borough. The Council acknowledges however that some forms of wind energy development may be acceptable within the Borough. In such cases the applicant would need to demonstrate that their development is technically feasible and acceptable taking into account factors such as wind speed, environmental and landscape designations and proximity to sensitive receptors such as residential properties and heritage assets. All proposals will be expected to comply with all relevant criteria set out in Policy LPC13, other policies of this Plan and national policy.

Use of low carbon and renewable energy in new housing and employment sites

- 7.27.6 The Building Regulations set out requirements concerning the conservation of fuel and power in buildings. However, to support the transition to a low carbon economy it is also necessary to encourage the greater use of renewable and low carbon energy in new development. This is generally more viable and feasible in larger developments. For this reason, whilst clause 4 of Policy LPC13 encourages use of renewable and low carbon energy as appropriate in all new development, it requires that at least 10% of energy needs in strategic employment and housing sites should be met in this way unless this is shown not to be feasible or viable.



## 7.28 Policy LPC14: Minerals

### **Policy LPC14: Minerals**

1. The Council will seek to ensure that the Borough of St.Helens provides a steady and adequate supply of minerals to contribute towards regional and national needs. To minimise the need for primary mineral extraction, provision of substitute, secondary or recycled sources will be encouraged in preference to land-won resources. This will include the provision of suitably designed and located temporary materials-recycling facilities on the sites of major demolition or construction projects and suitably designed and located permanent recycling plants for construction and demolition waste.
2. A Mineral Safeguarding Area has been defined around deposits of coal, clay (including brick clay and fire clay) and sandstone, considered to be of current or future economic importance. Proposals for non-mineral related development will be permitted (subject to compliance with other Plan policies) within the Mineral Safeguarding Area where it has been demonstrated that:
  - a) the mineral resource would be extracted satisfactorily prior to the non-mineral development taking place (in accordance with Part 4 and 5 of this policy and other relevant policies); or
  - b) the minerals are either not present, are no longer of any economic value, or have already been fully extracted; or
  - c) the prior extraction of minerals is not feasible, for reasons such as the depth of the deposit or because extraction would lead to or exacerbate ground instability; or
  - d) the prior extraction of minerals would have unacceptable impacts on neighbouring uses, the amenity of local communities or on the environment; or
  - e) the prior extraction of minerals would result in abnormal costs and / or delays that would jeopardise the viability of the development; or
  - f) the need for the proposed development outweighs the need to safeguard the mineral resource; or
  - g) the proposed development is compatible with the purposes of safeguarding the mineral; or
  - h) the proposed development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit future extraction of the minerals; or
  - i) the development is included on the list of exempt developments (as set out in the reasoned justification of this policy).

3. Development for non-mineral related use(s) on or close to existing mineral workings or existing or planned mineral infrastructure will be permitted provided it would not have an unacceptable impact on the continuation of mineral workings or on the operation of the mineral infrastructure. Where the development is likely to have a significant impact on the continuation of mineral working or on the operation of the minerals infrastructure, the applicant will be required to clearly demonstrate that either:
  - a) the mineral working and / or mineral infrastructure is no longer required to meet the current or anticipated future needs of the minerals, construction or waste management industries; or
  - b) the need for the proposed development outweighs the need to continue the mineral working and / or the need to safeguard the mineral infrastructure; or
  - c) an alternative site within an acceptable distance would be provided for the mineral working or infrastructure that is at least as appropriate for the relevant mineral working or infrastructure use(s) as the safeguarded site.
4. Proposals for the exploration, extraction, storage, processing and / or distribution of minerals will only be permitted if it has been demonstrated that:
  - a) any adverse impacts relating to any of the criteria set out in Part 5 of this policy would be avoided or appropriately mitigated;
  - b) the location of the proposed development would be suitable, taking into account all relevant environmental, geological and technical considerations; and
  - c) provisions for the restoration and aftercare of the site have been made and will be implemented at the earliest opportunity to an agreed timescale and to a standard and manner consistent with an agreed end use and the character, setting and landscape context of the surrounding area.
5. The criteria referred to in part 4(a) of this policy include:
  - i) amenity (e.g., dust, noise, visual intrusion, vibration or other nuisance);
  - ii) air and water quality;
  - iii) lighting;
  - iv) landscape character and setting;
  - v) traffic, including air and rail, and access;
  - vi) risk of contamination to land;
  - vii) soil resources and the impact on best and most versatile agricultural land;
  - viii) flood risk and drainage;
  - ix) disposal of mineral waste;

- x) land stability, including subsidence and risk of damage to buildings, structures and land;
  - xi) ecology, including habitats, species and designated sites (particularly the internationally important nature sites); and
  - xii) heritage assets and their setting.
6. Proposals for the development of onshore oil and gas resources (including coal bed methane, coal mine methane, shale gas and oil) must clearly demonstrate that the highest levels of environmental, health and social protection and benefit consistent with prevailing national policy and regulation and industry best practice standards, including those relating to Environmental Impact Assessment and Habitats Regulations Assessment, will be provided.

## 7.29 Policy LPC14: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6, SA 7
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 6.2, SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Annual review of Local Aggregates Assessment (LAA)</li> <li>• Development management process</li> <li>• Minerals related planning permissions</li> </ul>

## 7.30 Reasoned Justification

- 7.30.1 St.Helens Borough has been a location of significant minerals production in the past, including the extraction of coal (both deep-mined and open cast), clay, sandstone and sand and gravel. Whilst reserves of these minerals remain, much of this activity has now ceased. There is now only one quarry site in the Borough with an active planning consent – Bold Heath Quarry – that produces crushed sandstone for use in the construction industry. In addition, there is active permission for methane extraction from the workings of the former Sutton Manor Colliery near Union Bank Farm. There have been no major proposals for new mineral extraction in recent years and the level of future industry interest in exploiting the Borough's minerals resources remains uncertain.
- 7.30.2 Many minerals can only be worked at locations where they occur, whilst others, particularly where deep extraction by drilling is involved, allow for more flexibility to choose locations for surface development. The Council seeks to ensure that all future minerals workings will be located in appropriate places.

### Mineral Supply

- 7.30.3 The principal evidence base informing the Borough's future role in facilitating an appropriate supply of aggregate minerals is the annual Local Aggregate Assessment (LAA). The LAA is produced jointly with other local authorities to reflect an aggregate producing sub-region comprising Merseyside, Warrington and Greater Manchester. Matters relating to aggregate production, reserves, land-banks and future supply are reported annually at this sub-regional level through the LAA.
- 7.30.4 St.Helens Council, as part of Merseyside, is represented as a North West Aggregates Working Party (NWAAP) member and subscribes to the national Managed Aggregate Supply System (MASS) through market monitoring and production of annual LAAs. The Council intends to maintain its commitment to the MASS through continued representation on the NWAAP.
- 7.30.5 Bold Heath Quarry is the only quarry in Merseyside with an active planning consent for production of crushed rock (sandstone) aggregate. Whilst production levels at the quarry have been affected by economic conditions in recent years, its reserves make it capable of contributing to sub-regional supply for some time into the future.
- 7.30.6 Part 1 of Policy LPC14 aims, by prioritising the use of secondary and recycled materials, to reduce the need for production of new primary (land-won) aggregates and for disposal to landfill of Construction Demolition and Excavation (CD&E) waste materials. This approach is consistent with the NPPF that strongly promotes the use of secondary and recycled materials as an alternative to primary aggregate.

### Mineral Safeguarding

- 7.30.7 Mineral resources are finite and are vulnerable to being lost when building or other forms of development take place. Resources that are scarce or economically important should therefore be safeguarded from sterilisation. Where it is necessary for development to take place, the prior extraction of mineral resources will be encouraged, where this is feasible in terms of site size and location, and subject to compliance with the other plan policies and proposals including Parts 4 and 5 of Policy LPC14. Prior extraction of mineral resources can also have the benefit of removing land instability issues on certain sites.
- 7.30.8 To alert developers to the presence of known mineral resources and ensure their potential sterilisation is considered as part of the planning process, a Mineral Safeguarding Area (MSA) has been defined. Whilst the designation of the MSA does not indicate a presumption that mineral resources within it will be worked, Policy LPC14 seeks to avoid their unnecessary sterilisation.
- 7.30.9 In line with best practice guidance, the MSA has been drawn around the following mineral resources found in the Borough that are considered to be of economic importance, based on current evidence:
- Shallow coal;
  - Clay (including brick clay and fire clay); and
  - Sandstone (centred around existing workings at Bold Heath Quarry).

- 7.30.10 The MSA is shown on the Policies Map as a single area. Given the complexity of the mineral deposits within the Borough, it is not possible to show each mineral resource separately alongside all the other designations and maintain an acceptable degree of clarity. To give clear guidance on where the different mineral resources may be found within the Borough, the extent of each resource is shown in Appendix XX.
- 7.30.11 Where supporting information is required from the applicant to comply with Part 2 of the policy, this will be proportionate to the scale and nature of the proposal. Where the Council considers that a proposal may lead to the significant sterilisation of mineral resources, a detailed Minerals Assessment must be submitted, prepared by a qualified mineral surveyor or geologist. This should include information relating to the extent or quality of the mineral resource and any geotechnical issues informed by the most up-to-date mineral resource information available for the site or area.
- 7.30.12 In line with best practice guidance, the MSA does not exclude urban or built up areas. It therefore does not rule out the potential for prior extraction as part of larger urban regeneration schemes. However, given the abnormal costs associated with many development sites in the Borough it would be unreasonable to apply a mineral safeguarding requirement to small scale schemes. For this reason, whilst prior extraction of minerals will be encouraged subject to compliance with Policy LPC14 and other relevant policies, the requirement to demonstrate that minerals will not needlessly be sterilised will apply only to development proposals on sites of more than 0.5ha in area.

#### Mineral Safeguarding Area - Exempt Development

- a) The site or area is 0.5ha or less;
- b) Applications for householder development;
- c) Applications for alterations and extensions to existing buildings and / or for change of use of existing buildings;
- d) Applications for advertisement consent;
- e) Applications for approval of reserved matters or for full planning permission where the principle of development has been established by an existing outline planning permission;
- f) Prior notification proposals (telecommunications, forestry, agriculture, demolition);
- g) Certificates of Lawfulness of Existing Use or Development (CLEUD) and Certificates of Lawfulness of Proposed Use or Development (CLOPUD);
- h) Applications for works to trees;
- i) Applications for temporary planning permission.

#### Mineral infrastructure safeguarding

- 7.30.13 Development for other uses (such as housing) either on or close to existing or planned mineral extraction sites or mineral infrastructure can lead to the mineral operations or infrastructure becoming incompatible with surrounding uses. For this reason, proposals for housing or other sensitive forms of development that could suffer nuisance or other problems will not be permitted unless it is

demonstrated that they would satisfactorily co-exist with the existing or planned minerals related operations.

- 7.30.14 Minerals related infrastructure includes strategic rail freight links and sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

Development management requirements

- 7.30.15 All proposals for exploration, extraction, storage, processing and / or distribution of mineral resources, including energy minerals, should be accompanied by supporting information to demonstrate compliance with Parts 4 and 5 of Policy LPC14 and other relevant policies in the Plan. The level of information should be proportionate to the scale and nature of the proposal. Applicants will be expected to agree with the Council at pre-application stage the scope of any assessments of potential impact, including any Environmental Impact Assessment or Habitats Regulations Assessment that may be needed.

Energy minerals

- 7.30.16 Energy minerals include coal and other hydrocarbons such as oil and natural gas used to generate power. They can either be extracted using 'conventional' or 'unconventional' methods. Unconventional methods include the extraction of oil and natural gas from sources such as underground shale or coal seams using horizontal drilling and / or hydraulic fracturing (or 'fracking').
- 7.30.17 Previous interest in energy mineral extraction within St.Helens Borough (with the exception of coal) has primarily involved capturing methane from former coal working or landfill sites. As an indication of future industry interest, the government has issued a number of Petroleum Exploration and Development Licences (PEDLs) for onshore hydrocarbon extraction under the Petroleum Act 1998, covering different parts of the Borough. These licence areas are shown on the Policies Map. Whilst the Council is required to show these areas they are not subject to any local authority control and the Local Plan cannot influence them.
- 7.30.18 There are three phases of onshore hydrocarbon extraction: exploration, testing (appraisal) and production. Applications for energy related mineral development can relate to all or any combination of these phases. The Council will advise applicants on the evidence, issues and scope of information required as part of the pre-application process. In all cases, full compliance with prevailing industry standards, best practice and national regulatory requirements will be expected.
- 7.30.19 Some exploration work or testing, such as initial seismic work, may not require consent from the planning authority. The exploratory, appraisal or production phase of hydrocarbon extraction can only take place in areas where a PEDL licence has been issued.



## 7.31 Policy LPC15: Waste

### Policy LPC15: Waste

The Council will promote the sustainable management of waste in accordance with the waste hierarchy (as defined in national planning policy). In accordance with the Merseyside and Halton Joint Waste Local Plan 2013 (or any Plan that may supersede or supplement this) it will work to:

- a) identify and safeguard (where appropriate) waste management sites in appropriate locations;
- b) assist in the implementation of a resource-recovery led strategy for sustainable waste management;
- c) ensure that the Borough contributes to meeting the identified sub-regional needs for waste management facilities and sites;
- d) encourage good design in new development in order to minimise waste, promote the use of reclaimed and recycled materials and to facilitate the storage, collection and recycling of waste;
- e) encourage the sustainable transport of waste and promote the use of mechanisms such as waste audits and waste management plans to minimise the generation of waste; and
- f) ensure that waste management facilities are developed whilst minimising any negative impacts on the environment and communities of the Borough.

## 7.32 Policy LPC15: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 7
<b>Strategic Objectives Met</b>	SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Strategic
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Joint Merseyside and Halton Waste Local Plan</li> </ul>

## 7.33 Reasoned Justification

- 7.33.1 National policy establishes that planning policies and decisions should seek to drive waste management up the waste hierarchy. This is summarised as follows, with level 1 (prevention) being in general the most favoured environmental option and level 5 (disposal) being the least favoured option.

1. Prevention

2. Preparing for re-use
3. Recycling
4. Other recovery
5. Disposal

- 7.33.2 Decisions regarding planning for waste management facilities or other waste related uses should comply with policies in the Merseyside and Halton Joint Waste Local Plan (the 'Joint Waste Local Plan') adopted in 2013, Policy LPC15 and any other relevant policies in the Local Plan. The Joint Waste Local Plan sets out site allocations and development management policies for waste facilities and uses.
- 7.33.3 Under Policies WM2, WM3 and WM4 of the Joint Waste Local Plan, a range of sites across Merseyside and Halton are allocated for different waste management uses, details of which are set out in those Policies. These include the following sites in St.Helens Borough:
- Site S1a - Former Transco Site, Pocket Nook (Sub-regional Site);
  - Site S2 - Land North of T.A.C., Abbotsfield Industrial Estate (District Level Site); and
  - Site S3 - Bold Heath Quarry (Inert Landfill Site).
- 7.33.4 Policy WM5 of the Joint Waste Local Plan defines areas of search for small-scale waste management operations and re-processing sites, of which one area (including Abbotsfield Industrial Estate and industrial areas in its immediate vicinity) is in St.Helens Borough. Policy WM5 also sets out policy criteria used to assess proposals for these types of waste uses in this area.
- 7.33.5 The Joint Waste Local Plan will need to be reviewed in the future in accordance with relevant planning legislation. Policy LPC15 should therefore be read in conjunction with any future Plan document(s) that may supersede or supplement the Joint Waste Local Plan.

## 8. Development Management Policies

### 8.1 Policy LPD01: Ensuring Quality Development

#### **Policy LPD01: Ensuring Quality Development**

All proposals for development will be expected, as appropriate having to their scale, location and nature, to meet or exceed the following requirements:

1. Quality of the Built Environment

- a) Maintain or enhance the character and appearance of the local environment, for example with regard to the siting, layout, massing, scale, design and materials used in any building work, the building-to-plot ratio and landscaping;
- b) Avoid causing harm to the amenities of the local area and surrounding residential and other land uses and occupiers;
- c) Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa;
- d) Link in with surrounding movement patterns and not be prejudicial to the development of neighbouring land for example by creating landlocked sites;
- e) Be located and designed so as to minimise opportunities for crime, for example by maximising natural surveillance;
- f) Respect any existing natural features of the site by conserving, restoring or enhancing biodiversity and minimising any adverse impact on important natural features;
- g) Provide landscaping as an integral part of the development, protecting existing landscape features such as trees, hedges and watercourses and enhancing the public realm;
- h) Include or contribute to the provision of public art in appropriate circumstances (for example where the development would be of a substantial size and / or in a prominent gateway or town centre location);
- i) Provide for the needs of special groups in the community such as the elderly and those with disabilities; and
- j) Protect the setting, integrity and character of heritage assets in accordance with Policy LPC11.

2. Environmental Quality

- a) Ensure protection of watercourses and other water bodies from encroachment, modification and degradation and enable water bodies that are already modified or degraded to be improved to form sustainable, natural environments where feasible;
  - b) Minimise and mitigate to acceptable levels any effects that the development may have on: air quality; light, land and / or water pollution (including contamination of soil, surface water and groundwater resources); and levels of noise, vibration, smells, dust and electromagnetic fields in the area;
  - c) Ensure that any contamination or ground stability issues that exist on the site of the proposed development would be remediated to an appropriate standard, taking into account its intended use and making use of sustainable remediation technologies; and
  - d) Include satisfactory arrangements for the disposal of foul sewage, liquid waste, trade effluent and contaminated surface water.
3. Resource Management
- a) Ensure that development involving demolition and / or construction works minimises the generation of waste and promotes the use of recycled and / or locally sourced building materials in accordance with policy WM8 of the Merseyside and Halton Joint Waste Local Plan 2013 (or any equivalent policy in a successor document);
  - b) Avoid prejudicing the delivery/improvement of utility infrastructure;
  - c) Promote energy efficiency and the generation and use of low carbon and renewable energy in accordance with Policy LPC13; and
  - d) Avoid loss of or damage to high quality agricultural land and / or soils (except where clearly justified by wider public benefits) and minimise such loss or damage where this is shown to be unavoidable.

## 8.2 Policy LPD01: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 2.3
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	• Development management process

### 8.3 Reasoned Justification

- 8.3.1 In accordance with national policy, Policy LPD01 seeks to ensure that new development is of a high quality and provides buildings and places that will function well and be visually attractive and resource efficient. In doing so, it seeks to protect the many areas of St.Helens Borough that have a good quality environment and also promote the regeneration of areas that have become run down or have a less distinctive townscape.

#### Quality of the Built Environment

- 8.3.2 Policy LPD01 requires all new developments, having regard to its scale, nature and location to be well-designed, taking account of local distinctiveness and the need to respond positively to the Borough's character and history. Through good architectural design, new development should – without necessarily replicating existing development in the area - optimise the potential of the site in terms of form, height, scale, siting, layout, density, orientation, materials, parking and open space/green infrastructure.
- 8.3.3 Good design relates both to the appearance of a development and how well it will work in practical terms. All new development must be designed to enable safe and easy movement and passage into and through the development for all potential users, including those of limited mobility, pedestrians, cyclists, public transport users, car users, and for servicing, deliveries and collection. New development should establish a strong sense of place through the arrangement of streets, open spaces and materials, providing attractive public areas that promote and enhance biodiversity and healthy lifestyles.
- 8.3.4 Wherever possible, new development proposals should incorporate existing landscape features, such as landform, trees, hedges, watercourses etc. These should be used to inform and guide how the development is designed and should be incorporated in a way that ensures they will contribute positively to the development and surrounding area, maximising the amenity and visual value that such features can provide.
- 8.3.5 Development should be flexible, accessible to all and should be able to respond to the challenges of climate change. New residential development should be built to a standard capable of adaptation to enable people to remain in their homes until old age.
- 8.3.6 Safety and security can be provided through careful design of buildings and spaces, by promoting 'natural surveillance'. Good use of 'natural surveillance' can improve the layout of an area, reduce perceived and actual crime and opportunities for anti-social behaviour, and create places that are safe, inclusive, accessible and pleasant to live in and use.

#### Environmental Quality

- 8.3.7 Given St.Helens Borough's industrial past some of the land within it is affected by contamination and / or land stability issues (for example due to subsidence from the legacy of coal mining operations). In accordance with national planning policy where a site is affected by such issues, responsibility for securing a safe development will rest with the developer and / or landowner. A desk study report and site survey, and potentially more detailed site investigation, will typically be required with a planning application. Where development is proposed on land

within the Coal Authority Development 'High Risk' Area, a Coal Mining Risk Assessment should accompany any planning application.

- 8.3.8 Developers should undertake early discussions with United Utilities (or other relevant utilities provider) and relevant pollution control bodies to ensure adequate arrangements can be made for the disposal of any foul sewage, liquid waste, trade effluent or contaminated surface water.

#### Resource Management

- 8.3.9 A coordinated approach should be taken to the use of materials and the design and siting of street furniture, boundary treatments, lighting, signage and public art, all of which contribute towards to creating a sense of place. Trees and other planting appropriate to the scale of development and space available should be incorporated in order to soften the streetscape and reduce the visual impact of car parking. It is important that the landscaping and materials used within the public realm are durable and functional in order to accommodate every day and infrequent uses such as the movement of vehicles and people for the lifetime of the development. Consideration must also be given to the cost, practicalities and responsibilities for the maintenance of landscaping and materials in the long term.
- 8.3.10 Greenhouse gas emissions can be reduced through the location of new development, orientation and design. New development, including the construction of buildings and the redevelopment of existing buildings (with the exception of householder extensions), should be designed to minimise energy consumption. This requirement encompasses landform, layout, building orientation, massing, materials and landscaping. These elements need to respect the local context and any relevant heritage assets. As part of the Council's positive strategy to promote energy from renewable and low carbon sources, new development should also, subject to the requirements of Policy LPC13, be designed to facilitate the incorporation of renewable and / or other low carbon technologies.
- 8.3.11 The Borough has a significant amount of the best and most versatile (BMV) agricultural land. New development should avoid causing loss of or damage to BMV agricultural land or high quality soils unless such loss is clearly justified by wider public benefits arising from the proposal. Where a development would bring benefits that have been shown to justify some loss of or damage to high quality agricultural land or soils the extent of such loss or damage should be minimised.



## 8.4 Policy LPD02: Design and Layout of New Housing

### **Policy LPD02: Design and Layout of New Housing**

New residential developments will be required to:

1. be of a high quality design and use good architecture that respects and / or enhances the character of the surrounding area in terms of appearance, materials used, scale, mass, and pattern of structures, spaces and streets;
2. enhance local distinctiveness by reflecting good aspects of the character and environment of the local area, maintaining a strong sense of place, improving any poorer aspects and adding new features that benefit the local environment over the full lifetime of the development;
3. provide appropriate landscaping using native tree and shrub species and where appropriate other boundary treatments, thereby providing a strong Green Infrastructure in line with Policy LPA09;
4. provide a safe, secure, attractive, permeable, legible and useable environment for all users, that reinforces existing connections and creates new ones where necessary, including for pedestrians, cyclists, less mobile people and the elderly;
5. promote safe living environments that encourage natural surveillance and reduce the levels and fear of crime, disorder and anti-social behaviour;
6. avoid causing unjustified harm to the character or setting of any listed building(s), conservation area(s) or any other designated or non-designated heritage asset, in accordance with Policy LPC11;
7. avoid causing harm to any important natural habitat, historic or other important landscape, mature tree(s), hedgerow, wildlife habitat, pond or watercourse, and where practicable incorporate positive aspects of these features into its design and layout;
8. provide a satisfactory level of privacy, outlook and natural lighting for its future residents and for occupiers of neighbouring properties;
9. incorporate waste storage and recycling facilities, public transport infrastructure and car parking for residents and visitors (in line with Policy LPA07), all designed and integrated in a way that will preserve or enhance the street scene and safeguard amenity; and
10. be laid out and designed to ensure that the development is inclusive and accessible to all intended and future users, consistent with Policy LPC01.

## 8.5 Policy LPD02: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 4
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 2.3, SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>Development management process</li> </ul>

## 8.6 Reasoned Justification

- 8.6.1 National planning policy requires new housing developments to achieve high standards of design and environmental sustainability, and provide a good standard of amenity for all existing and future occupants and those of neighbouring land and buildings. The Government also stresses the need for local authorities to develop robust and comprehensive policies that will ensure that new development will function well and provide a strong sense of place reflecting local character and distinctiveness, where residents will feel safe and comfortable, with a good quality of life and level of community cohesion.
- 8.6.2 To successfully accommodate the levels of projected growth in the Borough over the Plan period, all new housing layouts in the Borough must be well designed. This approach will benefit the local economy, environment and quality of life, the sustainability and character of the Borough, and the health and wellbeing of its residents. Factors such as scale, massing, existing pattern of development, materials, topography, trees and hedgerows, watercourses and wildlife habitats should all be considered at the outset when designing new residential layouts.
- 8.6.3 The type of highway access should reflect the type of road involved and the volume and character of traffic likely to use it; good visibility is essential. The level and type of traffic associated with any new development will be examined to assess the likely impact on the character and amenity of the existing and proposed development. In order to minimise road congestion and consequent reduction in the quality of the environment, sufficient off-street parking and servicing must be provided to meet the needs of new development on site and to avoid any negative impacts on existing roads and residential areas. Generally, development of back-land sites will be discouraged where this would lead to loss of privacy, amenity or levels of greenery etc.
- 8.6.4 Any proposals for new housing will only be allowed where they would satisfy the relevant criteria in Policy LPD02. Supporting guidance is set out in the St.Helens New Residential Development SPD (2011) that will be updated as necessary within the Local Plan period.

## 8.7 Policy LPD03: Open Space and Residential Development

### **Policy LPD03: Open Space and Residential Development**

1. Proposals for new residential development of 40 dwellings or more will be required to make provision for new open space, or the expansion or enhancement of existing open space provision, where:
  - a) there are existing deficiencies in the quantity, accessibility or quality of open space(s) in the area; or
  - b) the development would generate a need for open space that cannot be satisfactorily or fully met by existing provision in the area.
2. The standards set out in Table 7.1 (under Policy LPC05) will be used to guide the type, quantity and quality of open space that is required. The following matters will be considered:
  - a) the estimated number of residents who would occupy the development (based upon the number of new residential bed spaces that would be provided); and
  - b) the quantity, accessibility and quality of existing provision in the area.
3. The required amount of open space should be provided on the development site unless it has been demonstrated that developer contributions towards the provision, expansion or enhancement of off-site open space within the locality would be more suitable. The appropriate balance between provision of new open space and the expansion or enhancement of existing open space will be determined having regard to:
  - a) the amount, proximity and quality of existing open space in the area;
  - b) the type and density of the proposed housing development;
  - c) the numbers of new dwellings to be created; and
  - d) any other practical site-specific factors.
4. Development proposals that would include new open space must incorporate suitable arrangements for its long-term management and maintenance and ensure that it will have continued public access.
5. Any new open space created will be afforded protection in accordance with Policy LPC05.

## 8.8 Policy LPD03: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 4, SA 6
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 2.3, SO 4.1, SO 6.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>Developer Contributions Supplementary Planning Document (SPD)</li> <li>Development management process</li> </ul>

## 8.9 Reasoned Justification

- 8.9.1 It is important that residential development proposals that would increase demands on the Borough's open spaces either make new provision to meet this demand or contribute towards the expansion or enhancement of existing open spaces in line with the Council's open space standards as set out in Table 7.1.
- 8.9.2 To determine the most appropriate form and amount of open space provision required, the Council will consider the anticipated new population generated by each development proposal alongside the latest evidence concerning the quantity, accessibility and quality of existing open space in proximity to the proposed development.
- 8.9.3 In some circumstances, it may be acceptable for lower density development with larger garden sizes or sites in areas close to sufficient existing open space to make an appropriate compensating contribution to the extension or enhancement of open space in the vicinity, whether by provision of land, direct funding of equipment or commuted payments. The findings of the Council's latest open space study and local standards set out in Policy LPC05 (Open Space, Sports and Recreation) will be used when considering existing levels of open space provision and its proximity.
- 8.9.4 The Council has used a threshold of 40 dwellings for on-site public open space contributions for a number of years in line with saved policy GEN6 of the St.Helens Unitary Development Plan 1998. This has worked well in practice, and there is no more recent evidence indicating that the threshold should be changed. The threshold of 40 dwellings is also appropriate having regard to the limited number of occupants that smaller developments would have, and the limited size of on-site provision that would be justified to meet their needs.
- 8.9.5 The requirements of Policy LPD03 concerning open space are in addition to any requirements for outdoor sports facilities such as playing pitches. Any requirement for outdoor sports provision that arises from new residential development will be addressed separately in accordance with Policy LPA08: Infrastructure Delivery and Funding and Policy LPC05: Open Space and Outdoor Sports Facilities.
- 8.9.6 The required layout of any new open space will depend on the nature of the proposed development. However, any areas provided on site should be able to function effectively as open space and be accessible, safe, overlooked and strategically located within the site and, where possible, well integrated into the wider green infrastructure network. In some cases the open space(s) provided may need to be designed and laid out in a way that would contribute towards flood

risk mitigation and management in accordance with Policy LPC12. The calculation of the amount of open space needed should not include areas such as landscaping, verges or inaccessible areas such as permanent water storage facilities, for which separate provision will in many cases be needed under Policy LPC12 or other relevant Plan policies

- 8.9.7 Suitable arrangements must be made to ensure that any new or enlarged open spaces are managed and maintained and remain accessible to the general public. In some circumstances, the Council may be willing to accept a commuted sum (factoring in inflation) and make its own arrangements for management of the open space.
- 8.9.8 The Council intends to set out further guidance on its expectations regarding open space provision (whether on-site or as contributions towards off-site provision) in its proposed Developer Contributions Supplementary Planning Document (SPD).

## 8.10 Policy LPD04: Householder Developments

### Policy LPD04: Householder Developments

Proposals for the alteration and / or extension of an existing dwelling will be approved where:

1. They would respect and / or enhance the appearance and character of the existing dwelling and any other buildings within the site or the surrounding area in terms of scale, size, design, and facing materials;
2. There would be no adverse impact on the amenity of any occupier(s) of neighbouring properties caused by overlooking, loss of privacy or reduction of daylight in habitable rooms or garden areas;
3. They would not have an overbearing or over-dominant effect on the outlook from any habitable room(s) or gardens in any neighbouring dwelling;
4. They would not cause harm to the safety of users of any highway (including drivers, cyclists or pedestrians) for example due to inadequate provision for off road parking, lack of visibility, or impact on the safety and free flow of traffic; and
5. Any car parking or other features associated with the development would avoid causing harm in respect of visual appearance, character or any of the other factors set out above.

## 8.11 Policy LPD04: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 4
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 2.3, SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> </ul>

## 8.12 Reasoned Justification

- 8.12.1 Extensions to residential properties allow householders to increase their living space and add value to a property. However, badly designed extensions can have a negative impact on the character and appearance of the property and street scene, and can affect the residential amenity enjoyed by neighbours. The St.Helens Householder Development SPD (2011) will be updated to incorporate the requirements of Policy LPD04.
- 8.12.2 The Council wishes to significantly raise the standard of design in the Borough to help create sustainable and inclusive communities and improve the quality of



people's lives. This approach will apply in all areas including where the existing environment is of a less high quality than elsewhere.

- 8.12.3 Opportunities to use existing materials and characteristics as part of any new development proposal should be the starting point of any design. Where there is no established character or the character is poor quality there may be a clear and justifiable need to improve the existing building stock. Proposals that demonstrate high quality design, reflect the requirements of Policy LPD04 and enhance the built environment may be considered acceptable even where they divert from current characteristics.
- 8.12.4 Any proposals brought forward within or immediately adjacent to a Conservation Area or would have an impact on the character or setting of a listed building or other heritage asset will also be considered against the requirements of Policy LPC11. Specific requirements also apply to proposed development in the Green Belt, as set out in Policies LPA02, LPA06 and LPD05 and in relevant national policy.

### 8.13 Policy LPD05: Extension, Alteration or Replacement of Buildings in the Green Belt

#### **Policy LPD05: Extension, Alteration or Replacement of Buildings in the Green Belt**

Proposals for the alteration, conversion, extension or replacement of an existing building in the Green Belt will be allowed subject to the following criteria:

1. The proposal must not have a materially greater impact on the openness or purposes of the Green Belt than the existing building. As a general guideline, proposals should not extend an original building by more than 30% (by volume) either individually or cumulatively with other extension(s). A replacement building should generally be no more than 30% larger (by volume) than the original building it would replace;
2. Garaging, storage or other ancillary structures will not be allowed unless, in conjunction with the remainder of the existing and any other proposed development, they fall within the requirements set out above;
3. The proposal would not result in a need for any additional building(s) would have a harmful effect on the openness or purposes of the Green Belt;
4. Any existing building to be converted must be permanent and of substantial construction, capable of conversion without the need for major or complete reconstruction. As a guideline if the proposals would result in a need for more than 30% (by volume) of the existing structure to be replaced this is likely to contravene this requirement;
5. The curtilage of the development should relate appropriately to the size and form of the existing building(s) and landscape features, and avoid causing unnecessary further impact on the openness and purposes of the Green Belt; and
6. Vehicular access must be capable of being provided that is safe and does not lead to a need for highway improvements or other works that would have a harmful effect on the openness and purposes of Green Belt.

### 8.14 Policy LPD05: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 4
<b>Strategic Objectives Met</b>	SO 2.1, SO 2.2, SO 2.3, SO 4.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>Development management process</li> </ul>

## 8.15 Reasoned Justification

- 8.15.1 The NPPF identifies limited exceptions where the construction of new buildings or other forms of development can be regarded as ‘not inappropriate’ in the Green Belt. These include (subject to specified conditions) the conversion or replacement of existing buildings.
- 8.15.2 There are often opportunities to convert or re-use buildings in rural areas, especially as changes in agricultural practices have rendered some barns and other buildings redundant for their original use. Such re-use or adaptation can help reduce demand for new buildings in the countryside and can help conserve traditional buildings that are a distinctive feature in the rural landscape. However, all such works must satisfy the requirements of Policy LPD05.
- 8.15.3 In relation to clause 1 in Policy LPD05, to calculate the volume of the original, existing or any proposed building(s), external measurements of the building(s) must be used. The calculation of volume must include the roof space, and any extension(s) to the building. It must not include any parts of the building(s) that are or would be below ground level or the volume of any part of them that is or would be enclosed by walls but not have a roof. Outbuildings are not normally considered part of the original building. “*Original building*” means a building as it was built or, if it was built before 1 July 1948, as it existed on that date.
- 8.15.4 The NPPF requires that extensions to existing buildings must “not result in disproportionate additions over and above the size of the original building”. The threshold of 30% is considered appropriate in achieving a sensible balance in most circumstances. Any departure from this would need to be clearly and robustly justified.
- 8.15.5 National policy also allows for replacement buildings in the Green Belt “provided the new building is in the same use and not materially larger than the one it replaces”. The threshold of 30% for assessing “materially larger” buildings is regarded as achieving the appropriate balance between modern building requirements and preserving the openness of the Green Belt in most circumstances. Similarly, any departure from this criterion would need to be clearly and robustly justified.
- 8.15.6 In addition, in designing new layouts careful consideration should be given to any ancillary needs, such as garages and storage facilities as any additional buildings on site may, under the requirements of Policy LPD05, be resisted.

## 8.16 Policy LPD06: Prominent Gateway Corridors

### Policy LPD06: Prominent Gateway Corridors

1. The prominent gateway corridors include the lengths of motorways, 'A' roads, waterways, and railway lines that cross the Borough.
2. Along the prominent gateway corridors, priority will be given as appropriate to the delivery of measures that will improve the visual appearance of the area (with particular priority to any areas that are of poor or mediocre visual quality, prominent road junctions and railway stations). Priority will also be given to delivering any necessary measures to improve access to railway stations.
3. All proposals for new development that would be within or visible from one or more prominent gateway corridor(s) must, as appropriate, having regard to its scale and nature:
  - a) be of high architectural quality, ensuring that the density, design, height and layout of any building(s) respond positively to the site and its setting; and
  - b) provide appropriate landscaping as an integral part of their design and layout.

## 8.17 Policy LPD06: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2
<b>Strategic Objectives Met</b>	SO 2.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	• Development management process

## 8.18 Reasoned Justification

- 8.18.1 St.Helens Borough contains several major regional and national highways and railways, and 10 railway stations that provide businesses, commuters, students and visitors with direct and frequent access to and from Liverpool, Wigan, Manchester, Preston, Blackpool, Warrington, Chester and parts of North Wales. It also contains other routes (including a number of 'A' class roads) that provide important links between the strategic routes and the Borough's towns and villages.
- 8.18.2 The prominent gateway corridors include the M6, M62, A58, A570, A580, North Road/City Road, A569 (Peasley Cross Lane section), A571 (between St.Helens town centre and the A580), and the A49. Although much of the land visible from some of these routes is high quality open countryside or development, some

routes and railway stations also pass through or are located within areas that have become less attractive due to the legacy of the Borough's industrial past.

- 8.18.3 In order to protect, promote and enhance the image and unique local distinctiveness of St.Helens Borough for its residents, visitors and for those who are passing through, it is considered important to optimise the visual appearance of these routes and locations. This approach will also promote a sense of welcome into the Borough, celebrate its diligent and enterprising business community and boost economic regeneration and investment by projecting and promoting a strong, positive and vibrant image for the area.
- 8.18.4 Poor quality new development in these gateway corridors and locations could however hinder efforts to attract investors, new residents and visitors as well as harm the environment for local residents. New development will therefore be expected to protect or, particularly in areas where the existing development is of poorer quality, enhance their appearance. Innovative new designs will be encouraged where appropriate and opportunities to improve the existing appearance of rundown areas will be sought.

## 8.19 Policy LPD07: Digital Communications

### **Policy LPD07: Digital Communications**

All new housing and employment development should make provision for the latest generation of information and digital communication (ICT) networks to a standard that is compatible with the infrastructure available, or is likely to become available in the Plan period, in the area in which the development would be sited. Subject to the requirements of Policy LPA08, contributions may also be sought from developers towards the cost of providing necessary off-site fast broadband infrastructure to serve the area.

Proposals for the development of new digital communications infrastructure will be assessed against the following criteria:

1. In the case of proposals for infrastructure to be sited on a new mast, it must be demonstrated that there is no realistic option of siting the infrastructure more suitably (in a manner that is less visually intrusive) on an existing mast, building or other structure;
2. There should be no suitable alternative site(s) available that could more satisfactorily meet the identified need for the proposed development;
3. Building-mounted dishes and apparatus must normally be placed in the least obtrusive position possible, and designed and sited to reduce visual clutter, taking account of the architectural detailing, materials and colour of the host building and its neighbours;
4. Development must not have an unacceptable impact, including cumulative impact, on residential amenity, landscape or townscape character, or wildlife;
5. Any development that could affect the character or setting of a heritage asset must satisfy the requirements of Policy LPC11;
6. Existing landscape features must be utilised and / or an appropriate landscaping scheme be implemented to minimise any impact on the visual amenity, character or appearance of the surrounding area;
7. Apparatus, mountings and ancillary structures should be coloured in a durable finish to minimise any visual harm that would arise from the proposal; and
8. Underground facilities and ducts should be sited and laid to minimise harm to tree roots or areas of archaeological importance.

The Council will continue to work with its Liverpool City Region partners to improve digital infrastructure within the Borough.



## 8.20 Policy LPD07: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 7
<b>Strategic Objectives Met</b>	SO 7.1
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>Development management process</li> </ul>

## 8.21 Reasoned Justification

- 8.21.1 There has been a huge expansion in telecommunications and computing in recent years. Mobile communications are now an integral part of everyday modern life and are essential to a successful economic future. With the emergence of new innovations such as fourth and fifth generation networks and the expansion of internet capable devices, there is likely to be a very large increase in demand for bandwidth, whether this is supplied via copper or fibre optic cables, Wi-Fi or mobile networks.

### National guidance and legislation

- 8.21.2 The Government is investing heavily in the UK's digital future through its *"Digital Strategy"*. A key component of the strategy is to ensure that reliable mobile telephone coverage is provided to 95% of the United Kingdom by 2022, and that mainline rail routes, major roads and connectivity 'hotspots' are all ready for the next generation of mobile and digital communication.
- 8.21.3 The Government has already put significant planning reforms for digital technology in place, with further reforms to help industry deliver 5G and support improved indoor coverage currently under review, together with the introduction of a new broadband Universal Service Obligation by 2020. New permitted development rights and the reform of the Electronic Communications Code, through the Digital Economy Bill, will make the roll-out of communications infrastructure substantially easier and cheaper for the industry to install.
- 8.21.4 Revised building regulations that came into force on 1 January 2017 will guarantee that all new buildings and renovations will include in-building physical infrastructure to support connections to superfast broadband. The Government has brokered an agreement between Openreach and the Home Builders Federation to offer access to full fibre broadband for all new developments, free of charge for developments of over 30 dwellings registered from November 2016, or as part of a co-funded initiative.
- 8.21.5 Following consultation on its White Paper *"Fixing our broken housing market"*, the Government also intends to support improved broadband and mobile connectivity by requiring local authorities to have planning policies in place, setting out how high quality digital infrastructure will be delivered in their area.

### Liverpool City Region priorities

- 8.21.6 One of the main priorities of the Liverpool City Region Combined Authority (LCRCA) is to improve digital infrastructure within the Liverpool City Region, to create excellent digital connectivity to help improve the quality of life for residents

and attract and retain investors, skilled workers and visitors who will contribute to economic growth.

- 8.21.7 Despite growth in the existing digitally-driven sectors, digital connectivity is still poorer in the Liverpool City Region than in some other parts of the United Kingdom. Therefore, the LCRCA aims to embed both digital and green technologies into the region's transport and built environment, in order to provide comprehensive coverage of ultra-fast broadband infrastructure and ensure digital connectivity is part of future strategic planning and built in to transport systems. This will be achieved for example through the use of smart ticketing and by exploring the use of free public WiFi networks to contribute to a vibrant visitor economy.

#### Developer Requirements

- 8.21.8 The Plan cannot predict the future of fast moving technology. However, it is important that the planning process proactively supports ICT networks to maximise their economic and social benefits whilst minimising any adverse effects. With this in mind, telecommunications infrastructure should be sensitively sited and designed having regard to the criteria in Policy LPD07.
- 8.21.9 Developers of new housing and employment facilities may also (subject to the requirements of Policy LPA08 'Infrastructure and Funding') be required to make appropriate provision to enable their development to have access to the highest available broadband speed. The Council is seeking to ensure that all new housing has fibre optic availability. Therefore, developers of new homes should contact the appropriate digital communications provider at an early stage of the planning process to plan and correctly match network connection points to serve the new development.
- 8.21.10 Developers are also encouraged to use 'Dig Once' principles, in which they install fibre duct in the ground during the initial construction of a development (even where there is no immediate use for the duct) so that cabling can be installed at a later date with reduced cost and disruption.
- 8.21.11 The St.Helens Telecommunications SPD (2008) will be updated as necessary to incorporate new forms of technology and policy requirements both nationally and locally to ensure requirements for the design and layout of new housing and employment meet the required standards.

## 8.22 Policy LPD08: Advertisements

### Policy LPD08: Advertisements

Proposals for advertisement display will be granted consent provided they would not have an unacceptable impact upon amenity or public safety.

#### Amenity

1. Advertisements should respect the scale of and be sympathetic to their surroundings and not dominate any building(s), the street scene or any nearby open and / or publicly accessible area(s).
2. Advertisements should respect the design and appearance of any building(s) on which they would be displayed.
3. Advertisements displayed on or within the setting of a Listed Building must be of particularly high quality, respecting the size, materials, proportions and detailing of the building concerned. Advertisements that could affect the character or appearance of a Conservation Area must respect the predominant building styles and design that lend the area its special character.
4. Consideration will be given to the size, location, and means of any illumination of any proposed advertisement and whether the proposal would lead to there being a proliferation of advertisements creating clutter in the area.

#### Public Safety

5. The location, siting, illumination, design and scale of any proposed advertisement must not compromise the safety of pedestrians, drivers or other users of the public highway, for example by hindering their movement, obscuring visibility or by causing a distraction.

## 8.23 Policy LPD08: Strategic Aims, Objectives and Key Delivery Mechanisms

Strategic Aims Met	SA 2
Strategic Objectives Met	SO 2.1
Is this a 'strategic' or 'local' policy?	Local
Key Delivery Mechanisms	• Development management process

## 8.24 Reasoned Justification

- 8.24.1 Advertisements can play an important role in supporting the economy and form a necessary part of the urban landscape, in some cases giving buildings or areas of land a clear identity and helping to direct vehicular and pedestrian traffic to their intended destination. However, they can also greatly influence the appearance

and character of an area. If advertisements are inappropriately sited or designed, or if there is a proliferation of them, this can lead to a dominating and cluttered street scene resulting in an undesirable environment.

- 8.24.2 In terms of public safety, consideration will be given to whether the advertisement itself, or the location proposed for its display, is likely to be so distracting, or so confusing, that it creates a hazard to, or endangers, people in the vicinity. Advertisements should not block or otherwise interfere with visibility splays of pedestrians and / or other road users, create glare or dazzle, or obscure or hinder the interpretation of road signs. In the case of illuminated signs, conditions will normally be imposed to ensure their brightness does not cause a traffic safety hazard or loss of amenity for neighbouring residents.
- 8.24.3 Not all advertisements require advertisement consent; national guidance on this point can be found in the booklet “Outdoor advertisements and signs: a guide for advertisers” at: <https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers>

## 8.25 Policy LPD09: Air Quality

### Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:
  - a) impede the achievement of any objective(s) or measure(s) set out in an Air Quality Management Area (AQMA) Action Plan; or
  - b) introduce a significant new source of any air pollutant, or new development whose users or occupiers would be particularly susceptible to air pollution, within an AQMA; or
  - c) lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment, that would require a new AQMA to be created; or
  - d) having regard to established local and national standards, lead to an unacceptable decline in air quality in any area.
2. Major development schemes should demonstrably promote a shift to the use of sustainable modes of transport to minimise the impact of vehicle emissions on air quality.
3. New development that would result in increased traffic flows on the M62 past Manchester Mosses Special Area of Conservation (SAC) of more than 1000 vehicles per day or 200 Heavy Goods Vehicles (HGVs) per day must be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on ecological interests within the SAC. Where such effects are identified they would need to be considered in accordance with Policy LPC06.

## 8.26 Policy LPD09: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.3, SO 6.2
<b>Is this a 'strategic' or 'local' policy?</b>	Local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Air Quality Management Area Action Plans</li> <li>• Development management process</li> </ul>

## 8.27 Reasoned Justification

- 8.27.1 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor, for example, in the onset of heart disease and cancer and particularly affects vulnerable groups such as children and older

people, and those with heart and lung conditions. Mortality rates in St.Helens Borough for cardiovascular and respiratory diseases are significantly higher than the national average.

- 8.27.2 There is a strong correlation with equalities issues, as many of the less affluent areas have poor air quality. Air quality can also affect biodiversity and thereby impact on legal obligations under the Conservation of Habitats and Species Regulations 2017.
- 8.27.3 Part IV of the Environment Act 1995 requires local authorities to regularly monitor levels of seven key pollutants against national standards set by the Air Quality (England) Regulations 2000 (as amended). St.Helens Council complies fully with these duties and works closely with other local authorities to protect air quality. The Council must designate an Air Quality Management Area (AQMA) where air pollution exceeds or is likely to exceed an air quality objective.
- 8.27.4 Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.Helens Borough as follows:
- M6 AQMA includes a strip of land either side of the M6 motorway;
  - High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;
  - Borough Road AQMA includes Borough Road, St.Helens between its junctions with Westfield Street and Prescott Road; and
  - Linkway Reflection Court, located off Linkway West, St.Helens.
- 8.27.5 Further guidance and links to the AQMAs maps can be found on the Council's website at: <https://www.sthelens.gov.uk/business/environmental-health/environmental-protection/air-quality/>
- 8.27.6 Action to protect and improve air quality will be undertaken by requiring all planning applications to be accompanied by suitable mitigation measures where necessary. These may include for example requiring proposals that would generate additional traffic to include new Electric Vehicle Charging Points. All proposals for new development that could give rise to significant amounts of traffic must include information on any increase in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases.
- 8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in clause 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. Any significant effects would need to be addressed in line with Policy LPC06.



## 8.28 Policy LPD10: Food and drink

### **Policy LPD10: Food and Drink**

1. Proposals for food and drink uses (including restaurants, cafes, drinking establishments and the sale of hot food for consumption off the premises) will only be permitted where all of the following criteria are met:
  - a) they would not cause significant harm to local amenity, public health, highway safety or community safety;
  - b) they would not cause significant harm to the character of the area or the vitality and viability of any town, district, local centre or shopping parade; and
  - c) any external ventilation or extractor system and / or waste storage connected with the proposed use would not:
    - i) significantly harm the external appearance of the building or the street scene, or
    - ii) harm the residential amenity of any neighbouring property through noise or odours.
2. In considering the criteria set out in 1) above the Council will also take into account any cumulative impacts that the proposal may have in combination with any other existing or permitted food and drink uses nearby.
3. Planning permission for a hot food takeaway will only be granted if it would be located:
  - a) within the defined town centre of St.Helens or Earlestown; or
  - b) if located outside the town centre of St.Helens or Earlestown, be outside a 400 metre exclusion zone measured from the boundary of any primary or secondary school or sixth form college.
4. For the purposes of part 3 above the 400 metre exclusion zones are defined in the St.Helens Hot Food Takeaway Supplementary Planning Document 2011 and / or any future Supplementary Planning Document that may supersede this. Where an exclusion zone has a boundary that cuts wholly or partly through the building that is subject to the application or its curtilage, the whole building and its curtilage shall be considered to be within the exclusion zone.

## 8.29 Policy LPD10: Strategic Aims, Objectives and Key Delivery Mechanisms

<b>Strategic Aims Met</b>	SA 2, SA 6
<b>Strategic Objectives Met</b>	SO 2.2, SO 6.1
<b>Is this a 'strategic' or 'local' policy?</b>	local
<b>Key Delivery Mechanisms</b>	<ul style="list-style-type: none"> <li>• Development management process</li> <li>• Hot Food Takeaway SPD</li> </ul>

## 8.30 Reasoned justification

- 8.30.1 National planning policy requires the Council to promote the achievement of healthy, inclusive and safe communities. It also encourages the creation and retention of vibrant town, district and local centres. These objectives can be met by promoting active street frontages (with open shop window displays), the creation of safe environments and by encouraging access to healthier food.
- 8.30.2 Parts 1 and 2 of Policy LPD10 cover food and drink uses within Classes A3 to A5 of the Use Classes Order i.e., restaurants and cafes, drinking establishments and hot food takeaways. Parts 3 and 4 of the policy relate solely to proposals for hot food takeaways falling within use Class A5. The policy does not apply to shops within Use Class A1 that sell food for consumption off the premises.
- 8.30.3 Premises selling food and drink can contribute to the mix of uses in an area and provide a popular service and source of jobs for local people. However they can also come to dominate the local retail food offer, displace other shops and food options, restrict choice and access to healthy, fresh food, and impact on the living conditions of nearby residents. It is therefore important that such uses are appropriately controlled.
- 8.30.4 Within town centres and other shopping areas, it is important that groupings of food and drink uses do not detract from the centre's primary retail function, or result in a loss of shops to the detriment of local residents. Clustering of hot food takeaways can lead to dead frontages during daytime hours leading to an adverse impact on the vitality and viability of existing designated shopping centres. To ensure that shopping areas are diverse and balanced, especially in designated centres, applications for food and drink uses will therefore be assessed for their cumulative impact.
- 8.30.5 Planning conditions will also be used, where appropriate, to mitigate any potential harmful effects of proposals, including the restriction of permitted development rights, installation of ventilation or extraction systems, the incorporation of sound insulation and / or the control of opening hours.
- 8.30.6 The Council's 'Hot Food Takeaways' Supplementary Planning Document (adopted in 2011) sets out further details to guide the location and design of hot food takeaways and also addresses their health impacts. In this regard, the SPD identifies that obesity is an important health issue that, if developed during childhood and adolescence, can lead to associated health issues during adulthood. It also establishes a link between the occurrence of hot food takeaways providing a source of cheap, energy-dense and nutrient-poor foods and health issues in the local area.

- 8.30.7 To promote healthy eating habits and reduce the rate of childhood obesity, Policy LPD11 therefore restricts the areas within which new hot food takeaways may be allowed by setting 400 metre exclusion zones around primary and secondary schools and colleges. The Council will continue this approach alongside other initiatives to promote healthy eating habits and physical activity. The Policy will apply irrespective of whether the affected schools or colleges are run by the Local Education Authority.
- 8.30.8 The Council will update the Hot Food Takeaways SPD (2011) to set out more detail about how Policy LPD10 will be implemented. In the meantime the 2011 document will continue to be applied.

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# **Appendix 1 - Part 2**

St. Helens Cabinet Report 12.12.2018

## Appendix 1: Glossary

Term	Definition
<b>Accessibility</b>	The ease at which people have access to key services at a reasonable cost and in a reasonable time, such as by a choice of means of transport. Consideration of sites based on how accessible a site is by sustainable modes of transport to key services; Food, Retail, Health, Employment & Education.
<b>Active Frontages –</b>	ensuring that the part of the building that faces the public realm is occupied by uses that ensure a high level of activity (e.g. shops, cafes)
<b>Affordable Housing: a) Affordable Housing for Rent</b>	Meets all the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
<b>Affordable Housing: b) Starter Homes</b>	Is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limit in a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
<b>Affordable Housing: c) Discounted Market Sales Housing</b>	Is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
<b>Affordable Housing: d) Other affordable routes to home ownership</b>	Is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to

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	at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.
<b>Aggregates</b>	Granular or particulate material that is suitable for use in construction as concrete, mortar, roadstone, asphalt or drainage courses, or for use as constructional fill or railway ballast.
<b>Agricultural Land Classification</b>	It classifies Agricultural Land into five categories according to versatility and suitability for growing crops.
<b>Air Quality Management Areas</b>	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
<b>Allocation</b>	The designation of land within a development plan for a particular use such as residential development.
<b>Allocation</b>	The designation of land within a development plan for a particular use such as residential development.
<b>Amenity -</b>	pleasantness of place, quality of life (of an area).
<b>Ancient or Veteran Tree</b>	A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach ancient life-stage.
<b>Ancient Woodland</b>	An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).
<b>Archaeologist Interest</b>	There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
<b>Area Action Plan (AAP)</b>	In St Helens, the Bold Forest Park Area Action Plan is a Local Plan that is part of the Development Plan for St Helens. Area Action Plans will have a geographic or spatial dimension and focus upon implementation. They will provide an important mechanism for ensuring development of an appropriate scale, mix and quality for key areas of opportunity, change or conservation. Such plans could be relevant to a



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	wide range of circumstances and will benefit from having development plan status.
<b>Article 4 direction:</b>	A direction which withdraws automatic planning permission granted by the General Permitted Development Order.
<b>Asset Management Programme (AMP)</b>	a tactical plan for managing an organisation's infrastructure and other assets to deliver an agreed standard of service.
<b>Authority's Monitoring Reports/Annual Monitoring Report (AMR)</b>	The Authority's Monitoring Reports are a series of reports that can be reported as soon as the information is available and/or combined as an annual report (Annual Monitoring Report) which sets out the progress in terms of producing Local Plans against the timetable set out in the LDS, the progress in implementing policies and setting out any necessary revision to the LDS.
<b>Bad Neighbour Development -</b>	any form of development which, by the way or manner in which it operates, would be detrimental to the amenity of the area, in particular to the occupiers of land and buildings such as homes, schools, hospitals, parks etc.
<b>Best and most versatile agricultural land:</b>	Land in grades 1, 2 and 3a of the Agricultural Land Classification.
<b>Biodiversity</b>	The whole variety of life encompassing all genetic, species and ecosystem variations.
<b>Biodiversity Action Plan (BAP)</b>	A Biodiversity Action Plan is a strategy prepared for a local area aimed at conserving and enhancing biological diversity.
<b>BREEAM</b>	The Building Research Establishment Environmental Assessment Method (BREEAM) for Industrial Uses is a national recognised certification scheme which can be used for assessing the environmental performance of industrial buildings from the design through to the completed building stage.
<b>Broadband</b>	A high-capacity transmission technique using a wide range of frequencies, which enables a large number of messages to be communicated simultaneously.
<b>Brownfield</b>	See "Previously Developed Land".
<b>Brownfield Land</b>	Land that is or was occupied by a permanent structure (excluding agricultural or forestry) and associated fixed surface infrastructure. It can occur in both built up or rural setting and includes defence buildings and land used for mineral extraction and waste disposal where there is no requirement for restoration through planning control. It does not include such land as parks, recreation grounds and allotments and land that cannot be regarded as requiring

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	development, such as where it has been put to an amenity use or is valuable for its contribution to nature conservation.
<b>Brownfield Land Registers</b>	Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.
<b>Build to Rent</b>	Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.
<b>Building Cost Information Service (BCIS)</b>	BCIS is the Building Cost Information Service of RICS, providing cost and price information to the construction industry.
<b>Catchment Flood Management Plans</b>	A strategic tool that seeks to identify sustainable flood management mechanisms by: understanding the factors that contribute to flood risk within a Catchment both now and in the future; through discussion with communities and professional partners, recommending the best ways of managing the risk of flooding within the Catchment over the next 50 to 100 years and providing a tool to communicate the issues to allow a discussion about the future management of flood risk.
<b>Certificates of Lawfulness of Existing Use or Development (CLEUD)</b>	This is a legal document (not a planning permission) issued by the Local Planning Authority that is generally used to regularise unauthorised development and prevent enforcement action being taken by that Authority against any breach of planning policy or conditions. The certificate establishes that an existing use, operation or activity named in it is lawful and as such cannot be enforced upon.
<b>Certificates of Lawfulness of Proposed Use or Development (CLOPUD)</b>	(CLOPUD) where you wish to confirm that a proposed use is lawful or any operations that are proposed would be lawful if undertaken without prior consent.
<b>City Growth Strategy</b>	Private sector led economic strategy for St.Helens. Strategy aimed at winning larger market share, even at the expense of short-term

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	earnings.
<b>Classified Roads</b>	The hierarchy of roads categorises roads according to their status, function and capacity. There is a list of these on the Council's Transport Planning website pages.
<b>Climate Change Adaption</b>	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.
<b>Climate Change Mitigation</b>	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
<b>Clinical Commissioning Group (CCG)</b>	These commission most of the hospital and community NHS services in the local areas for which they are responsible. Commissioning involves deciding what services are needed for diverse local populations, and ensuring that they are provided.
<b>Coal Authority Development 'High Risk' Area</b>	The coalfield is divided into 2 areas, referred to as Development High Risk Area and Development Low Risk Area: The High Risk Area (15% of the coalfield area) is where coal mining risks are present at shallow depth which is likely to affect new development. If your site is in a Development High Risk Area you will need to submit a Coal Mining Risk Assessment to your Local Planning Authority, to support your planning application
<b>Coal Mining Risk Assessment</b>	The aim of a Coal Mining Risk Assessment is to identify site specific coal mining risks and set out the proposed mitigation strategy to show that the site can be made safe and stable for the development being proposed.
<b>Combined Authority (CA)</b>	is a legal body set up using national legislation that enables a group of two or more councils to collaborate and take collective decisions across council boundaries.
<b>Combined Heat &amp; Power (CHP)</b>	Thermal process which produces steam which can be used for heat and power which can be used for electricity generation.
<b>Communities Infrastructure Levy (CIL)</b>	The communities' infrastructure levy is a new charge which local authorities in England and Wales will be empowered, but not required, to charge on most types of new development in their area. The charge is related to size and character of a development.
<b>Community Forest</b>	An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations. The Mersey Forest, which St Helens is a part of, is a community forest.

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<b>Community Infrastructure Levy (CIL)</b>	The Community Infrastructure Levy (the 'levy') is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.
<b>Community Infrastructure Levy:</b>	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.
<b>Community Right to Build Order</b>	An order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.
<b>Community Safety Partnership (CSP)</b>	(CSPs) are made up of representatives from the police, local authorities, fire and rescue authorities, health and probation services (the 'responsible authorities'). The responsible authorities work together to protect their local communities from crime and to help people feel safe.
<b>Comparison Goods (Retail)</b>	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
<b>Competent Person (to prepare site investigation information)</b>	A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.
<b>Compulsory Purchase order (CPO)</b>	Legal procedure of compulsorily acquiring land or buildings through Planning or Housing Acts.
<b>Conservation (for heritage policy)</b>	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
<b>Conservation Area</b>	Areas of special architectural or historic interest, designated under S69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
<b>Conservation Area</b>	Areas of special architectural or historic interest, designated under S69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
<b>Construction, Demolition &amp; Excavation Waste (CD&amp;E)</b>	Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures.
<b>Contaminated Land</b>	Land where the actual or suspected presence of substances, in, on or under the land may cause risk to people, property, human activities or the environment regardless of whether or not the land meets the definition of contaminated land in Part IIA of the Environmental Protection Act 1990.

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<b>Convenience Goods (Retail)</b>	Convenience retailing is the provision of everyday items including food, drinks, newspapers/magazines and confectionery.
<b>Core Strategy</b>	Under the 2004 Town & Country Planning Act, A core strategy was a DPD that sets out the vision, spatial strategy and core policies for the spatial development of the Borough. All other Development Plan Documents must be in conformity with it. The St. Helens Core Strategy was adopted in 2012 and will be replaced by the new Local Plan when adopted.
<b>Countryside In and Around Towns</b>	The Countryside In and Around Towns Initiative was a pilot study supported by Natural England. St.Helens was one of a number of Local Authorities to undergo a pilot study assessing the role of the countryside in and around towns, green infrastructure issues and the role of the urban fringe.
<b>Critical Drainage Areas</b>	An area which is within Flood Zone 1 but which has critical drainage problems and which has been notified to the Council by the Environment Agency for the purposes of Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 . This legislation defines circumstances in which the Council must consult the Environment Agency before determining a planning application.
<b>Culvert</b>	A covered channel or pipe designed to prevent the obstruction of a watercourse or drainage path by an artificial construction. There is no definition in current legislation. This definition will be added to Section 72 of the Land Drainage Act
<b>Curtilage</b>	A legal term describing the enclosed area of land around a dwelling.
<b>Decentralised energy:</b>	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
<b>Deliverable</b>	To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable. there is no longer a demand for

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	the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
<b>Density</b>	Density is a measurement that compares the amount of matter an object has to its volume. An object with much matter in a certain volume has high density. An object with little matter in the same amount of volume has a low density. Density is found by dividing the mass of an object by its volume.
<b>Department for Transport (DfT)</b>	Work to support the transport network that helps the UK's businesses and gets people and goods travelling around the country. They plan and invest in transport infrastructure to keep the UK on the move.
<b>Design Code</b>	A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as masterplan or other design and development framework for a site or area.
<b>Designated Heritage Asset</b>	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
<b>Developable</b>	To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
<b>Development -</b>	defined in Section 44 of the Town and Country Planning Act 12990 as:- "The carrying out of building, engineering, mining or other operations, in, on, over or under land, or the making of any material change in the use of any buildings or other land."
<b>Development Brief -</b>	a document containing guidance to a developer on Council requirements for a site.
<b>Development Plan</b>	The Development Plan is the statutory land-use plan for a given area, and acts as a framework for development and land use planning decisions. It is defined in Section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial

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	<p>development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.</p>
<b>Development Plan Document (DPD)</b>	<p>A term brought in by the Planning and Compulsory Purchase Act 2004. These documents set out spatial planning policies and proposals for an area or topic. They are subject to an independent examination run by a Planning Inspector. Once adopted, following an inquiry, these documents will have statutory status as defined by Section 38 (6) of the Planning and Compulsory Purchase Act 2004. DPDs form part of the statutory development plan.</p>
<b>Digital Communications Infrastructure Strategy</b>	<p>The government's long term digital communications infrastructure strategy contains commitments to remove barriers to market investment and reduce legislative and regulatory red tape, framed around meeting the government's new headline ambition for the UK's broadband infrastructure: that ultrafast broadband of at least 100 megabits per second should be available to nearly all UK premises.</p>
<b>Digital Economy Bill</b>	<p>The Digital Economy Bill received Royal Assent on 27 April 2017 and is now known as the Digital Economy Act 2017. The Act will:</p> <ul style="list-style-type: none"><li>empower consumers and provide better connectivity so that everyone has access to broadband wherever they live;</li><li>build a better infrastructure fit for the digital future;</li><li>enable better public services using digital technologies;</li></ul> <p>Provide important protections for citizens from spam email and nuisance calls, and protect children from online pornography.</p>
<b>Digital Infrastructure Action Plan (DIAP)</b>	<p>The Digital Infrastructure Action Plan works to map the existing infrastructure assets, identify opportunities to best use those assets, and suggest potential operating models. The plan will also set out specific actions to maximise digital connectivity and drive economic growth.</p>
<b>"Digital Strategy"</b>	<p>This strategy sets out how we will build on our success to date to develop a world-leading digital economy that works for everyone.</p>
<b>District Centres</b>	<p>District Centres will usually comprise groups of shops often containing at least one supermarket</p>

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	or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.
<b>Dwelling</b>	A single self-contained household space (an unshared dwelling) or two or more household spaces at the same address that are not self-contained, but combine to form a shared dwelling that is self-contained. A household space is the accommodation that a household occupies, and self-containment means that all rooms, including the kitchen, bathroom and toilet are behind a door (but not necessarily a single door) only that household can use. In most cases, a single household space will be an unshared dwelling.
<b>Ecological Assets:</b>	The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation.
<b>Ecological Framework</b>	A strategy that aims to reduce habitat fragmentation and species isolation. It includes a map-based element, which identifies core biodiversity assets, the connectivity between them and potential opportunities for habitat expansion and creation.
<b>Ecological networks:</b>	These link sites of biodiversity importance.
<b>Edge of Centre</b>	For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 meters of a town centre boundary. For office development, this includes locations outside the town centre but within 500 meters of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.
<b>Electronic Communications Code</b>	The Electronic Communications Code is set out in Schedule 3a to the Communications Act and is designed to facilitate the installation and maintenance of electronic communications networks. The Code only has effect in the case of a person to whom it is applied by a direction given by Ofcom (or, in the case of the Secretary of State or any Northern Ireland department, where the Secretary of State or that department is providing or proposing to provide an electronic communications network). The Grant of Code powers is intended to assist persons who provide an electronic communications network and/or system of infrastructure.
<b>Employment Uses</b>	The Town and Country Planning (Use Classes)

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	<p>Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. This Order is periodically amended.</p> <p>Employment use classes fall under Class B1 A, B and C (business), Class B2 general industrial use, and B8 use for storage or as a distribution centre.</p>
<b>Environmental Impact Assessment (EIA)</b>	<p>The term 'environmental impact assessment' (EIA) describes a procedure that must be followed for certain types of project before they can be given 'development consent'. The procedure is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects.</p>
<b>European Landscape Convention (ELC)</b>	<p>The ELC is the first international treaty dedicated to the protection, management and planning of all landscapes in Europe. Signed by the UK government in 2006 and introduced in March 2007, the ELC provides a people-centred and forward-looking way to reconcile management of the environment with the social and economic challenges of the future, and aims to help people reconnect with place.</p>
<b>European Sites (Natura 2000)</b>	<p>Natura 2000 is the European Union-wide network of nature conservation sites established under the Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) - The EC Habitats Directive. This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2010.</p>
<b>Fibre to the Premises (FTTP)</b>	<p>Is a fibre optic cable delivery medium that provides Internet access directly to a user or groups of users from an Internet service provider (ISP).</p>
<b>Flood Plain</b>	<p>Land adjacent to a watercourse over which water flows in times of flood, or would flow but for the presence of flood defences, where they exist.</p>
<b>Flood Risk Assessment</b>	<p>Flood Risk Assessments consider the specific risk of flooding to a development being proposed over its currently expected lifetime and its possible effects on flood risks elsewhere in terms of its effects on flood flows and flood storage capacity and the run-off implications.</p>
<b>Flood Zone 1</b>	<p>The annual probability of flooding is lower than 0.1%. Technical Guidance to the National</p>

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	Planning Policy Framework imposes no constraints upon development here.
<b>Flood Zone 1</b>	The annual probability of flooding is lower than 0.1%. Technical Guidance to the National Planning Policy Framework imposes no constraints upon development here.
<b>Flood Zone 2</b>	Flood Zone 2 is defined as 'Medium Probability' with an annual probability of flooding between 0.1 and 1.0% for fluvial and 0.1 and 0.5% for tidal and coastal flooding. The Technical Guidance to the NPPF recommends that Flood Zone 2 is suitable for most development with the exception of Highly Vulnerable uses (unless the Exception Test is passed), as defined within Table 2 of the Technical Guidance.
<b>Flood Zone 3</b>	Flood Zone 3 is defined as 'High Probability' with an annual probability of flooding of 1.0% or greater for fluvial and 0.5% or greater for tidal or coastal. The Technical Guidance to the NPPF recommends that appropriate development is based upon a further classification of Flood Zone 3 into: 3a High Probability; and 3b Functional Floodplain. Greater constraints are placed upon development within Flood Zone 3 compared to any other Flood Zone; refer to Table 2 of the Technical Guidance for details.
<b>Floodwater Storage Safeguarding Areas (FLOSSA)</b>	Development within or adjacent to* a flood water storage area, which would have a negative impact on its function, will not be supported. As the Lead Local Flood Authority the Council, in partnership with the Environment Agency, may identify additional areas for flood water storage through the Local Flood Risk Management Strategy. If needed, these additional areas will be safeguarded as part of a review of the Local Plan. *adjacent means within eight metres of the boundary of the flood water storage area as defined on the policies map or within eight metres of the landward toe of any associated flood defence structure.
<b>Footprint -</b>	The aggregate ground floor area of a building, or complex of buildings but not the entire area of the plot.
<b>Frontage –</b>	the part of a building that faces onto the public realm
<b>Functional Economic Market Area (FEMA)</b>	The principle of Functional Economic Market Areas (FEMAs) is of longstanding relevance for spatial and economic planning. Economic development needs should be assessed in relation to relevant FEMAs - that is, the spatial level at which local economies and markets

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	actually operate (in most cases extending beyond administrative boundaries). In that sense, it is analogous to the role of Housing Market Areas (HMAs) in assessing housing need.
<b>Functionally Linked Land (FLL)</b>	The land which is linked between industries, including information, components, raw materials, finished goods, and transport links.
<b>Gas Distribution Networks (GDNs)</b>	Gas needs to travel through the high pressure transmission system, then through the medium and low pressure distribution networks to reach the consumer.
<b>Gateway –</b>	We use gateway to describe an arrangement of buildings to give a sense of entrance through a ‘gateway’ into a place. Can be by creating a ‘pinch point’, giving emphasis by increasing height, or by using under croft access
<b>Geodiversity</b>	The range of rocks, minerals, fossils, soils and landforms.
<b>Green Belt</b>	Areas of land where development is particularly tightly controlled. Prior to the Local Plan 2020-2035, the 1998 Unitary Development Plan set out the Green Belt in St Helens, and before the UDP, the Merseyside Green Belt Local Plan (1982). The purpose is to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging; to safeguard the countryside from encroachment; to preserve the setting and special character of historical towns; and to aid urban regeneration by encouraging the recycling of derelict and other urban land.
<b>Green Infrastructure</b>	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It is a network of open spaces, waterways, gardens, woodlands, green corridors, street trees and open countryside that brings many social, economic and environmental benefits to local people and communities. Some examples of these are parks, street trees, gardens, grassland, rivers and ponds.
<b>Greenfield Land</b>	Land that has not been previously developed. I.e. not "Brownfield - previously developed land".
<b>Greenway -</b>	Undeveloped land near an urban area, set aside for recreational use or environmental protection.
<b>Groundwater</b>	Refers to all sub-surface water as distinct from surface water. Generally groundwater is considered to be that water which is below the surface of saturation and contained within

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	porous soil or rock stratum (aquifer).
<b>Habitat</b>	The area or environment where an organism or ecological community usually lives
<b>Habitats Regulations</b>	Provides legal protection for habitats and species of European importance.
<b>Habitats Regulations Assessment (HRA)</b>	HRA assesses the likely impacts of the possible effects of a plan's policies on the integrity of the Natura 2000 sites (including possible effects 'in combination' with other plans projects and programmes).
<b>Habitats Site</b>	Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.
<b>Hectare (HA)</b>	A unit of land area equivalent to 10,000 square metres or 0.01 of a square kilometre. One Hectare is approximately equal to 2.5 acres.
<b>Heritage Asset</b>	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
<b>Highway Improvement Line</b>	Are retained to facilitate future highway improvement projects. Section 73 of the Highways Act 1980 details the powers of the Highway Authority in this regard.
<b>Highways England</b>	Is the government-owned company charged with operating, maintaining and improving England's motorways and major A roads.
<b>Historic Environment</b>	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
<b>Historic Environment Record</b>	Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.
<b>Historical Environment Records (HERs)</b>	HERs are a primary source of information for planning, development-control work, and land management. They can provide information on a wide variety of buildings and sites.
<b>Home Builders Federation (HBF)</b>	Is the representative body of the home building industry in England and Wales.

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<b>Housing Delivery Test</b>	Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.
<b>Housing Land Supply</b>	A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.
<b>Hydraulic Fracturing (Fracking)</b>	Hydraulic fracturing, also known as fracking, is a technique which can be used in the extraction of gas from shale rock. Shale gas has the potential to provide the UK with greater energy security, economic growth and jobs, and could be an important part of our transition to a low carbon future.
<b>Hydrocarbon</b>	A compound of hydrogen and carbon, such as any of those which are the chief components of petroleum and natural gas.
<b>Index of Multiple Deprivation</b>	The Index of Multiple Deprivation (IMD) is a measure of multiple deprivations at the small area level.
<b>Inert</b>	A material that will not react chemically to others. In the context of waste, it is materials such as hard-core, sand and clay.
<b>Informal Recreation -</b>	Recreation not requiring the provision of formal facilities, e.g. Walking.
<b>Infrastructure</b>	SEE APPENDIX 'DEFINITION OF INFRASTRUCTURE'
<b>Intermediate Housing</b>	Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.
<b>International, National and Locally Designated Sites of Importance for Biodiversity</b>	All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Specific Interest) and locally designated sites including Local Wildlife Sites.
<b>Key Diagram</b>	Is an illustrative map which brings together the main components of the spatial strategy of the Local Plan, emphasising the broad locations for development identified on the Policies Map.

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<b>Key Route Network</b>	An integrated programme of investment in the strategic highway routes that contribute to growth in the LCR. The KRN is integral to the success of the LCR Growth Strategy. The KRN investment programme is designed to support the economic growth of our region and maximize the benefits for our residents, visitors and businesses.
<b>Landfill</b>	Site for the disposal of waste into or onto land, as defined by the Landfill (England and Wales) Regulations 2002 (as amended). Landfill sites can range from a few hectares (ha) to more than 100ha and can receive inert, non-inert and/or hazardous waste. Typical after uses include: agriculture, public open space and nature conservation. Based on a site receiving 250,000tpa, a landfill could employ greater than 10 workers.
<b>Landscape Character</b>	The distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape, and how this is perceived by people. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement. It creates the particular sense of place of different areas of the landscape.
<b>Landscape Character Assessments</b>	An approach to assessing and recording those features and characteristics that constitutes a particular landscape as a basis for informed planning and policy decisions that respect and enhance that character and a local sense of place.
<b>Lead Local Flood Authority (LLFA)</b>	Are responsible for developing, maintaining and applying a strategy for local flood risk management in their areas and for maintaining a register of flood risk assets.
<b>Listed Buildings</b>	Buildings and structures, which have been identified by the Secretary of State for Culture, Media and Sport, as being of special architectural or historic interest and whose protection and maintenance, are the subject of special legislation. Their curtilage and setting is also protected. Listed Building Consent is required before any works are carried out on a Listed Building. They are graded I, II* and II.
<b>Liverpool City Region (LCR)</b>	The six local councils (Halton, Knowsley, Liverpool, Sefton, St Helens & Wirral) working with the LEP and Mersey travel and other local services to improve the LCR.
<b>Liverpool SuperPort</b>	SuperPort is an integrated cluster of logistics assets and expertise that will deliver



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	<p>faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port.</p>
<b>Local Aggregate Assessment</b>	<p>An annual assessment of the demand for and supply of aggregates in a mineral planning authority's area</p>
<b>Local Centres</b>	<p>Local Centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.</p>
<b>Local Development Scheme (LDS)</b>	<p>A 3-year programme that sets out the details, the timescales and the arrangements for production for each document that will form part of the LDF.</p>
<b>local distinctiveness –</b>	<p>The positive features of a place and its communities that contribute to its special character and sense of place. It includes the form of a place, the way it is used, buildings – density and mix, height and massing, urban structure, grain, landscape and building traditions</p>
<b>Local Equipped Area for Play (LEAP)</b>	<p>Is a piece of open space that is designated and equipped for children of early school age.</p>
<b>Local Full Fibre Networks (LFFN)</b>	<p>These projects will enter a phase of due diligence in anticipation of delivering full fibre networks before the end of the Financial Year 2020/2021. This will allow a period to confirm that they are fully compliant with the Local Full Fibre Networks programme, and will test areas including state aid and procurement law. It will also check that the local body has the capability and capacity to manage their project.</p>
<b>Local Geology Sites</b>	<p>Local Geological Sites (formerly known as Regionally Important Geological Sites – or RIGS) are non-statutory sites that have been identified by local geoconservation groups as being of importance.</p>
<b>Local Housing Need</b>	<p>The number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.</p>
<b>Local Nature Reserves (LNR)</b>	<p>Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. Parish and Town Councils can also declare LNRs but they must have the powers to do so delegate to them by a principal local authority. LNRs are for people</p>

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	and wildlife. They are places with wildlife or geological features that are of special interest locally.
<b>Local People</b>	persons who reside in the Borough of St.Helens
<b>Local Plan</b>	A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, together; these DPDs form the Development Plan. In St Helens, on adoption of this plan, the Local Plan will consist of the St Helens Local Plan 2020-2035, the Joint Waste Local Plan and the Bold Forest Park Area Action Plan.
<b>Local Plan Preferred Options (LPPO)</b>	Draft Local Plan.
<b>Local Plan Submission Document (LPSD)</b>	Local Plan submission to the government for examination.
<b>Local Planning Authority</b>	The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.
<b>Local Shopping Centre -</b>	Centres providing basic shopping facilities of importance for those who live locally.
<b>Local Transport Plan</b>	A five-year integrated transport strategy, prepared by Merseytravel in partnership with local authorities, stakeholders and the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy.
<b>Local Wildlife Sites (LWS)</b>	Also known as Sites of Biological Importance (SBI) or Sites of Interest for Nature Conservation (SINC) - are areas which are locally important for the conservation of wildlife. They are identified and selected for the significant habitats and species that they contain.
<b>Main river</b>	Watercourse shown as such on a main river map. Main river maps are held by Defra and Welsh Government and copies are available to LLFAs as a GIS layer on GEOSTORE.
<b>Main Town Centre Uses</b>	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants,

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	drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
<b>Major Development</b>	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m <sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
<b>Managed Aggregate Supply System (MASS)</b>	The underpinning concept behind the Managed Aggregate Supply System is that Mineral Planning Authorities which have adequate resources of aggregates make an appropriate contribution to national as well as local supply, while making due allowance for the need to reduce environmental damage to an acceptable level. Furthermore, Government expects resource-poor areas to make some contribution to meeting local and national needs where that can be done sustainably.
<b>Mersey Forest</b>	A partnership project which aims to create woodlands which bring benefits to people, wildlife and the economy.
<b>Mineral Safeguarding Area</b>	An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
<b>Multimodal Distribution Parks (MDPs)</b>	Multimodal Distribution Parks are newly developed and limit freight activity by road.
<b>National Planning Policy Framework (NPPF):</b>	This is the Government's statement of planning policy with which all Local Plan's must be in conformity. Where a local plan is silent on an issue planning decisions will be made in accordance with national policy. This document came into force in March 2012 and replaces the planning policy statements and planning policy guidance notes (PPS' and PPGs).
<b>National Transmission System (NTS)</b>	The high pressure gas network which transports gas from the entry terminals to gas distribution networks, or directly to power stations and other large industrial users.
<b>Natural Assets</b>	Natural assets are assets of the natural environment. These consist of biological assets (produced or wild), land and water areas with their ecosystems, subsoil assets and air.

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<b>Natural Surveillance</b>	Crime Prevention Through Environmental Design (CPTED) is a set of design principles used to discourage crime. The concept is simple: Buildings and properties are designed to prevent damage from the force of the elements and natural disasters; they should also be designed to prevent crime.
<b>Nature Conservation -</b>	The protection and enhancement of the natural environment.
<b>Nature Improvement Areas:</b>	Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.
<b>Neighbourhood Plan</b>	A plan prepared by a Parish Council or Neighbourhood Forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.
<b>North West Aggregates Working Party (NWAWP)</b>	Technical advisory group of mineral planning authorities (and their representatives) from the North West region and other relevant organisations who work together to: produce fit-for-purpose and comprehensive data on aggregate demand and supply in the North West; and provide advice to individual mineral planning authorities and to the National Aggregate Co-ordinating Group.
<b>Northern Powerhouse Rail (NPR)</b>	Northern Powerhouse Rail is a transformational rail programme to better connect the key economic areas and cities of the North. Delivered over 30 years and combining new, existing and already planned lines, the programme will improve east-west connections, offering a radical change in journey times, reliability frequency and capacity.
<b>Older People</b>	People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.
<b>Open Space</b>	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
<b>Original Building</b>	A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

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<b>Out of Centre</b>	A location which is not in, or on, the edge of a centre but not necessarily outside the urban area.
<b>People with Disabilities</b>	People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.
<b>Permission in Principle</b>	A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.
<b>Permitted Development Rights -</b>	Development for which planning permission is required, but is deemed to have been granted by the General Development Order.
<b>Petroleum Exploration and Development Licence (PEDL)</b>	Licence issued by the Government that allows a company to pursue a range of oil and gas exploration activities, subject to necessary drilling/development consents and planning permission.
<b>Plan Period</b>	The plan period we are working to is 2020 -2035.
<b>Planning Condition</b>	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
<b>Planning obligation:</b>	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
<b>Planning Permission</b>	Condition attached to a planning permission that needs to be complied with for a planning permission to be valid.
<b>Planning Policy Guidance (PPG)</b>	Guidance produced by the Government setting out national planning policy.
<b>Playing Field</b>	The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
<b>Policies Map</b>	An illustrative diagram of the main proposal designations and areas where specific policies or Area Action Plans apply.
<b>Preferred Options</b>	The stage of the LDF process that takes account of public and stakeholder interest, providing enough information to ensure that people can

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	understand the implications of the Preferred Options and the opportunity to select alternative options.
<b>Previously Developed Land</b>	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
<b>Primary and secondary frontages:</b>	Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
<b>Primary Shopping Area</b>	Defined area where retail development is concentrated.
<b>Priority Habitats and Species</b>	Species and Habitats of Principle Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.
<b>Protected Species</b>	Plants and species afforded protection under certain Acts of Law and Regulations.
<b>Public Realm</b>	Publicly owned streets, sidewalks, rights of ways, parks and other publicly accessible open spaces, and public and civic buildings and facilities.
<b>Regeneration</b>	A regeneration activity is one which is part of a wide and balanced approach to enhancing the overall wellbeing of a community, through social, physical and economic improvements - combining economic competitiveness, environmental sustainability and social equity to bring about renewal.
<b>Registered Parks and Gardens</b>	Registered Parks and Gardens are historic parks and gardens which make a rich and varied contribution to the landscape. A register of all the historic parks and gardens in the country is kept by English Heritage.

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<b>Registered Provider of Social Housing (RP)</b>	A landlord registered with the Housing Corporation who provides and manages affordable housing.
<b>Renewable</b>	A natural resource or source of energy not depleted when used.
<b>Renewable and Low Carbon Energy</b>	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment - from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
<b>Scheduled Ancient Monument</b>	A feature of national historical or archaeological importance, either above or below the ground, which is included in the schedule of monuments as identified by the Secretary of State.
<b>Self-build and Custom-build Housing</b>	Housing built by an individual, a group of individuals, or persons working with them or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1 (A1) and (A2) of that Act.
<b>Setting of a Heritage Asset</b>	The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
<b>Shallow Coal</b>	Shallow and Probable Shallow Coal Mine Workings (no buffers) Recorded shallow workings and associated probable shallow mine workings make up a large proportion of the Development High Risk Areas. Shallow mining is usually defined as depth of less than 30 metres.
<b>Significance (for heritage policy)</b>	The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.
<b>Site Investigation Information</b>	Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All



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	investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites - Code of Practice).
<b>Site of Special Scientific Interest (SSSI)</b>	Nationally important areas of land, designated by Natural England under the Wildlife and Countryside Act 1981 as being of special interest for nature or geological conservation.
<b>Special Protection Area (SPA)</b>	Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.
<b>Special Protection Areas</b>	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.
<b>Special Protection Areas:</b>	Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.
<b>Stakeholder</b>	<p>A stakeholder is a person or organisation that has an interest in a field or area of work. Within planning there are three statutory stakeholders who are consulted during the planning process.</p> <p>These are Natural England, the Environment Agency and English Heritage. Other stakeholders may include developers, architects, environmentalists who have an interest in the planning process.</p>
<b>Strategic Flood Risk Assessment (SFRA)</b>	An SFRA takes into account the impacts of climate change and assesses the impact that land use changes and development in the area will have on flood risk.
<b>Strategic Freight Route</b>	Enhancing the network to carry more freight traffic and make rail freight more competitive with other modes by increasing its efficiency.
<b>Strategic Housing Land Availability Assessment (SHLAA)</b>	Key evidence base document and establishes realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified housing need for housing over the plan period.

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<b>Strategic Housing Market Assessment (SHMA)</b>	Key evidence base document and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
<b>Strategic Policies</b>	Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.
<b>Strategic Rail Freight Interchange (SRFI)</b>	A Strategic Rail Freight Interchange (SRFI) is a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems. It has rail-served warehousing and container handling facilities. Rail Freight Interchanges (RFI) enable freight to be transferred between transport modes, thus allowing rail to be used to best effect to undertake the long-haul primary trunk journey, with other modes (usually road) providing the secondary (final delivery) leg of the journey.
<b>Strategic Road Network</b>	Roads across the borough essential to free and safe movement of traffic throughout the region.
<b>Supplementary Planning Documents</b>	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
<b>Supplementary Planning Guidance (SPG)</b>	Non-statutory policy documents elaborating on policies and proposals in a UDP. These were replaced by SPDs under the new legislation.
<b>Surface Water</b>	Water that collects on the surface of the ground.
<b>Sustainability</b>	The ability to be maintained at a certain rate or level and the avoidance of the depletion of natural resources in order to maintain an ecological balance.
<b>Sustainability Appraisal (SA)</b>	The purpose of Sustainability Appraisals is to ensure that social, environmental and economic considerations are made during the preparation of policies and plans.
<b>Sustainable Drainage Systems (SuDS)</b>	Approaches to manage surface water that take account of water quantity (flooding), water quality (pollution) biodiversity (wildlife and plants) and amenity.
<b>Sustainable Transport Enhancement Package (STEP)</b>	Sustainable Transport Enhancements Package (STEP) is split into four overarching packages, integral to the LCR Growth Plan and Strategic Economic Plan: Transport Investment for Growth, Sustainable Access to Employment and

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	<p>Opportunity, Transport and Low Carbon Opportunities, Travel for the Visitor Economy. The investment programme is targeted geographically in areas identified by the Growth Plan as Growth Zones that will benefit from investment in businesses, housing and training and employment opportunities over the coming years.</p>
<b>Sustainable Transport Impact Assessment (STIA)</b>	<p>A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p>
<b>Sustainable Transport Modes</b>	<p>Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking or cycling, low and ultra-low emission vehicles, car sharing and public transport.</p>
<b>Town Centre</b>	<p>Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.</p>
<b>Townscape –</b>	<p>the urban equivalent of landscape; the overall effect of the combination of buildings, changes of level, greenspaces, boundary walls, colours and textures, street surfaces, street furniture, uses, scale, enclosure and views</p>
<b>Transport Assessment</b>	<p>A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed to deal with the anticipated transport impacts of the development.</p>
<b>Transport for the North (TfN)</b>	<p>TfN are the first statutory sub-national transport body in the United Kingdom. Transports for the North are making the case for pan-Northern</p>

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	strategic transport improvements, which are needed to support transformational economic growth.
<b>Transport Statement</b>	A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.
<b>Travel Plan</b>	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.
<b>Travel Time</b>	A catchment area contains all the places that can be reached within a specified travel time from a specified place.
<b>Tree Preservation Order (TPO) –</b>	An order made by the Council to protect trees which are considered to make a significant contribution to their local surroundings. Such an order makes it an offence to cut down, top, lop, uproot, wilfully damage or wilfully destroy a tree. Any works to protected trees require the Council's permission
<b>Use Classes Order</b>	The Town and Country Planning (Use Classes) Order 2010 specifies sixteen classes of land use. Change of use within a use class does not normally require planning permission.
<b>Vacant Buildings</b>	Unoccupied buildings, that are structurally sound and in a reasonable state of repair (i.e. capable of being occupied in their present state).
<b>Ward</b>	Electoral wards are the key building block of UK administrative geography.
<b>Water Framework Directive</b>	A European Union Directive which commits member states to achieve good ecological status of all water bodies including; surface waters, groundwater, estuaries, and marine waters up to one mile from low water. The Directive looks at the ecological health of surface water bodies as well as achieving traditional chemical standards.
<b>Watercourse</b>	includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.
<b>Wildlife Corridor</b>	Areas of habitat connecting wildlife populations.

## Appendix 2: Definition of 'infrastructure'

(NB these categories are not exhaustive and all include supporting infrastructure)

- **Community Services:** libraries, community centres, youth services, social services, older peoples support, special needs and disability, courts, prisons, hostels, places of worship, cemeteries and crematoria;
- **Culture and Leisure:** museums and galleries, performance venues (theatres and cinemas), sports and fitness centres, swimming pools;
- **Education:** nursery and pre-school facilities, primary and secondary, further, higher and adult education;
- **Emergency Services:** police, fire service and ambulance;
- **Energy:** power generation, distribution and provision, decentralised and renewable or low carbon energy;
- **Green Infrastructure Network:** open space, parks, children's play areas, sports pitches and courts, country parks and accessible natural green space, Local Wildlife Sites (LWS), forests and woodlands, allotments;
- **Gypsy, Travellers and Travelling Showpeople Sites and Facilities;**
- **Health:** hospitals, health centres, GP surgeries, dental practices, opticians, hospices and pharmacies, public health and prevention;
- **Information and Communication Technology:** telecommunications, internet and broadband, public phones, cable television.
- **Mineral Workings;**
- **Post Offices:** main post offices, sub-post offices, sorting offices, post boxes;
- **Public Realm:** footways, street furniture, planting, historic environment protection;
- **Retail:** town centre, neighbourhood shops, markets, out of town retail parks;
- **Transport:** roads, air travel, railways, trams, bus facilities, taxi ranks, cycling, pedestrian, car and coach parking and park-and-ride facilities, waterways, vehicle charging facilities, vehicle testing stations freight interchanges;
- **Water Supply:** water mains, sewers, wastewater treatment, surface water, drainage facilities, sustainable drainage systems (SuDS), flood defences and flood risk management;
- **Water Bodies:** Rivers, streams, ditches, ponds, lakes, canals, reservoirs; and
- **Waste Management:** refuse collection and disposal, recycling, treatment, transfer stations, landfill.

## Appendix 3: St. Helens Local Plan 2020-2035 – Strategic Aims, Objectives and Policies

STRATEGIC AIM	STRATEGIC OBJECTIVE	KEY ISSUE(S) ADDRESSED <sup>1</sup>	PRIMARY POLICY DELIVERY
<b>1. Supporting Regeneration and Balanced Growth</b>	<i>1.1 To promote regeneration by enabling steady and sustainable economic and population growth.</i>	i, ii, iii, iv, v, vi, vii, x, xii	LPA01-06, 08,10; LPB01-02; LPC03-04
	<i>1.2 To reduce deprivation by ensuring that new development and investment can benefit deprived communities.</i>	i, ii, iii, iv, v, vi, vii, viii, ix, xi, xii, xiii, xiv	LPA01-04, 08
	<i>1.3 To help meet development needs by ensuring the efficient re-use of previously developed land.</i>	i, iii, iv, v, vi, x, xiii,	LPA01-03, 08
<b>2 Ensuring Quality Development</b>	<i>2.1 To promote the creation of a well-designed environment by supporting proposals for high quality development.</i>	i, iii, iv, v, vi, vii, viii, x, xi, xiii	LPA01-03, 4.1, 5.1, 08-09; LPC03, 05-06, 14; LPD01-06, 08
	<i>2.2 To mitigate the effects and minimising the impacts of land use changes on climate change by requiring well-designed developments in suitable locations.</i>	i, iii, iv, v, vi, vii, xii, xiii, xv	LPA01-03, 08-09,11; LPC06, 12-14; LPD01-05, 10
	<i>2.3 To contribute to the development of stronger and safer communities by prioritising new development and investment that can benefit those who are disadvantaged.</i>	i, ii, iii, iv, v, vi, vii, viii, ix, xi, xii, xiii, xiv	LPA01-03, 08; LPD01-05, 09
<b>3 Promoting Sustainable Transport</b>	<i>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 network.</i>	i, iii, vi, viii, ix, xii	LPA01-03, 04.1, 07-08, 10; LPB01; LPC03
<b>4 Meeting Housing Needs</b>	<i>4.1 To enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings.</i>	i, iii, iv, vi, viii, x	LPA01-03, 05, 05.1, 06, 08; LPC01-03; LPD02-05

<sup>1</sup> See numbered list in paragraph 2.10.1

STRATEGIC AIM	STRATEGIC OBJECTIVE	KEY ISSUE(S) ADDRESSED <sup>1</sup>	PRIMARY POLICY DELIVERY
<b>5 Ensuring a Strong and Sustainable Economy</b>	<i>5.1 To maximise the contribution of St. Helens to the economy of the Liverpool City Region and adjacent areas, and meeting local employment needs, by ensuring an adequate supply of employment land and premises.</i>	i, ii, iii, v, vi, vii, viii	LPA01-04, 04.1, 05.1, 08, 10
	<i>5.2 To support the wider Borough by aiding the development of the tourism, leisure and rural economies.</i>	i, ii, iii, v, vii, ix, xiii, xiv	LPA01-04,08; LPB01
	<i>5.3 To enhance the vitality and viability of town, district and local centres, and the role of St. Helens as a sub-regional shopping centre, by enabling appropriate development in those locations.</i>	i, ii, iii, v, vi, vii, ix, xii, xiv	LPA01-04, 08; LPB01-02; LPC04
	<i>5.4 To utilise the Borough's strategic location in relation to the rail network by facilitating rail-enabled employment development.</i>	ii, iii, v, xii	LPA01-04, 04.1, 08
<b>6 Safeguarding and Enhancing Quality of Life</b>	<i>6.1 To increase convenience and reduce the need to travel by ensuring appropriately located, integrated provision of a wide range of community facilities.</i>	i, ii, iii, vi, vii, viii, ix, xi, xii, xiv	LPA01-03, 08, 11; LPB01; LPD03, 10
	<i>6.2 To safeguard the quality of the environment by protecting and enhancing local character and distinctiveness, the historic environment, biodiversity and geodiversity.</i>	iii, vii, viii, xiii, xiv, xv	LPA01-03, 05.1, 06, 08-09; LPC03, 05-14; LPD09
	<i>6.3 To protect and enhance the multi-functional network of green spaces throughout the Borough by promoting positive use and management whilst improving their biodiversity and increasing tree and woodland coverage.</i>	iii, vii, viii, ix, xii, xiii, xiv, xv	LPA01-03, 05.1, 08-09; LPC05-08, 10
<b>7 Meeting Resource and Infrastructure Needs</b>	<i>7.1 To mitigate development impacts by ensuring that local and strategic infrastructure needs are fully met.</i>	i, ii, iii, vii, ix, xii, xiii, xv	LPA01-03, 04.1, 08; LPC12-15; LPD07
	<i>7.2 To acknowledge the value of resources within the Borough by safeguarding them or promoting their use in a sustainable manner.</i>	ii, iii, v, vii, xiii, xv	LPA01-03, 08



## Appendix 4: Monitoring Framework

Continual monitoring is a key aspect of the plan making system. The Localism Act of 2011 requires local planning authorities to monitor the extent to which policies contained in their plans are being achieved and to publish this information each year in an Authority Monitoring Report (AMR).

The effectiveness of the policies in the Local Plan will be monitored to ensure that they are:

- achieving the Local Plan objectives and delivering sustainable development;
- delivering new homes and jobs; and
- not having any unintended consequences.

To enable this to happen, the Local Plan contains suitable targets and indicators that relate to the delivery of policies and sets out clearly how these are to be measured. This will help to determine if any action is necessary to ensure that the policies can be implemented, if any amendments are needed to any of the policies in order to ensure the desired objective is being achieved.

The targets and indicators included in the Monitoring Framework includes existing indicators used to measure performance and new indicators that will be used going forward. In these cases, the indicators have been selected where information is available to ensure that the policy can be monitored on a regular basis.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
<b>LPA01 - Presumption in Favour of Sustainable Development</b>	All Local Plan indicators	St.Helens Authority Monitoring Report (AMR)	Delivery of sustainable development.	Failure to deliver a coherent, implementabl e strategy to facilitate progress towards sustainable development.	Review of Local Plan.
<b>LPA02 - Spatial Strategy</b>	Analysis of progress with strategic sites	A range of economic, housing, environmental and infrastructure sources.	Most new housing to be delivered on strategic and/or brownfield sites Significant new employment development at existing and	Failure to deliver the quantity and distribution of development proposed by the Local Plan	Review of land identified for development. Review of Local Plan.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
			strategic locations.		
	Percentage of housing completions on brownfield sites	Annual SHBC house completion survey.	No target set	Not yet determined	Review of Local Plan policies.
<b>LPA03 - Development Principles</b>	All Local Plan indicators	St.Helens Authority Monitoring Report (AMR)	Delivery of sustainable development.	Failure to deliver a coherent, implementabl e strategy to facilitate progress towards sustainable development	Review of Local Plan policies.
<b>LPA04 - A Strong &amp; Sustainable Economy</b>	Employment land available per annum by type	St.Helens Authority Monitoring Report (AMR)	Monitor provision of new employment land by type on a yearly basis.	Cumulative take up of allocated employment land for employment development less than 50% of the expected pro-rata amount, or more than 150% of the expected pro-rata amount.	Where take up of allocated employment land for employment development is higher than expected, consider review of policy. Where take-up is lower, consider whether there are obstacles to take-up on particular sites that could be overcome.
	Number of permissions for expansion of existing businesses	SHBC employment monitoring	No target set	Not yet determined	To be determined
	Loss of employment on existing employment sites	SHBC employment monitoring	No loss on previous years	Not yet determined, monitor initially	To be determined
	Total number of active	SHBC employment	Increase on previous years	Decrease over the Plan	Review of Local Plan policies.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	businesses	monitoring		period	
	Number of applications approved for employment uses in rural areas	Development management processes	No target set – monitor for now	Not yet determined	To be determined
<b>LPA05 - Meeting St Helens' Housing Needs</b>	Distribution of new housing development across the Borough	Annual SHBC house completion survey	Percentage of new homes built on allocated sites.	Having fewer than 5 years' supply (plus the required buffer) of housing land.	Consider the reasons for the imbalance in delivery compared to the target and whether there are any obstacles to delivery affecting sites in particular locations.
	Gross completions of new homes by house type and number of bedrooms, against annual and plan period targets	Annual SHBC house completion survey, St.Helens Authority Monitoring Report (AMR)	Annual net homes completions to be at least the residual number required for 2020-2035 of 486 homes per annum. within the Plan period	Failure to deliver 95% of the residual number over a 3-year rolling period, i.e. 1,385 net homes over 3 years.	Prepare and publish an action plan setting out key reasons for the situation and actions the Council and other parties need to take.
	Density numbers of approved housing developments	Development management processes	Minimum 30dph on all sites 30-40dph in and adjacent to district and local centres 40-50dph+ at sites within St.Helens Town centre, Earlestown Town centre and on the edge of these centres.	30dph or more (dependent on location) dwellings not achieved on completed sites, using a net developable site area of 75% of the site area.	Review how the policy is being applied, the age and circumstances of the planning permissions to which the completions relate where the target was not met; if the policy has been applied accurately to the permissions which led to the trigger being

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
					applied, consider whether the policy needs to be reviewed.
	5 Year housing land supply	Development management processes	To have a 5 year + housing supply	Having fewer than 5 years' supply (plus the required buffer) of housing land.	Consider early review of the Local Plan.
<b>LPA06 - Safeguarded Land</b>	Number and extent of planning applications approved on land safeguarded for post-2035	Development management processes	Zero	10% (or more) of land safeguarded granted planning consent for built development	Consider early review of the Local Plan.
<b>LPA07 - Transport and Travel</b>	Number of developments approved resulting in significant transport impacts producing a transport assessment and travel plan agreed by the Council	Development management processes	Transport assessments/Transport Statement and Travel Plans submitted in all cases where these are required.	Planning applications determined without the prescribed information.	Review how the policy is being applied; consider whether the policy needs to be reviewed.
	Cycle and footpaths created (detailing how they have improved accessibility and reduced reliance on private transport)	St.Helens Council	Implement schemes and projects that will help to deliver sustainable economic growth (by reducing congestion and delays for businesses).	Implementation has not occurred within a set period (to be decided).	Consider whether there are obstacles in the process of implementation or specific to particular sites that could be overcome.
	Improvements to public	St.Helens Council,	All new sites allocated for	Any allocated sites	Review how the policy is being

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	transport infrastructure and services	Merseytravel	development should have easy access to public transport.	developed with no access to public transport.	applied and how external providers are consulted and what (if any) obstacles are in the way of providing public transport that can be overcome.
	Levels of car ownership	St.Helens Council, Office for National Statistics - Census	No target set - monitor levels for now – should be a decrease on a yearly basis.	Not yet determined	To be determined
	Number of electric vehicle charging points provided	Development management processes	Increase in Plan period.	Failure to secure electric vehicle charging points on all new developments	Review how the policy is being applied, and sees if there are any specific obstacles preventing this requirement.
	Number of planning applications approved contrary to Highways England advice	Development management processes	None – planning applications should not be approved were Highways England have issues with the proposal.	Planning applications granted planning permission contrary to Highways England advice.	Review how the policy is being applied.
<b>LPA08 - Infrastructure Delivery and Funding</b>	Number of community facilities (including health, education, neighbourhood retail and leisure, lost through new development	St.Helens Council, Development management processes	Development that includes the loss of a community facility should be resisted unless a better facility can be located locally.	Failure to secure suitable replacements.	Review how the policy is being applied, whether any means exist of preventing or mitigating any loss, potential review of Local Plan policy.
	Number of	St.Helens	None – due	Planning	Review how the

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	planning applications amended on economic viability grounds	Council, Development management processes	regard should be made at application stage on the ability of development proposals to support the required level of developer contributions	applications amended due to economic viability	policy is being applied, and considers any means that exist within the Local Plan to prevent this, potential review of Local Plan policies.
	Amount of Section 106 monies received through obligations	St.Helens Authority Monitoring Report (AMR)	No set target - developer contributions will be monitored and a summary will be presented each year in the new AMR.	Not yet determined	To be determined
	Amount of New Homes Bonus payments received	St.Helens Authority Monitoring Report (AMR)	No set target - developer contributions will be monitored and a summary will be presented each year in the new AMR.	Not yet determined	To be determined
<b>LPA09 - Green Infrastructure</b>	Area of green infrastructure created as the result of new development	Development management processes	A net increase in areas of provision as a reflection of the extant standards of provision.	Any net loss of green infrastructure provision	Review of standards applied
	Number of new nature reserves created	Reports to members; development management processes	Number of new nature reserves to rise in proportion to the increase in population arising from new development.	Failure to achieve additional nature reserves over Plan period	To be determined

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	Planning applications received that assist in the implementation of the Bold Forest Action Plan	Development management processes	Substantial progress towards delivery of the Action Plan's priorities.	Not yet determined	Review of Local Plan policies.
<b>LPA11 - Health and Wellbeing</b>	Number of affordable houses completed; proportion of new/improved green spaces; active leisure opportunities included in strategic housing site masterplans; manage air quality and pollution	Development management records; Sport England; NHS, public health records, 2021 Census	A decline in lifestyle related illness, and in average years-of-life-lost.	Decline in health of wider population, or increases in health and well-being that are less than significant.	To be determined
<b>LPB01 - St Helens Town Centre and Central Spatial Area</b>	Proportion of town centre premises that are vacant or in non-active use.	Survey, property registers, business rates records, planning applications	An increase in active town centre uses.	Sustained increases in town centre premises that are vacant or under-used.	Review of Local Plan
<b>LPB02 - Earlestown Town Centre</b>	Proportion of non-active commercial premises in town centre	Survey, property registers, business rates records, planning applications	A decline in the proportion of town centre commercial properties in non-active use.	Proportion decreases or remains stagnant.	Accelerated progress to produce a town centre action plan or masterplan.
<b>LPA04.1 - Strategic Employment Sites</b>	Employment land available per annum by type	SHBC employment monitoring	No target set as yet – monitor for now to ensure an increase on a yearly basis.	Not yet determined	Review of Local Plan policies.
	Number of	Development	Every planning	Planning	Review how the



POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	masterplans submitted	management processes	application for an allocated strategic employment site should be accompanied by a masterplan.	applications determined without the prescribed information.	policy is being applied; consider whether the policy needs to be reviewed.
<b>LPA10 - Parkside East</b>	Substantial progress towards site development, e.g., completion of a masterplan; agreed timescale for implementation; planning application process; works commencing on site	Development management process; reports considered by members; memoranda of understanding agreed with developers	Substantial development of Parkside for employment purpose; a minimum of 60ha identified and reserved for rail-enabled employment development	Progress stalled to the extent that minimal implementation can be expected prior to 2035	Review of Local Plan
<b>LPA05.1 - Strategic Housing Sites</b>	Number of dwellings granted planning consent on strategic housing sites	Development management processes	20% shortfall on the cumulative requirement of the Housing Trajectory	Number of dwelling completed on strategic sites falls below 75% of target	Consider early review of the Local Plan.
<b>LPC01 - Housing Mix</b>	Percentage of bungalows being constructed on greenfield sites.	Information will be derived from the approved planning applications.	All new developments of 25 or more dwellings on greenfield sites should comprise of at least 5% bungalows.	Less than 5%. The trigger will be adjusted in response to the findings of future Housing Needs Assessments conducted by or on behalf of the Council.	Review how the policy is being applied, the age and circumstances of the planning permissions where the target was not met; if the policy has been applied accurately, consider whether the policy needs to be reviewed.
	Percentage of	Information	"At least 20%	Less than	Review how the

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	dwelling designed to the “accessible and adaptable” standard, as set out in Part M4(2) and Part M4(3) of the Building Regulations or equivalent standard	will be derived from the approved planning applications.	of new dwellings on sites of 25 or more new homes should be designed to meet Part M4(2) of the Building Regulations 2010.	5%. The trigger will be adjusted in response to the findings of future Housing Needs Assessments conducted by or on behalf of the Council.	policy is being applied, the age and circumstances of the planning permissions where the target was not met; if the policy has been applied accurately, consider whether the policy needs to be reviewed.
<b>LPC02 - Affordable Housing Provision</b>	Percentage of market housing developments of 11 or more homes granted planning permission that provides 30% affordable homes.	Development management processes	All market housing developments of 11 or more homes to provide 30% affordable homes.	Fewer than 90% of market housing schemes of 11 or more homes granted planning permission in any given year provides 30% affordable homes.	Review the circumstances of the permissions granted that have led to the trigger. If a generalised viability problem is indicated, Review a review of the requirement in the policy.
<b>LPC03 - Gypsies, Travellers and Travelling Show People</b>	Maintenance of a supply of suitable sites to meet the requirement	Development management processes	Provision for 8 additional permanent pitches in the period to 2035 (GTAA minimum).	Assessment that there is less than a five-year supply of sites for additional permanent pitches	"Identification of land for additional pitches, through a Call-for-sites.
<b>LPC04 - Retail and Town Centres</b>	Number of empty / inactive town centre commercial properties.	St.Helens Business rates records	A decrease in the number of vacant/inactive properties.	A significant increase in unused and underused commercial premises in and around town centres.	To be determined

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
<b>LPC05 - Open Space</b>	Quantity and extent of new sport, open space and recreational development.	Development management processes	Net increase in provision over the Plan period.	Provision is below assessed need	Consider whether the fall in the areas of dedicated land has been offset by more effective use of the area of land that remains for open space. If not, consider a review of how the policies have been applied.
	Green Flag awards	St.Helens Authority Monitoring Report (AMR)	No decrease over Plan period.	Not yet determined	To be determined
<b>LPC06 - Biodiversity and Geological Conservation</b>	Change in areas of land covered by local, national or international policy protections for biodiversity, or areas provided for biodiversity in mitigation through developments.	St.Helens Council, Natural England and Lancashire Wildlife Trust.	Net gains in areas of land specifically dedicated to and protected for biodiversity.	Fall in areas of land specifically dedicated to and protected for biodiversity.	Consider whether the fall in the areas of dedicated land has been offset by more effective use of the area of land that remains for biodiversity. If not, consider a review of how the policies have been applied.
<b>LPC07 - Greenways</b>	Amount of greenways	St.Helens Council	Net gains over Plan period.	Unexpected specific losses.	Review how the policy is being applied, whether any means exist of preventing or mitigating any loss.
<b>LPC08 - Ecological Network</b>	Quantity and extent of additional land contributing to the ecological network as a result of planning permissions	Development management processes	Net gains since previous assessment.	Fall in areas of land specifically dedicated to and protected for the ecological network.	Initiate creation of an updated Nature Conservation SPD. Review Local Plan policy.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	granted.				
<b>LPC09 - Landscape Protection</b>	Number of developments allowed on appeal that had been initially refused on landscape character grounds.	Development management processes	No appeals lost.	Failure to prevent appeals being lost where initial refusal was on grounds of landscape character.	Not yet determined, potential review of Local Plan policy.
<b>LPC10 - Trees and Woodland</b>	Loss of trees and/or woodland as a result of development proposals	Development management processes	Justifiable losses replaced on a 2 for 1 ratio.	Failure to secure suitable replacements.	Review how the policy is being applied, whether any means exist of preventing or mitigating any loss, potential review of Local Plan policy.
	Total area of Ancient Woodland	St.Helens Council, development management process.	No loss.	Unexpected specific loss.	Review how the policy is being applied, whether any means exist of preventing or mitigating any loss, potential review of Local Plan policy.
<b>LPC11 - Historic Environment</b>	Number of Heritage Assets on Historic England's 'At Risk' register. Number of heritage assets at risk on St. Helen's Local List of Heritage Assets (once established).	St.Helens Council, Heritage England	Reduction in the number of heritage assets on the Historic England's 'At Risk' register. Reduction in the number of heritage assets considered to be "at risk" on the local list of heritage assets once established.	Identification of a heritage asset newly listed on "at risk" register. Periodic increase in the number of heritage assets on the "at risk" register in the Borough. Identification of a locally listed heritage asset that could be at	Consider how the Council can contribute to measures to improve the condition of the "at risk" heritage assets. Consider whether the policy is contributing to the neglect of heritage assets, and if so, consider whether the policy should be reviewed.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
				risk through periodic review.	
<b>LPC12 - Flood Risk</b>	Number of planning applications granted permission for inappropriate development in Flood Risk Zones 2 and 3.	St.Helens Council, Local Lead Flood Authority Officer, Environment Agency	No planning applications granted permission for inappropriate development in Flood Zones 2 and 3.	Planning applications for inappropriate development in Flood Risk Zones 2 and/or 3 granted planning permission contrary to Environment Agency advice.	Review how the policy is being applied.
<b>LPC13 - Renewable and Low Carbon Development</b>	Amount of grid connected renewable energy by type	St.Helens Council, development management process.	Increase from start of Plan period.	Not yet determined	To be determined
	Number and capacity of permitted and installed renewable energy developments featuring: - large scale biomass energy - energy from waste - micro-wind turbines and roof mounted wind turbines - roof mounted solar technologies (including photovoltaic arrays and hot water panels) - heat pumps	St.Helens Council, development management process, Department for Business, Energy & Industrial Strategy	To contribute towards the achievement of set national targets for renewable energy (15% by 2020) and reduction of CO2 emissions (80% by 2050).	Not yet determined	To be determined

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	(ground source, air source and water source), - individual biomass boilers				
	Number and capacity of permitted/installed wind turbines	Development management process	No target set - monitor	Not yet determined	To be determined
<b>LPC14 - Minerals</b>	Number of operational mineral extraction and recycling units	St.Helens Council, development management process, Merseyside Environmental Advisory Service (MEAS)	Sub-regional needs are met.	Not yet determined	To be determined
<b>LPC15 - Waste</b>	See Indicators within the Merseyside and Halton Joint Waste Local Plan	Merseyside Environmental Advisory Service (MEAS)	N/A	N/A	N/A
<b>LPD01 - Ensuring Quality Development in St.Helens</b>	Level of road traffic growth	St.Helens Council, Merseytravel, Liverpool City Region, Highways England	Road traffic and growth for cars – same or lower than the national average (ownership and use)	Not yet determined	To be determined
	Cycling and pedestrian counts	St.Helens Council	Increase in yearly cycling and pedestrian counts.	Not yet determined	To be determined
	Reduction in crime	Crime Survey conducted by Office for National Statistics	Reduction on previous year's.	Not yet determined	To be determined
	Protection of	St.Helens	No loss of the	Unexpected	Review how the

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	the best and most versatile land from development (Grades 1, 2, and 3a)	Council (development management process).	best and most versatile land unless justified by the benefits of the development.	loss of land not proposed for development in the Local Plan.	policy is being applied, whether any means exist of preventing or mitigating any loss not already covered by Policy. Potential review of Policy.
	Number of applications including a Ground Stability Report Number of applications including a Contaminated Land Report	Development management processes	No target set – monitor number of applications approved against the recommendations of Ground Stability Report or Contaminated Land Report.	Not yet determined	To be determined
<b>LPD02 - Design and Layout of New Housing</b>	Number of applications approved contrary to policy	Development management processes	None – there should be 100% compliance with policy.	Failure to prevent appeals being lost where initial refusal was on grounds of design and layout.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
	Number of new residential developments with incorporated cycle and waste storage	Development management processes	100% - development should comply with policy.	Provision or contributions are below policy requirements.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
<b>LPD03 - Open Space and Residential Development</b>	Amount of open space gained, and lost to other uses, measured both by number and type of facilities, and by amount of space of each	St.Helens Council, Sport England, sports clubs, schools and developers	Net gains in open space provision.	Unexpected specific losses of facilities (without like for like replacement or enhancement	Review how the policy is being applied, whether any means exist of preventing or mitigating any loss.



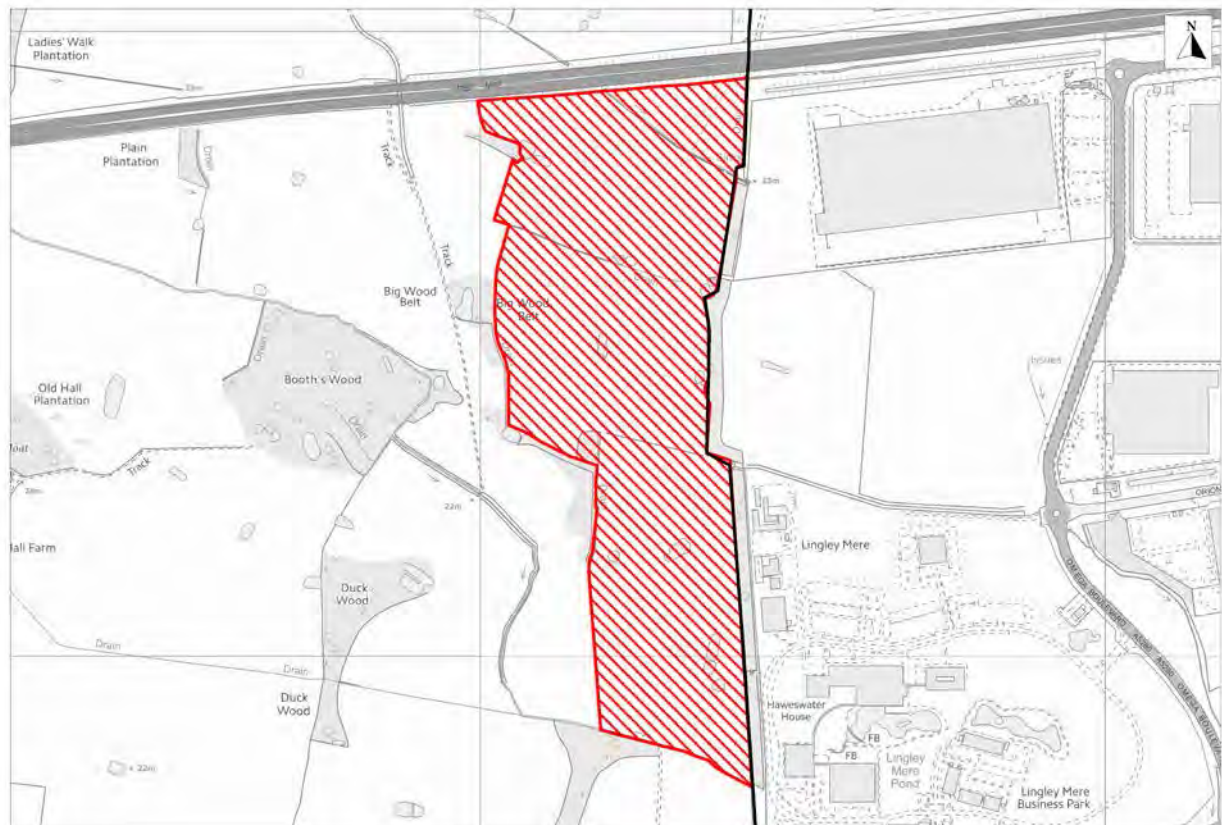
POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	type (with reference to the typology used in the Open Space Study).			).	
	Development resulting in a net loss of open space (contrary to policy)	Development management processes	No loss of open space.	Unexpected specific losses of open space (without like for like replacement or betterment).	Review how the policy is being applied.
	Number of applications approved with contributions towards open space provision: • on-site; • off-site; and • financial contributions collected for open space	Development management processes	All new residential development of 40 or more dwellings to provide new open space, or the expansion or enhancement of existing open space provision.	Provision or contributions are below policy requirements.	Review how the policy is being applied, the age and circumstances of the planning permissions where the target was not met; if the policy has been applied accurately, consider whether the policy needs to be reviewed.
<b>LPD04 - Householder Developments</b>	Developments allowed on appeal which were refused on amenity grounds	Development management processes	No appeals lost.	Failure to prevent appeals being lost where initial refusal was on grounds of amenity.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
	Developments allowed on appeal which were refused on highway safety grounds	Development management processes	No appeals lost.	Failure to prevent appeals being lost where initial refusal was on grounds of highway	Review how the policy is being applied, consider whether the policy needs to be reviewed.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
				safety.	
<b>LPD05 – Development in Green Belt.</b>	Number of developments permitted in very special circumstances in accordance with national policy within the Green Belt	Development management processes	No development permitted except for that complying with very special circumstances in accordance with national policy.	Failure to prevent appeals being lost where initial refusal was on Green Belt grounds.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
<b>LPD06 – Development in Gateway Corridors</b>	Developments allowed on appeal which were refused on design grounds	Development management processes	No appeals lost.	Failure to prevent appeals being lost where initial refusal was on grounds of design.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
<b>LPD07 - Digital Communications</b>	% of premises capable of accessing Next Generation speeds across St.Helens	St.Helens Council, Liverpool City Region (LCR)	Increase in number per annum, ultimately 95% of all premises to have access to superfast broadband.	Not yet determined	To be determined
<b>LPD08 - Advertisements</b>	Number of applications permitted that introduce visually obtrusive features or impact on the amenity of road users (including pedestrian and cycle traffic)	St.Helens Council	100% compliance with policy No applications permitted that introduce visually obtrusive features or impact on the amenity of road users (including pedestrian and cycle traffic)	Failure to prevent appeals being lost where initial refusal was on grounds of visual obtrusiveness.	Review how the policy is being applied, consider whether the policy needs to be reviewed.
<b>LPD09 - Air Quality</b>	All development in designated AQMAs should	St.Helens Council (Environment	Development proposals in designated AQMAs should	Planning applications or appeals granted	Review how the policy is being applied, consider whether the

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	ensure consistency with the relevant Air Quality Action plan	al Health)	not result in a worsening of air quality and where possible improve it.	planning permission contrary to Policy.	policy needs to be reviewed.
<b>LPD10 - Food and Drink</b>	Number of hot food takeaways permitted contrary to criteria set out in policy	Development management processes	None – there should be 100% compliance with policy.	Planning applications or appeals granted planning permission contrary to the set criteria.	Review how the policy is being applied; consider whether the policy needs to be reviewed.

## Appendix 5: Site Profiles – Allocated Housing and Employment Sites

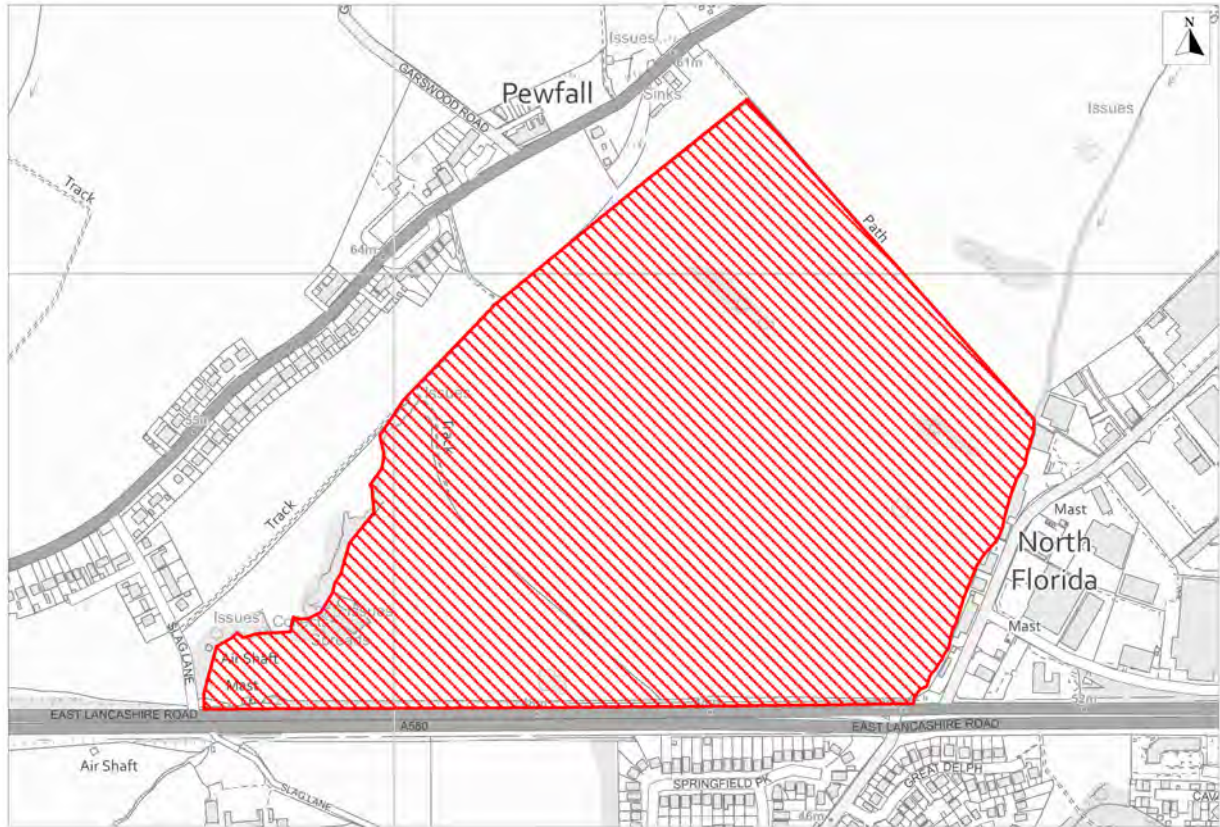
<b>LPSD Ref:</b>	<b>1EA - Omega South Western Extension, Land North of Finches Plantation, Bold</b>	<b>Ward:</b>	<b>Bold</b>
<b>Notional Capacity:</b>	<b>31.22ha</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Appropriate highway access via the existing Omega South development.
- Implementation of any measures required to mitigate impacts on the M62 (Junction 8) or other parts of the highway network.
- Measures to secure suitable access to the site by walking, cycling and public transport from residential areas in St Helens and Warrington.

<b>LPSD Ref:</b>	<b>2EA - Land at Florida Farm North, Slag Lane, Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>36.37ha</b>	<b>Designation:</b>	<b>Allocate</b>

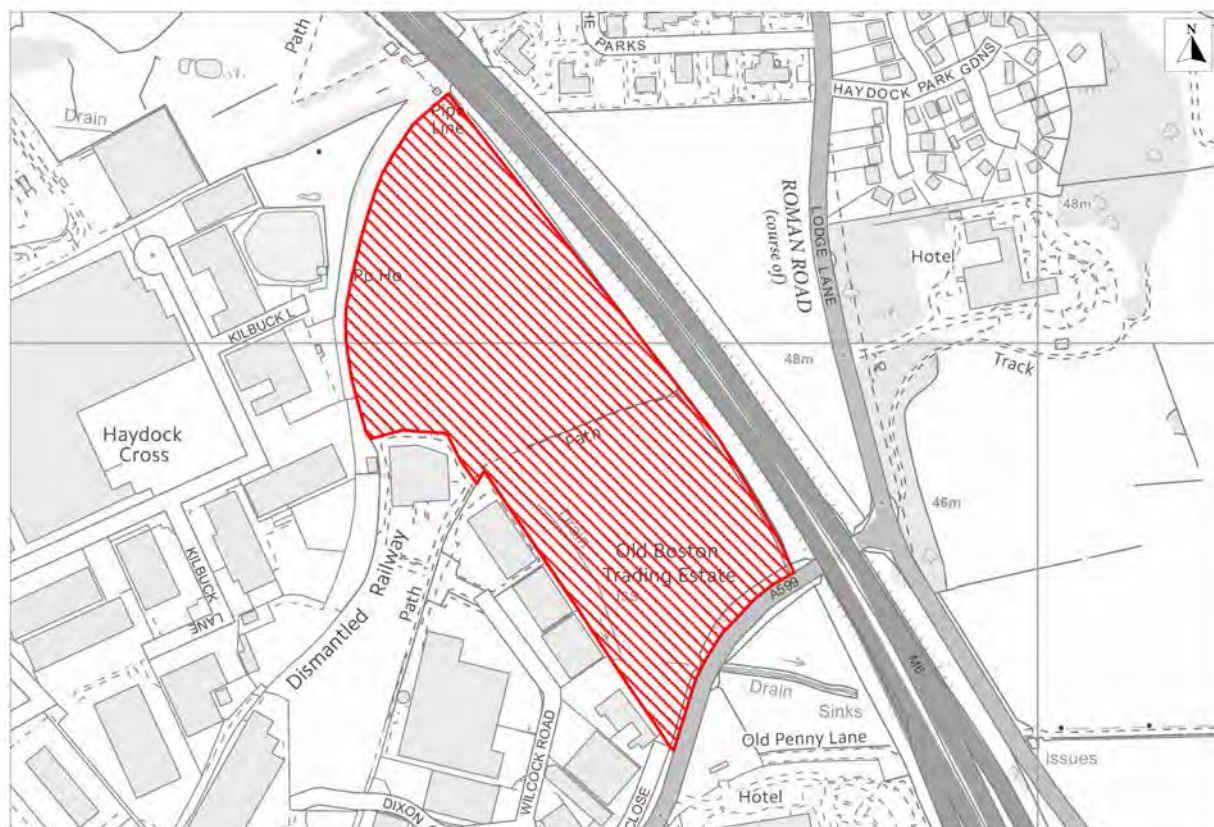


#### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2016/0608/HYBR, granted in 2017.



<b>LPSD Ref:</b>	<b>3EA - Land North of Penny Lane, Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>11.05ha</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission – reference P/2015/0571/HYBR) granted in July 2015, and with a reserved matters application (Ref: P/2018/0476/Res) pending consideration as of October 2018.

<b>LPSD Ref:</b>	<b>4EA - Land South of Penny Lane, Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>2.16ha</b>	<b>Designation:</b>	<b>Allocate</b>

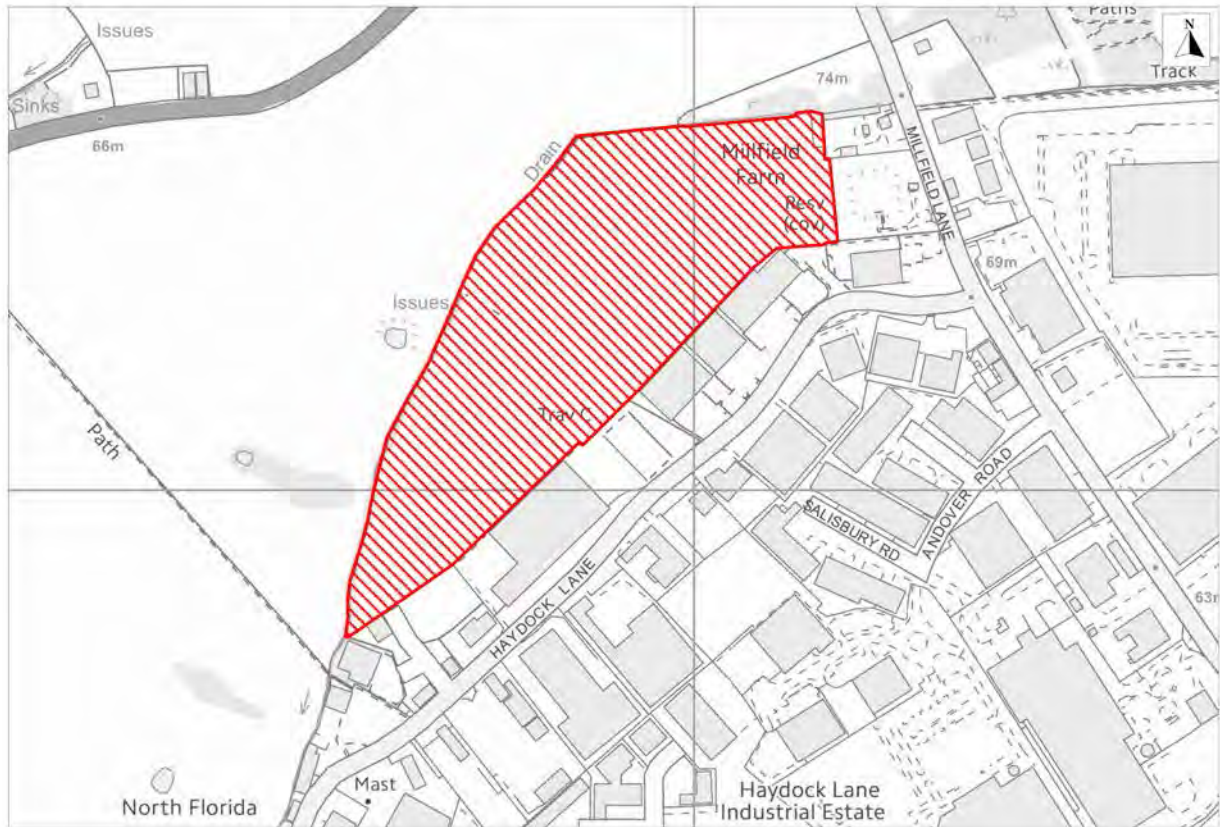


#### Requirements:

- Safe highway access can be provided off the A599 (Penny Lane).
- The design and layout of the development must integrate well with that of the surrounding area.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.



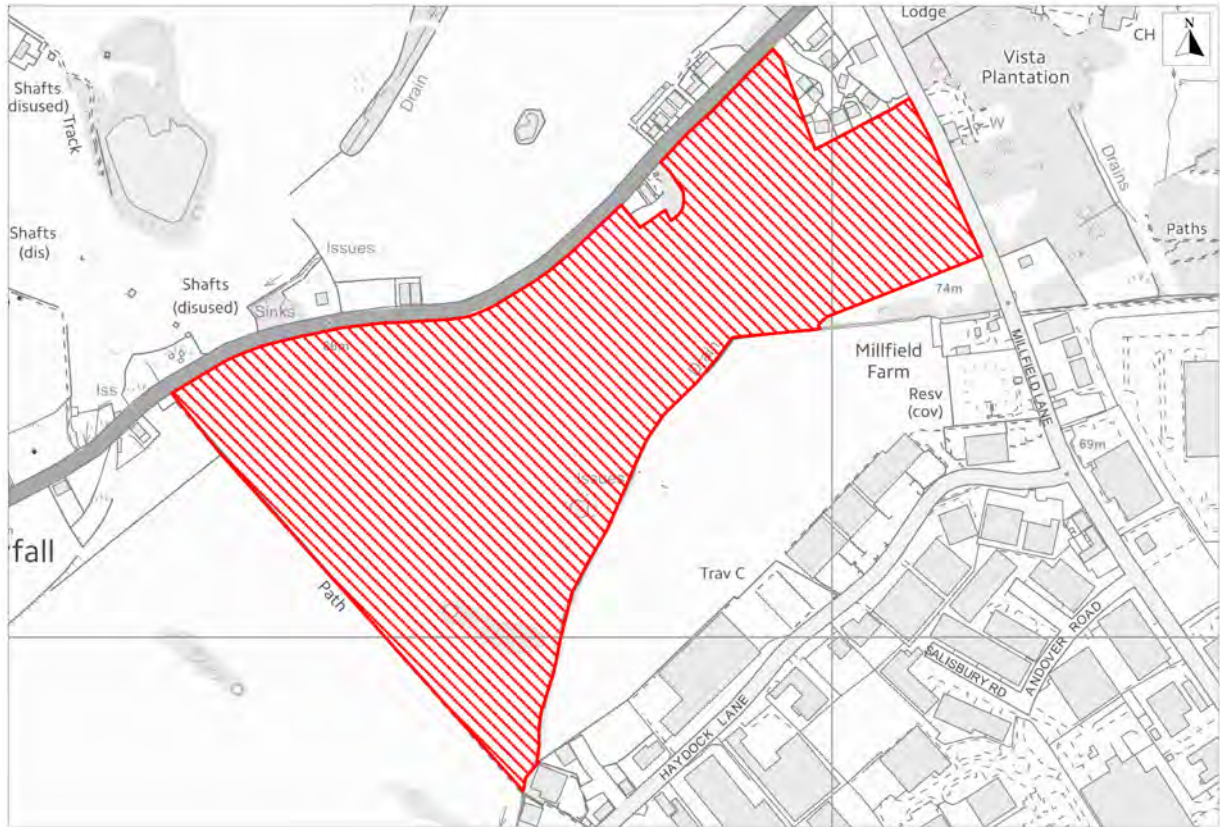
<b>LPSD Ref:</b>	<b>5EA - Land to the West of Haydock Industrial Estate, Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>7.75ha</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Due consideration to be given to neighbouring Millfield Service Reservoir and pressurised distribution main.
- Site falls within a consultation distance of a major hazard pipeline, therefore Essar Oil (UK) Ltd. need to be consulted.
- Safe highway access can be gained through neighbouring allocated sites 2EA and 6EA.
- Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network.
- The design and layout of the development must integrate well with that of the surrounding area.

<b>LPSD Ref:</b>	<b>6EA - Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>20.58ha</b>	<b>Designation:</b>	<b>Allocate</b>

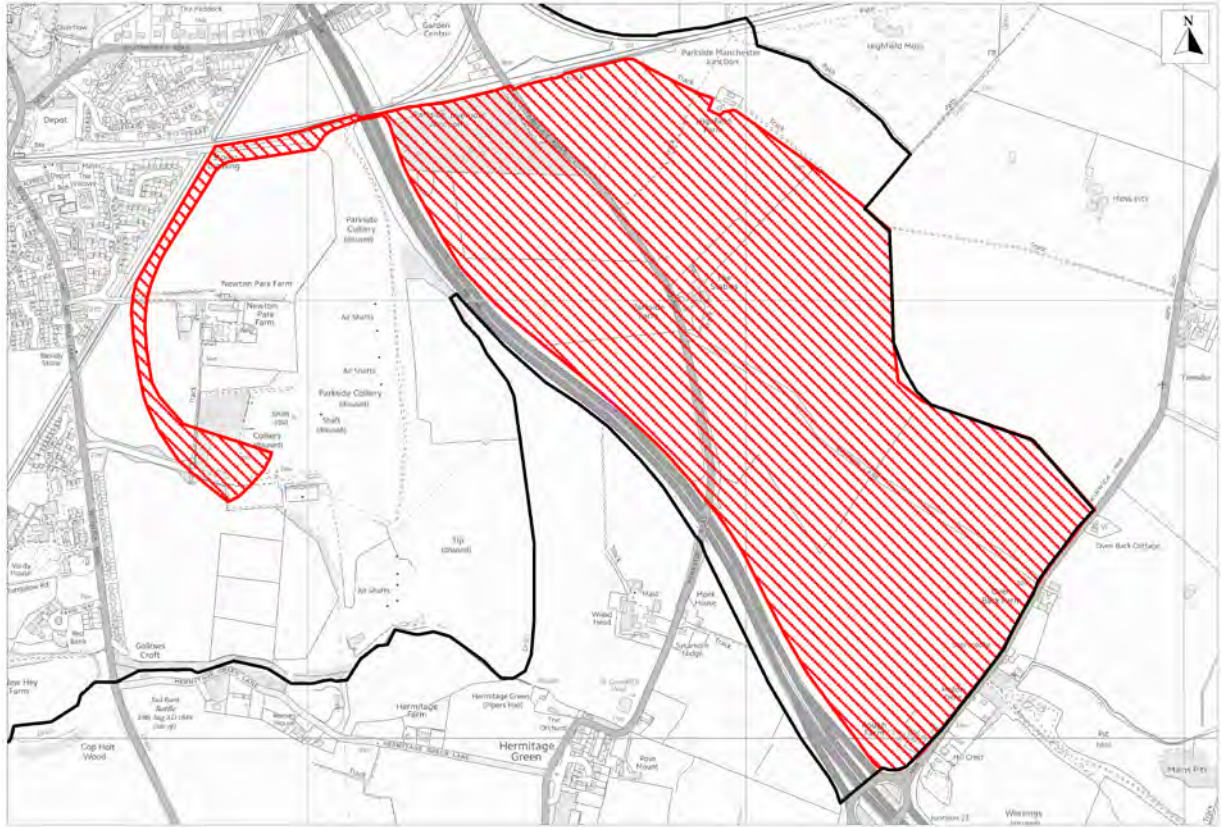


### Requirements:

- Appropriate highway access via Millfield Lane and allocated 2EA site;
- Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network.
- The design and layout of the development must integrate well with that of any existing or approved development within allocated sites 4EA and 6EA.
- Provision of effective flood management measures for Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.



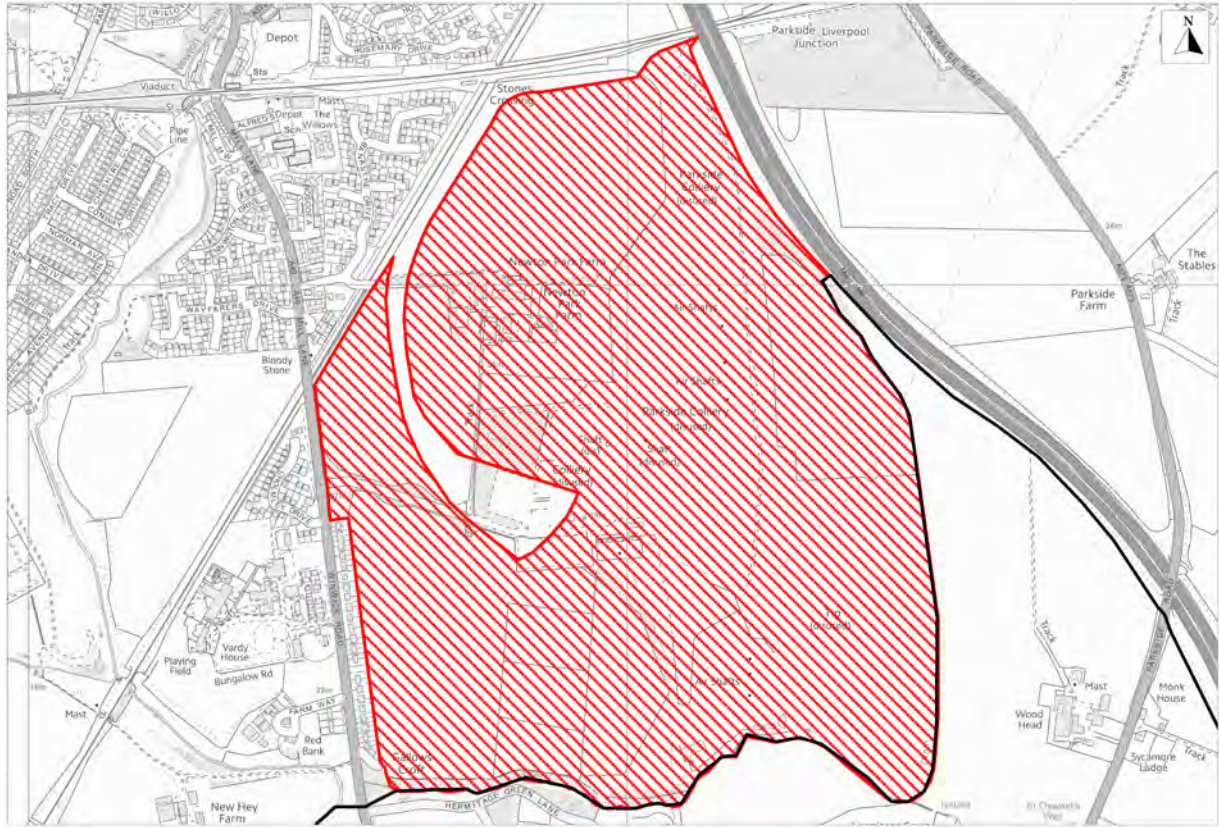
<b>LPSD Ref:</b>	<b>7EA - Parkside East, Newton-le-Willows</b>	<b>Ward:</b>	<b>Newton</b>
<b>Notional Capacity:</b>	<b>64.55ha</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- See Policy LPA10

<b>LPSD Ref:</b>	<b>8EA - Parkside West, Newton-le-Willows</b>	<b>Ward:</b>	<b>Newton</b>
<b>Notional Capacity:</b>	<b>79.57ha</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Access to an initial phase of development can be provided off the A49 (Winwick Road).
- Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).
- The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.
- Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the

surrounding area.

- Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.
- The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.



<b>LPSD Ref:</b>	<b>9EA - Land to the West of Sandwash Close, Rainford</b>	<b>Ward:</b>	<b>Rainford</b>
<b>Notional Capacity:</b>	<b>6.96ha</b>	<b>Designation:</b>	<b>Allocate</b>



#### **Requirements:**

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2006/115, and subsequent planning permission reference P/2009/1046, granted in January 2010.

<b>LPSD Ref:</b>	<b>10EA - Land at Lea Green Farm West, Thatto Heath</b>	<b>Ward:</b>	<b>Thatto Heath</b>
<b>Notional Capacity:</b>	<b>3.84ha</b>	<b>Designation:</b>	<b>Allocate</b>

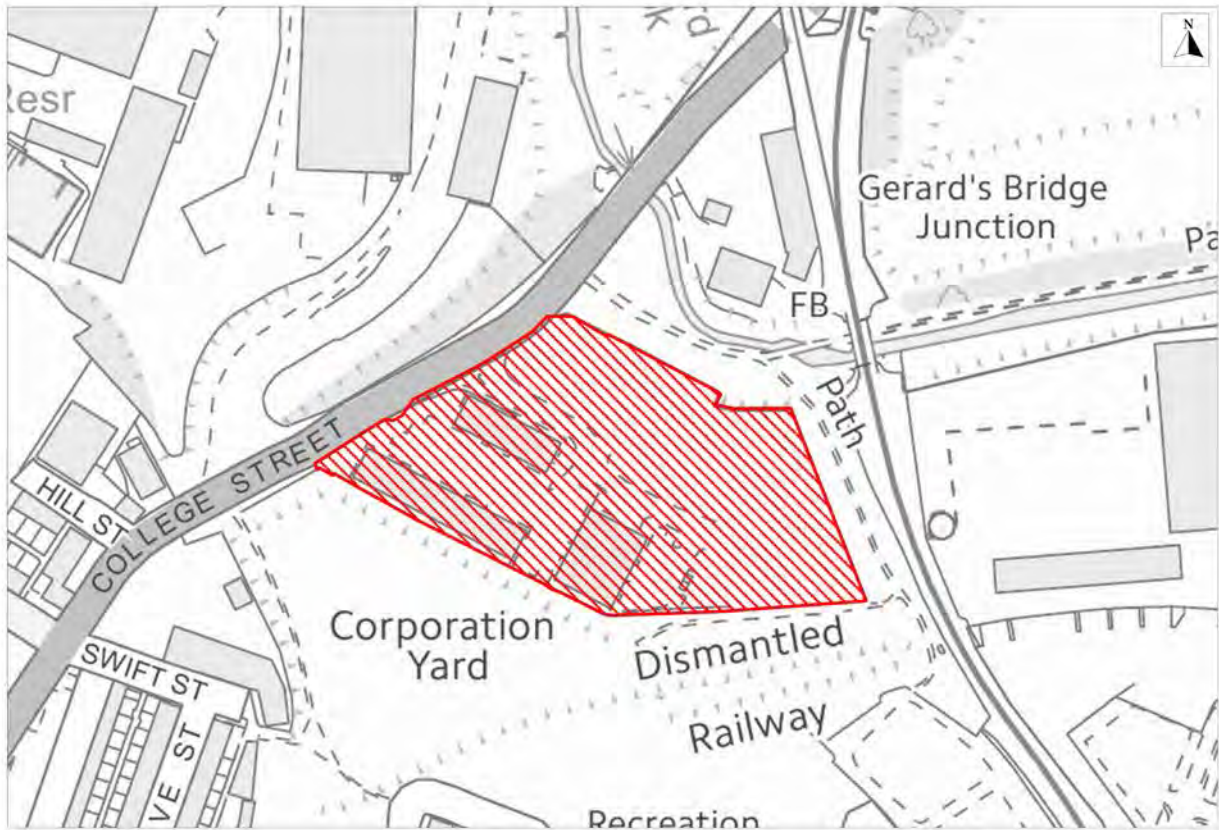


#### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2016/0567/HYBR, granted in November 2016.



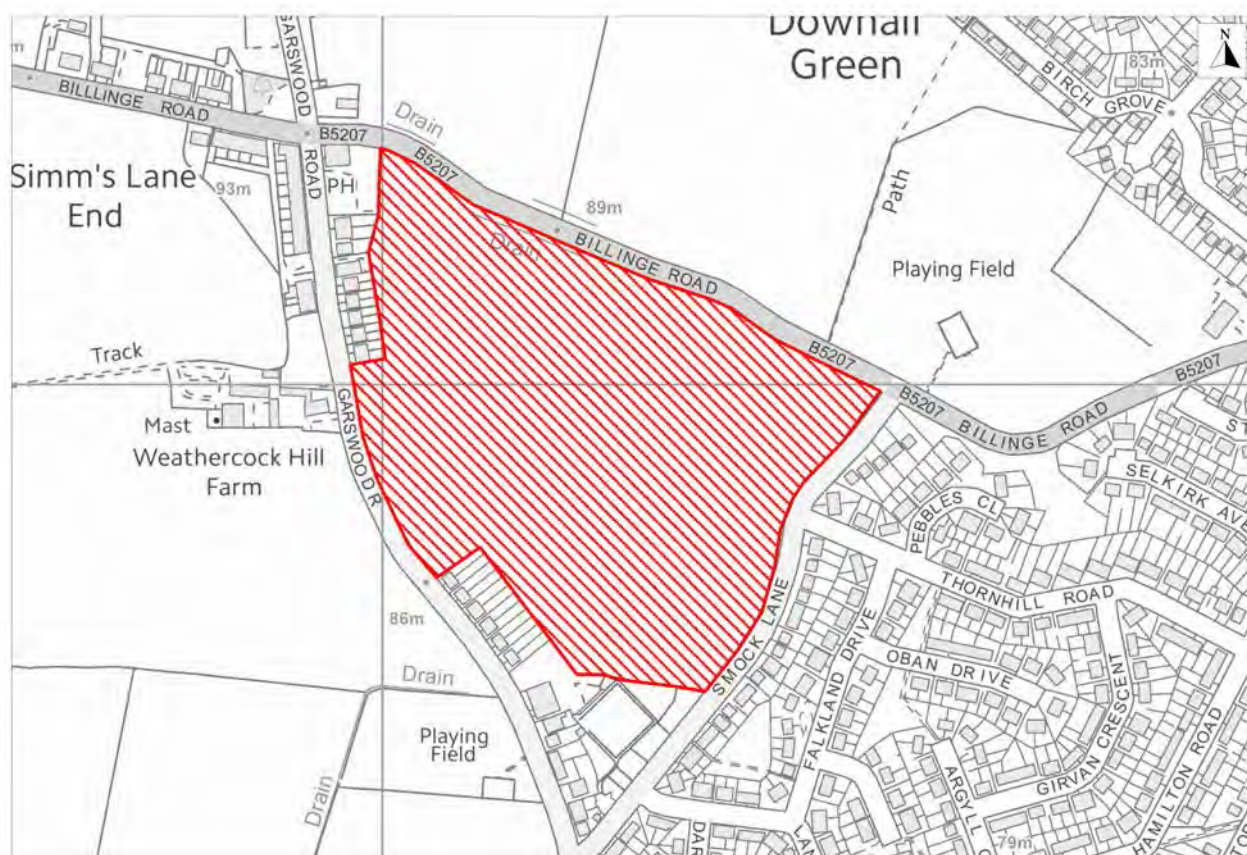
<b>LPSD Ref:</b>	<b>11EA - Land at Gerards Park, College Street, St. Helens Town Centre</b>	<b>Ward:</b>	<b>Town Centre</b>
<b>Notional Capacity:</b>	<b>0.95ha</b>	<b>Designation:</b>	<b>Allocate</b>



#### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2016/0903/FUL, granted in May 2017.

<b>LPSD Ref:</b>	<b>1HA - Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood</b>	<b>Ward:</b>	<b>Billinge &amp; Seneley Green</b>
<b>Notional Capacity:</b>	<b>216 units</b>	<b>Designation:</b>	<b>Allocate</b>

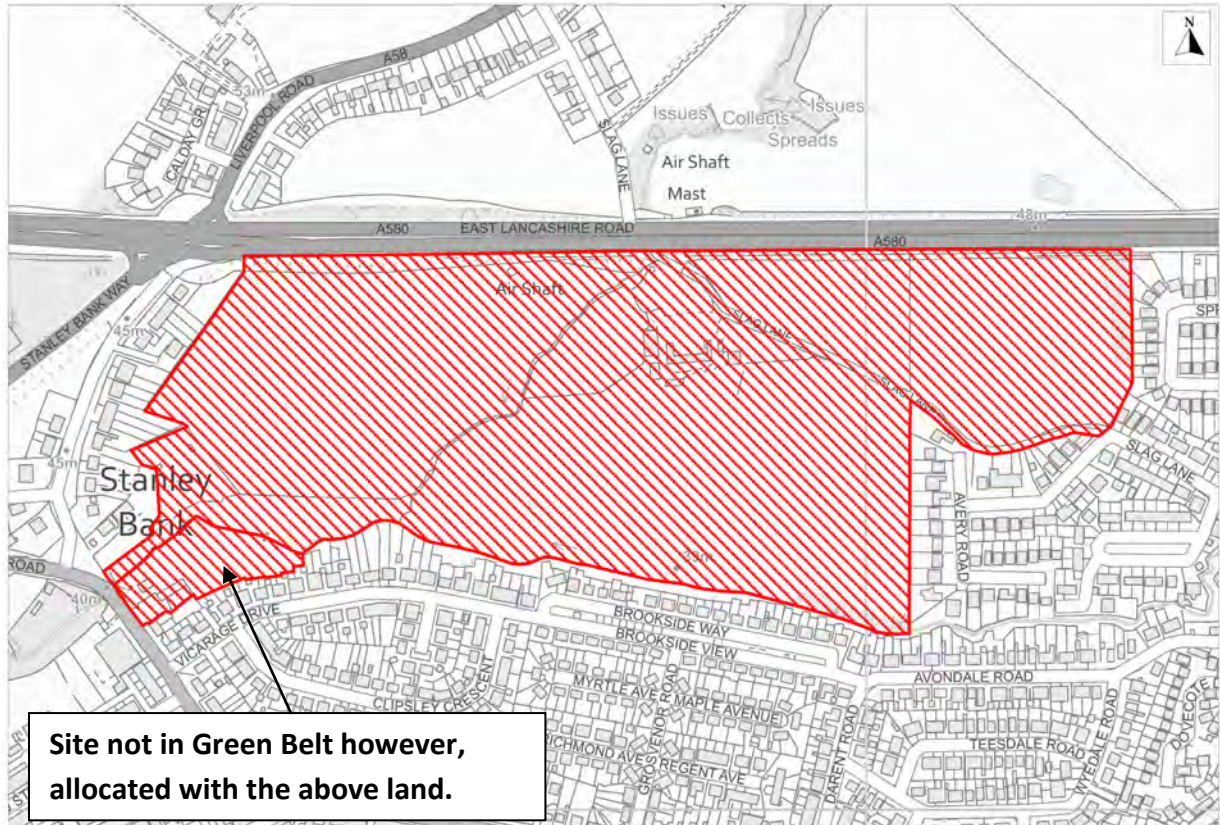


#### Requirements:

- Safe highway access should be provided from Garswood Road and / or Billinge Road (with any necessary off-site improvements).
- Pedestrian and cycle access should be provided through the site to the wider area.
- Provision of effective flood management measures to reduce the risk of flooding caused by overland flow.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



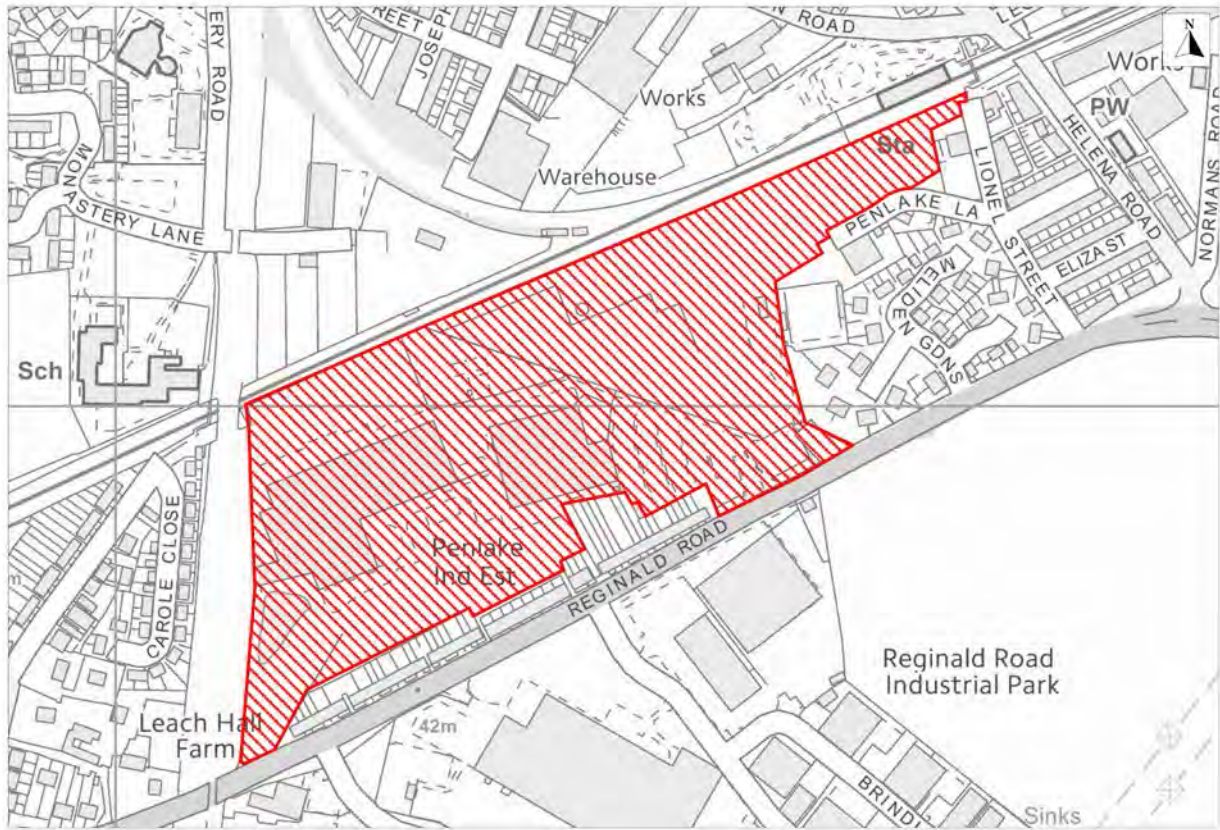
<b>LPSD Ref:</b>	<b>2HA - Land at Florida Farm (South of A580), Slag Lane, Blackbrook</b>	<b>Ward:</b>	<b>Blackbrook &amp; Haydock (area outside Green Belt)</b>
<b>Notional Capacity:</b>	<b>522 units</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Highway access should be provided via a primary access from Vicarage Road (with any necessary off-site improvements to this) and a left-in, left-out access from the A580 East Lancashire Road.
- Pedestrian and cycleway access will be required onto Haydock Lane via Slag Lane.
- Provision of effective flood management measures for Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.
- Financial contributions for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.

<b>LPSD Ref:</b>	<b>3HA - Former Penlake Industrial Estate, Reginald Road, Bold</b>	<b>Ward:</b>	<b>Bold</b>
<b>Notional Capacity:</b>	<b>337 units</b>	<b>Designation:</b>	<b>Allocate</b>

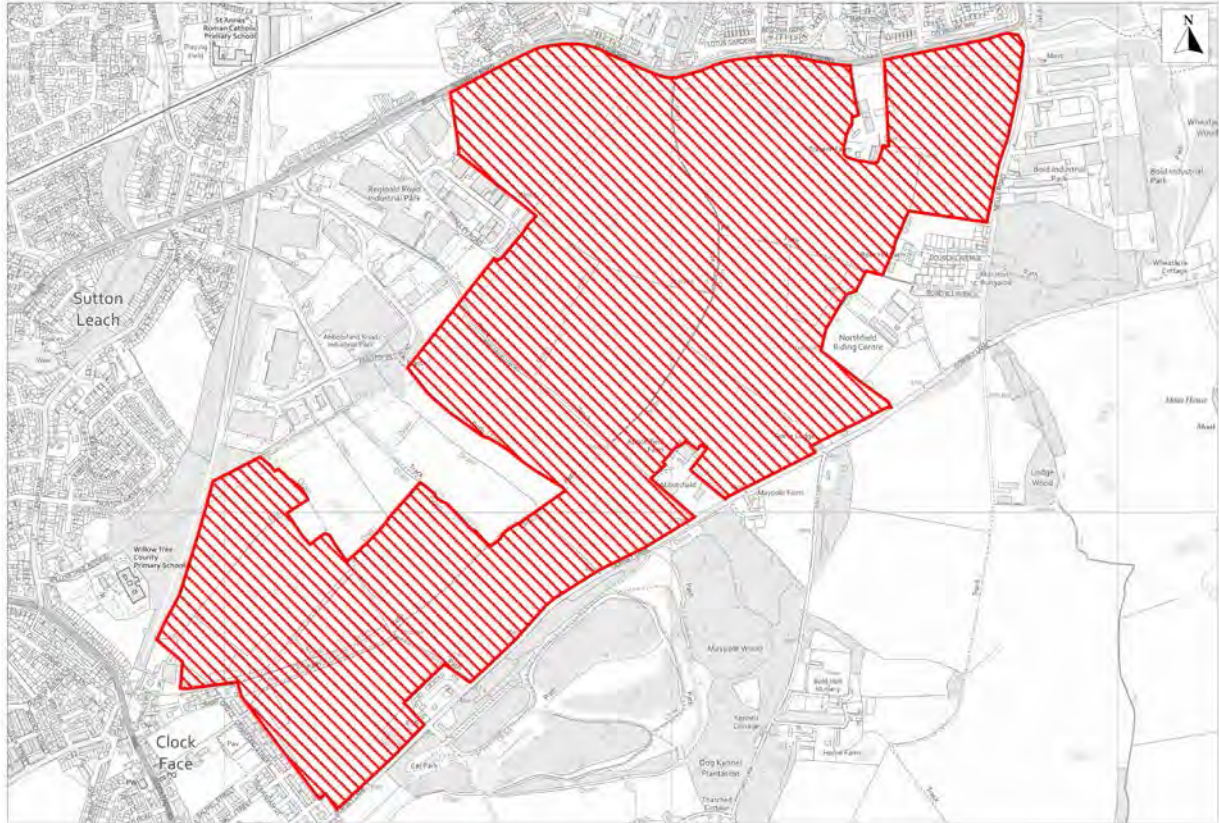


#### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2015/0130, granted on 11 December 2015.



<b>LPSD Ref:</b>	<b>4HA - Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb)</b>	<b>Ward:</b>	<b>Bold</b>
<b>Notional Capacity:</b>	<b>2,988 units</b>	<b>Designation:</b>	<b>Allocate</b>



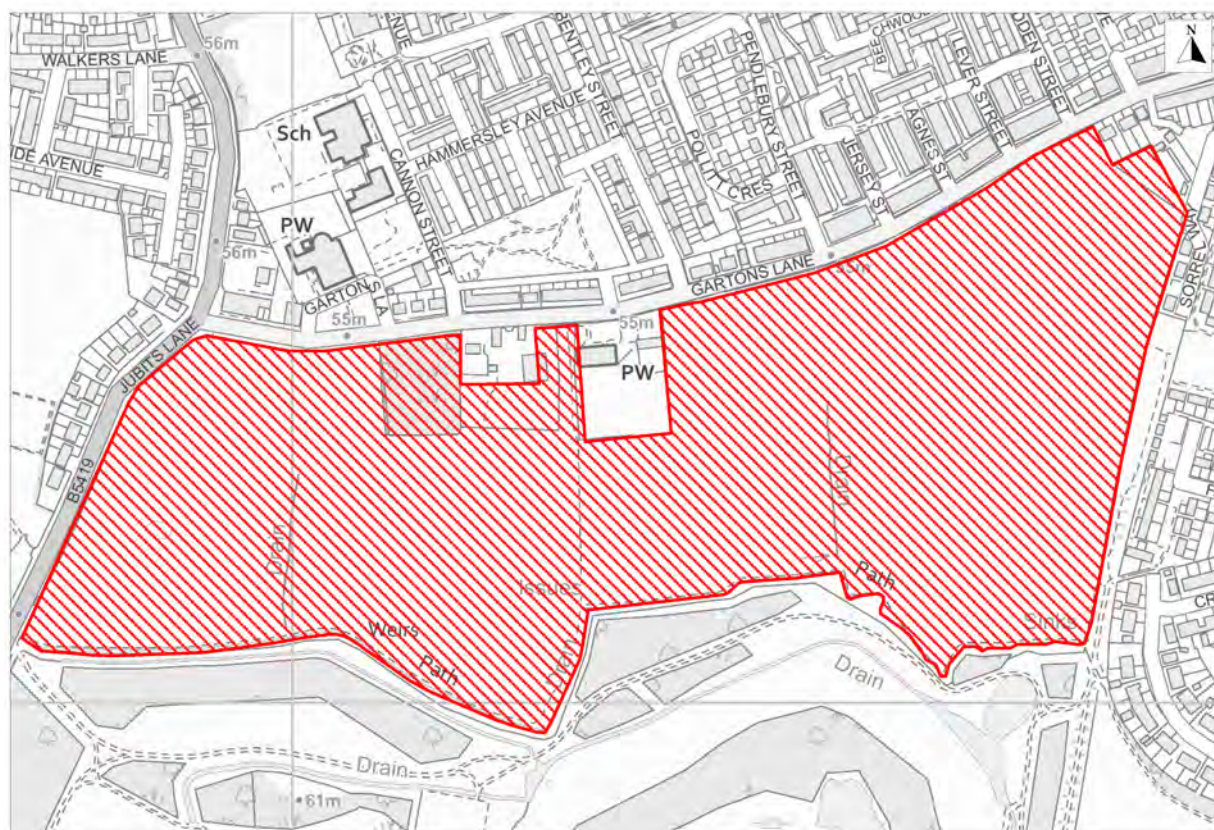
### Requirements:

- The development must be consistent with the vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (BFPAAP).
- The development must provide a well landscaped setting including extensive green links through and around the site, and tree planting to reduce impact on the landscape and promote the objective of the BFPAAP to increase tree cover by 30% across the Bold Forest as a whole.
- Any adverse impacts on biodiversity interests within the existing Local Wildlife Site (LWS 108 as indicated on the Policies Map) and the proposed extension to this must be either avoided or minimised. Any resultant harm must be adequately mitigated.
- The development must create a permeable layout with a range of highways provided through the site with access via the B5204, Neills Road and Gorsey Lane. The layout

must be compatible with the provision of a bus service through the site between Clock Face and St Helens Junction

- The development must also provide a choice of foot, bridleway, and cycle routes through the site to facilitate access between homes, workplaces, recreational facilities, and other key services in the area. These must where necessary be segregated to ensure safety and include new provision in line with policy INF6 “Creating an Accessible Forest Park” of the Bold Forest Park Area Action Plan 2017.
- Financial contributions or the provision of on-site infrastructure for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.
- The layout must avoid causing excessive noise or disturbance to occupiers of existing dwellings and businesses within or around the site and for users of walking and cycling routes and open spaces.

<b>LPSD Ref:</b>	<b>5HA - Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold</b>	<b>Ward:</b>	<b>Bold</b>
<b>Notional Capacity:</b>	<b>569 units</b>	<b>Designation:</b>	<b>Allocate</b>

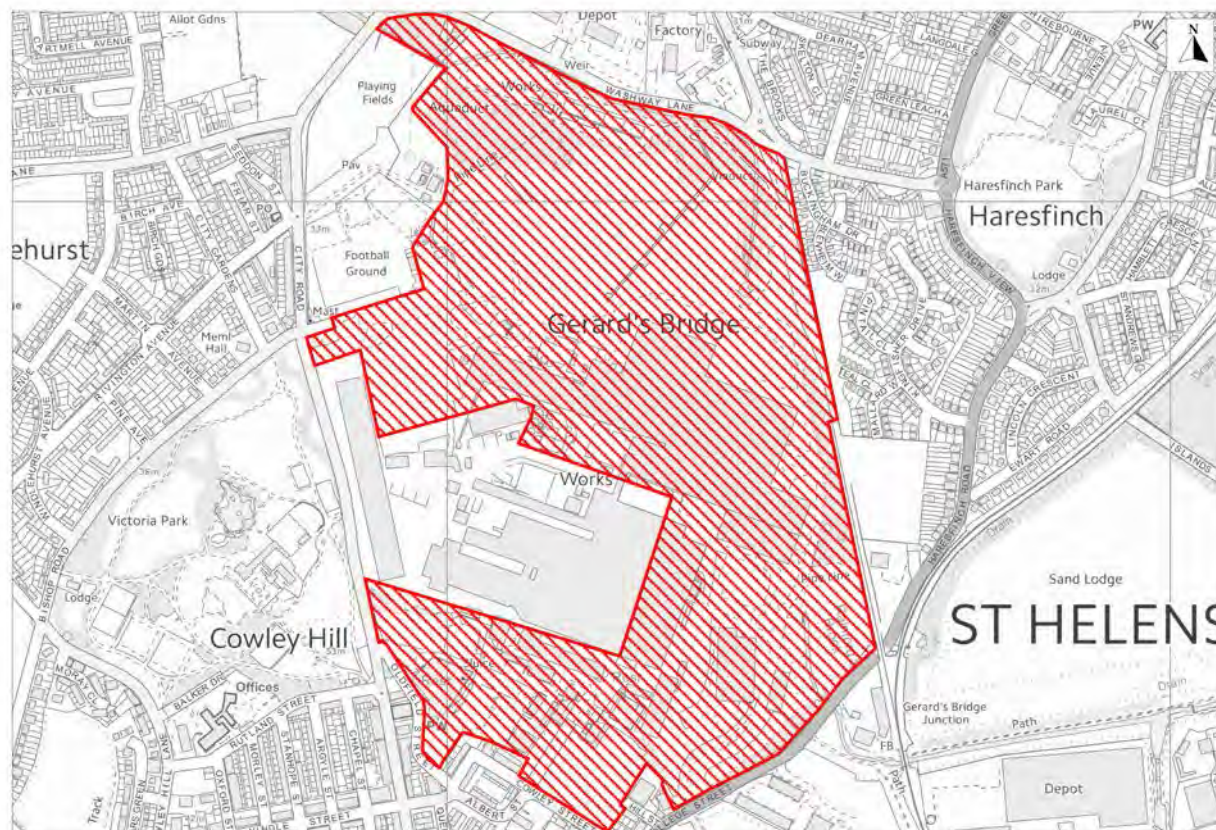


### Requirements:

- The master plan should preferably incorporate the former St. Teresa's Social Club site.
- Appropriate highway access should be provided via Jubits Lane and Gartons Lane, together with a suitable internal road network.
- The development should integrate well into the Bold Forest Park setting and provide satisfactory pedestrian, bridleway and cycleway access into the Forest Park.
- The developer would be expected to fund the provision of a suitable access road to the car park area in the adjacent Bold Forest Park, as well as utility service connections.
- Financial contributions for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.



<b>LPSP Ref:</b>	<b>6HA - Land at Cowley Street, Cowley Hill, Town Centre</b>	<b>Ward:</b>	<b>Moss Bank</b>
<b>Notional Capacity:</b>	<b>816 units</b>	<b>Designation:</b>	<b>Allocate</b>



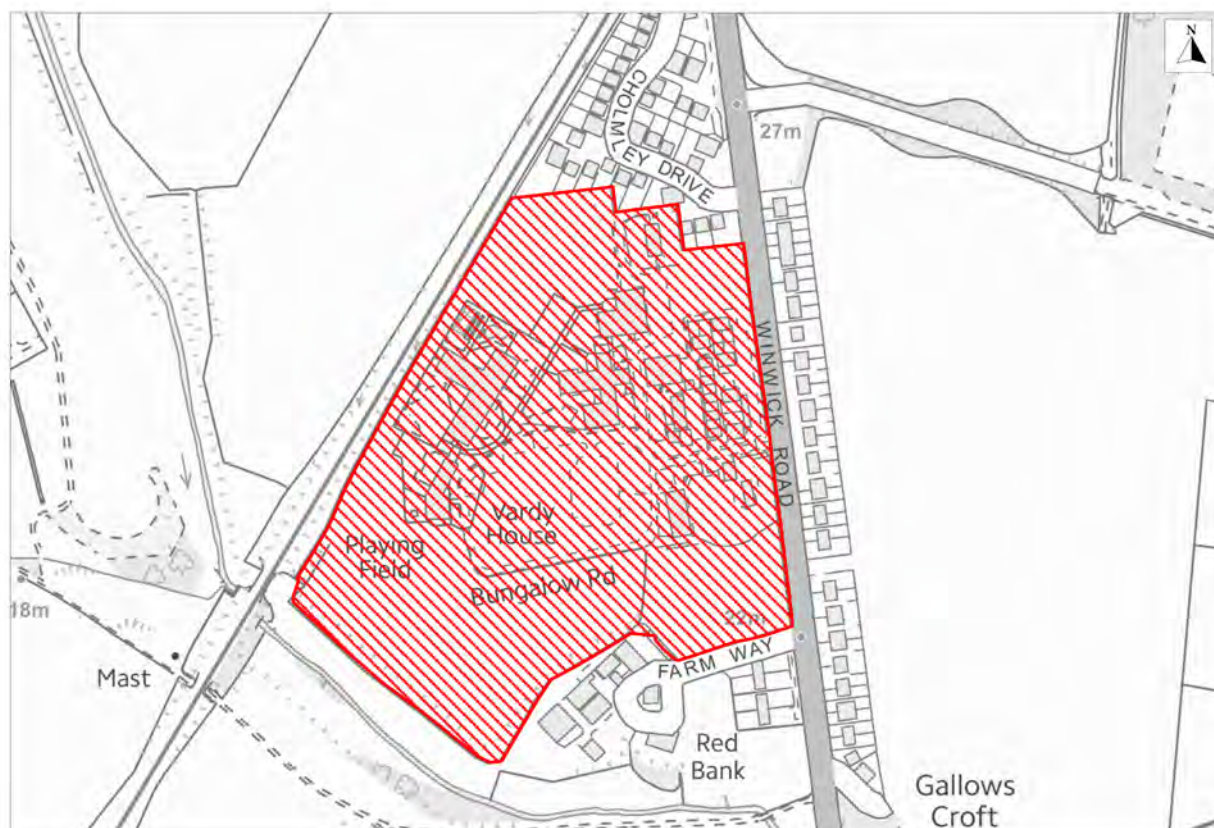
#### Requirements:

- Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).
- A Green corridor, incorporating the LWS47, should be provided from the north around the eastern boundary of the site linking the green spaces and habitats along Rainford Brook and the wider greenway network.
- Measures to 'slow the flow' and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 'flood Risk and Water Management'.
- The development should include appropriate measures to attenuate noise from the adjacent employment use(s).
- The development area allows for the inclusion of 4ha of B1 employment uses (if this

is not implemented this will make more land available for housing).

- Any development should address any contamination issues and/or other geo-technical issues affecting the site.
- Related to the above, site levels should be carefully considered in relation to the site layout and surrounding area.
- The design and layout of the development should provide for a range of house types in character areas.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.

<b>LPSD Ref:</b>	<b>7HA - Land West of the A49 Mill Lane and to the East of the West Coast Mainline Railway Line, Newton-le-Willows</b>	<b>Ward:</b>	<b>Newton</b>
<b>Notional Capacity:</b>	<b>181 units</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Safe highway access should be provided from Winnick Road (with any necessary off-site improvements).
- Appropriate noise attenuation measures, including buffers, should be incorporated to protect new residents from unacceptable noise levels from the adjoining railway line and adjacent farm activities.
- Provision of effective flood management measures to reduce the risk of flooding.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Existing protected trees within the site should be given due consideration in line with Policy LPC10.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



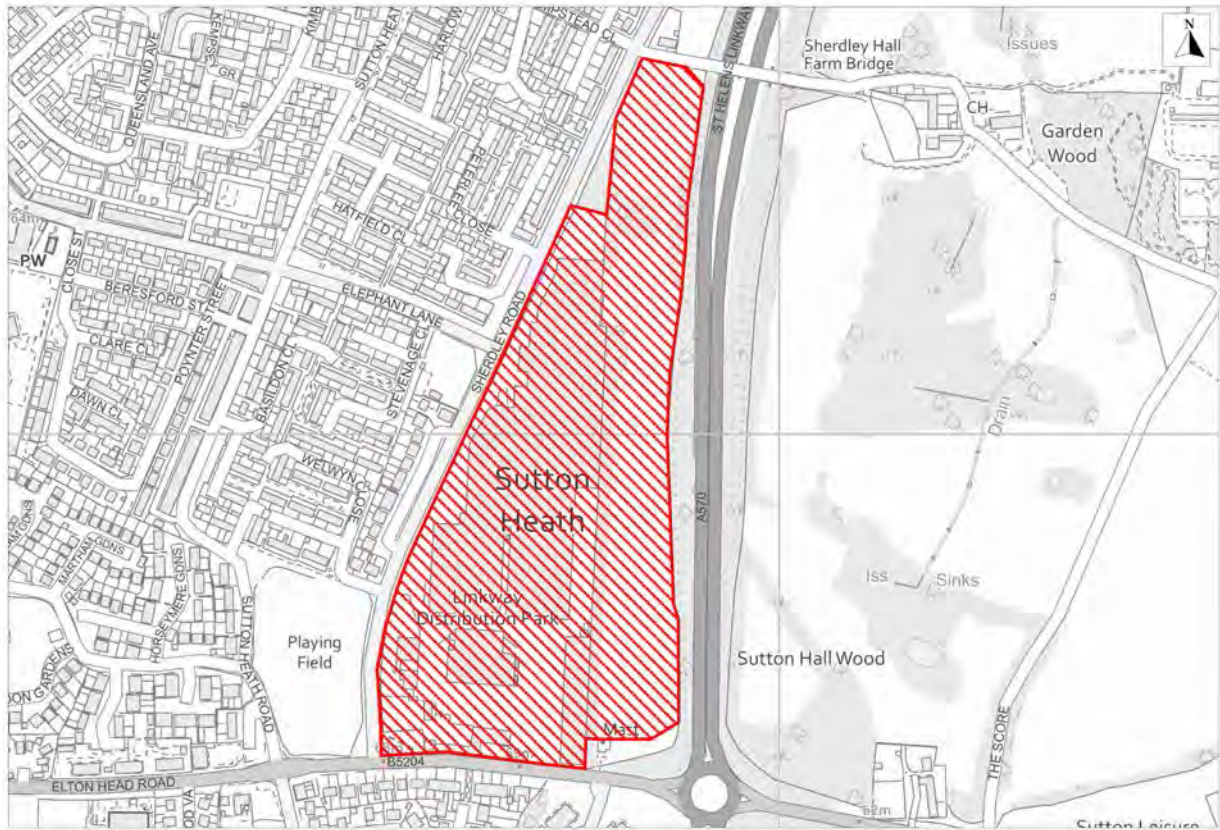
<b>LPSD Ref:</b>	<b>8HA - Land South of Higher Lane and East of Rookery Lane, Rainford</b>	<b>Ward:</b>	<b>Rainford</b>
<b>Notional Capacity:</b>	<b>259 units</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Safe highway access should be provided from both Rookery Lane and Higher Lane (with any necessary off-site improvements).
- Appropriate noise attenuation measures, should be incorporated to protect new residents from unacceptable noise levels from the adjoining industrial area.
- A flood attenuation feature and habitat creation (similar to existing woodland to the south-east of the site) would be required along the south -western boundary with Rainford Linear Park (minimum 25m).
- Existing protected trees within the site should be given due consideration in line with Policy LPC10.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.

<b>LPSD Ref:</b>	<b>9HA - Land at former Linkway Distribution Park, Elton Head Road, Thatto Heath</b>	<b>Ward:</b>	<b>Thatto Heath</b>
<b>Notional Capacity:</b>	<b>350 units</b>	<b>Designation:</b>	<b>Allocate</b>

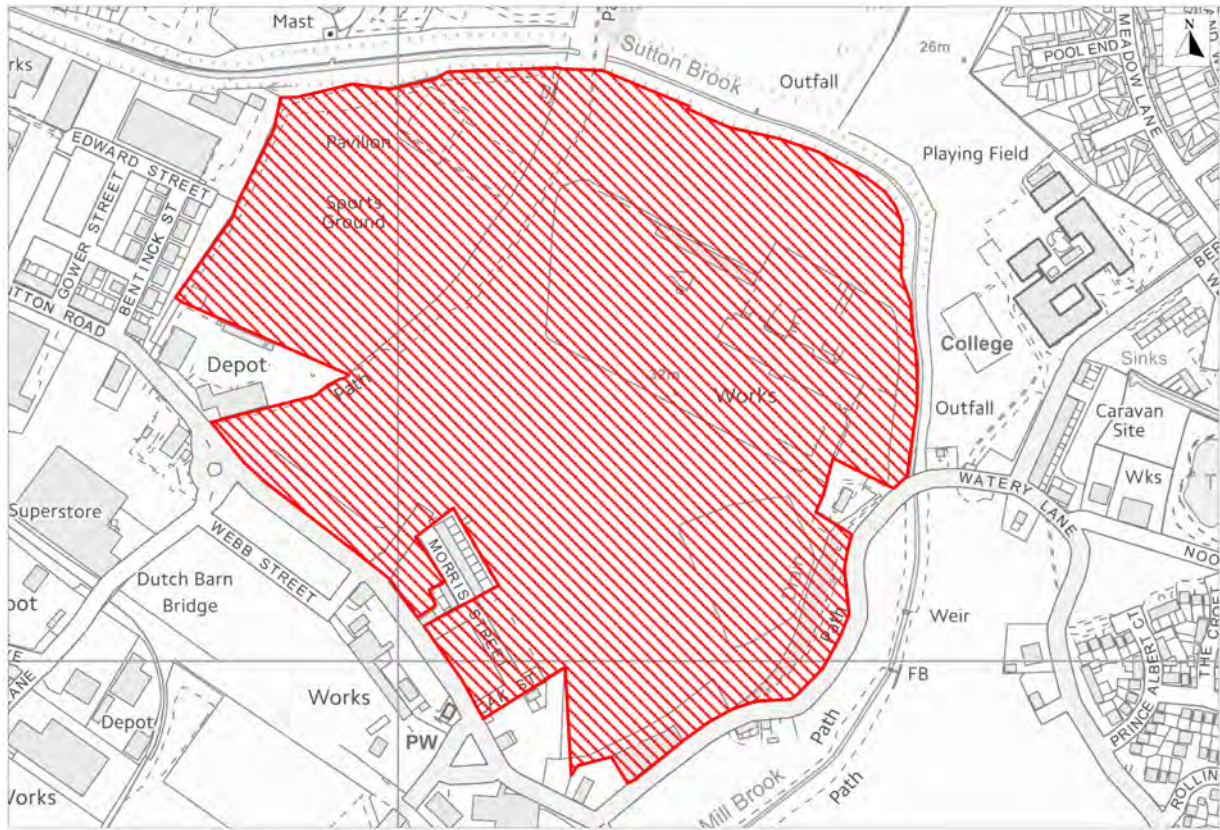


### Requirements:

- Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2018/0060/FUL, granted on 20 June 2018.



<b>LPSD Ref:</b>	<b>10HA – Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton</b>	<b>Ward:</b>	<b>Town Centre</b>
<b>Notional Capacity:</b>	<b>802 units</b>	<b>Designation:</b>	<b>Allocate</b>



### Requirements:

- Appropriate highway access to be provided linking Sutton Road to Watery Lane (with any necessary off-site improvements).
- Off-site highway works to be undertaken, to be phased in line with the development of the site.
- Suitable measures will be required to ensure accessibility through the site by bus.
- Appropriate site remediation should be undertaken along with resolution of any geo-technical issues.
- The design and layout should provide for a range of house types and character areas
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03. Any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.

- Playing pitches within the site must be suitably replaced off-site before they are lost as part of the development.
- Appropriate noise mitigation measures may be required in relation to industrial land uses close to the site.
- Provision of a small commercial/retail area close to the junction with Sutton Road
- (NB planning permission P/2003/1574 was granted for mainly residential development on 18 July 2007; Permission P/2011/0058 to – in summary – vary conditions on the scheme was granted on 22 May 2017).



## Appendix 6: Site profiles - allocated Gypsy and Traveller Sites

LPSD Ref:	GTA01 - Gypsy and Traveller Permanent Provision	Ward:	Thatto Heath
Notional Capacity:	8 pitches	Designation:	Allocate



LPSD Ref:	GTA02 – Gypsy and Traveller Transit Site	Ward:	Thatto Heath
Notional Capacity:	3 pitches	Designation:	Allocate



## Appendix 7: Site Profiles – Safeguarded Employment and Housing Sites

<b>LPSD Ref:</b>	<b>1ES - Land North of M62 and South of Gorsey Lane, Bold</b>	<b>Ward:</b>	<b>Bold</b>
<b>Notional Capacity:</b>	<b>29.98ha</b>	<b>Designation:</b>	<b>Safeguard</b>

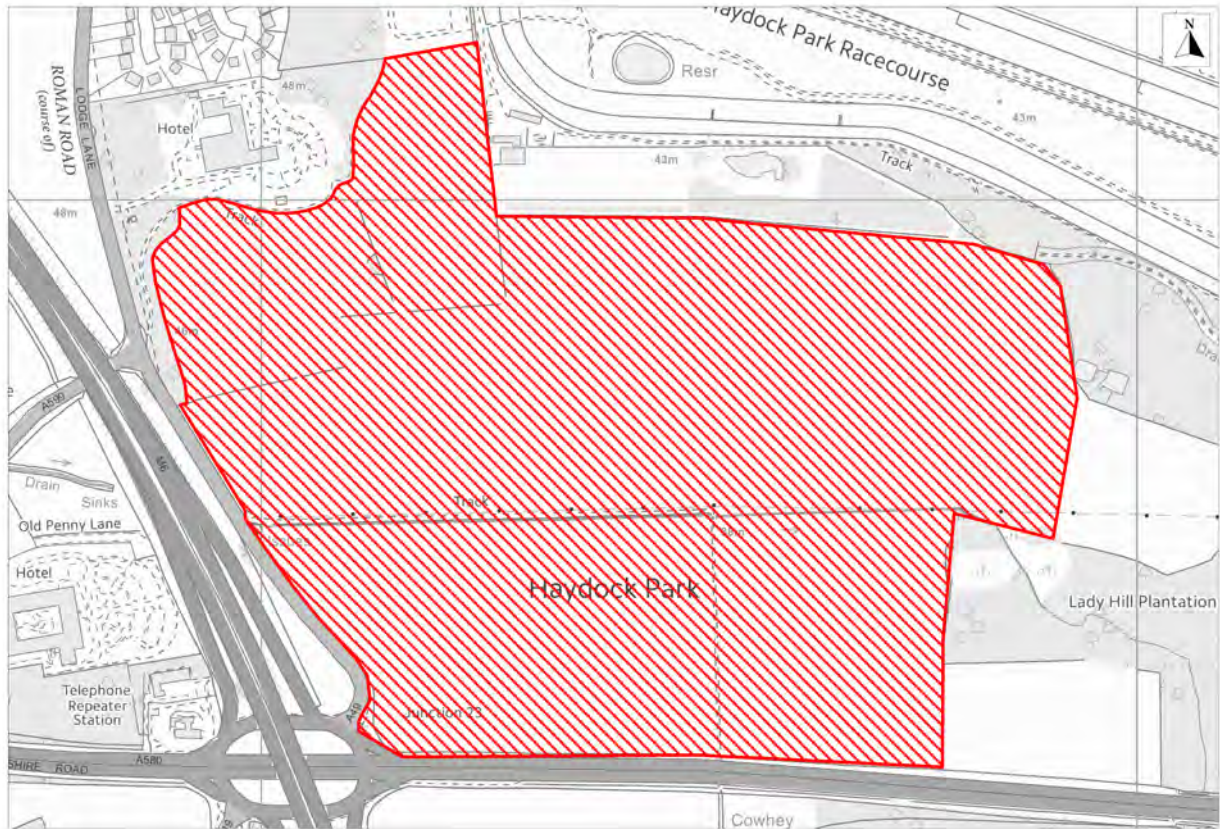


### Requirements:

- Appropriate highway access via the existing Omega North Western extension development.
- Implementation of any measures required to mitigate impacts on the M62 (Junction 8) or other parts of the highway network.
- Measures to secure suitable access to the site by walking, cycling and public transport from residential areas in St Helens and Warrington.



<b>LPSD Ref:</b>	<b>2ES - Land to the East of M6 Junction 23 (South of Haydock racecourse), Haydock</b>	<b>Ward:</b>	<b>Haydock</b>
<b>Notional Capacity:</b>	<b>42.31ha</b>	<b>Designation:</b>	<b>Safeguard</b>



### Requirements:

- Appropriate highway access should be provided via the A580 (East Lancashire Road).
- Developers must liaise with Highways England and St. Helens Council to identify and deliver any enhancement work required to M6 Junction 23 to mitigate any impacts from the proposed development.
- Opportunities to provide improved bus services and pedestrian and cycle links from residential areas in St. Helens to the site should be delivered if practicable.

<b>LPSD Ref:</b>	<b>1HS - Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood</b>	<b>Ward:</b>	<b>Billinge &amp; Seneley Green</b>
<b>Notional Capacity:</b>	<b>291 units</b>	<b>Designation:</b>	<b>Safeguard</b>



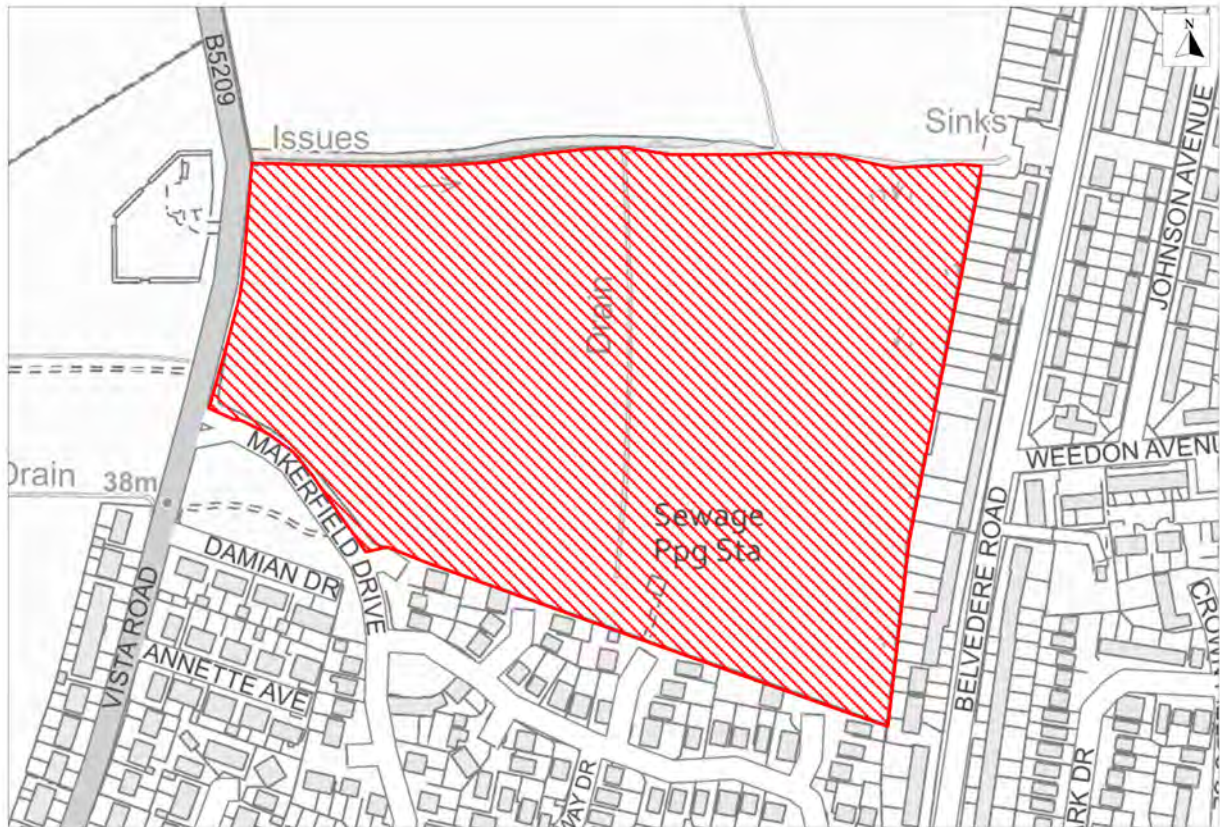
#### Requirements:

- Safe highway access should be provided from Leyland Green Road and Billinge Road (with any necessary off-site improvements).
- Pedestrian and cycle access should be provided through the site to the wider area.
- Provision of effective flood management measures to reduce the risk of flooding.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.
- The ground conditions are unknown, although historic mineshafts are recorded within



the sub-parcel, so further investigation is required.

<b>LPSD Ref:</b>	<b>2HS - Land between Vista Road and Belvedere Road, Earlestown</b>	<b>Ward:</b>	<b>Earlestown</b>
<b>Notional Capacity:</b>	<b>178 units</b>	<b>Designation:</b>	<b>Safeguard</b>

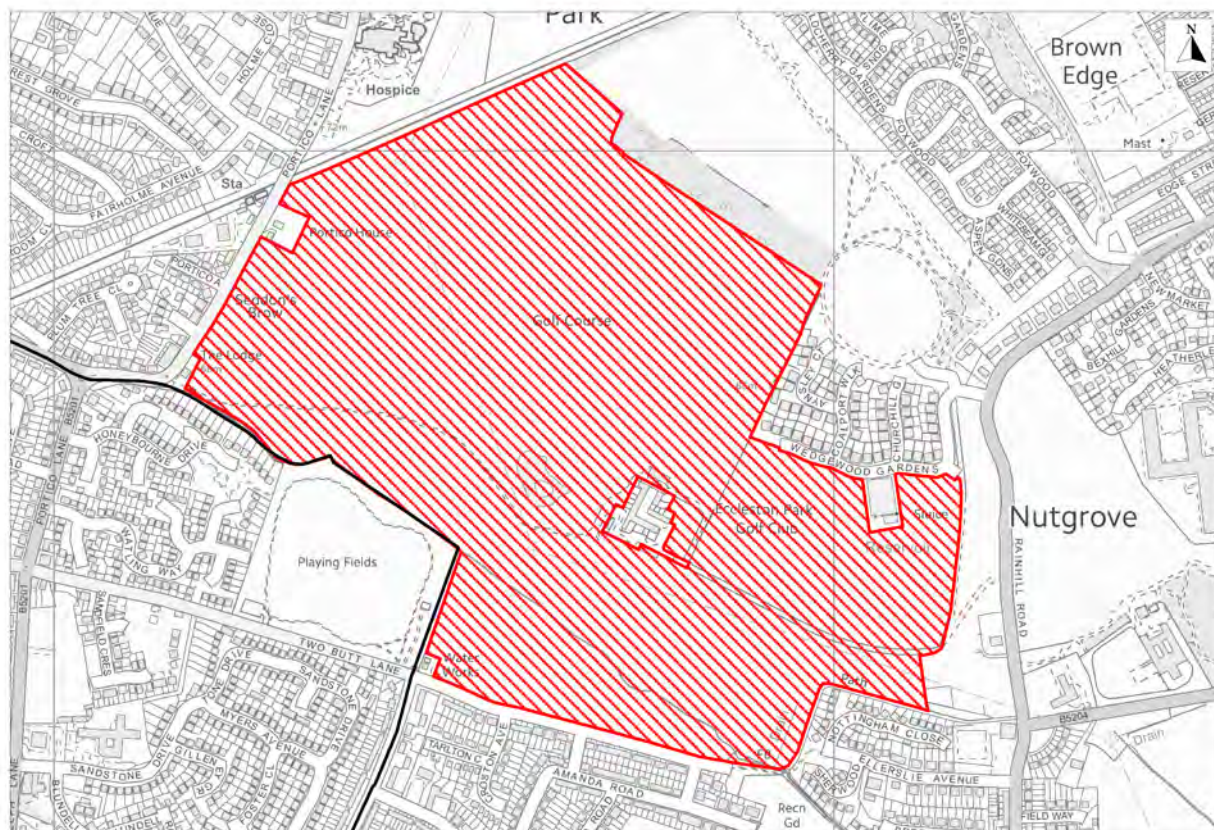


#### Requirements:

- Safe highway access can be gained from Vista Road and Makerfield Drive.
- Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network.
- Provision of effective flood management measures to reduce the risk of flooding with due consideration to be given to the existing UU pumping station.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



<b>LPSD Ref:</b>	<b>3HS – Former Eccleston Park Golf Club, Rainhill Road, Eccleston</b>	<b>Ward:</b>	<b>Eccleston</b>
<b>Notional Capacity:</b>	<b>956 units</b>	<b>Designation:</b>	<b>Safeguard</b>



#### Requirements:

- Appropriate highway access should be provided via a primary access from the B5413 Rainhill Road and secondary access at Portico Lane together with a suitable internal road network.
- The layout and design of the development should make suitable provision for a bus service to access the primary access road and consider feasibility of a bus through-route from Portico Lane to Rainhill Road.
- Safe pedestrian and cycle access should be provided to Eccleston Park Station.
- Consideration should be given to the potential for park and ride facilities.
- Any access to the site from Two Butt Lane must, at most, serve only a limited number of properties and be agreed by Knowsley Council as the Highways Authority.

- Ensure that the design and layout mitigates and minimises impacts on the existing road network, including the Rainhill Road/Warrington Road junction and other junctions in the area.
- Financial contributions for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.
- The sandstone wall on the Rainhill Road frontage should be reclaimed and rebuilt once the access road is constructed.
- The developer should liaise with the Lead Local Flood Authority in the design of a suitable and ecologically friendly flood management solution for the on-site open watercourse. The development should incorporate measures to “slow the flow” to reduce the risk of flooding downstream and enhance biodiversity.

<b>LPSD Ref:</b>	<b>4HS - Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows</b>	<b>Ward:</b>	<b>Newton</b>
<b>Notional Capacity:</b>	<b>256 units</b>	<b>Designation:</b>	<b>Safeguard</b>



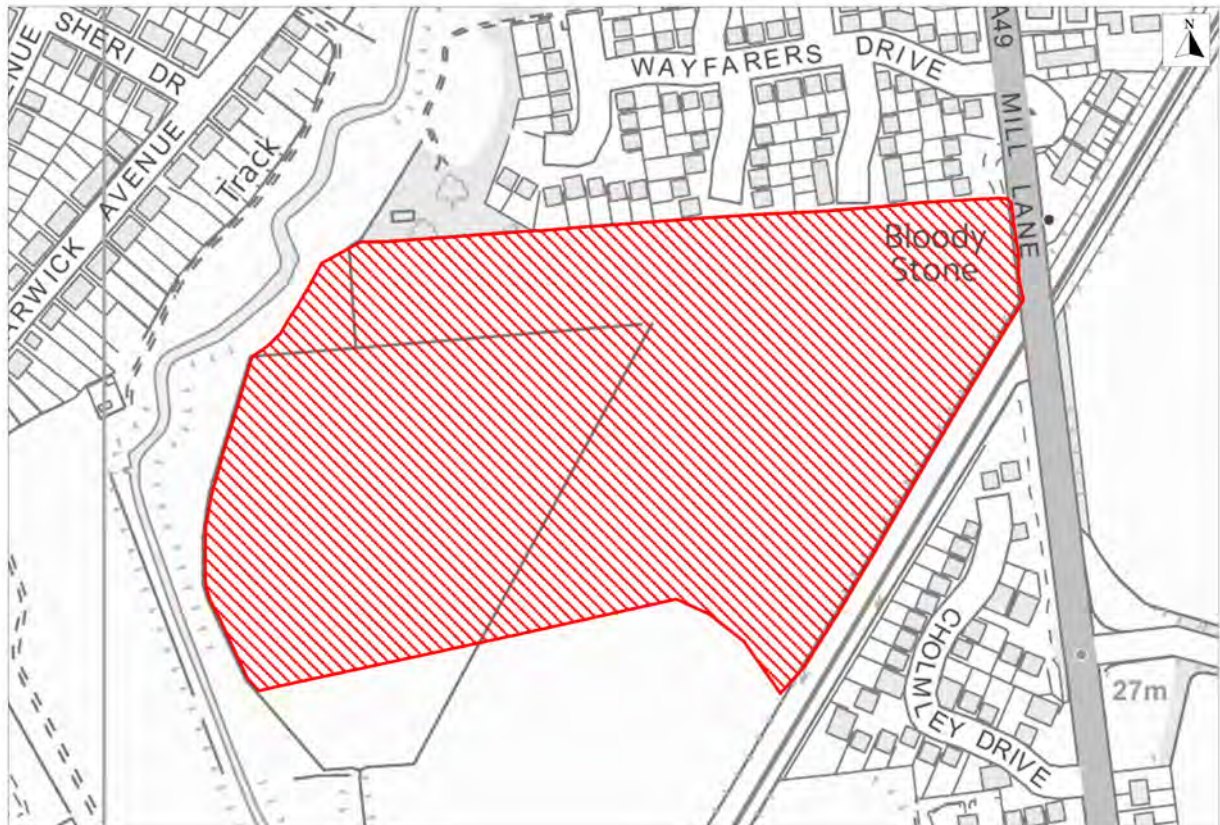
#### Requirements:

- Safe highway access should be provided from the existing development to the west of the site (with any necessary off-site improvements).
- Appropriate noise attenuation measures, including buffers, should be incorporated to protect new residents from unacceptable noise levels from the adjoining.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Significant landscaping will be required to the south of the site to provide an appropriate buffer with the adjacent Vulcan Village Conservation Area.
- The design and layout should provide for a range of house types in accordance with



Policy LPC01 and LPC02.

<b>LPSD Ref:</b>	<b>5HS - Land West of Winwick Road and East of Wayfarers Drive, Newton-le-Willows</b>	<b>Ward:</b>	<b>Newton</b>
<b>Notional Capacity:</b>	<b>191 units</b>	<b>Designation:</b>	<b>Safeguard</b>



#### Requirements:

- Safe highway access should be provided from the A49 (Mill Lane), (with any necessary off-site improvements).
- Appropriate noise attenuation measures, including buffers, should be incorporated to protect new residents from unacceptable noise levels from the adjoining railway line.
- Provision of effective flood management measures to reduce the risk of flooding.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Appropriate buffers should be provided from the proposed site and adjoining LWS.
- The design and layout should provide for a range of house types in accordance with

Policy LPC01 and LPC02.

<b>LPSD Ref:</b>	<b>6HS - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor</b>	<b>Ward:</b>	<b>Thatto Heath</b>
<b>Notional Capacity:</b>	<b>113 units</b>	<b>Designation:</b>	<b>Safeguard</b>

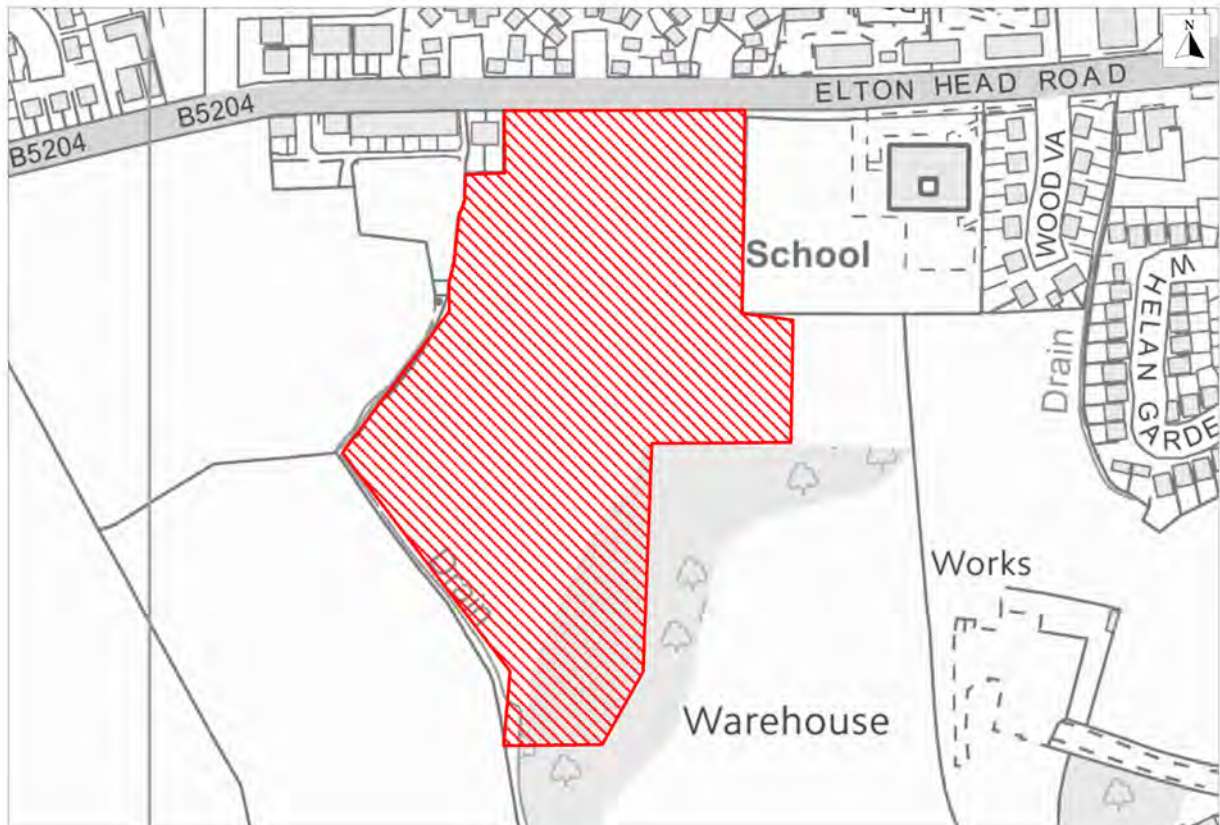


#### Requirements:

- Safe highway access can be provided from Chapel Lane and Shakespeare Road, (with any necessary off-site improvements).
- Provision of effective flood management measures to reduce the risk of flooding.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Appropriate buffers should be provided from the proposed site and adjacent woodland and LWS (Pendlebury Brook).
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



<b>LPSD Ref:</b>	<b>7HS - Land South of Elton Head Road (adjacent to St. John Vianney Catholic Primary School), Thatto Heath</b>	<b>Ward:</b>	<b>Thatto Heath</b>
<b>Notional Capacity:</b>	<b>84 units</b>	<b>Designation:</b>	<b>Safeguard</b>

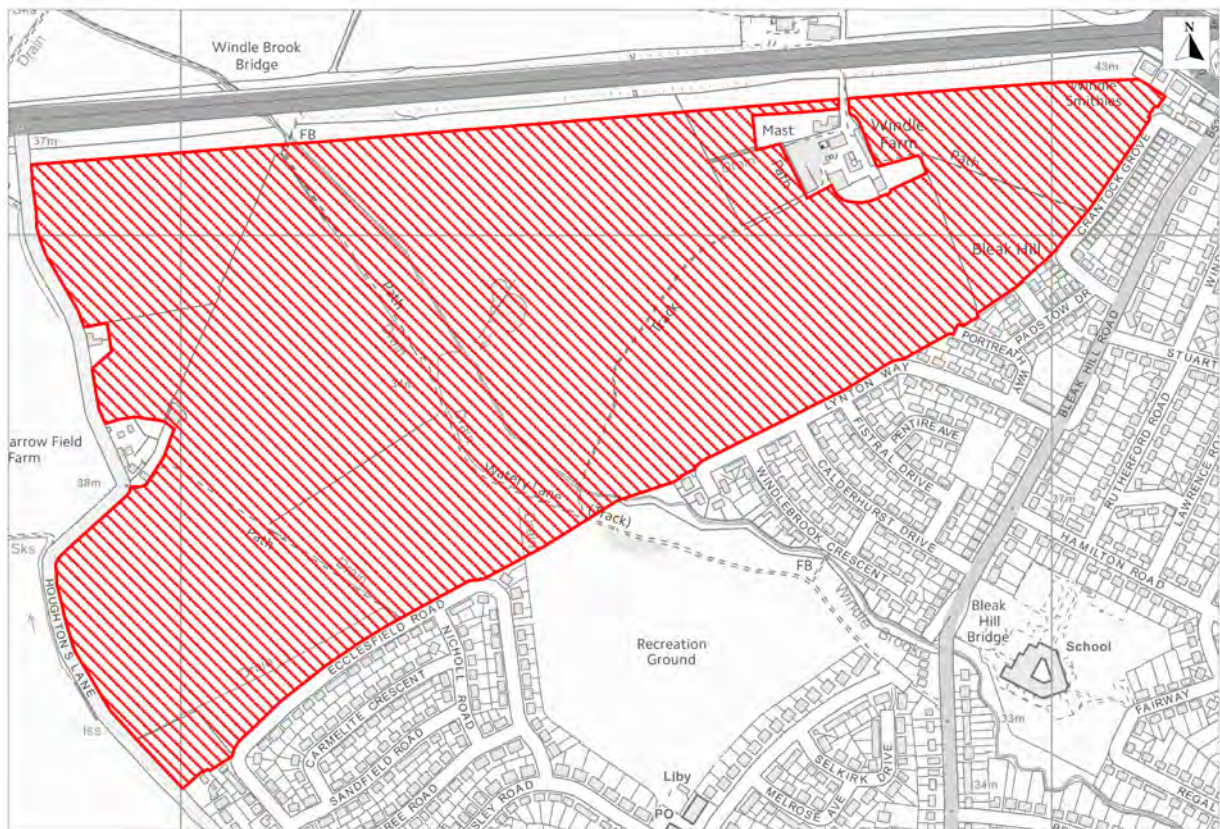


#### Requirements:

- Safe highway access can be provided from Elton Head Road (with any necessary off-site improvements).
- Provision of effective flood management measures to reduce the risk of flooding.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Appropriate buffers should be provided from the proposed site and adjoining saltmarsh area.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



<b>LPSD Ref:</b>	<b>8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle</b>	<b>Ward:</b>	<b>Windle</b>
<b>Notional Capacity:</b>	<b>1,027 units</b>	<b>Designation:</b>	<b>Safeguard</b>



### Requirements:

- Appropriate highway access should be provided via a new access from the A580 East Lancashire Road at Houghton's Lane junction (or suitable alternative) during initial phases of development, to link into a new primary access road into the site and a pedestrian and cycle access through to adjacent roads together with a suitable internal road network.
- The design and layout should mitigate and minimise impacts on the existing road network, including cul-de-sacs adjoining the site and the junction of Rainford Road/Bleak Hill Road.
- Houghton's Lane should be diverted and upgraded.
- The developer ensure that the design and layout makes suitable provision for a bus service to access the primary access road.

- Financial contributions or the provision of on-site infrastructure for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.
- The developer should liaise with the Lead Local Flood Authority in the design of a suitable and ecologically friendly flood management solution for Windle Brook. The development should incorporate measures to “slow the flow” to reduce the risk of flooding downstream and enhance biodiversity.

## Appendix 8: Sites of Biodiversity and Geodiversity Importance

### Local Wildlife Sites

(NB Sites LWS 29,40,78 and 82 have been deleted)

Site reference number	Local Wildlife Site	Ward
LWS1	Rainford Brook	Rainford
LWS2	Bawdy Brook	Rainford
LWS3	Ponds, east of Birch Wood	Rainford
LWS4	Downham Walk, pond and marsh	Billinge and Seneley Green
LWS5	Sidings Lane, Rainford	Rainford
LWS6	Shaley Brow, Billinge	Rainford
LWS7	Nursery Plantation	Rainford
LWS8	Randles Brook	Rainford
LWS9	Holiday Moss, Rainford	Rainford
LWS10	Shaley Brow, Brownlow	Rainford
LWS11	Billinge Beacon	Billinge and Seneley Green
LWS12	Camholes Wood	Rainford
LWS13	Wooded Valley at Billinge	Billinge and Seneley Green
LWS14	Ashgrove Farm, wood	Billinge and Seneley Green
LWS15	King's Moss Plantation	Rainford
LWS16	Barton Clough, Billinge	Billinge and Seneley Green
LWS17	Disused Depot Rainford	Rainford
LWS18	Twelve Yarder Pits, Pond and Wood	Billinge and Seneley Green
LWS 19	Mine Spoil, West of Weathercock Hill	Billinge and Seneley Green
LWS 20	Birchley Wood	Billinge and Seneley Green
LWS 21	Rainford Old Delph & Crank Caverns	Rainford

Site reference number	Local Wildlife Site	Ward
LWS 22	Fir Wood	Moss Bank
LWS 23	Black Brook, Kings Moss	Billinge and Seneley Green
LWS 24	Brown Birches	Rainford
LWS 25	Hill Top Farm Woodland	Rainford
LWS26	Small Wood, North-East of Fenny Bank	Moss Bank
LWS 27	Goyt Hey Wood	Billinge and Seneley Green
LWS 28	Hollins Hey Woods	Billinge and Seneley Green
LWS 30	Plantation Copse and Ponds, Haydock	Haydock
LWS 31	Haydock Cross	Haydock
LWS 32	Mossborough Moss woodland and land	Rainford
LWS 33	Moss Plantation	Rainford
LWS 34	Carr Mill Dam	Billinge and Seneley Green
LWS 35	Woodland beside Old Garswood Railway	Haydock
LWS 36	Clinkham Wood	Moss Bank
LWS 37	Brook Wood	Rainford
LWS 38	Haydock Park Woods	Haydock
LWS 39	Windle Park Wood	Rainford
LWS 41	Emma Wood	Rainford
LWS 42	Windlehurst Sedgemarksh	Moss Bank
LWS 43	Glasshouse Close Wood	Blackbrook
LWS 44	Fox Covert, including Cow Hey Dam	Haydock
LWS 45	Stanley Bank Meadow, Ponds and Wood	Blackbrook
LWS 46	Wicken Hedge and Ellams Brook	Haydock
LWS 47	Pilkington's Glass Factory Grounds	Moss Bank
LWS 48	Cambourne Avenue Pond	Moss Bank

Site reference number	Local Wildlife Site	Ward
LWS 49	Windlehurst Quarry	Windle
LWS 50	Windle Brook	Eccleston
LWS 51	Ellams Brook	Haydock
LWS 52	Wood Pit Covert	Haydock
LWS 53	Islands Brow Burgy	Moss Bank
LWS 54	St. Helens Canal	Blackbrook
LWS 55	Haresfinch Bank	Moss Bank
LWS 56	St. Helens Canal, South of Haresfinch Burgy	Town Centre
LWS 57	Parr Hall Millennium Green	Blackbrook
LWS 58	Grassland, west of Wagon Lane	Blackbrook
LWS 59	Castle Hill	Newton-le-Willows
LWS 60	Wood Pit Tip, Grassland	Haydock
LWS 61	Cloghe Wood and Grassland	Haydock
LWS 62	Lyme Pit Tip	Haydock
LWS 63	Mill Brook 04	Eccleston
LWS 64	St. Helens Canal, Broad Oak Basin and Frog Hall	Parr
LWS 65	Ashton's Green Reclaimed tip (Southport St Open Space)	Parr
LWS 66	Havannah Flash	Haydock
LWS 67	Newton Lake and Southern Woodland	Newton-le-Willows
LWS 68	Mill Brook	Eccleston
LWS 69	Crow Lane Copse	Earlestown
LWS 70	Mill Wood, Eccleston	Eccleston
LWS 71	Willow Park	Newton-le-Willows
LWS72	Collingwood Road Openspace	Earlestown
LWS 73	Mesnes Park and Stream	Newton-le-Willows

Site reference number	Local Wildlife Site	Ward
LWS 74	Newton Common and Pond	Earlestown
LWS 75	Sankey Brook	Earlestown
LWS 76	Eccleston Top Dam	Eccleston
LWS 77	Leg O' Mutton Dam and Woodland	West Park
LWS 79	The Dingle, Newton	Earlestown
LWS 80	Gillars Green Wood	Eccleston
LWS 81	Old Joan's Plantation	Eccleston
LWS 83	Grassland South of Towpath, Sankey Valley Park	Earlestown
LWS 84	Eccleston Mere	Eccleston
LWS 85	Red Brow Wood	Earlestown
LWS 86	Newton Brook 05	Newton-le-Willows
LWS 87	Eccleston Golf Course, West Ponds	Eccleston
LWS 88	Mucky Mountains	Earlestown
LWS 89	Woodland East of Wargrave Road	Newton-le-Willows
LWS 90	Grassland by Parr Flat	Parr
LWS 91	Parr Flat	Parr
LWS 92	Ravenhead Ponds	Town Centre
LWS 93	Old Hey Wood	Newton-le-Willows
LWS 94	Sales Wood / Gorse Plantation	Eccleston
LWS 95	Alexandra Colliery	West Park
LWS 96	Colliers Moss Common Local Nature Reserve	Parr
LWS 97	Gallows Croft	Newton-le-Willows
LWS 98	Thatto Heath Dam	West Park
LWS 99	Prescot Reservoirs Nos 3 & 4	Eccleston
LWS 100	Thatto Heath Meadow	Thatto Heath



Site reference number	Local Wildlife Site	Ward
LWS 101	Sutton Brook	Parr
LWS 102	Sherdley Park and Golf Course	Thatto Heath
LWS 103	Newton Brook 05	Newton-le-Willows
LWS 104	Land, West of Gerrards Lane	Sutton
LWS 105	Rough Grassland around Sutton Dam Stream	Sutton
LWS 106	Reeve Court Woodland (Former Rainhill Hospital)	Thatto Heath
LWS 107	Sutton Mill Dam	Sutton
LWS 108	Field, North of Gorsey Lane/ Tunstalls Farm	Bold
LWS 109	Ansdell's Wood	Bold
LWS 110	Old Mineral Line, Lea Green	Bold
LWS 111	Dog Kennel Plantation	Bold
LWS 112	Pendlebury Brook	Rainhill
LWS 113	Parrens Covert	Rainhill
LWS 114	Booth's Wood	Bold
LWS 115	Blundell Hills Golf Course	Rainhill
LWS 116	The Rough, Woodland	Rainhill
LWS 117	Whittle Brook	Bold
LWS 118	Mersey Valley Golf Course	Bold
LWS 119	Clock Face Colliery Country Park pond	Bold
LWS 120	Sutton Manor	Bold

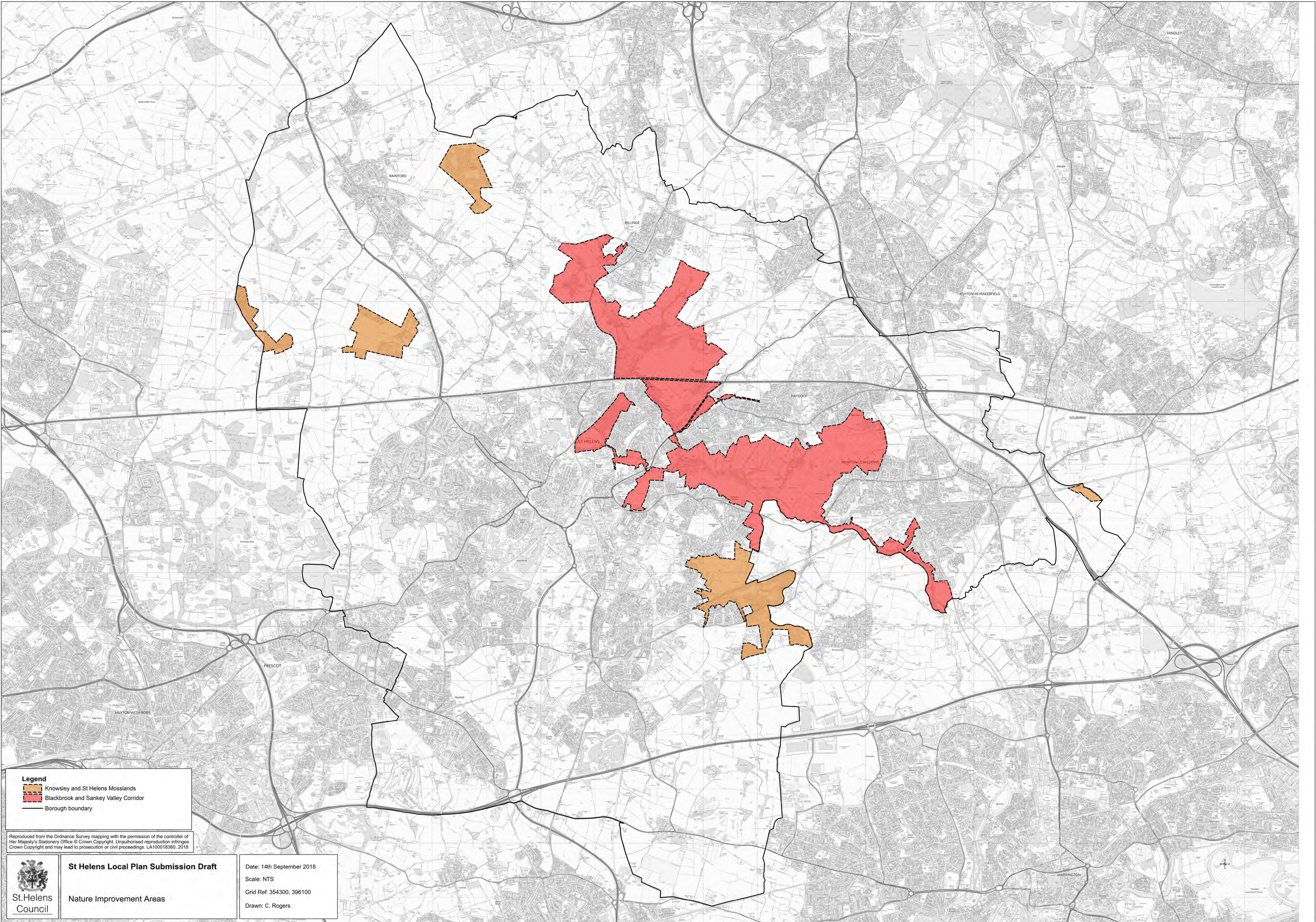
### **Local Geological Sites**

SH1	Windlehurst Quarry	Disused quarry
SH2	Crank Caverns	Quarry and Adits
SH3	Wargrave Quarry ( Red Brow Wood)	Disused quarry
SH5	Carr Mill Dam	Disused quarry

SH15	Billinge Plants	Disused quarry
SH19	Billinge Quarry	Disused quarry
SH25	Shaley Brow Quarry	Disused quarry
SH27	Brook, 150m NE of Houghwood Golf Course	Road Cutting
SH28	Brook, 130m NE of Houghwood Golf Course	Stream Section / Waterfall
SH30	Clinkham Wood (N), Mossbank	Disused quarry
SH33	Taylor Park Quarry	Disused quarry

## **Appendix 9: Nature Improvement Areas**





**Legend**

- Knowsley and St Helens Mosslands
- Blackbrook and Sankey Valley Corridor
- Borough boundary

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**St Helens Local Plan Submission Draft**

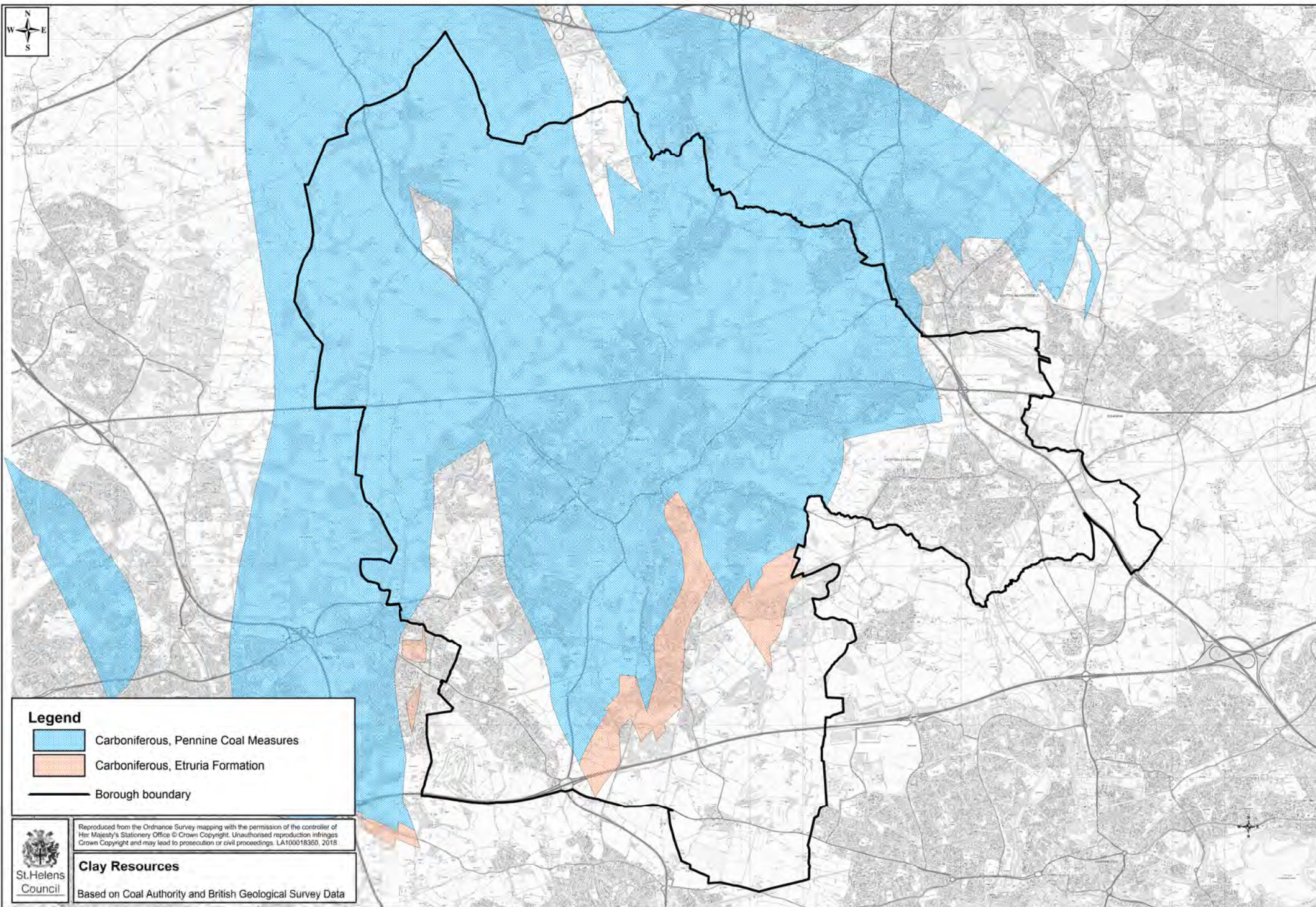
Nature Improvement Areas

Date: 14th September 2018  
Scale: NTS  
Grid Ref: 354300, 396100  
Drawn: C. Rogers






## **Appendix 10: Mineral Resources and Licence Areas**





#### Legend

-  Carboniferous, Pennine Coal Measures
-  Carboniferous, Etruria Formation
-  Borough boundary



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#### Clay Resources

Based on Coal Authority and British Geological Survey Data





PEDL  
164  
(2008)

PEDL262  
(2016)

PEDL264  
(2016)

PEDL39  
(1998)

PEDL265  
(2016)

PEDL39  
(1998)

EXL253  
(1992)

PEDL193  
(2008)

EXL253  
(1992)



EXL273  
(1993)

PEDL191  
(2008)

EXL276  
(1993)

PEDL145  
(2004)

### Legend

-  Oil & Gas Authority Licence Areas
-  Borough boundary

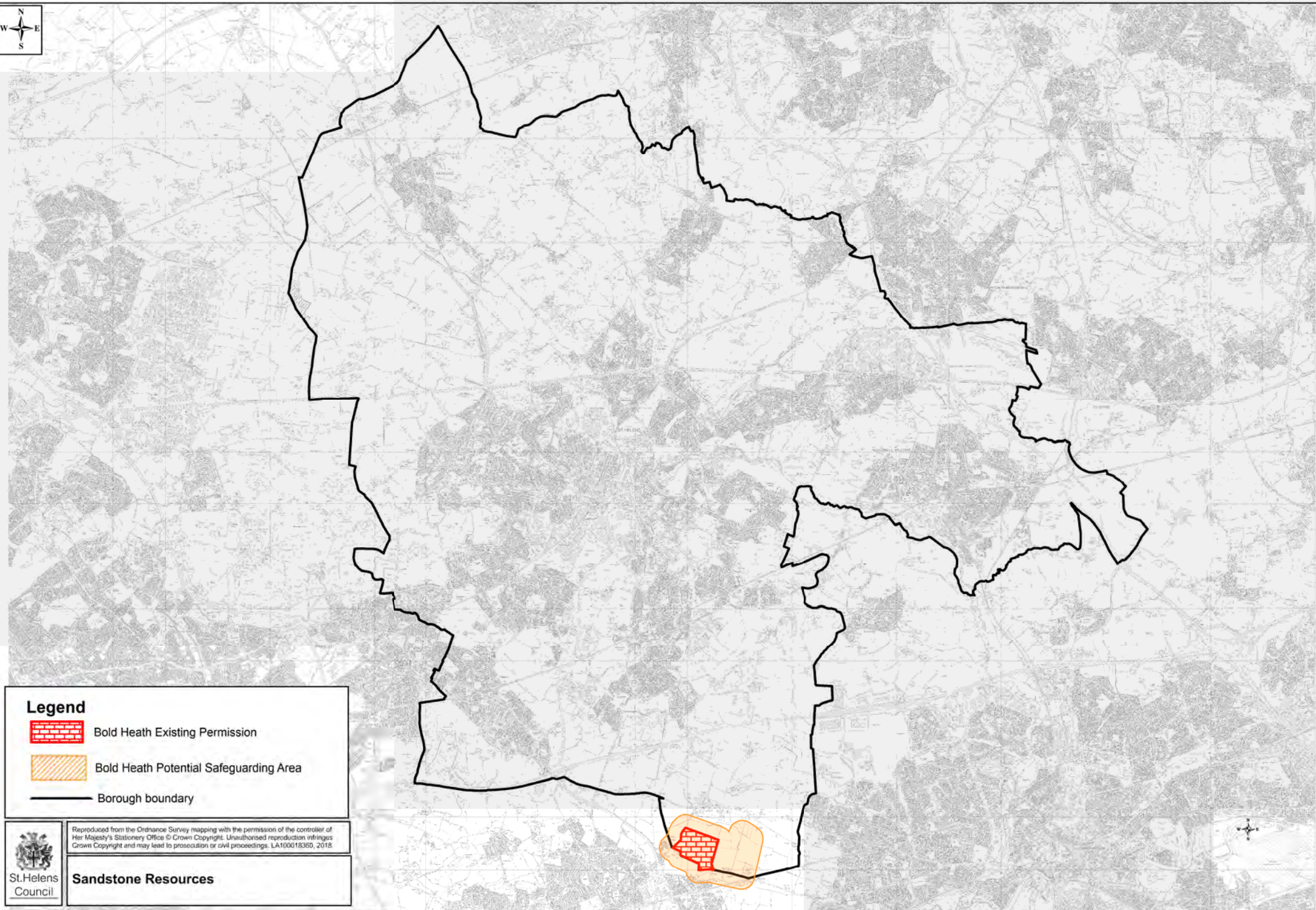


St. Helens  
Council

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**Oil & Gas Authority Licence Areas  
(October 2016)**





### Legend



Bold Heath Existing Permission



Bold Heath Potential Safeguarding Area



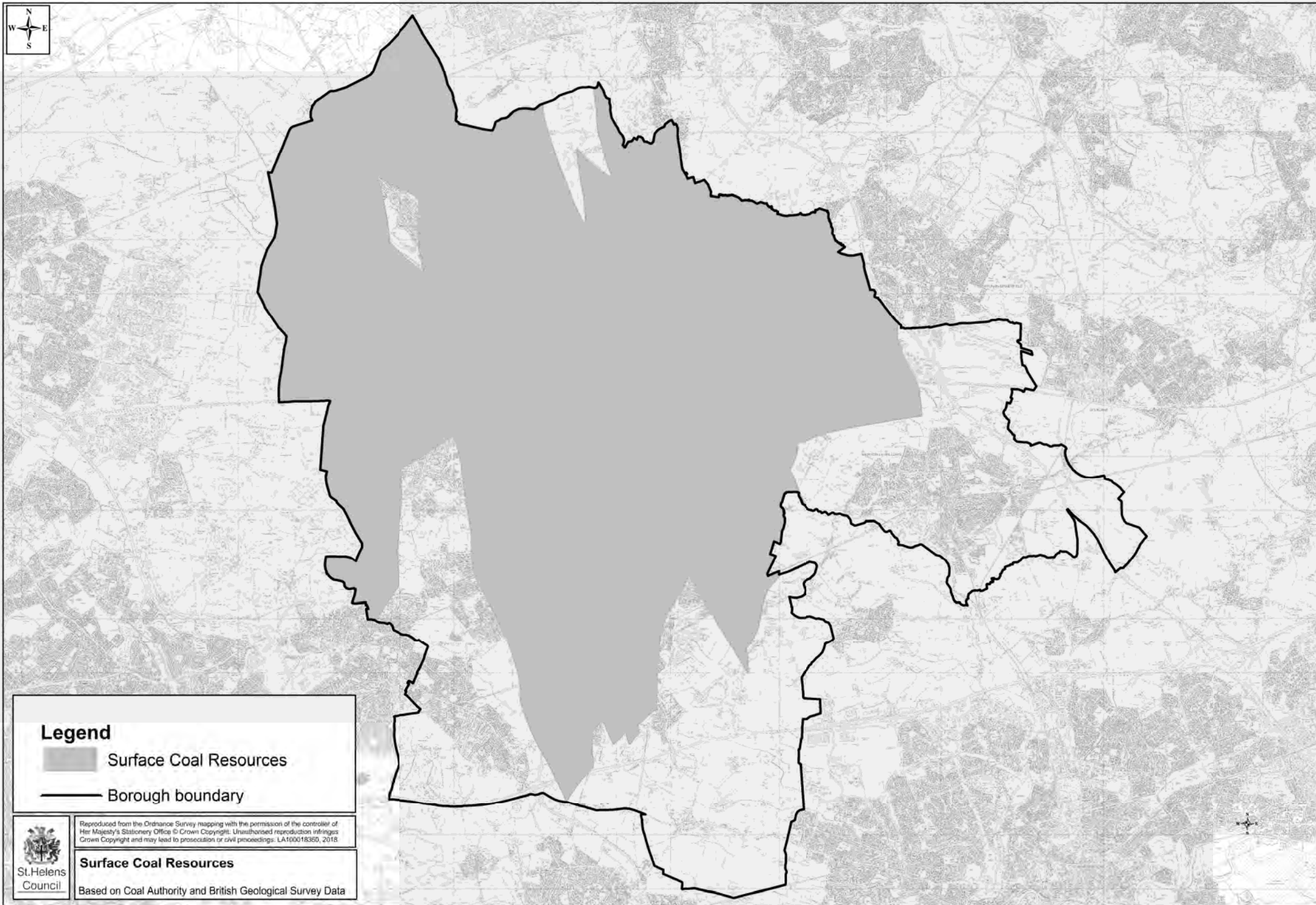
Borough boundary




St. Helens  
Council


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**Sandstone Resources**



### Legend

 Surface Coal Resources

 Borough boundary



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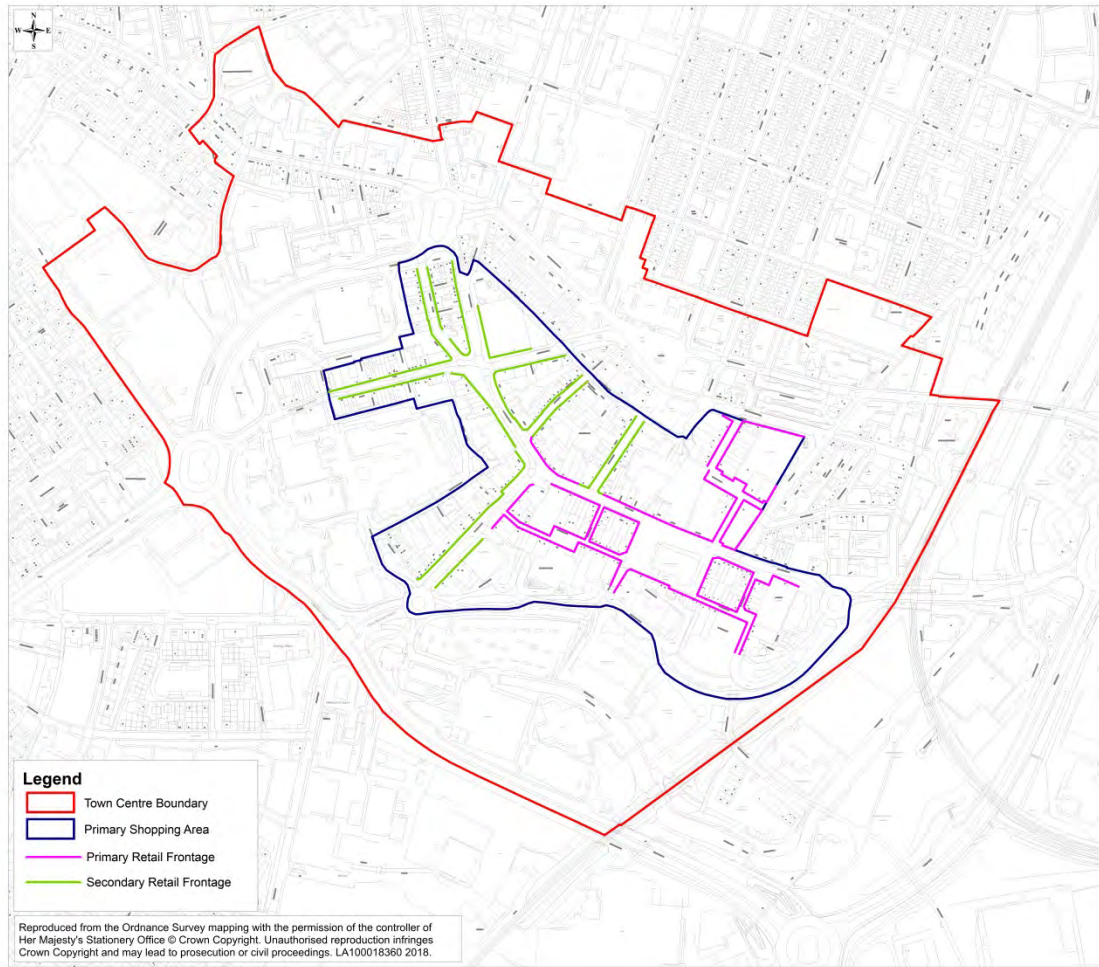
### Surface Coal Resources

Based on Coal Authority and British Geological Survey Data

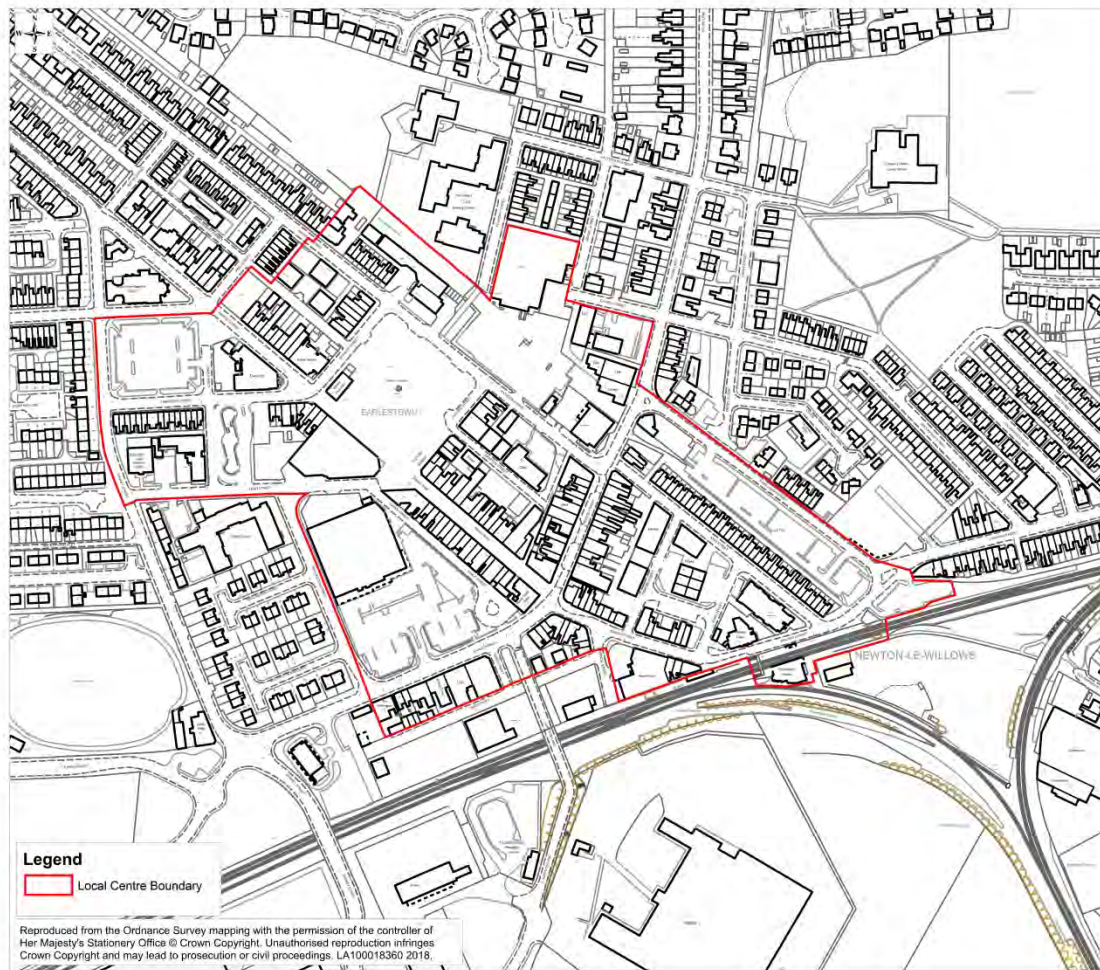
## **Appendix 11: Town, district and local centre boundaries**



# St.Helens Town Centre



# Earlestown Town Centre

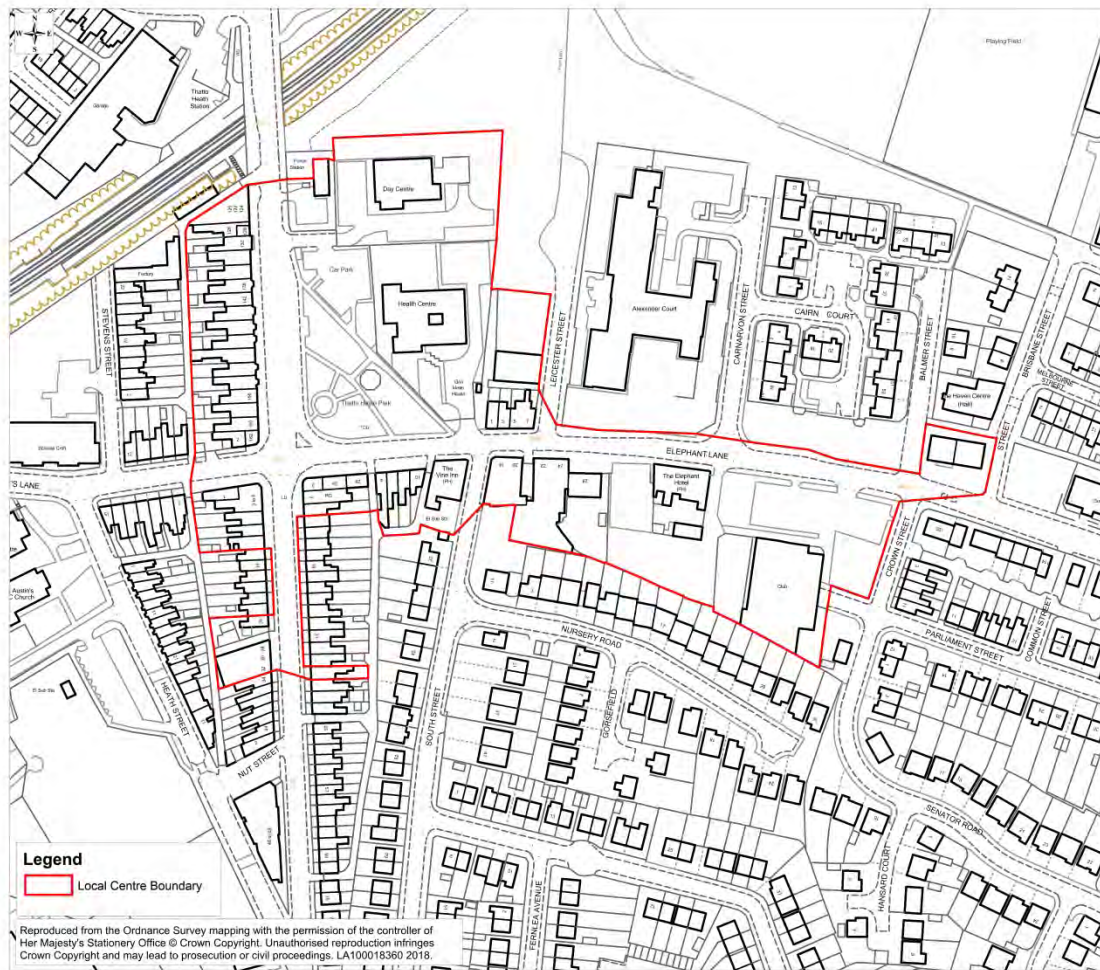




# Rainhill District Centre

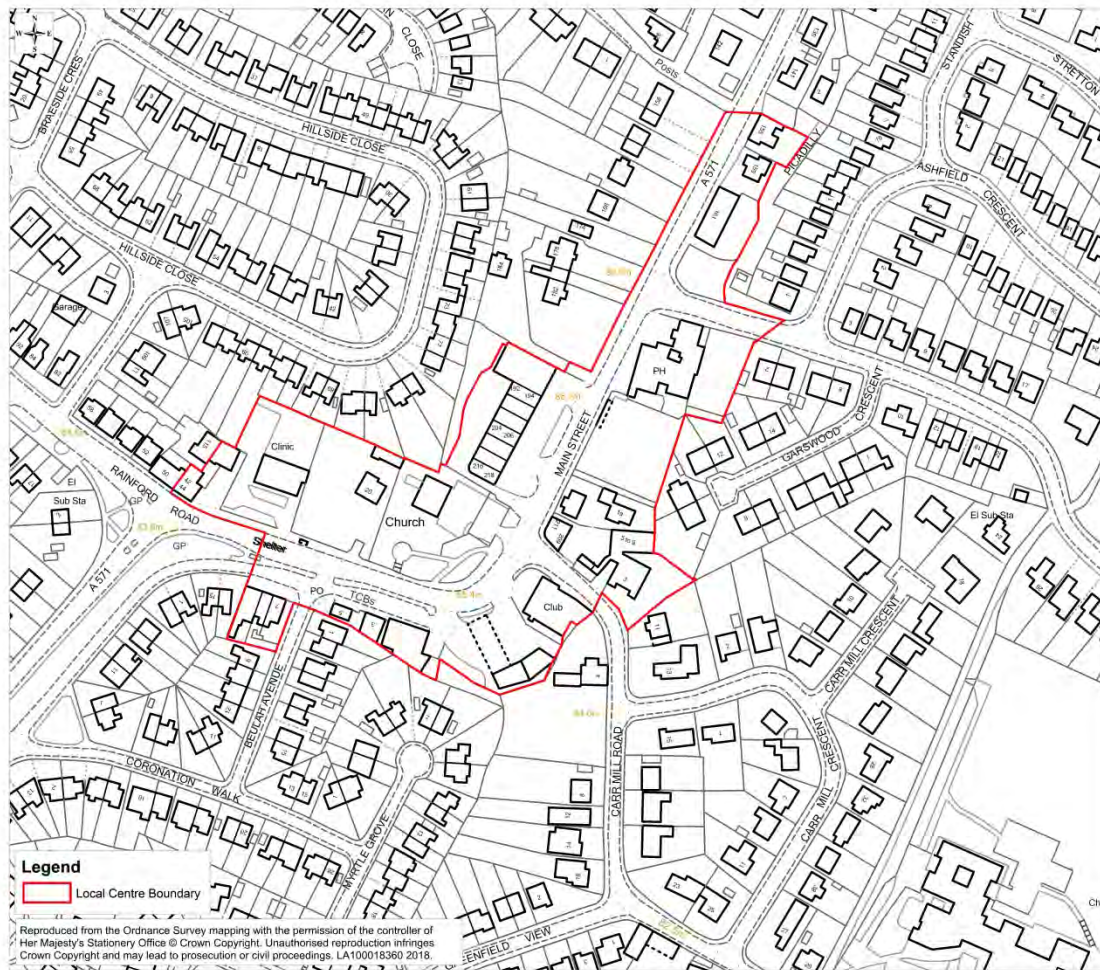


# Thatto Heath District Centre





# Billinge Local Centre



# Chain Lane Local Centre



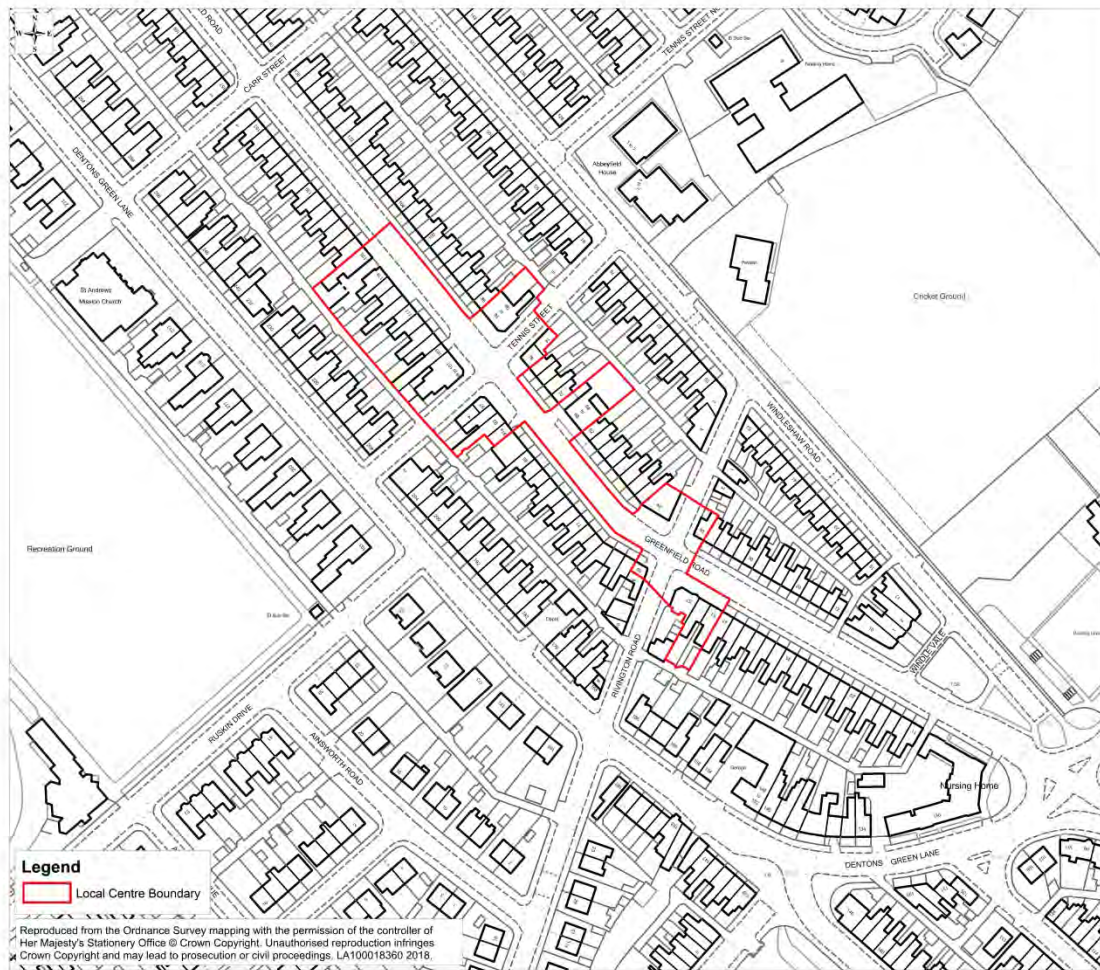


# Clipsey Lane Local Centre





# Denton's Green Local Centre

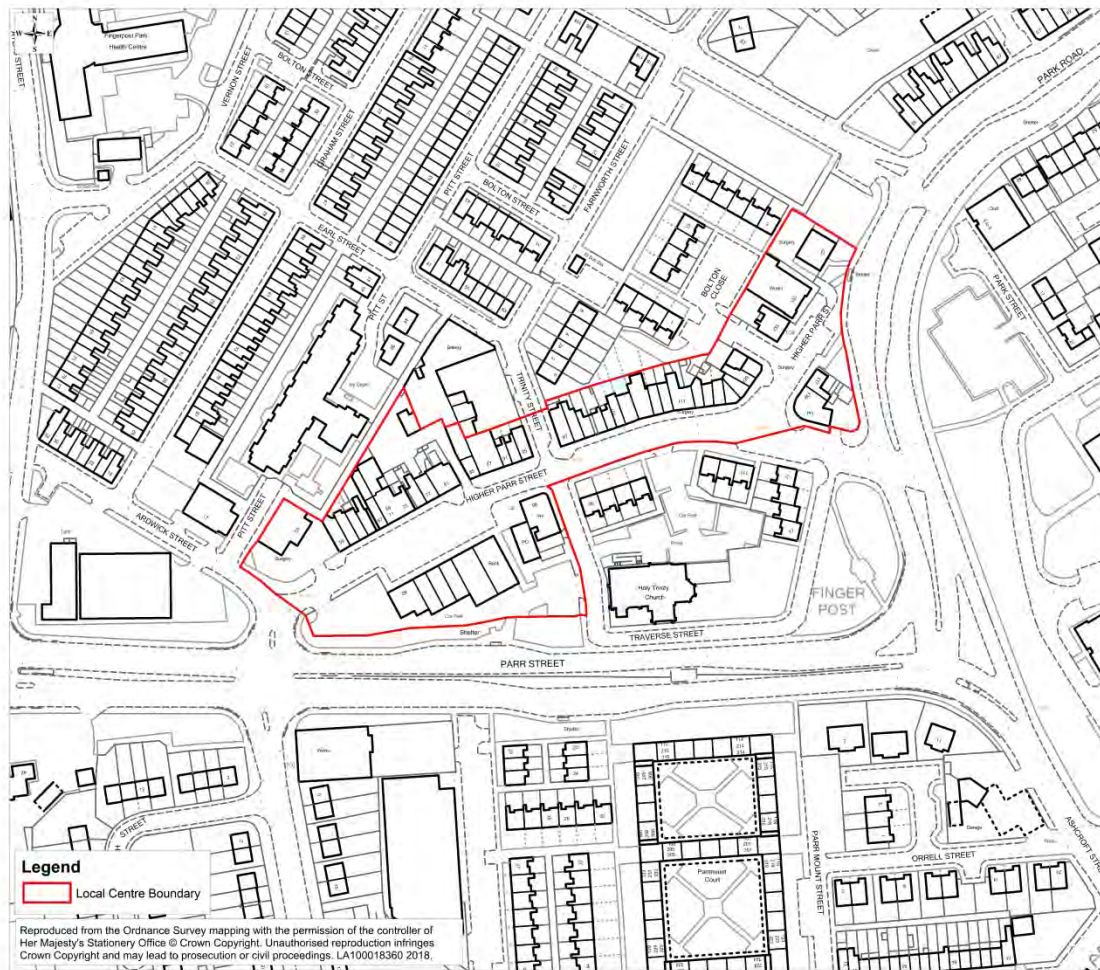


# Eccleston Local Centre





# Fingerpost Local Centre



## Marshall's Cross Local Centre



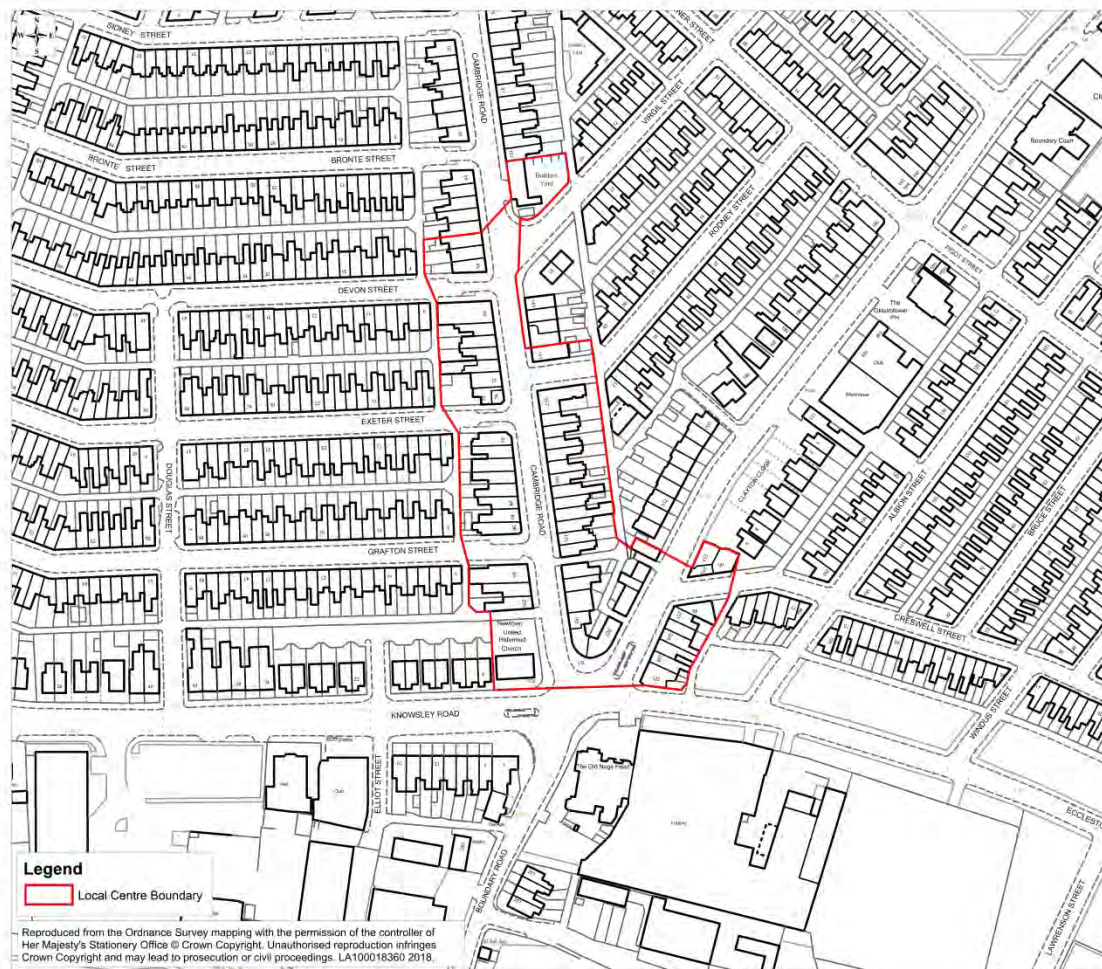


# Newton-le-Willows Local Centre

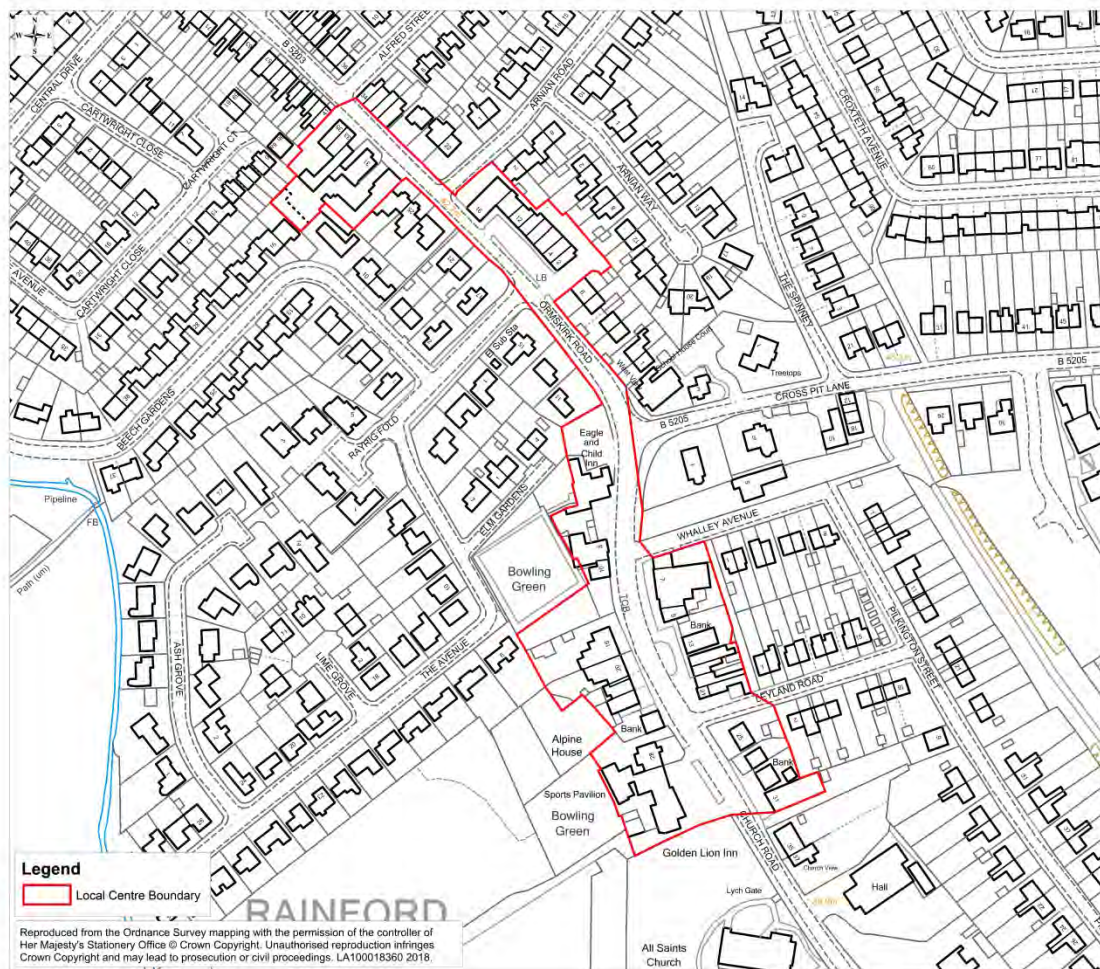




# Newton Local Centre

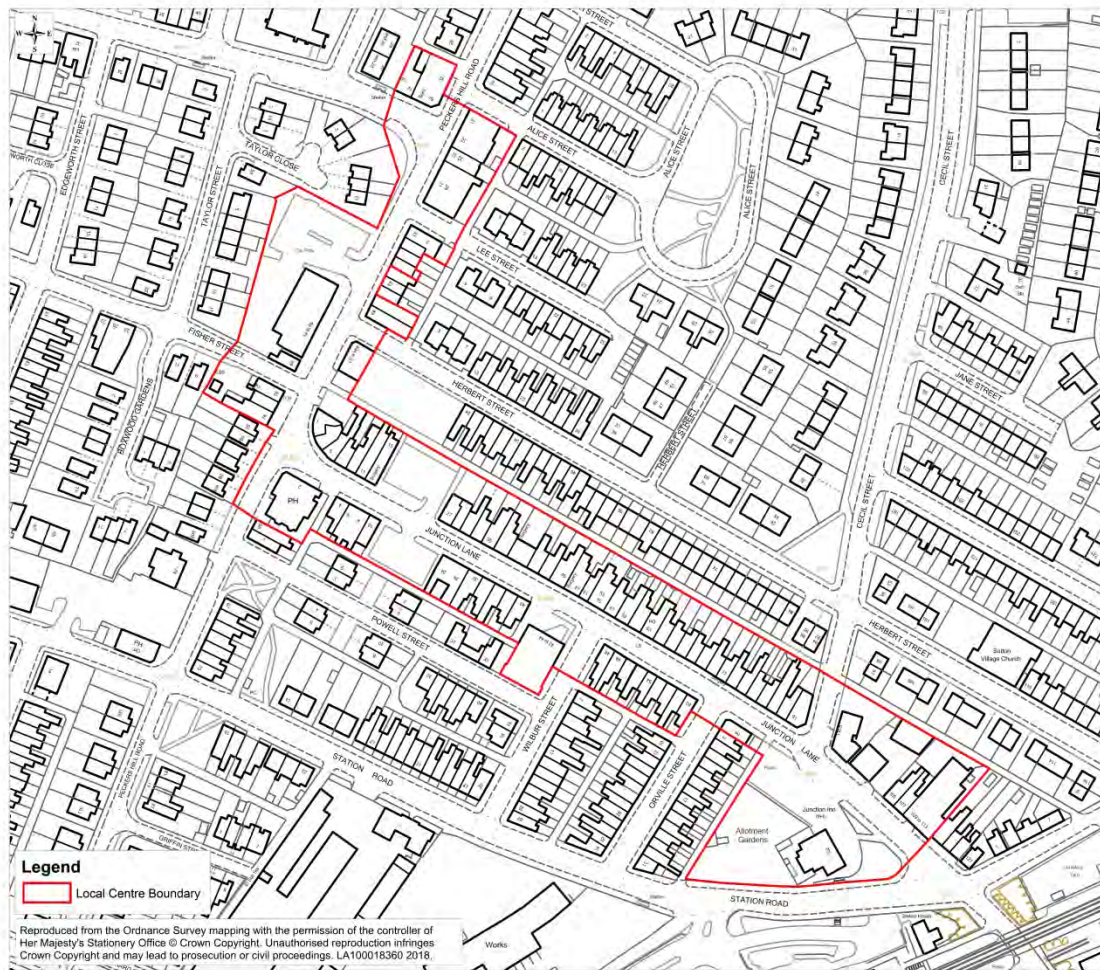


# Rainford Local Centre





# Sutton Local Centre



## Appendix 12: Existing Employment Areas

This list shows existing employment areas as referred to in Policy LPA04 ‘a Strong and Sustainable Economy’

Employment Area	Local Economy SPD Reference Number
Lords Fold Industrial Estate	A
Millbrook Business Centre	B
Mill Lane Industrial Estate	B
Rainford Industrial Estate	B
Pilkington Works, Cowley Hill	C
Gerard's Park	D
Pocket Nook	E
Site at Corporation Street	F
Site at Parr Street / Corporation Street	G
Westside Industrial Estate / Kellerer Court	H
Chalon Way Industrial Estate	I
Eccleston Street Industrial Estate	J
Knowsley Road Industrial Park	K
Alexandra Business Park	L
Ravenhead Road Industrial Estate	M
Ravenhead Works	N
Sherdley Road Industrial Estate and Business Park	P
Baxters Lane Industrial Estate	Q
Sutton Oak Drive Industrial Estate	Q
Sutton Road Industrial Area	Q
Parr Industrial Estate	R

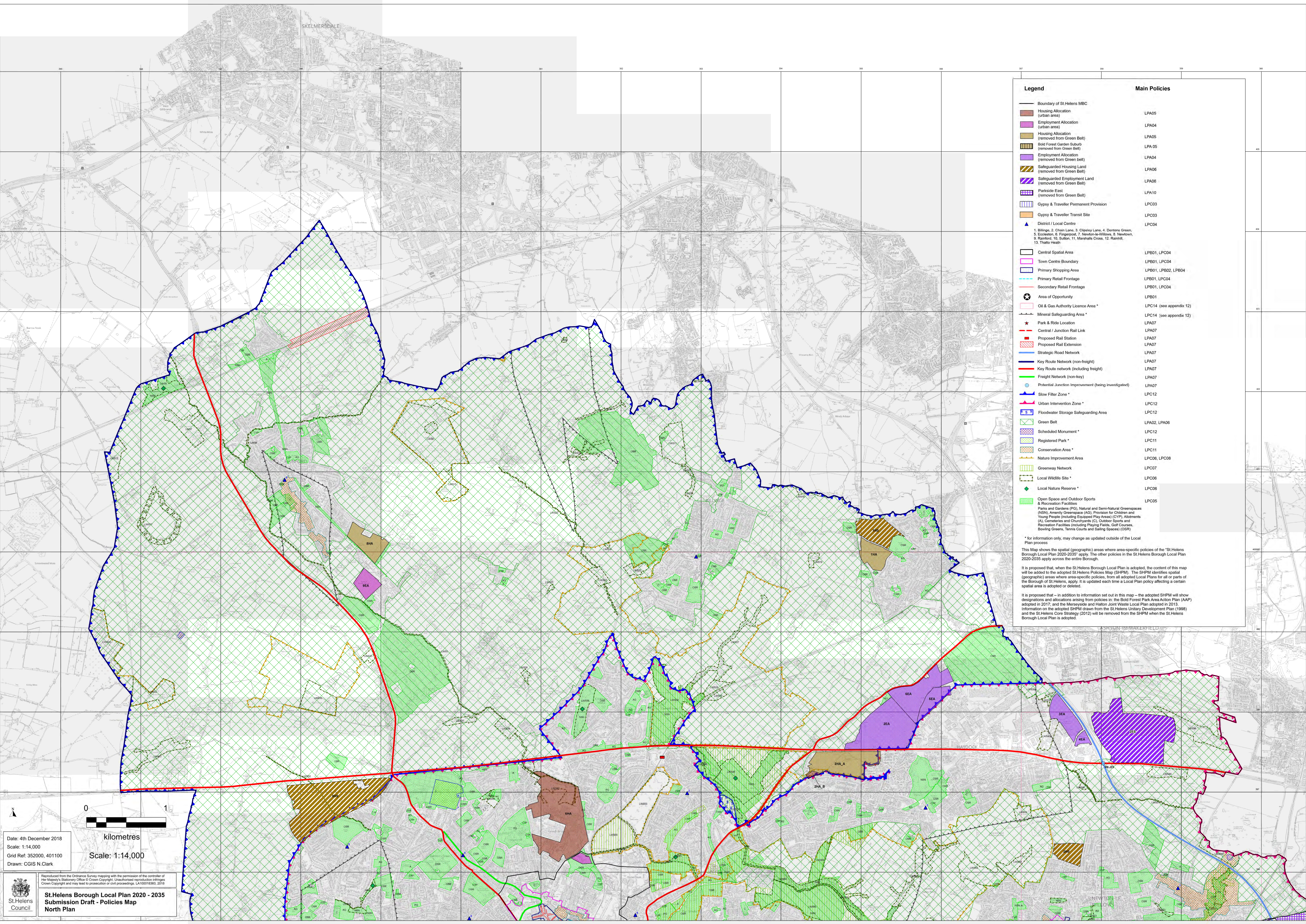
Site at Nook Lane	S
Moorfoot Road Industrial Estate	T
Delta Road Industrial Estate	U
Garswood Industrial Estate	V
Haydock Industrial Estate	W
The Parks	X
Woodlands Industrial Estate	Y
Sankey Valley Industrial Estate	AA
Bold Business Centre	BB
Bold Industrial Estate	CC
Normans Road Industrial Estate	DD
Reginald Road Industrial Park/ Abbotsfield Road Industrial Park	FF
Co-op Distribution Centre	GG
Linkway Distribution Park	HH
Mere Grange	II
Lea Green Business Park / Industrial Estate	JJ
St. Helens Road	LL



# **Appendix 2**

St. Helens Cabinet Report 12.12.2018





**Legend**

Boundary of St Helens MBC

Housing Allocation (urban area)

Employment Allocation (urban area)

Housing Allocation (removed from Green Belt)

Bold Forest Garden Suburb (removed from Green Belt)

Employment Allocation (removed from Green Belt)

Safeguarded Housing Land (removed from Green Belt)

Safeguarded Employment Land (removed from Green Belt)

Parkside East (removed from Green Belt)

Gypsy & Traveller Permanent Provision

Gypsy & Traveller Transit Site

District / Local Centre

Central Spatial Area

Town Centre Boundary

Primary Shopping Area

Primary Retail Frontage

Secondary Retail Frontage

Area of Opportunity

Oil & Gas Authority Licence Area \*

Mineral Safeguarding Area \*

Park & Ride Location

Central / Junction Rail Link

Proposed Rail Station

Proposed Rail Extension

Strategic Road Network

Key Route Network (non-freight)

Key Route network (including freight)

Freight Network (non-key)

Potential Junction Improvement (being investigated)

Slow Filter Zone \*

Urban Intervention Zone \*

Floodwater Storage Safeguarding Area

Green Belt

Scheduled Monument \*

Registered Park \*

Conservation Area \*

Nature Improvement Area

Greenway Network

Local Wildlife Site \*

Local Nature Reserve \*

Open Space and Outdoor Sports & Recreation Facilities

Parks and Gardens (PG), Natural and Semi-Natural Greenspaces (NSN), Amenity Greenspace (AG), Provision for Children and Young People (including Equipped Play Areas) (CYP), Allotments (A), Cemeteries and Churchyards (C), Outdoor Sports and Recreation Facilities (including Playing Fields, Golf Courses, Bowling Greens, Tennis Courts and Sailing Spaces) (OSR)

**Main Policies**

LPA05

LPA04

LPA05

LPA 05

LPA04

LPA06

LPA06

LPA10

LPC03

LPC03

LPC04

LPB01, LPC04

LPB01, LPC04

LPB01, LPB02, LPB04

LPB01, LPC04

LPB01, LPC04

LPB01

LPC14 (see appendix 12)

LPC14 (see appendix 12)

LPA07

LPA07

LPA07

LPA07

LPA07

LPA07

LPA07

LPC12

LPC12

LPC12

LPA02, LPA06

LPC12

LPC11

LPC11

LPC06, LPC08

LPC07

LPC06

LPC06

LPC05

\* for information only, may change as updated outside of the Local Plan process

This Map shows the spatial (geographic) areas where area-specific policies of the "St Helens Borough Local Plan 2020-2035" apply. The other policies in the St Helens Borough Local Plan 2020-2035 apply across the entire Borough.

It is proposed that, when the St Helens Borough Local Plan is adopted, the content of this map will be added to the adopted St Helens Policies Map (SHPM). The SHPM identifies spatial (geographic) areas where area-specific policies, from all adopted Local Plans for all or parts of the Borough of St Helens, apply. It is updated each time a Local Plan policy affecting a certain spatial area is adopted or deleted.

It is proposed that – in addition to information set out in this map – the adopted SHPM will show designations and allocations arising from policies in: the Bold Forest Park Area Action Plan (AAP) adopted in 2017; and the Merseyside and Halton Joint Waste Local Plan adopted in 2013. Information on the adopted SHPM drawn from the St Helens Unitary Development Plan (1998) and the St Helens Core Strategy (2012) will be removed from the SHPM when the St Helens Borough Local Plan is adopted.

0

1

kilometres

Date: 4th December 2018

Scale: 1:14,000

Grid Ref: 352000, 401100

Drawn: CGIS N.Clark

St Helens Council

St Helens Borough Local Plan 2020 - 2035

Submission Draft - Policies Map

North Plan



# **Appendix 3**

St. Helens Cabinet Report 12.12.2018







# **Appendix 4**

St. Helens Cabinet Report 12.12.2018

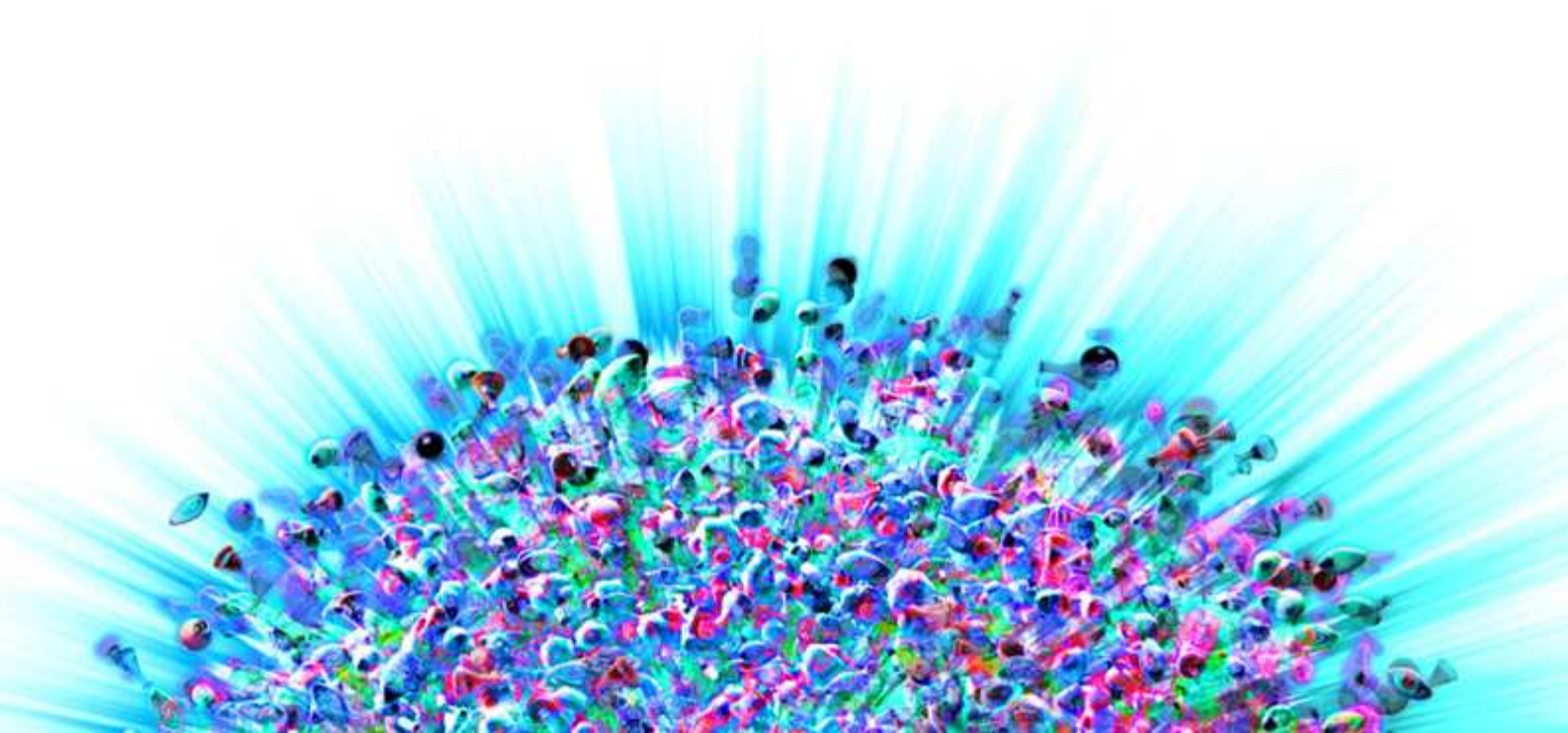




St. Helens  
Council

**LOCAL PLAN  
PREFERRED OPTIONS  
REPORT OF REPRESENTATIONS**

DRAFT 2018



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DRAFT

## **1. INTRODUCTION**

A statement under Regulation 17 (d) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Local Plan Regulations)

### **1.1 Report of consultation on the St.Helens Local Plan**

1.1.1 The preparation of the Local Plan has been informed by a process of continuous and ongoing consultation with the general public and other key stakeholders, both through formal consultation periods and through information and views gathered throughout the process. The process has followed the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 for preparing a Local Plan, and also the St.Helens Revised Statement of Community Involvement, adopted November 2013 (the 2013 SCI).

1.1.2 What this statement is

1.1.3 This statement has been prepared to comply with Regulation 17 (d) of the 2012 Regulations, which requires that at Publication of a Local Plan, a statement setting out the following is prepared:

- (i) which bodies and persons were invited to make representations under regulation 18 [Preparation of a Local Plan];
- (ii) how those bodies and persons were invited to make such representations;
- (iii) a summary of the main issues raised by those representations; and
- (iv) how those main issues have been addressed in the local plan.

### **1.2 Overview of the St.Helens Local Plan 2020-2035 preparation process**

#### Start of preparation

1.2.1 For the Borough of St.Helens, St.Helens Council is the Local Planning Authority (LPA) responsible for preparing the Local Plan. A decision was made by the Council's Cabinet in November 2015 to prepare a new single Local Plan for the Borough of St.Helens. The Local Development Scheme (LDS), which must set out the timescale and content of any Local Plan being prepared, was updated.

Regulation 18 stage: St.Helens Local Plan Scoping: Jan 2016 to Mar 2016

- 1.2.2 Regulation 18 of the 2012 Local Plan Regulations requires the LPA to notify certain “bodies or persons” of the subject of the Local Plan the LPA proposes to prepare, and also to invite them to make comments (“representations”) to the LPA on what a Local Plan of that subject should contain. The LPA did this at the St. Helens Local Plan Scoping consultation (20 Jan 2016 to 2 Mar 2016). The consultation letters and other material explained that St.Helens Council proposed to prepare a new Local Plan for the Borough of St.Helens, which would *“set how much new development for housing, employment and other uses should take place in the borough, where development should take place and set out policies to be taken account of when assessing planning applications for development”*.

- 1.2.3 The bodies invited to make representations are set out in Appendix 6

**1.3 St.Helens Local Plan 2018-2033 Preferred Options: Dec 2016 to Jan 2017**

- 1.3.1 The 2012 Regulations, unlike previous Regulations, do not require any more than a scoping consultation (Regulation 18) and publication of the Local Plan for representations to be made (Regulation 19) on the proposed submission draft version of the Local Plan prior to submission for examination (Regulation 22). However, the LPA decided to invite comments on the Local Plan Preferred Options (LPPO), which was an advanced draft of the Local Plan, setting out various options that had been considered and what, at the time, were the Council’s Preferred Options for key issues. This took place from 5 Dec 2016 to 30 Jan 2017.

Scoping consultation and Preferred Options: Which bodies and persons were invited to make representations under regulation 18 [Preparation of a Local Plan] (Regulation 17 (d) (i))

- 1.3.2 The 2012 Regulations state that the “bodies or persons” are:
- (a) the “*specific consultation bodies*” set out in the Regulations that the LPA consider “*may have an interest in the subject of the proposed local plan*”;
  - (b) the “*general consultation bodies*” set out in the Regulations that the LPA consider appropriate; and
  - (c) such residents or other persons carrying on business in the LPA’s area from which the LPA consider it appropriate to invite representations

1.3.3 Please note that these change over time, and the regulations can be changed and updated to add or remove specific and general consultation. The specific consultation bodies set out in the regulations are listed at Appendix 4, and include neighbouring Borough and Parish Councils and Neighbourhood Forums, highways authorities, government agencies and utilities companies. The general consultation bodies definition is at Appendix 5, and includes voluntary organisations and groups representing the interests of different racial, ethnic or national groups, religious groups, disabled persons and businesses in the LPA's area.

1.3.4 A full list of the bodies that were consulted at Scoping and at Preferred Options stages are set out at Appendix 6 and 7 – these include the specific consultation bodies and those groups the Council considered to be general consultation bodies. Please note we have endeavoured not to name private individuals who are on our consultation database, but have instead listed the number of those contacted.

Scoping stage: How bodies and persons were invited to make representations (Regulation 17 (d) (ii))

1.3.5 A full public consultation was held on the St.Helens Local Plan Scoping Document for a six week period between 20 Jan 2016 and 2 Mar 2016. The consultation asked residents, businesses and other groups which issues are important and what the new Local Plan should contain. This included views on planning policies and which sites - including those in urban areas and the Green Belt - should be developed or protected. The consultation asked 21 questions in relation to the Scoping Document.

1.3.6 The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 18 of the 2012 Local Planning Regulations. This included:

- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies;
- articles and adverts in the local newspapers;
- posts on Council social media such as twitter and facebook;
- information pages on the Council website with link from the front page;
- A4 posters distributed across the Borough; and
- Offers of meetings made to stakeholders such as specific and general consultees, including St.Helens Chamber.



Scoping stage: main issues raised by representations (Regulation 17 (d) (iii))

- 1.3.7 A total of 212 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period. The main issues in these comments have been identified by the LPA in the report St.Helens Local Plan 2018 – 2033 Summary of Representations on St. Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016. The representations have been considered and, where considered appropriate by the LPA, they have been addressed in the proposed submission draft version of the Local Plan (the Local Plan Submission Draft). The report is available at:
- <https://www.sthelens.gov.uk/media/5402/summary-of-representations-on-st-helens-local-plan-scoping-consultation.pdf>
- 1.3.8 The following provides a very high level summary of the main issues raised – please see the above linked report for more detail on the main issues raised.
- 1.3.9 There were no suggestions for a significant change in scope of the Local Plan, or for the key issues to be addressed. There were suggestions that climate change and environmental conservation should be made more central to the Plan. Comments on the Vision included a need for growth but balanced with well-being and health, more emphasis on brownfield land regeneration before use of Green Belt, making sure we accommodate growth needs and also regenerate the town centres.
- 1.3.10 There was concern from the public about the amount of employment land that the evidence indicated would be required, in particular from the Green Belt, and especially at the former Parkside Colliery in Newton-le-Willows, due to the potential adverse impact. The re-use of brownfield land and growth of higher technology businesses were suggested instead. However, other authorities indicated that they could not meet St.Helens employment land needs in their area, and there was support from the development industry for the level of employment land and housing growth proposed. Indeed some suggested it should be substantially higher, and some thought the allocations DPD should proceed (with Green Belt release) instead.
- 1.3.11 There was concern about the impact of potential higher levels of development on infrastructure, in particular the road network.

Scoping stage: How the main issues have been addressed in the local plan (Regulation 17 (d) (iv))

- 1.3.12 The main issues in the comments at Scoping, along with a response on how the Council took account of these in the LPPO, were set out in the report St. Helens Local Plan 2018 – 2033 Summary of Representations on St.Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016. The LPPO policies have been further refined with comments received at the LPPO stage to produce the Local Plan Submission Draft. The comments received in relation to the Sustainability Appraisal (SA) Scoping Report Dec 2015 were taken into consideration in preparation of the St Helens Local Plan Sustainability Appraisal: Interim SA Report Dec 2016.. A further stage of the SA has been prepared for the Local Plan Submission Draft.

Local Plan Preferred Options: How bodies and persons were invited to make representations ((Regulation 17 (d) (ii))

- 1.3.13 The LPA invited comments on the LPPO, which was an advanced draft of the Local Plan, setting out various options that had been considered and what at the time, was the Council's Preferred Options for key issues. This took place from 5 Dec 2016 to 30 Jan 2017.
- 1.3.14 The LPPO was accompanied by a draft Policies Map and supporting evidence base, including a draft Green Belt review, employment and housing needs evidence, housing and employment land supply evidence, open space and sport assessments, an interim draft Sustainability Appraisal and Habitats Regulations Assessment, and was informed by other draft documents, including emerging economic viability work. Where considered appropriate, the Council has taken into account comments on these documents.
- 1.3.15 The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 18 of the 2012 Local Planning Regulations. This included:
- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies
  - letters sent to properties within 200m of sites proposed to be removed from the Green Belt
  - articles and adverts in the local newspapers, repeated mid-way during the consultation
  - posts on Council social media such as twitter and facebook
  - information pages on the Council website with link from the front page
  - A4 site notices displayed next to sites being proposed for development
  - A4 posters distributed across the borough

- Offers of meetings made to stakeholders such as specific and general consultees, including St.Helens Chamber.

- 1.3.16 Council officers hosted 15 daytime, evening and weekend drop-in sessions at locations across the Borough to provide information on the Preferred Options and answer questions from the public. The events were well attended and feedback given to the Council has been incorporated into the summaries below. In addition, Council officers gave presentations to the St.Helens Senior Voice Forum and St.Helens Youth Forum to discuss the Local Plan and obtain feedback from the perspective of those groups.
- 1.3.17 In November 2017, the Council wrote to all respondents who submitted comments and provided a valid email address or complete postal address to give an update on the Local Plan's progress since the consultation and to inform them of the revised timetable.

Level of response

- 1.3.18 Consultation on the LPPO ran for an eight week period between 5 Dec 2016 and 30 Jan 2017: following which, a total of 6,048 responses were received by the Council.
- 1.3.19 Discounting 353 responses that were either blank (i.e., no details given), duplications or additional comments from the same respondent, the total number of responses registered was 5,695 (including joint responses).
- 1.3.20 Of this number, 130 were classified as 'technical and stakeholder' responses. These included those responses from representatives of statutory consultee organisations (e.g., the Environment Agency), residents' action groups, landowners and planning agents/site promoters, neighbouring authorities, parish councils and other individuals or organisations who provide issue specific and technical input into the plan making process.
- 1.3.21 The remaining 5,565 responses were predominantly received from residents living in or close to St. Helens Borough. Responses from local businesses were also included. Based on the address information provided, 4,910 were from people living or based in areas within the Borough and 553 from outside. 102 responses did not provide sufficient address details to ascertain this information.
- 1.3.22 Responses were received and accepted in a number of formats. These included the Council's standard response form (both electronic and paper copy), the Council's online web based form, email and letter. A large number of responses were submitted on dedicated pre-prepared response forms/email produced by residents' action groups including 'Save our Green Belt/Residents Against Florida Farm Development', 'Save Eccleston's Green Belt' and 'Parkside Action Group'.

- 1.3.23 In addition, the Council was made aware of two online petitions generated independently using the 'change.org' platform in response to the proposals put forward in the LPPO. These were titled 'Protect the Green Belt, Agriculture and Wildlife in Rainford, St Helens, Merseyside' (receiving 584 online signatories at end of consultation period) and 'Keep Rainhill and Eccleston Park Green Belt Land' (receiving 693 online signatories at end of consultation period). Whilst not accepted as formal responses to the consultation, consideration has been given to the comments left by those who signed these online petitions, many of which raise the same issues as recorded in the registered responses.

Local Plan Preferred Options: main issues raised by representations  
(Regulation 17 (d) (iii))

- 1.3.24 The main issues raised in the Local Plan Preferred Options are set out in the tables in Section 2. However the following provides a high level summary of the issues raised.
- 1.3.25 The majority of the members of the public who responded were concerned about the scale of potential Green Belt release in the Borough. There were doubts expressed over whether the amount was justified, and the level of need for housing and employment land was also questioned, indicating that St.Helens has had a declining population up until fairly recently.
- 1.3.26 Many people were concerned about the potential adverse impacts of the new development on biodiversity and wildlife, landscape and historic character. The loss of agricultural land needed for food production was also a concern cited by some. Others asked why more brownfield land was not being allocated, or empty homes occupied, rather than Green Belt land being developed.
- 1.3.27 Respondents also mentioned increased traffic congestion and air pollution could arise from the development, and there were concerns raised about the road infrastructure's ability to cope, especially at congested junctions. There was concern about the need to avoid exacerbating flooding problems in parts of the Borough. Concerns were raised by many respondents about a perceived lack of infrastructure to support existing population, especially education and health, let alone the additional development and population. There was support for providing more affordable housing and housing for elderly persons, including bungalows and retirement housing.

Local Plan Preferred Options: How the main issues have been addressed in the  
Local Plan (Regulation 17 (d) (iv))

- 1.3.28 The responses to the main issues raised in the LPPO are set out in the tables in Section 2. However the following provides a high level summary of how the main issues have been addressed.

- 1.3.29 The Council considers that the strategy in the Local Plan Submission Draft (LPSD) addresses the main issues by striking the right balance between meeting housing and employment needs while protecting the most valuable environmental resources and the overall function of the Green Belt, and making provision for adequate infrastructure to be secured at the appropriate time. The Vision, Aims and Objectives have all been revised.
- 1.3.30 The need for large, modern employment land remains strong, although the amount of land identified as being required within the Plan period has been reduced. The LPSD has taken account of revised estimates of housing need, which is lower than at LPPO, reducing the need for housing land compared to the LPPO. Additional brownfield sites have been identified to meet housing needs, and the 2016 draft Green Belt review has been reviewed and revised. Fewer sites are now considered suitable for housing development. The Council is actively exploring how it can increase the re-use of brownfield land both inside and outside of the planning system. Together, this addresses some of the concerns about the amount of land being released from the Green Belt.
- 1.3.31 An Infrastructure Delivery Plan (IDP) has been developed to address infrastructure requirements that are clearly set out in policy. The impact of housing development on the road network, both roads controlled by St.Helens Council and those by Highways England (i.e., the M6 and M62) have been considered through the development of a transport model, and the modelling of proposed sites to identify the degree of impact and potential mitigation. Some sites will not be able to be developed until road infrastructure issues are addressed.



## **2. MAIN ISSUES (BY CHAPTER, POLICY AND SITE)**

### **2.1 Introduction**

- 2.1.1 This chapter summarises the main issues raised by respondents in relation to each chapter, policy or site identified within the Local Plan Preferred Options (LPPO) document 2016. It also sets out how the issues have been addressed in the Local Plan Submission Draft (LPSD) 2018. The information is presented as a series of tables that cover each part of the LPPO and LPSD documents (i.e., vision, policies, sites) in sequence. Some of the main issues have been submitted by multiple representors and/or by persons whose names have not been attributed<sup>1</sup> within the summaries. Where this is the case, the representor reference number column is left blank.. Similarly, some respondees chose to submit their representations anonymously; these, therefore, cannot be specifically attributed.
- 2.1.2 Two reference indexes are set out at the end of the document. These indicate which responses were 'main issues' and the Ref.No. assigned to them. There is also a page index that enables location of the responses in the tables that follow.

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<sup>1</sup> In this report, members of the public who made representations are not individually identified, neither are those who put their names to a petition, or commented via social media.

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CHAPTER 3 - SPATIAL VISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO0801, Seneley Green PC	Cannot support the loss of Green Belt, additional homes within the rural areas would not support the Vision.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Spatial Vision as it reflects the issues facing St.Helens and encourages sustainable development, renewal and opportunity, and seeks to unlock the growth potential of St.Helens.	Support noted.
E1510, Homes & Communities Agency	Support for the continued urban regeneration and sustainable expansion of St.Helens as identified within the Spatial Vision that St.Helens is an attractive place to live, work, visit and invest in, with healthy, safe and inclusive communities and a quality and accessible built and natural environment.	Support noted.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Supports the Spatial Vision but consider it could be improved upon by also making clear that if the economic aspirations of the Borough are to be achieved, family homes of a high enough quality must be provided to help attract and retain a sufficiently skilled workforce within the Borough.	The LPSD addresses this by including an allowance for employment growth in the calculation of Objectively Assessed Need (OAN) for housing. This matter is covered in Policy LPA05.



CHAPTER 3 - SPATIAL VISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Suggest that the first sentence should be amended to "High quality employment land has been provided to meet modern employment needs to 2033 and beyond...." Consideration should also be given to the inclusion of a specific reference in the vision to "achieving an appropriate Green Belt review and defining a revised long term defensible Green Belt boundary" to achieve the growth aims. Specific reference should also be made to the logistics sector in meeting a specific part of the modern employment needs in the Borough.	The vision has been revised in the LPSD. The need to provide for employment needs beyond the end of the Plan period is acknowledged but is adequately covered elsewhere in the Plan. It is also not necessary for the vision to refer specifically to the Green Belt review as this is simply the mechanism by which 'sustainable growth' (which is referred to in the vision) will be achieved. The needs of the logistics sector are adequately addressed in Policies LPA02, LPA04 and LPA06.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd	The Spatial Vision should strongly reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the LCR and North West in general (such as the Superport, Airport City, and major upgrades to the M6 and M60 to make them Smart Motorways.	The positive impact of these initiatives and infrastructure projects is acknowledged. However, it is not considered necessary to refer to them specifically in the vision as they are adequately covered elsewhere (in the supporting text to Policies LPA02 and 04).
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Core Strategy Spatial Vision identified Haydock Industrial Estate and the M62 Link Road Corridor as the priority areas for economic development. The Vision and Strategic Aims should identify Haydock as a priority location because of its proximity to the strategic road network, the existing employers in the vicinity and the availability of local labour. The Spatial Vision should identify sufficient employment land in sustainable locations.	Haydock is an important location for employment in the Borough, is identified as one of its Key Settlements in the Plan (Diagram 4.1) and is referenced in Policy LPA04.1: Strategic Employment Sites. It is considered that to include it as a named location in the Spatial Vision would give its role undue prominence.

CHAPTER 3 - STRATEGIC AIMS AND OBJECTIVES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Aim 1 – should recognise the appropriate contribution that sustainable greenfield sites can make to regeneration and economic development of the Borough.	Comment noted. The LPSD addresses this under Policy LPA02 (no.4). This provides a framework for the Plan to release land from the Green Belt to enable needs for housing and employment development to be met in full over the plan period.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Aim 5 – a reference to capitalise on the growth sectors of SuperPort and large scale logistics sector should be incorporated to reflect the aims of the economic strategies that are referred to in the Aim.	Comment noted. The LPSD Strategic Aim 1 and Objective 1.1 and 5/5.1 and the Spatial vision support economic growth and regeneration in sustainable locations in St.Helens.
E1543, Barton Willmore on behalf of Jones Homes (North West) Ltd.	Supportive of the proposed Strategic Aims & Objectives, however Objective 1.1 should give priority to development of derelict and vacant sites. Objective 4.1 should be amended to include reference to market and affordable homes.	Support noted. The relevant part of Strategic Objective 1.1 (which is numbered 1.3 in the LPSD) has been changed to refer to Previously Developed Land instead of derelict and vacant sites. The reference in Objective 4.1 to providing for a “sufficient number and range of new dwellings” is considered to encompass market and affordable housing.
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	Strategic Aim 4, in particular the use of the word “sufficient”, is lacking in ambition and should be reworded to reflect the positive aspirations of the [2012] NPPF.	Use of the word ‘sufficient’ is retained in LPSD Strategic Aim 4. This is a robust approach and consistent with national policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Generally supportive, however, Strategic Objective 1.1. Objective 4 Reference to 'local needs' should be reviewed as it is clear that new homes are also needed to deliver the Boroughs economic ambitions.	Support noted. The revised Strategic Objective 4.1 of the LPSD addresses this issue by stating that land should be identified for “...a sufficient number and range of new dwellings”.

### CHAPTER 3 - STRATEGIC AIMS AND OBJECTIVES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1560, Pegasus Group on behalf of Redrow Homes North West	Strategic Aim 1.1 - uses the word 'priority', however the NPPF seeks to significantly boost housing supply through a range of site types both greenfield and brownfield. Strategic Objectives 4.1 & 5.1 refer to 'sufficient' housing and employment land, which suggested the Council is only just meeting its needs, the NPPF requires plans to be 'positively prepared' and to 'boost significantly' the housing supply. As such we recommend amending the wording.	Comment noted. The relevant part of Strategic Aim 1 has now been amended to refer to efficient use of Previously Developed Land. It has been established (see the supporting text to the draft local plan Policy LPA02) that St.Helens does not need to accommodate any housing needs arising in any neighbouring local authority area. The LPSD has been positively prepared. It seeks to meet St.Helens objectively assessed needs, and is informed by cooperation with neighbouring authorities.
E1488, Historic England	Strategic Aims and Objectives could be improved upon by incorporating the wording of Objective 8 of the 'Local Plan Sustainability Appraisal: SA Report December 2016/2018'. This wording is "to protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment"	This matter is addressed in Strategic Objective 6.2 of the LPSD, which is to "... safeguard the quality of the environment by protecting and enhancing local character and distinctiveness, the historic environment, biodiversity and geodiversity." Policy LPC11 also addresses this matter.

### POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Promoting healthy communities etc. through development will be difficult as people are so reliant on cars and additional growth will only add to the pollution problems.	The Vision, Strategic Objective 3.1 and Policies LPA02, LPA07 and LPA09 collectively support sustainable modes of transport including walking and cycling. They promote healthy communities through improved access to formal and informal green infrastructure assets to reduce carbon emissions.

POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Poor transport links and lack of local services make it extremely difficult to encourage new residents to cycle and as such residents will be reliant on cars thereby failing to meet the aim of minimising carbon emissions	The Vision, Strategic Objective 3.1 and Policies LPA02, LPA07 and LPA09 collectively support sustainable modes of transport including walking and cycling. The approach of the LPSD will therefore support sustainable modes of transport including cycling and walking which will mitigate carbon emissions.
E1467, Cllrs Glover, Neal & Baines	Residents have concerns in regards to pollution by the additional cars.	LPSD Policy LPD09 addresses this issue and requires development proposals to demonstrate that they will not "...having regard to established local and national standards, lead to an unacceptable decline in air quality in any area."
E1470, Cllr Haw	Eccleston residents disagree that the Plan is sustainable and that development has been divided equally around the Borough.	Sustainable development principles are addressed in the Vision and the Strategic Aims and Objectives. The distribution of development is addressed in Policy LPA02, which focusses development into sustainable locations (including a focus on the Key Settlements) across St.Helens.
E1470, Cllr Haw	In regards to climate change the addition of 2,477 new homes in Eccleston will exacerbate the flooding issues.	Policy LPC12 seeks to ensure that new development will not cause an unacceptable risk of flooding and sets out the requirements for developers to demonstrate how flood risk will be addressed.
E1495, CPRE	The policy should define what is meant by sustainable development and include a commitment to air quality.	Sustainable development is defined in the NPPF Para.11 and the LPSD does not duplicate this. Air quality issues are addressed in Policy LPD09.
E1481, Parkside Regeneration LLP	The Plan identifies Key settlements where development is focussed ensuring sustainable development.	Support noted.

POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Support the policy but it should be amended to reflect para 14 of the NPPF, by deleting the following text from Criterion 3 "material considerations indicate otherwise – taking into account whether".	The wording of Policy LPA01 has been revised and is consistent with the relevant paragraph (11) of the revised NPPF (July 2018).
E1499, Natural England	Support the preferred approach of this policy.	Support noted.
E1503, Kingsland Strategic Estates Ltd.	Policy is in keeping with the NPPF. Criterion 2 part II will be an important part of a successful Plan.	Support noted.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Clarification is required between Policy LPA01 and Policy LPA03, to ensure that proposals that comply with presumption in favour of sustainable development are not then refused on the development principles contained within Policy LPA03.	LPSD Policies LPA01 and LPA03 have been updated. The requirements of Policy LPA03 are reasonable and justified having regard to relevant national policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Support the approach to include a buffer in determining the scale of Green Belt release, however, in line with LPEG recommendations the buffer should be applied to the overall housing requirement rather than simply the scale of the land supply 'gap'.	Support noted. The approach to housing land supply in Policy LPA05 (and explained in its supporting text) contains an appropriate level of contingency in the supply as a whole, including sites being delivered from the current urban areas and from areas released from the Green Belt.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Policy text needs to be amended to be more positively prepared. Part 1. should have additional texts, which states: "This will take into account the need expressed in the NPPF to 'boost significantly' the supply of housing."	LPSD Policy LPA01 has been revised and fully aligns with the revised NPPF (July 2018). It is not necessary to include the wording suggested in this Policy as the underlying point is addressed elsewhere in the Plan.



POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1482, Spawforths on behalf of Network Space	Object to the word 'comparison' – this should be deleted in order for the Plan to be found sound.	Policy LPA02 has been re-worded and does not include this word.
E0224, Rainhill Civic Society	The concept of "Safeguarding" land is misleading, as the NPPF states it should be used "where appropriate". This could lead to unrestricted sprawl especially as the Garden Village at Halshead is to go ahead, which makes the case to preserve the Green Belt in St.Helens South even stronger.	The inclusion of safeguarded land accords with paragraph 139 of the NPPF(2018). The inclusion of safeguarded land will help ensure that the new Green Belt boundary endures for the long term in line with national policy.
E1491, NFU	Do not support the significant loss of productive acres of land. Farmland and farming activities should take priority in the Green Belt.	The LPSD proposes a reduced amount of development on agricultural land, as a result of the reduced housing requirement. The remaining sites that have been selected as development locations are those that are well-related to the existing built-up areas. Whilst some loss of agricultural land would still occur, this is justified by other sustainability factors. The St.Helens Green Belt Review 2018 sets out how the sites to be removed from the Green Belt have been selected.
E1495, CPRE	Object to Criterion 4 as exceptional circumstances have yet to be met so the Plan cannot remove land from the GB.	The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. There is insufficient land in the Borough's urban areas (and in those of neighbouring districts) to provide for future development land needs and therefore some sites need to be removed from the Green Belt to accommodate new development. The LPSD proposes a reduction in the amount of Green Belt release due to the reduction in the annual housing requirement from 570 to 486 dwellings per annum.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Strongly oppose the proposals to release 1,187ha of land from the GB.	See above. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1495, CPRE	Opposed to development particularly at Rainford Junction; Crank; Bold and Kings Moss due to the harm it would cause the GB.	See above. The loss of Green Belt land in some locations (e.g., Rainford Junction) has been reduced compared to that proposed at Preferred Options stage.
E1250, Rainford Action Group	The lack of Brownfield Sites is not an "exceptional circumstance" to release GB land.	See above. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1453, Culcheth and Glazenbury PC	Object to GB being removed and doubt the Council can control the sequential use of land in regards to Safeguarded Land.	The Plan seeks to identify sufficient land for housing and employment in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. Policy LPA06 of the LPSD confirms that planning permission should not be granted for development on safeguarded land unless it is allocated for development in a future Local Plan.
E1458, Winwick PC	Too much development is being proposed near the Winwick area. The openness around Winwick will be gone if Green Belt release goes ahead.	The LPSD seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. Whilst the loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage, some sites close to Winwick are still to be released. The reasons for selecting specific sites are set out in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	The impact on local highways infrastructure will be unacceptable.	The impact on local highways infrastructure is covered by relevant Policies (e.g., LPA07 and LPA10).

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Reliance on Brownfield land is not appropriate. Object to lowering the threshold for developers of brownfield sites. To assume developers on greenfield sites have less constraints is not necessarily correct.	Policy LPA02, clause 3 has been revised but reaffirms that development on previously developed land in Key Settlements will be encouraged by setting lower thresholds for developer contributions on such sites. This is fully justified by the findings of the Economic Viability Assessment.
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, health facilities, public transport, retail outlets. The sites identified consist of Grade 1 agricultural land, which is a high source of employment in the village.	The St.Helens Infrastructure Delivery Plan 2018 sets out the key infrastructure requirements necessary for development to take place. LPSD Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements. Site HA14 is no longer proposed to be allocated for housing.
E1456, Rainford PC	Site HA21 is publicly accessible parkland and should be protected as such, as an alternative Red Bank Farm should be included to increase the numbers.	Comment noted
E1470, Cllr Haw	The amount of land proposed for development in Eccleston is unacceptable, brownfield sites must be developed first. There are also 3,500 empty homes in the Borough the Council should accelerate its 'Empty Property Strategy'.	Council tax data confirms that in October 2017, 936 dwellings in St.Helens Borough met the Government criteria for being Long Term vacant. Whilst the Council pro-actively promotes the re-use of vacant dwellings via its Empty Homes Strategy it cannot control the numbers of dwellings which become vacant. It therefore cannot assume that net trends in vacancies will contribute to meeting housing needs. LPSD Policy LPA02 confirms that "re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites."

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Landor Associates	Employment allocated in close proximity to the M6 and M62 will encourage long-distance commuting.	LPSD employment allocations are supported by the Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (October 2017). These studies indicate that sites close to the M6 and M62 motorways will play a critical role in the North West large-scale logistics and distribution sector. The policies of the LPSD will encourage use of sustainable transport links to mitigate long distance commuting.
E1486, McGinn MP	Resident constituents have expressed concern over how much GB is being released. Have the Council considered a step housing target with identified phases? Disappointed that the Government funding for brownfield sites has been removed.	The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
LA399, Newton Resident & Friends Association	Newton and Haydock will be taking a disproportionate amount of employment development compared to the rest of the Borough.	Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The sites identified for development have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
E1461, Croft PC	The protection of GB is especially important in light of the planned route of HS2 through the region. The proposal would see considerable urban sprawl with the space between existing small, fairly rural communities being eroded.	Comment noted. The LPSD is aligned with the NPPF(2018) especially para.139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "sprawl" and help to strengthen the protection for the remainder of the Green Belt.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1548, Nexus Planning on behalf of NHS Property Services	Insufficient land has been allocated in Newton-le-Willows in comparison to the amount of employment identified.	The employment site allocations set out in Policy LPA04 are suitable to meet needs set out in the Employment Land Needs Study (ELNS) 2015 and its Addendum Report (October 2017). The location of employment and housing sites has also been informed by the Green Belt Review 2018.
E1470, Cllr Haw	More brownfield land needs to be built on first before GB land is removed; however there is no Brownfield register.	The LPSD Policy LPA02 states that "re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites". The Council has taken account of the sites in its published Brownfield Register in finalising the LPSD.
E1569, Nexus Planning on behalf of BXB Ltd	Concern that the evidence base, specifically the draft Green Belt Review 2016, does not fully consider the impact that Bold Heath has upon the character and purpose of the Green Belt in that particular location.)	The Green Belt Review (2018) fully takes account of the impact of developing sites on the character and purposes of Green Belt areas. Its methodology also takes relevant policies in the NPPF (2018) into account.
E1468, Cllr Long	Allocate more land as greenspace in the local plans or let developers build on sites regardless of planning aspirations.	The LPSD includes adequate policy provision for open spaces across the Borough. Policy LPCC05 confirms that the Council will seek to ensure that the Borough's network of open spaces is protected, managed, enhanced and where appropriate expanded. Policies LPC06, LPC07, LPC09 and LPC10 also support the protection, provision and enhancement of greenspaces.
E1465, Y. Fovargue MP for Makerfield	Without GB, Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed.	The LPSD seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.



POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
FP0260 Billinge PC	Suggest that more land is allocated in Garswood, where there seems to be little objection.	The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are in sustainable locations and those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs
E1560, Pegasus Group on behalf of Redrow Homes North West	Part 3. - need a range of brownfield and greenfield sites to guarantee delivery and not prioritise one over the other.	Policy LPA02 confirms that re-use of brownfield land in Key Settlements will remain a key priority. This approach is fully in line with national policy.
E0442, Billinge Chapel End PC	Concerned that the current approach to Green Belt release will undermine the purpose of preventing urban sprawl. Housing Allocation HA1 is close to two neighbouring authorities (Wigan, West Lancashire).	The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. Site HA1 has been removed and will remain in the Green Belt.
FP0456, Residents Against The Development Of Green Belt – Rainhill	Rainhill has a number of constraints including highways, education facilities, poor pollution levels and the further removal of GB will remove the areas of CO2 absorption.	The sites chosen for Green Belt release and safeguarding have been objectively assessed such that they: are adjacent to existing built-up areas; relate well to the key settlements so that the availability of local services and facilities is more likely; reflect the demand for additional housing in areas that are accessible to jobs; and result in sustainable development. The details of the site assessments, including anticipated impacts on the provision of local services, are contained in the Green Belt Review 2018.
FP0717, Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.	The Plan should be amended and priority should be given to non-GB sites and support the delivery of new housing, employment development on such sites.	LPSD Policy LPA02 states that "re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites." The Council took account of the Brownfield Register when identifying sites.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0228, Rainford Heritage Society	Allocations in Rainford will bring us closer to neighbouring parishes which will intrude into our heritage	LPSD Policy LPC11 seeks to protect the historic environment. A number of areas proposed for removal from the Green Belt in the LPPO would now stay in the Green Belt.
LPPO588, Rainford Action Group.	Object to development in Rainford due to lack of affordability, pressure on drainage system, blue light services, and the decimation of GB, increase in anti-social behaviour, all for a declining population.	Comment noted. The level of development proposed in Rainford has been reduced compared to that proposed in the LPPO. Infrastructure issues are addressed in Policy LPA08.
LPPO534, Cllr Mitchell (Burton & Winwick Ward).	Removal of GB around Winwick will have a detrimental impact on Winwick residents including outlook and traffic infrastructure.	Impacts from development in this area will be addressed in relevant policies including Policies LPA07 'Transport and Travel', LPA08 'Infrastructure Delivery and Funding' and LPA10 'Parkside East'.
E1427, Residents of French Fields	A disproportionate amount Green Belt Land is being released in the south of the Borough for housing despite the Bold Forest Park AAP and Mersey Forest initiatives.	The distribution of sites to be removed from the Green Belt has been guided by the Green Belt Review 2018. The levels of development proposed in Bold are not inconsistent with the Bold Forest AAP. Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues.
E1446, Knowsley Council	It will be extremely challenging to demonstrate adequate ground for removing a further 15 years' worth of housing sites from the GB when there is no certainty of future demands and given the Plan was published before the SHELMA.	The LPSD was informed by the draft Liverpool City Region SHELMA, published in 2017, which assessed housing and employment needs across the whole City Region and West Lancashire but excluding Warrington. Its proposals for safeguarded land (to meet post Plan period development needs) are fully in line with relevant policy in the NPPF.
E1400, Parish Councillor Trisha Long	The concept of releasing more GB land for development runs counter to the concept of localism.	The concept and methodology used for assessing the release of Green Belt for development is aligned with the national policies including the NPPF.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO588, RAG – Rainford Action Group	Animal and natural habitats would be ruined, we have a right to protect.	LPSD Policy LPC06 supports the protection of biodiversity including wildlife.
LB0001, Save our Green Belt & Residents against Florida Farm Development	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used.	LPSD Policy LPA07 addresses the issue of transport impacts from development. It states that “all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement”. Air pollution and noise are also covered in relevant Plan policies (e.g., LPD01 and LPD09).
LPPO801, Seneley Green PC	Cannot support the current proposals for release of GB as they would be to the detriment of the character of the areas.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1489, Home Builders Federation	Support the lowering of developer contributions to encourage development in Criterion 3.	Support noted
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Broadly supportive but concern with reference to the majority of housing to be developed on brownfield land.	Support noted. The emphasis on securing efficient use of brownfield land accords with national policy.
	Support the focus on delivering new development on previously developed land.	Support noted
E1489, Home Builders Federation	Support the approach of supplying a further 15 years' worth of land.	Support noted

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Landor Associates	Green Belt land needs to be released. There has been virtually no housing development in Rainford over last 20 years and the current amount of housing allocated in Rainford does not address the "backlog".	Support noted. The LPSD Policy LPA02 sets out how development will be distributed across the Borough up to 2035 and beyond.
E1458, Winwick PC	Support the Spatial Strategy and Vision but request neighbouring residents outside the Borough are not treated any differently.	Support noted. The LPSD covers St.Helens Borough. The Council has cooperated extensively with neighbouring local planning authorities in preparing the Plan. The Plan policies do not treat residents of neighbouring districts any differently for example in terms of protection of residential amenity.
E1491, NFU	Welcome the inclusion of rural economic diversification in the Green Belt.	Support noted
E1460, Cllr Glover	Support as attractive areas for housing and manufacture have been selected.	Support noted
E1521, Michael Sparks associates on behalf of Canmoor Developments Ltd.	Support the release of land for additional jobs for the Borough, as currently there is insufficient land allocated for employment.	Support noted.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Agree that Haydock; Newton-le-Willows and Earlestown should be amongst the key settlements.	Support noted
FP0717, Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.	Support criteria 1, 2 and 5.	Support noted

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support the inclusion of Garswood as a Key Settlement	Support noted
E1447, West Lancashire Council	Broadly supportive, however greater clarity is required to ensure that the proposed spatial strategy is robust and complements the spatial strategies of neighbouring boroughs, including West Lancashire.	Support noted. LPSD Policy LPA02 supporting text recognises the importance of effective cooperation with nearby districts in the Liverpool and Greater Manchester City Regions, and in Warrington and West Lancashire.
E1445, Sefton Council	Support the overall strategy	Support noted
E1466, Cllr Sims	Generally supportive but local residents object to the amount of development proposed for Earlestown.	Support noted. The level of Green Belt release proposed is Earlestown has reduced compared to LPPO stage.
E1467, Cllrs Glover, Neal & Baines	Agree with the ambitious aims and growth for the Borough but local Windle residents have concerns with the allocated site HA16.	Support noted. Site HA16 is now proposed for safeguarding (to meet post 2035 housing needs) as opposed to being allocated for development before then.
E1468, Cllr Long	Support and residents are clear that this is a Borough-wide Plan.	Support noted
E1469, Cllrs Banks, Bond & Burns	The Plan sets out growth ambitions in a sustainable way.	Support noted
E1486, McGinn MP	Welcome the Vision and ambition to win investment and create employment in the Borough	Support noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Agree with general approach, however the trust is not convinced that some of the sites being put forward can be developed with an 'acceptable impact on the environment'.	Support noted. LPSD Policy LPC06 supports the protection of biodiversity including wildlife. Impacts upon the environment have been taken into account in the methodology of the St.Helens Green Belt Review, which has informed the selection of sites to be removed from the Green Belt.



POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Support the spatial strategy and the identification of the St.Helens Core Area and Newton-le-Willows as key settlements.	Support noted
E1555, Helen Howie on behalf of Wallace Land Investments	Support Rainhill as a Key settlement within the Borough.	Support noted
E1481, Parkside Regeneration LLP	The demand/deficit for new employment floorspace and housing combined with the historic and tightly drawn GB/settlement boundaries justifies the requirement to release land from the GB to meet identified needs.	Support noted.
E1583, Warrington Borough Council	Supportive of St.Helens' overall growth ambitions and its commitment to meet its own housing and employment needs.	Support noted
E1575, DPP Planning on behalf of Tesco Stores Ltd.	Generally support the spatial strategy set out, however, when choosing which GB sites to allocate for development, preference should be given to those sites which will assist with the redevelopment of land adjacent to brownfield sites within the urban areas that are in need of regeneration.	Support noted
E1479, Edward Landor Associates	Green Belt release is necessary in order to meet FOAHN housing target. The supply of brownfield is limited. The extent of land to be removed from the GB is not significant in the context of the proportion of GB to be retained in the Plan.	The Council's Green Belt Review (2018) sets out a robust approach and methodology for the release of Green Belt for housing and employment development.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Support the release of GB and the Council acknowledges other authorities in the same housing market have no spare suitable brownfield land to meet St.Helens' needs.	Support noted
EFP0260, Billinge PC	We need more houses and business.	LPSD Policies LPA04, LPA04.1 and LPA05 support the delivery of housing and employment in the Borough.
LLPO538, Torus	Support providing the Brownfield sites are considered and dismissed first.	Support noted. Whilst the re-use of brownfield land remains a key priority this will not be sufficient on its own to meet the Borough's development needs.
E1496, Highways England	Broadly supportive but site-specific requirements are currently very high, with a lack of detail regarding sustainable and active transport provision. Many employment sites are lacking existing opportunities for sustainable and active travel.	Support noted. The housing and employment allocations proposed in the LPSD have been identified having regard to the findings of the St.Helens Local Plan Transport Impact Assessment 2018. Policies LPA07 and LPA05.1 set out requirements for sustainable and active travel provision, linked to the delivery of the employment sites. Sustainable and active travel are also addressed in the St.Helens Infrastructure Delivery Plan 2018.
E1496, Highways England.	Allocated sites should include detailed measures in order to maximise the potential for sustainable and active travel opportunities, including off-site works as required.	LPSD Policies LPA04.1, LPA05.1 and LPA 07 set out detailed measures to achieve sustainable transport and active travel.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Council must ensure that Policy LPA06 is fully consistent with Policy LPA02 and full regard is had to the implications of the SHELMA.	LPSD Policy LPA06 is consistent with Policy LPA02. The LPSD was informed by the draft Liverpool City Region SHELMA, published in 2017.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSP
E1549, Persimmon Homes North West	The quantum of future housing requirements for Billinge and Seneley Green is disproportionately low and fails to reflect population size. It is recommended that the redistribution of the Borough's housing supply should be amended to align with the settlement size of these areas.).	Housing and employment sites have been identified by assessing a number of factors including the contribution that sites make to the purposes of the Green Belt, accessibility by sustainable modes of transport and other deliverability issues. The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
E1564, De Pol Associates on behalf of Metacre Ltd.	Agree with the principle of releasing of GB land however it is considered that additional land off Fleet Lane, Parr should be released.	Support noted. The selection of sites for release from the GB has been guided by the Green Belt Review 2018. No additional land is proposed to be released off Fleet Lane.
E1559, DLP Planning on behalf of Mr P. Reynolds	Site HS05 is capable of coming forward within this Plan period. Site GBS_156 should be removed from GB and allocated as Safeguarded Land. Allocation of both these sites would widen the choice of housing sites available.	Following the re-appraisal of sites in the Green Belt Review 2018, it has been determined that LPPO site HS05 will remain in the Green Belt. This is following the reduction in the assessed level of housing need from 570 to 486 dwellings per annum, which impacts on the amount of land required. This approach is in line with the revised methodology for the Green Belt Review.
E1548, NHS Property Services	Support subject to the revision of the proposed development boundary of site HA12.	Following the re-appraisal of sites in the Green Belt Review 2018, it has been determined that LPPO site HA12 will remain in the Green Belt. This is following the reduction in the assessed level of housing need from 570 to 486 dwellings per annum, which impacts on the amount of land required. This approach is in line with the revised methodology for the Green Belt Review.



POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1557, Peter Brett Associates LLP on behalf of Smith Property Developments Ltd. and Interland UK Ltd.	Endorse the release of land at Parkside West from GB and consider that land at Newton Park Farm (situated within the EA9 site) should be allocated for residential development.	Comment noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E1518, Cass Associates on behalf of Redrow Homes Ltd.	Generally supportive but object to the Policies Map as it does not exclude the land at Junction Road/Stanley Avenue from the Green Belt.	Comment noted. The LPSD proposes to keep the land at Junction Road/Stanley Avenue (Rainford) in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1472, Edward Landor Associates on behalf of Z. Mallik	More smaller sites should be included in the south of the Borough to address the current imbalance in the distribution of sites likely to come forward for development. There is an opportunity to identify sites in "other district settlements" such as Bold Heath, rear of Holly House.	The St.Helens Brownfield Register 2017 identifies 62 sites, with a combined capacity of 852 dwellings, which are no larger than one hectare in size. Further small sites are likely to come forward as windfall sites. There is no evidenced need for a greater supply of small sites to be allocated in the south of the Borough.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England.	Part 6 should be more explicit in terms of what constitutes a lack of housing supply.	Comment noted. Policy LPA05 confirms that housing delivery will be monitored in accordance with the national Housing Delivery Test. In accordance with national policy, the LPSD will seek to ensure there is a 5 year deliverable supply of housing sites at all times.
E1575, DPP Planning on behalf of Tesco Stores Ltd.	Where Green Belt releases are required, preference should be given to land which is adjacent to, and can form part of, the redevelopment of brownfield sites within the urban area.	Comment noted. Any specific regeneration benefits likely to arise from the development of sites has been taken into account by the Council in its site selection process.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1558, Savills (UK) Ltd. on behalf of the Knowsley Estate	Fully support the release of land from GB but request the identification of Site HS21 be allocated for housing in this Plan period, rather than identified as 'Safeguarded Land'.	Comment noted. The LPSD proposes to keep LPPO site HS21 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E0224, Rainhill Civic Society	Need to refer to Rainhill's transport links via the railway and M62 in para 4.5.	Comment noted. No change made.
E1555, Helen Howie on behalf of Wallace Land Investments	Support land being removed from GB and classed as Safeguarded Land, to meet two plan periods. However site HS23 should come forward now as an allocation to meet the housing deficit in the Borough.	Comment noted. The LPSD proposes to keep LPPO site HS23 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1494, Merseytravel	Development should be sited in accessible locations.	Comment noted. LPSD Policies LPA02(2) and LPA07(1) require development to be sited in accessible locations.
E1494, Merseytravel	Sustainable housing does not just mean an energy efficient build, but it must also encompass housing design and how the resident will live in the house and access the necessary services.	Comment noted.
E1494, Merseytravel	Homes should be in a variety of sizes and tenures to meet all needs including affordable housing, jobs and better opportunities for all.	LPSD Policy LPC01 requires development to provide mix of housing in terms of its type, size and tenure to meet the needs of residents in the Borough.
E1508, PWA Planning on behalf of JMB Farming	Site HS20 should be brought forward as an allocation.	Comment noted
E1518, Cass Associates on behalf of Redrow Homes Ltd.	Site GBS_010 (Rainford) should be allocated as a site in the Plan.	Comment noted. The LPSD does not allocate this site. The reasoning for the approach to Green Belt release is set out in the Green Belt Review 2018.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie, on behalf of Wallace land Investments.	Part 1 - reference to Rainhill is missing.	Comment noted. Clause 1 of Policy LPA02 in the LPSD makes appropriate reference to Rainhill.
LPPO19, MWA on behalf of J Murphy and Sons Ltd.	Wording should be amended to indicate that safeguarded land could come forward sooner if housing needs are not met.	Comment noted. Clause 4 of Policy LPA05 confirms that if annual monitoring demonstrates the deliverable housing land supply has fallen significantly below the required level, a partial or full plan review will be considered to bring forward additional sites.
E1504, Plot owners of Bell Lane.	Site HS04 should not be safeguarded but rather an allocated site.	Comment noted. The LPSD proposes to keep LPPO site HS04 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Site GBS_054 (Rainford) could help boost housing supply in a sustainable manner	Comment noted. The LPSD does not allocate this site. The reasoning for the approach to Green Belt release is set out in the Green Belt Review 2018.



POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Residents of Eccleston do not accept that there is a 'housing crisis' in St.Helens, and feel that the housing figures are inflated on the back of a national narrative, and that does not fit the local housing market.	The LPSD has a reduced housing target of 486 new dwellings per annum. This figure is informed by relevant evidence including the the St.Helens Strategic Housing Market Assessment (SHMA) Update (2018). This evidence considered the Government's official population and household projections as the starting point for considering future housing needs.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Does not provide ability to take into account existing open space provision within an area, e.g., where there is currently an excess of open space this should be accounted for when calculating the appropriate amount of open space required. In such instances, the provision of 40sqm per dwelling might exceed that which is actually required.	Under Policies LPC05 and LPD03 of the LPSD, existing surpluses of open space will be taken into account in the assessment of needs connected with new development.
E1492, Sport England	Support part 5 of the policy subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design. Active Design Guidance produced by Sport England in partnership with Public Health England.	Policy LPD03/LPC05 supports the delivery of programmes and strategies that provide and enhance sport and recreational activities such as youth and children's play and sports facilities. Active design principles are addressed in clause 7 of Policy LPA11 'Health and Wellbeing'.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Particularly support new developments to meet the challenges of population growth by providing a mix of types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations.	Support noted. LPSD Policy LPC01 and LPA03(2a) require development to provide for a mix of housing in terms of its type, size and tenure to meet the needs of residents in the Borough.

POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Development Principles, particularly improving the economic well-being of the Borough's residents, which is crucial given the deprivation in parts of the Borough and the high levels of unemployment.	Support noted
E1542, Barton Willmore	Generally supportive of this Policy, but disproportionate to expect all developments submitted to adhere to all the principles outlined. Not all development will be able to respond in a positive way to each of the principles outlined.	Support noted. The first sentence of the Policy has been amended to make it clear that the principles will apply where relevant.
E1549, Persimmon Homes	Generally supportive of the development principles but policy should refer to meeting the challenges of population growth by significantly boosting the supply of homes.	Support noted. Housing supply issues are covered in LPSD Policy LPA05 and Policy LPA05.1.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Development Principles, particularly improving the economic well-being of the Borough's residents, which is crucial given the deprivation in parts of the Borough and the high levels of unemployment.	Support noted
E1495, CPRE	Broadly supportive of policy	Support noted
E1572, GVA on behalf of Miller Developments	Strategic Site Allocations currently include high-level site specific requirements, it is anticipated that more detailed site-specific requirements can be included in the Publication Draft Local Plan in order to ensure the principles of this policy are met.	Comment noted. Site requirements are set out in Policies LPA04.1, LPA05.1 and LPA10.

POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1542, Barton Willmore	Suggest the wording is amended to read "New Development in St.Helens will be expected to support the following development principles where relevant".	Policy LPA03 has been updated to incorporate the suggested wording.
E1558, Savills (UK) Ltd. on behalf of The Knowsley Estate	The Council should balance this policy against Policy LPA01 and avoid refusing schemes which do not meet all these objectives where it is beyond the scope of the proposed development.	Comment noted.
E1563, Barton Willmore on behalf of Millar Homes	Generally supportive of this Policy, but disproportionate to expect all developments submitted to adhere to all the principles outlined. Not all development will be able to respond in a positive way to each of the principles outlined.	Support noted. The first sentence of the Policy has been amended to make it clear that the principles will apply where relevant.

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Find it difficult to follow the calculations of estimated employment land needs. Are the uplifts based on robust evidence? Will the aspirational quantum of development ever be achieved in reality?	Comment noted. The basis for the employment land needs assessment is set out in the supporting text to Policy LPA04 of the LPSD.



POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	More attention should be given to the importance of rural jobs such as farming and forestry and linked sectors such as food and drink.	Policy LPA04 of the LPSD confirms (in clause 7) that appropriate proposals for the diversification of rural economy will be supported. The policy also encourages suitable proposals for the re-use of buildings in the rural areas for employment use. Agricultural land quality has also been taken into account in the Green Belt Review.
E1495, CPRE	Best and Most Versatile (BMV) agricultural land (grades 1-3a) should not be included as local plan allocations.	Agricultural land quality has been taken into account in the Green Belt Review. Whilst some employment land allocations are on BMV land this is justified by the other factors addressed in the Review.
E1495, CPRE	Swamping the market with GB sites will erode the viability of brownfield sites. As St.Helens was built on the back of the Industrial Revolution it is important to reuse previously developed sites to bring forward new opportunities.	The LPSD promotes the reuse of brownfield land in key sustainable locations. However, as the existing urban area does not include sufficient sites of the quantum and type required to meet employment development needs, it is necessary to release land from the Green Belt.
E1495, CPRE	Strongly object to Sites EA2, EA4 and EA9. There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO sites EA2 and EA9 are still to be allocated. LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.
E1496, Highways England	Large employment allocations in the GB lack existing sustainable and active transport linkages.	LPSD Policies LPA02 (clauses 5 and 9) and LPA07 address the issue of sustainable transport links. Policy LPA02 states that ..... "high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth".

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1496, Highways England	The employment strategy currently has significant implications for the SRN, inherently relying on the connectivity the network.	The impact of employment development on the Strategic Road Network is addressed in LPSD Policies LPA02 and LPA07. It has also been considered in the Local Plan Transport Impact Assessment 2018.
E1519, Barton Willmore on behalf of Avenbury Properties	Disagree that site GBS_019 has not been included.	The Council's Green Belt Review (2018) sets out a robust approach to determine which sites should be released from the Green Belt. No further employment sites have been identified for release.
E1557, Peter Brett Associates LLP on behalf of Smith Property developments Ltd. and Interland UL Ltd.	Site within Parkside West (Newton Park) should be allocated for residential development.	Comment noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E0224, Rainhill Civic Society	Large scale distribution places employ fewer people and as such concentrating on small businesses may reduce the need to release so much.	Comment noted. LPSD Policy LPSD04 retains an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St.Helens and the Liverpool City Region.
E1446, Knowsley Council	Such a significant increase in economic growth will be difficult to pass 'exceptional circumstances'. The sites allocated could bring benefits to Knowsley residents but have poor access.	Comment noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of 215.4 hectares (from 2018 until 2035). Policies LPA02 (clauses 5 and 9), LPA05.1 and LPA07 address the issue of sustainable transport linkages.
E1453, Culcheth and Glazenbury PC.	Concerned over cumulative impact of all employment land on the M6, including EA4, EA8 and EA9	The Council's Infrastructure Delivery Plan(2018) sets out the key infrastructure requirements necessary for development to take place. Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements. Traffic impact has been assessed in the St.Helens Local Plan Transport Impact Assessment 2018.

<b>POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1465, Y. Fovargue MP for Makerfield	Additional traffic generated by these sites will lead to further air pollution and traffic will only add to an already high level of congestion.	Policies LPA02, LPA07 and LPD09 address the issues of air quality and traffic impact respectively associated with planned development. Traffic impact has been assessed in the St.Helens Local Plan Transport Impact Assessment 2018.
E1469, Cllrs Banks, Bond & Burns	Concerned with the potential for oversupply and then the impact this will have on our infrastructure.	Policy LPA02 indicates that development will be required to “provide the necessary infrastructure and services” and proposals that are brought forward that fail to meet that expectation will not be permitted. Policy LPA07 makes clear that new development should maintain “the safe and efficient flow of traffic on the surrounding highway network.” Infrastructure issues are also addressed in Policy LPA09.
E1479, Edward Landor Associates	Distribution of sites does not meet the spatial objectives. The employment strategy does not cater for small start-up businesses)	Policy LPA04(1d) supports the creation of and expansion of small businesses.
L0770, Parkside Action Group	Policy is founded on employment land estimates which appear highly inflated and erroneous.	The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035). This figure is supported by robust evidence.
FP0456, Residents Against The Development Of Green Belt - Rainhill	Brownfield sites have not been explored, with no register yet in place. Gain clients first before guessing. We should be increasing the GB.	The Council has fully explored the potential for delivery from brownfield sites in finalising the LPSD. Release of Green Belt is needed to meet needs for employment and housing development.
E1250, Rainford Action Group	Research shows that the warehouse and logistics strategy for economic growth is wildly overoptimistic, and forecasts used do not factor in Brexit. Thousands of houses were added to the housing need figures on the basis of this forecasts.	The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035). The LPSD employment and housing policies are robust and consistent with national policies including the NPPF(2018).



POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO588, Rainford Action Group	Warehouse jobs will be replaced by automation which equal minimum vacancies. Re-invest into the companies in the surrounding areas, let them flourish.	Comment noted.
LPO801, Seneley Green PC	Sites close to Seneley Green area may not attract investment to the Borough and risk the area as a 'white elephant'. There are also severe traffic problems in the area.	The LPSD aims, vision and policy framework is to attract investment into St. Helens. Policy LPA04 supports regeneration and growth in sustainable locations. The location of sites to be released from the Green Belt has been guided by the Green Belt Review 2018.
E1502, United Utilities PLC	Supportive but would ask future developers to contact United Utilities as early as possible to discuss water infrastructure requirements to ensure the delivery of development.	Support noted. In preparing the LPSD, the Council has consulted all relevant infrastructure providers to ascertain the level of capacity around the allocated sites. No serious concerns were raised regarding water infrastructure. The Council will encourage developers to contact UU at an early stage when developing their proposals to assess this matter in further detail.
E1448, Wigan Council	Land allocated along the M6 and A580 corridor will bring benefits to both boroughs, and significant investment will be needed at these junctions.	Support noted. The LPSD (for example in Policy LPA07) recognises the need for investment in motorway junctions, including Junction 23 of the M6 and junctions on the A580 corridor.
E1510, Homes & Communities Agency	Strongly supports the allocation of HCA owned site EA1 as a strategic employment site.	Support noted. This site remains allocated in the LPSD.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support policy and suggest that the first sentence should be amended to "High quality employment land has been provided to meet modern employment needs to 2033 and beyond".	This matter has been addressed (albeit not in the exact form suggested) in the vision (chapter 3).

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1486, McGinn MP	Support in general but the Council need to look at the transport network and the impact these sites will have on it.	Support noted. The LPSD (for example in Policy LPA07) recognises the need for investment in the road network. One of the sites (LPPO site EA4) has been moved back from an allocated site to being safeguarded to meet potential post 2035 needs. This is due to the need to address issues concerning Junction 23 of the M6 and as it is not required as an allocation for development in the Plan period.
E1447, West Lancashire Council	Generally supportive but it is unclear whether the housing requirement is sufficient to support the employment growth.	Support noted. This matter is addressed in the supporting text of Policy LPA05 'Meeting St.Helens Borough's Housing Needs'.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Supportive. However we would request that the policy is amended to provide further clarification on community benefits. The Local Economy SPD should be referenced.	Support noted. Clause 5 of Policy LPA04 has been amended to give greater clarity on the circumstances in which sites which are in or were last used for employment use will be allowed to be re-developed for other uses.
E1580, Jockey Club Racecourse Ltd.	Support policy and suggest it is amended to refer to 'tourism resources and facilities, cultural and visitor attractions' rather than simply 'tourism resources' and 'appropriate to the local context' wording be removed	Support noted. Policy LPA04 refers to tourism resources, facilities and attractions.
E1447, West Lancashire Council	Support the focus of growth on the M6 corridor and the forward thinking in setting the employment land requirement.	Support noted
E1460, Cllr Glover	Attractive areas close to good transport links are well identified.	Support noted
E1563, Barton Willmore on behalf of Millar Homes	The Plan is correct to deliver the upper range of the Objectively Assessed Need (OAN).	Support noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035).

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1502, United Utilities PLC	All United Utilities resources will need to be afforded due regard in the master planning process for any site. There does not appear to be any text requiring developers to pay due regard to the position of existing water supply and wastewater infrastructure.	Policy LPA08 requires new development to be adequately served by infrastructure.
	Our site (FDL Packaging Site (Site Ref: 153) 2016 SHLAA) would be better allocated as a brownfield site for residential development as opposed as an employment site.	Comment noted. The site is not allocated for housing or employment in the LPSD. The site is identified in the SHLAA 2017.
E1448, Wigan Council	Need to ensure that there is sufficient projected demand during the plan periods to warrant this level of allocation and Green Belt release.	Comment noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035).
E1495, CPRE	Duty to Cooperate issues, as it appears the whole of the North West is planning for such growth, where will the people come from to work here.	The Council has worked closely with neighbouring Councils, the Liverpool City Region Combined Authority, and other public bodies in addressing key strategic planning issues such as housing, the economy, infrastructure and strategic environmental assets. Further details of this joint working are set out in the supporting text to Policy LPA04.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Suggest that reference is made to the suitability of the Florida Farm North site for logistics development given its location on the strategic road network and close to existing businesses and local labour.	Comment noted. This site remains allocated for employment development including logistics.
E1491, NFU	Criterion 6 - recommend references an aim to protect the best and most versatile agricultural land as well as supporting and protecting agricultural and farming operations.	Comment noted



### POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	There is enough vacant land each side of the East Lancs heading up towards Manchester that could be used and would have suitable access onto the East Lancs and M6	Comments noted. No surplus of site provision has been identified within Greater Manchester to help meet the employment land needs of St.Helens.
E1488, Historic England	Criterion 5 contrasts with para 4.81 which appear to focus on demolition and rebuild.	Comment noted.

### SITE EA1- OMEGA SOUTH WESTERN EXTENSION

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA1 is still proposed to be allocated for employment development.
LPPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.

SITE EA1- OMEGA SOUTH WESTERN EXTENSION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Brownfield land in St.Helens should be developed on first	Policy LPA02 promotes the reuse of brownfield land in key sustainable locations.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes. HGVs will have to use inappropriate local roads or the already over utilised M62 Junction 8.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
	No public transport linkages have been proposed.	Policy LPA05.1 requires the development of all strategic employment sites (including this site) to be informed by a master planning exercise which will address public transport linkages.
	Development would result in increase of HGVs and associated pollution across nearby residential areas.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
	Sections of ancient woodland will be threatened and removed.	Policy LPC10 confirms that development resulting in the loss or deterioration of any area of ancient woodland or of any ancient or veteran tree will be refused unless there are wholly exceptional circumstances in which the need for, and benefits of, the development would clearly outweigh any resultant loss and a suitable mitigation strategy exists.

SITE EA1- OMEGA SOUTH WESTERN EXTENSION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1583, Warrington Borough Council	Access work has highlighted that both local and strategic road networks will be placed under considerable pressure, therefore Omega must demonstrate the impact of the additional traffic would have on these networks and show mitigation measures etc.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
E1510 Homes & Communities Agency	Strongly support the allocation of HCA owned site EA1 as a strategic employment site.	Support noted.
E1572, GVA on behalf of Miller Developments	The allocation of EA1 'Omega South Western Extension, Phase 1, Land north of Finches Plantation, Bold' as employment land is fully supported. As demonstrated by the indicative masterplan, this level of floorspace can comfortably be accommodated on the site taking into account known constraints. There are no identified issues with the requirements for all strategic employment sites in principle. Wording should be amended to include B2/B8 uses and B1a uses where they are ancillary.	Support noted. The wording of Policy LPA04 has not been revised to include ancillary Class B1a uses as these would not require planning permission anyway if they are truly ancillary to a Class B2 or B8 use.
E1583, Warrington Borough Council	The site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington and continue to provide employment opportunities to the residents of St.Helens.	Comment noted



<b>SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK</b> (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA2 is still proposed to be allocated for employment development.
E1495, CPRE	There is a lack of exceptional circumstances to justify release of sites from the Green Belt. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Traffic, congestion and air quality are addressed by other policies including LPA04.1, LPA07 and LPD 09.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat for wildlife which are currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
	Flood Risk – Development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	Flood risk issues relating to this site are addressed in Policy LPA04.1.

<b>SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK</b> (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	Highways Impact - development will increase traffic congestion and worsen existing capacity issues.	LPSD Policy LPA07 makes clear that new development should maintain “the safe and efficient flow of traffic on the surrounding highway network.” Highways impact issues are also addressed in Policy LPA04.1.
	Increased traffic will further deteriorate local air quality with associated health impacts.	Air quality issues are addressed in Policy LPD09.
	Visual impact - the development will create an eyesore.	This matter is addressed in Policies LPA04.1 and LPC09.
	Wildlife – development of the site will impact on bird habitats on land off Slag Lane.	LPSD Policy LPC06 addresses how biodiversity issues will be addressed at the planning application stage.
	Mining legacy/land stability – historic coal workings will need to be investigated.	Comment noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Fully support the inclusion of Site EA2. However the boundary needs to be amended and Highways England confirmed no enhancement work was required, and the Environment Agency did not request a 25m easement from Clipsley Bank, therefore both these elements need to be removed from the policy.	Comments noted.

<b>SITE EA3 - LAND NORTH OF PENNY LANE, HAYDOCK</b> (note: planning permission has now been granted for an employment development on this site)		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA3 is still proposed to be allocated for employment development.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	This site is adjacent to Local Wildlife Sites 'Kilbruck Lane and 'Plantation Copse and Ponds'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.



SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA4 is now proposed to be safeguarded to meet potential employment land needs after 2035, instead of being allocated for employment development. This revised approach is in the light of the need to address junction capacity issues at junction 23 of the M6 which is immediately adjacent to the site. Further reasoning is set out in the Green Belt Review 2018.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA4 is to be removed from the Green Belt but safeguarded to meet potential employment development needs after 2035. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
E1495, CPRE	There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.

SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	This site is adjacent to Local Wildlife Site 'Haydock Park Woodland'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
	Highways/Traffic - development will increase traffic congestion and worsen existing capacity issues at M6 Junction 23.	LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035. This approach will provide time to address the junction capacity issues at junction 23. In addition, policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Infrastructure issues are also addressed in policy LPA08. The improvement of junction 23 is identified as a key priority in the St.Helens Infrastructure Delivery Plan (IDP) 2018.
E1453, Culcheth PC	Object to this site being allocated, along with other sites in the vicinity such as Parkside. The M6 is already frequently blocked forcing traffic to use A and B roads through our village as escape routes.	LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035. This approach will provide time to address the junction capacity issues at junction 23. In addition, policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Infrastructure issues are also addressed in policy LPA08. The improvement of junction 23 is identified as a key priority in the St.Helens Infrastructure Delivery Plan (IDP) 2018.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Site allocation EA4 is fully supported. However, object to the detailed site boundary of the allocation, the boundary should be extended to include additional land at the eastern end of the site to reflect the land area that is being progressed to a planning application.	Comment noted. The boundary of the site has not been extended to the east as requested as this would represent a narrow 'neck' of development protruding into the Green Belt. Other boundary changes have been made as set out in the Green Belt Review 2018. The site is now proposed to be safeguarded rather than allocated.

#### SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1448 Wigan Council	Generally supportive, Site EA4 should complement the racecourse and promote the site as a regional facility.	Support noted. The Council will continue to engage with neighbours as part of the Duty to Cooperate to ensure that any new strategic cross-boundary issues are effectively addressed.
	Happy with the release of land for site EA5, but not happy with the types of use proposed.	Support noted.

#### SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA5 is still proposed to be allocated for employment development.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA5 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.



SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
	Support the release of land from Green Belt for site EA5, but not happy with the proposed types of use proposed for.	Support noted. The proposed uses (B2 and B8) are suitable for this location.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.

SITE EA6 - LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA6 is still proposed to be allocated for employment development.

SITE EA6 - LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood Risk – development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	LPSD Policy LPC12 addresses flooding issues associated with development. It establishes that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted.
	Highways Traffic - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 makes clear that new development should maintain “the safe and efficient flow of traffic on the surrounding highway network.” Infrastructure issues are also addressed in Policy LPA08.
	Visual impact - the development will create an eyesore.	LPSD Policy LPC09 addresses the visual impact from new development.
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion.	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
E1521, Michael Sparks Associates on behalf of Canmoor Developments Ltd.	The Haydock Industrial Estate is a successful business area and the allocation of this site will form a logical extension to this employment location. This site benefits from an existing access and nearby infrastructure. This will allow this site to come forward quickly to meet employment needs within St.Helens. This site is available and suitable for employment development and its allocation is supported.	Support noted.

SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA7 is still proposed to be allocated for employment development.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA7 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
	Flood Risk – development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	LPSD Policy LPC12 addresses flooding issues associated with development. It establishes that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. This issue is also addressed for this site in Policy LPA04.1.
	Highways Traffic - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 makes clear that new development should maintain “the safe and efficient flow of traffic on the surrounding highway network. Infrastructure issues are also addressed in Policy LPA08.
	Visual impact - the development will create an eyesore.	LPSD Policy LPC09 addresses the visual impact from new development.



### SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion.	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
E1521, Michael Sparks Associates on behalf of Canmoor Developments Ltd.	Strongly support allocation of Site EA7, however it is considered that requirements for implementing access to a site could constrain future development, a 25m easement along Clipsley Brook is questioned, the policy appears too prescriptive.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1.

### SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development will result in significant detrimental impact on the M6 and local roads.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0278, Parkside Action Group	Despite being a rail freight interchange, 85% of freight will still be transported by road, therefore adding to congestion which is already an issue. There is no-longer a need for Parkside East as a rail freight terminal due to Omega South West Logistics at Warrington.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. Policy LPA07 addresses the issue of traffic impacts from development. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
	Photographs used were deliberately chosen to show Parkside as a concrete block instead of showing its woodland, wildlife, fauna and flora.	Comment noted.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site includes Local Wildlife Site 'Gallows Croft'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
	This could be a wind farm, which will not cause traffic. There is a mine below and a substation to be put into.	Comment noted
E1453, Culcheth PC	Object to this site being allocated, the M6 is already frequently blocked forcing traffic to use A & B roads through our village as escape routes.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495 CPRE	Strongly object to a SRFI here as it will severely harm the ability of the Newton-le-Willows Green Belt to fulfil its purposes, as well as causing adverse environmental and social impacts, and due to the spare capacity on the West Coast Mainline.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1488 Historic England	There is no mention that site lies near designated heritage assets, despite being identified in the SA and its conclusion that effects on the assets are likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E1458, Winwick PC	The aspirations for Parkside East to be developed as a SRFI are not realistic given movements of goods by this method of transport, which could lead to a site being used for a different purpose and further impact on local roads.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1458, Winwick PC	Development of this site would be harmful to the open aspect of this area for residents of Winwick.	Policy LPC09 addresses the visual impact from new development.



SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1532, Lane Head Residents' Association	Development to the west and east of the former Parkside Colliery is likely to have a profound environmental impact, relating to air pollution levels rising. The level of traffic will no doubt increase, bringing even further congestion problems and the associated air pollution road safety risks.	Policies LPA07, LPA10 and LPD09 address this through provision to minimise traffic and associated impacts including air pollution. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
	Parkside multi-modal rail/freight interchange is an example of a good idea but in the wrong place, there is no spare capacity.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
	Peel Ports will not use Parkside as they already have Port Salford just down the line, and further to that down the river, we have Ellesmere Port. On the Manchester Ship Canal we have 3MG Runcorn and Port Warrington some established, others being developed.	Comment noted.
E1457 Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support noted. The bullet points in Policies LPA04.1 and LPA10 have been revised.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1496, Highways England	Site EA8 will potentially generate a number of vehicle movements which may impact on J22 of the M6, and requires direct access to the site via the M6. It should be noted that as part of the Smart Motorway upgrade J22 is identified for improvements and scheme/design for direct access to the site would need to pay due cognisance to this proposal.	Policies LPA07 and LPA10 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1496 Highways England	The IDP and transport evidence base for the site allocations is not yet available for review. As this site has the potential for significant impacts on the SRN, and require HE's cooperation in regard to a new access point, it is essential that this transport evidence base is reviewed as soon as possible	The Council will publish the IDP and relevant transport evidence with the LPSD. The Local Plan Transport Impact Assessment provides supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St.Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA10 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development will result in significant detrimental impact on the M6 and local roads and worsen air quality.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1 and LPA08. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
L0770, Parkside Action Group	A strategy to promote large scale logistics will also bring with it heavy levels of traffic and air pollution. The policy makes no provision for underpinning infrastructure including transport, social, health and education. Releasing this amount of land will result in a “trolley dash” by developers, leaving Brownfield sites undeveloped. Lack of phasing and monitoring will result in a lack of demonstrable sustainable benefits.	Policy LPA07 addresses the issue of traffic impacts from development. Policy LPA08 provides a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities. Policy LPA02 promotes the reuse of brownfield land in sustainable locations. Air quality issues are addressed in Policy LPD09. Policy LPA04.1 requires development of the site to be informed by a master plan which should include phasing.
E1495, CPRE.	There is a lack of exceptional circumstances. The site will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA9 is still to be allocated. Traffic, congestion and air quality are addressed by other policies including LPA04.1, LPA07 and LPD 09.



SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0770, Parkside Action Group	Previous documents make it clear that Parkside West should only be set aside for the purpose of an SFRI. It is clear that the only reason to remove it from its intended purpose is to support the Council's relationship with Langtree development.	Parkside West (site 8EA) and the Parkside East site are required to provide the single largest economic development opportunity in the Borough. The parts of the site which are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.
E1532, Lane Head Residents' Association	Development to the west and east of the former Parkside Colliery is likely to have a profound environmental impact, relating to air pollution levels rising. The level of traffic will no doubt increase, bringing even further congestion problems and the associated air pollution road safety risks.	Policies LPA07, LPA10 and LPD09 address these points through provision to minimise traffic and associated impacts including air pollution. The proposed Parkside link road will address the issues by providing a direct link to junction 22 of the M6.
E1453, Culcheth PC	Object to this site being allocated, the M6 is already frequently blocked forcing traffic to use A & B roads through our village as escape routes.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1 and LPA08. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1488, Historic England.	There is no mention that site lies in close proximity to designated heritage assets, despite being identified in the SA and its conclusion that the effect on them is likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E0278, Parkside Action Group	Parkside West site should be used as a university campus.	Comment noted.
	Site should be redeveloped into a science technology park instead of warehousing.	Comment noted

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site should be redeveloped as a golf course, swimming pool, leisure facility or cycle velodrome.	Comment noted
	Site is unsuitable for commercial uses or railroad development.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this or to provide other rail enabled uses. The suitability of the Parkside West site for employment development is addressed in the St.Helens Green Belt Review 2018.
	Site should be affordable housing only.	Comment Noted
E1481, Spawforths on behalf of Parkside Regeneration LLP	The release of Green Belt to accommodate the pent up demand/deficit for new employment floorspace is supported. The identification of Parkside West as a phased (non-rail) strategic employment site that will contribute to meeting employment requirements on a partially brownfield site as well as providing a significant boost to the local economy is supported.	Support noted
E1481, Spawforths on behalf of Parkside Regeneration LLP	Support policy and the identification of Parkside West for B2 and B8 development as part of a wider quantum of development to meet the needs of St.Helens and wider City Region.	Support noted

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1481, Spawforths on behalf of Parkside Regeneration LLP	Allocation supported but object to proposed criteria relating to the land retained for a potential future rail access path. We understand that the future delivery of EA8 is not inhibited however we consider the position of the safeguarded land would impede on the deliverability of EA9. We will continue to talk with the Council to reach an agreement on this matter.	Support and comment noted. The alignment of land in Parkside West to provide a future siding for the rail uses in the Parkside East site is informed by relevant technical evidence. No changes in this alignment have been identified in the LPSD.
E1557, Peter Brett Associates LLP on behalf of Smith Property Developments Ltd. and Interland UK Ltd.	Endorse the release of land at Parkside West from Green Belt and consider that land at Newton Park Farm (situated within the EA9 site) should be allocated for residential development, as the Council clearly considers that this section of GB no-longer fulfils the five purposes of GB as set out in the NPPF.	Support noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E1457 Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support noted. The bullet points in Policies LPA04.1 and LPA10 have been revised.
E1486, McGinn MP	Welcome the inclusion of Parkside and the identification of Earlestown as the second town centre within the Borough, however it needs to be made clear that traffic generated from the Parkside development will be directed to the motorway to minimise the impact on local roads.	Support noted. LPSD Policies LPA04.1 and LPA07 address the issue of traffic impacts from the development.



SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St.Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA04.1 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	The principle of developing this site for employment development is established in the St.Helens Unitary Development Plan 1998. The LPSD proposes to carry its allocation for this use forward.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife site 'Rainford Brook' runs to the south. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.

**SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1517, Frost Planning on behalf of English Land Ltd.	The issues raised by those in support of this proposed site included: site should be allocated for employment use, inclusive of B1/B2/B8 uses, with extended boundaries to show access from both Pasture Lane and Sandwash Close.	Support and comment noted. The uses for which the site is allocated are Class B2 and B8. The LPSD also does not extend the site area. The extended site area would encroach into the Green Belt. Having regard to the findings of the Green Belt Review 2018, the relevant area has not been selected for Green Belt release.
E1563, Barton Willmore on behalf of Millar Homes.	Allocation of this site is fully supported as a preferred location for employment.	Support noted

**SITE EA11 - LAND AT LEA GREEN FARM WEST, THATTO HEATH**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	There is insufficient infrastructure in Sutton Heath, Lea Green and surrounding area.	Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities.

SITE EA12 - GERARDS PARK, PHASES 2 AND 3, COLLEGE STREET, ST.HELENS TOWN CENTRE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust	Local Wildlife site 'St.Helens Canal' is adjacent. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Site EA12 - Gerards Park has received full Planning Permission (Ref.P/2016/0903) and is a natural extension of an existing site.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Object to sites EA8 & EA9 due to the impact on GB and the M6 and local roads, as this development will create more traffic.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO sites EA8 and EA9 are still proposed to be allocated for employment development. Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.
E1461, Croft Parish Council	Concern that too many HGV's may take routes through residential villages.	Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.
E1461, Croft Parish Council	The increase in traffic congestion especially in areas identified for warehousing will only add to the existing heavily congested roads and motorways.	Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.



POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Banks, Bond & Burns	Haydock residents are concerned they are shouldering more of their fair share of growth and as such this will have a detrimental impact on them through increased traffic, pollution, flood risk and lack of infrastructure.	LPSD does not propose that there is an even distribution of sites across the Borough, rather that the sites identified are those that sited at sustainable locations and are deliverable and to meet objectively assessed housing and employment needs. Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. In addition, Policy LPA08 addresses infrastructure issues.
E1469, Cllrs Banks, Bond & Burns	Concern over the impact of the proposed employment sites on J23 of the M6 which is unable to cope with any further development.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. One site (EA4) which is next to junction 23 is now proposed to be safeguarded rather than allocated.
	Parkside West is unsuitable to meet the modern SRFI requirements and hence that the site should no longer be identified as a potential future SRFI. We also object to the proposed criteria relating to the land retained for a potential future rail access path.	The Parkside West site (site 8EA) is allocated for Class B2 and B8 employment uses i.e. is not limited to development as an SRFI. The alignment of land in Parkside West to provide future siding facilities for the rail uses in the Parkside East site is informed by relevant technical evidence. No changes in this alignment have been identified in the LPSD.
E1488, Historic England	There is no mention that Sites EA8 and EA9 lie in close proximity to designated heritage assets.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E1495, CPRE	Strongly object to Sites EA2, EA4 and EA9. There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO sites EA2 and EA9 are still to be allocated. LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Generally support the policy but object to the provision of a minimum 10% of energy requirements through on site generation of renewable or low carbon energy. It should not be policy requirement to address existing issues.	Policy LPA04.1 does not now contain a target for renewable or low carbon energy. However, Policy LPC13 maintains the requirements for housing and employment development to provide for at least 10% renewable or low carbon energy. This approach is aligned with Government national policy and guidance.
E0278, Parkside Action Group	Parkside West site should be used as a university campus	Comment noted.
E0278, Parkside Action Group	There is no-longer a need for Parkside East as a rail freight terminal due to Omega South West Logistics at Warrington.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use.
	The exceptional circumstances test can only be passed once it is clearly established that there are no suitable, sustainable alternatives outside the GB. Land at Junction Lane, Newton-le-Willows should be released for development before GB.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
E1457, Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support. Relevant bullet points have ben updated.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1458, Winwick Parish Council	Welcome the Council's commitment to engage with Warrington Council to carry out a comprehensive transport assessment, however the Policy should state that no construction will be permitted on Parkside West until such time as the link road to the M6 has been constructed.	Comment noted. The phasing issues must be addressed under the master planning requirements of Policy LPA04.1
	Parkside Regeneration fully supports the identification of Parkside West as a phased (non-rail) strategic employment site.	Support noted.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Fully support the inclusion of Site EA2, however the boundary needs to be amended and Highways England confirmed no enhancement work was required, and the Environment Agency did not request a 25m easement from Clipsley Bank, therefore both these elements need to be removed from the policy.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1. noted.
	Strongly support allocation of Site EA7, however it is considered that requirements for implementing access to a site could constrain future development, a 25m easement along Clipsley Brook is questioned, the policy appears too prescriptive.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1.
	Generally support the high level site specific requirements in principle but it could be difficult to connect to land that is adjoining but safeguarded.	Support noted



POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1448, Wigan Council	Generally supportive, Site EA4 should complement the racecourse and promote the site as a regional facility.	Support and comment noted.
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St.Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA04.1 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1448, Wigan Council	Must ensure that Site EA4 compliments the racecourse and helps promote the site as a regional facility.	Comment noted
E1469, Cllrs Banks, Bond & Burns	Question there being no alternative brownfield land that can accommodate this type of development.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
	Avenbury Properties believes that their Site (GBS_019) should be included within Policy LPA04.1, which should be amended accordingly.	Comment noted. No additional sites have been added to the list of strategic employment sites.
E1496, Highways England	Highways England must be involved at the earliest opportunity in the development of these sites, including masterplanning and scoping for Transport Assessment and Travel Plans.	Comment noted. The Council will continue to engage with key stakeholders including Highways England at all relevant stages.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO801, Billinge & Seneley Green PC	The number of houses assessed as being required up to 2033 is questionable when it would appear the population is significantly less than twenty years ago rising only in the last five years by a little under 2,000 to bring it back to approximate 2001 levels.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
LPPO801, Billinge & Seneley Green PC	A significant number of unoccupied properties in the town would satisfy the more immediate, estimated increase in population, and would satisfy the shortfall in the total number of homes noted as being required for the life of this Plan after brownfield sites have been used.	Whilst the Council is pro-active in encouraging the re-use of empty homes, it cannot control the numbers falling into vacancy. The number that are long-term vacant and that have the potential to be brought back into use is also limited.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Build out rates are considered incorrect and as such more sites would be needed to meet the OAN	Comment noted. The OAN has been reduced – see the supporting text to Policy LPA05.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Concerned that the allocated and safeguarded sites have not been rigorously assessed.	The tables of allocated and safeguarded sites have been revised to take account of more up to date evidence including the SHLAA 2017 and the Green Belt Review 2018.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Criteria 3 should be reviewed further to ensure the Plan is up to date at the point of adoption.	The approach in Policy LPA05 criterion 3 is considered to be aligned with national policy and guidance.
	The estimated delivery of 45dpa is considered to be a too conservative.	Comment noted. The site delivery estimates and the housing trajectory have been updated and are considered to be robust.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Further work is necessary to justify the level of growth proposed. The OAN for the new LP should be based on the SHELMA numbers.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
	Five representors commented that density should be considered on a case by case basis and not impose broad ranging density requirements.	Comment noted. The density requirements in Policy LPA 05 are minima but allow some flexibility in specific circumstances.
	Density requirements should be scrapped.	Density requirements are retained in Policy LPA05. This approach is in line with national planning policy.
	Two representors commented that there is now a dramatic commitment to jobs led growth but housing targets have not changed. Additional housing sites should therefore be given serious consideration to reflect the ambitions for growth.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
	Four representors expressed concern that Part 4 is too vague and that infrastructure considerations should be considered now.	Comment noted. Infrastructure requirements are addressed in Policy LPA08.



POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Nine representors stated that Part 6 - the approach in dealing with any shortfall would be too slow, suggest a number of safeguarded allocations are brought forward and triggers set out.	The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1250, Rainford Action Group	The St.Helens Local Plan assumes an increased population based almost entirely on "Unexplained Population Change" (UPC). Census data shows that St.Helens' population has been falling for 30 years but the projection consistent with that long-term trend is ignored in favour of one that includes UPC.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
E1250, Rainford Action Group	The number of houses the council wants to build is inflated by an arbitrary 26%. The housing need figures quoted in the plan are not supported by population growth or housing need, or any proper calculation.	LPSD housing figures are based on robust local evidence as set out above.
	The Council has not calculated a shortfall in and as such additional sites should be allocated.	LPSD housing figures are based on robust local evidence.
	Two developers object to the phasing of housing. Too much reliance on sites coming forward from the SHLAA. To make the Plan sound it is considered that other land (GB Parcel Ref: 68) should be excluded from the GB boundary and allocated for housing.	Comment noted. There is no justification for bringing forward additional land from the Green Belt beyond that proposed in the LPSD.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two agents objected to Part 4 – safeguarded land should be able to come forward within this Plan period.	Comment noted. The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
	Site HS11 should be a housing allocation and not a safeguarded site.	Comment noted. Following the reduction in the housing requirement figure, site HS11 is now proposed to remain in the Green Belt. The reasoning for this is set out in the Green Belt Review 2018.
	Development in Rainford, Eccleston and Windle will increase the existing traffic congestion.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. Following the reduction in the housing requirement figure, some sites in Rainford and Eccleston are now proposed to remain in the Green Belt. The reasoning for this is set out in the Green Belt Review 2018.
	Two representors expressed concern over significant issues in terms of education facilities, GP's and parking in Rainford, further development will exacerbate these.	Policy LPA08 addresses social infrastructure issues associated with new development.
E1468, Cllr Long	West Park residents will only be able to buy affordable homes on greenfield sites and are concerned over the potential highway congestion and lack of services.	Comment noted. Policies LPC01 and Policy LPC02 set out the policy framework to deliver a suitable housing mix including affordable housing. Due to viability issues, no affordable housing is required on brownfield sites in most areas. Policies LPA07 and LPA08 address traffic impacts and infrastructure.
	Two landowners object to the policy as too few housing sites are allocated in the Plan, especially Rainford.	Comment noted. The LPSD housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.
	PiP should be incorporated now to ensure the Plan is up to date at the point of adoption.	Comment noted.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE.	Question whether the high jobs assumptions in compiling this evidence are robust, and whether the housing industry has the capacity to build at this level. The OAN is vastly inflated.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
E0224, Rainhill Civic Society	Options 1 & 4 are both more realistic alternatives.	Comment noted
E1447 West Lancs Council	The housing provision should match the increased employment land, although this housing could be in a different authority.	Comment noted. The LPSD housing provision makes a suitable allowance for additional employment on the employment land allocations.
E1250, Rainford Action Group	Do not accept the 570dpa housing figures. The OAN is overstated and dependent on unreliable figures, the population is falling and modelling work is hard to understand. It does not factor in Brexit or the uncertainty behind economic growth forecasts. Serious concerns are raised regarding the method in which the Borough's future housing need figures have been arrived at, in turn questioning if the 'exceptional circumstances' necessitating Green Belt release have been demonstrated.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05. There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.



POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	The additional 26% calculation applied on top of the OAN to arrive at the 570 dwelling per annum figure is unsupported not clearly explained.	The LPSD does not use the figure of 570 dwellings per annum.
E1250, Rainford Action Group	The apparent lack of brownfield land directly contradicts the Core Strategy adopted by St.Helens Council in 2012. Just four years ago, St.Helens Council claimed 80 percent of development needed could be achieved on previously developed land. There has been insufficient building on brown field sites in the last four years for that policy to change so dramatically.	The LPSD covers a Plan period up to 2035 i.e. 8 years beyond the Core Strategy. Its approach of requiring some land to be released from the Green Belt is fully justified in accordance with the NPPF(2018).
FP0456, Residents Against The Development Of Green Belt - Rainhill	Estate agents are saying there is currently 3,000 houses in the Borough up for sale, from £60,000 to £80,000.	Comment noted.
	How can the Council justify an increase of the population to 6.843, and want to build 13,110 new homes?	The reduced housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.
E1250, Rainford Action Group	Rainford does not have the infrastructure to cope with the proposed additional new homes. Existing brownfield sites in the town centre should be utilised, creating more affordable homes closer to the town centre.	Infrastructure issues are addressed in Policies LPA07 and LPA08.
E1458, Winwick PC.	Sites HA13, HS13, HS14 & HS17 will generate further traffic putting more pressure on already heavily congested roads.	LPSD Policy LPA07 addresses the issue of traffic impacts from development.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	The OAN figures have changed from the scoping document, the Plan's population is 30% higher than the ONS. Clear evidence needs to be provided to show that a lack of affordable housing is leading people to leave the Borough. House prices are falling allowing more people access to the housing market.	Comment noted. The LPSD housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.
	The Council has a Duty to Cooperate across the Housing Market Areas and there should be mechanisms for this to take place.	The LPSD has been positively prepared. It seeks to meet St.Helens objectively assessed needs, and is informed by on-going engagement with neighbouring authorities.
E1494, Merseytravel	Delivering just houses and not communities will just create dormitory suburbs and towns and so lead to greater commuting and long distance commuting; this will then have significant implications for the transport infrastructure.	The LPSD promotes job creation and sustainable communities. Sustainable transport infrastructure requirements are addressed in Policies 04.1, 05.1 and LPA07.
	Support Alternative Option 2 for a housing target of 712 dpa based on our assessment of the adjustments needed to the SHMA.	Comment noted.
L0770, Parkside Action Group	A disproportionate amount of housing is targeted for Haydock and Newton-Le-Willows. The Council has not properly explained how the deallocation of Green Belt land to meet housing needs has met 'Special Circumstances'.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land (including in Haydock and Newton-le-Willows) has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	Use brownfield land before GB	Policy LPA02 promotes the re-use of brownfield land in Key sustainable locations.
LPPO801, Seneley Green PC	There are a significant amount of empty homes in the town centre which need to be used before development starts in the GB. The town centre would benefit from more housing closer to the heart of the Borough.	Whilst there is a role for the reuse of empty homes in helping to meet the Plan's housing requirement, it is not considered that this can realistically amount to a significant number of properties as the number that are long-term vacant and that have the potential to be brought back into use is limited.
	Support para 4.111 and part 6 of policy LPA05 and the Council's approach of identifying safeguarded land to meet future needs	Support noted
E1445, Sefton Council	Welcome the reference to the SHELMA in the justification and its importance as a piece of evidence.	Support noted
	Support the density flexibility text, in Part 6, however, phasing should be avoided as it can have negative impacts on delivery of sites.	Support noted
	Support the Key Settlements and agree that exceptional circumstances exist for targeted release of GB in order to meet identified needs.	Support noted
	Fully support the identification of sites HA14 & HA15; however both sites have the potential to yield more dwellings.	Support noted. Site HA14 has been removed as an allocation in the LPSD.
	Two developers support Part 6 but the policy should go further and establish clear triggers for a LP review.	Comment noted.



POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Three representors support the Council's conclusion that the absence of sufficient land within settlement boundaries in response to the housing requirement, provides special circumstances required to review the GB boundaries	Support noted
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Agree that a proportion of housing should be met from sites identified in the SHLAA and windfall gains, our site would be perfect for this (SHLAA 2016 Ref: 153).	Support noted
	Support the policy but indicative density below 30dph should be evaluated on a site by site basis.	Support noted. Policy LPA05 allows for some flexibility in dealing with density issues.
	Support the policy in principle, however it should recognise that some safeguarded sites may need to come out in this Plan period.	The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support HA10 as an allocation.	Support noted. This site is however removed as a site allocation in the LPSD.
	Support the fact that land will need to be released from GB.	Support noted
	Support the recognition of HS11 as a safeguarded site.	Support noted.
	Three representors support the uplift in housing numbers, however suggest it should be made clear if this is gross or net.	Support noted. The target of 486 per annum in the LPSD is net of losses through demolitions and conversions.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Agree that adequate affordable housing and types suitable for aging population must be delivered.	Support noted
E1496, Highways England.	Phasing of development could be crucial in ensuring the deliverability of the plan's allocated sites.	The approach of the LPSD will ensure an adequate degree of flexibility and choice in the supply of housing at any one time, and avoid prejudicing the overall delivery of housing if there are unforeseen delays in specific sites coming forward.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Agree with the wording, scale and rationale of the policy, justification text needs to be amended to avoid confusion.	Comment noted
E1460, Cllr Glover	The Council needs to aim high to give choices and to attract various developers.	Comment noted
E1486, Mr McGinn MP	Generally supportive but concerned the impact of this amount of additional housing will have on existing schools, NHS facilities, particularly Rainford, Garswood, Billinge and Windle where residents feel these services are already overstretched.	Support noted. Policy LPA08 addresses social infrastructure issues associated with new development.
E1469, Cllrs Banks, Bond & Burns	Building new properties at the higher bandings will increase Council Tax income, which can be spent on essential services to protect the most vulnerable, in a time of politically motivated austerity.	Comment noted
	The numbers are based on detailed and up to date research.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Agree with the windfall allowance, and support the inclusion of a 10% discount capacity and the allocation of Sites HA5 & HA7.	Support noted
	Support policy, however it needs to be more flexible as housing requirements could change for a variety of reasons.	Support and comment noted
	Agree that Alternative Option 1 and 4 should be rejected.	Comment noted
	Support the positive approach to increase the housing requirement above the OAN found in the SHMA, but evidence needs to be robust in this.	Support noted
	Support policy as there is a need to meet the objectively assessed needs of the Borough and presently there is only a 4.8 year supply of land.	Support noted. The LPSD proposals will ensure provision of a 5 year deliverable supply of land.
	Two developers suggest that the policy should be amended to specify when a review of the LP would take place should there be a shortfall in housing.	Comment noted
E1549, Persimmon Homes North West	The housing figures for Billinge and Seneley Green are disproportionately low and fail to reflect population size. It is recommended that the redistribution of the Borough's housing supply should be amended to align with the settlement size of these areas.	The LPSD housing requirements are supported by evidence on local need across the Borough as a whole. Whilst the LPSD focusses development towards key settlements including Billinge there is no requirement for each settlement to take a proportionate share of housing provision.



POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie on behalf of Wallace Land Investments	Under-delivery should be dealt with swiftly, suggested amendments: "Where housing delivery is significantly below the anticipated level, reasons for under-delivery will be investigated and a partial or full plan review will be triggered to allocate Safeguarded sites for housing development."	Comment noted. The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1556, JLL on behalf of Suttons Group	Linkway Distribution Park is not suitable or viable for continued employment use and should be allocated either as a strategic or a non-strategic housing allocation.	Comment noted. This site is included as an allocation in the LPSD.
LPPO808, Cllr McCauley	Land adjacent to Elephant Lane Thatto Heath should be considered as an alternative (behind the Police Station on Thatto Heath Rd). Following discussions with residents, this site has come forward as a very marketable piece of land that should be included in the Plan.	Comment noted.
E1564, De Pol Associated on behalf of Metacre Ltd.	Green Belt release to meet future housing need is supported. Land to the south of Fleet Lane, Parr, St.Helens should be allocated for residential development in the next 5 years; this site is suitable, available and deliverable.	Comment noted. The LPSD does not however propose to allocate this site for development.
	PiP should be applied if there is sufficient clarity about the process, before the next draft of the Local Plan is published.	Comment noted
E1568, Cassidy + Ashton	It is requested that the table 4.4 is amended to include Land off Elton Head Road, as an individual site within an area of 3.59ha.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1568, Cassidy + Ashton	It is requested that the table includes a revised HS24, which excludes land off Elton Head Road.	Comment noted. The LPPO site HS24 is retained in the LPSD, but with a reduced site area.
	A commitment to undertake a future review of the LP on account of the SHELMA and/or a LCR Spatial Framework should be included within Policy LPA05.	Policy LPA05 has been updated but does not include this specific commitment.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Recognise site HA12 is redundant, however the hospital is of significance as a war memorial and any development should be sympathetic and apartment styled.	Comment noted. This site is now proposed to remain in the Green Belt.
	Concerned that the allocated and safeguarded sites have not been rigorously assessed.	The LPSD is based on an updated Green Belt Review (2018) which robustly assesses the sites for potential allocation or safeguarding.
E1488, Historic England)	An opportunity exists for this policy to positively assist with safeguarding the historic environment.	Historic assets are addressed under Policy LPC11.
E1490, Network Rail	Land at Standish Street, the canal and Parr Street should be allocated as a housing site within the Plan.	The LPSD does not specifically allocate these sites (they are smaller than the brownfield sites within the urban area which have been allocated).
E1496, Highways England	It is anticipated that the forthcoming transport evidence base will identify site infrastructure requirements, including deliverability and time constraints, which should inform any need for phasing of development.	Comment noted. This matter will be addressed in Policies LPA04.1, LPA05.1, LPA07 and LPA08.
E1447, West Lancs Council	Note the housing and safeguarded land allocations in Rainford and would request to be kept up-to-date on these sites.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1446, Knowsley Council	The creation of 4,000 new homes in the GB will attract developers; we are keen to ensure St.Helens doesn't undermine our own ability of delivering 450 dpa.	There is insufficient land within the current urban areas of the Borough to provide for future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The level of GB release is reduced in the LPSD.
	Site HA8 should not be referenced in the table of safeguarded sites as it creates ambiguity.	Comment noted. However, in accordance with the evidence in the Green Belt Review 2018 this site is now correctly identified as a safeguarded site.
	The Council will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.	The LPSD has been informed by an up-to-date viability study. Deliverability issues are also addressed in the Green Belt Review 2018.
LPPO538, Torus	Pipeline will need to be reviewed regularly to take into account strategic disposals/demolition/conversions by key landlords in the town, i.e. tenure split required may change due to changes to stock profile.	Comment noted
E0224, Rainhill Civic Society	The possible implications of PiP on GB sites should be given more consideration in the Plan.	Comment noted



SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0442, Billinge Chapel End PC	The removal of this land from Green Belt is unjustified - the current approach to Green Belt release will undermine the purpose of preventing urban sprawl. Housing Allocation HA1 is close to two neighbouring authorities (Wigan, West Lancashire). GB reviews should be done with other LPA's collectively.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic/Highway safety - Main Street in Billinge is a congested and dangerous roads - adding additional houses on top of the current and other developments will increase risk of accidents.	See above.
	Access to site is unsuitable - the track from Ash Grove Farm to Main Street is unstable (ditches), too narrow for road and footpath access and is very low lying; Roby Well Way is unsuitable and already used as a 'rat run'.	See above
	Development of the site would only be accessible by a small farm track from either Beacon Road or Ashgrove Crescent, causing major traffic disruption on the already congested Main Street.	See above
	Public Footpaths - there are various long established footpaths and bridleways leading up to the historic Billinge Beacon which will be impacted upon.	See above
	Air quality impact – the development will result in negative impacts on the amenity of existing residents.	See above

SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of this site will result in the loss of high grade agricultural land.	See above
	Public health hazards - the proximity of the proposed development to the former landfill site at Billinge Hill poses concerns regarding potential toxic gases.	See above.
	Impact on landscape – this proposal will lead to the destruction of the Billinge's beauty and visual impact on the views across to/from Billinge Hill and beyond to the Welsh Hills.	See above
	Grade A agricultural land will be lost	See above
E0442, Billinge Chapel End PC	Wildlife/ecology - Site HA1 has a border with a local wildlife site (LWS14) and it is not clear how the conflict between a housing development and the Council's commitment to safeguard this local wildlife site will be addressed.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Wooded Valley at Billinge'.	See above
E0442, Billinge Chapel End PC	Policy LPA09 refers to Billinge Hill as a new nature reserve site, therefore it is disappointing that such a significant and popular site will be adversely affected by Site HA1	See above
	Flood risk - flooding has occurred in Roby Well Way, Elm Drive and Beacon Road which would be further exacerbated by this development.	See above

SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Drainage from new housing on the site will impact on existing water courses or the combined sewer which is at capacity.	See above
	Lack of market interest - not all properties have been sold in the existing development across from Billinge Hospital Site, called The View, which has been built for 2 years.	See above
	Housing development should be extended at site HA2 to include the land opposite as well instead of HA1, as there a train station, a new medical centre and a primary school.	See above
FP0260, Parish Cllr Clift	Infrastructure must be put in first before housing and this particular site is unsuitable for housing due to the leaking of methane gas.	See above

SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA2 is still proposed to be allocated for housing development.



SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	Development of this site will lead to more traffic congestion leading to the East Lancs around the Garswood, Liverpool road area.	Policy LPA07 addresses the issue of traffic impacts from development. This issue has also been considered in the Green Belt Review 2018.
LB0001, Save our Green Belt & Residents against Florida Farm Development	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used. Garswood is already heavily congested and services are not available.	Policies LPA07, LPA09 and LPD09 address the issues of traffic impact, infrastructure and air quality and respectively. These issues have also been considered in the Green Belt Review 2018.
	Flood risk – site is prone to flooding, the water table is already high around this site, and development and climate change will make this issue even worse.	LPSD Policy LPC12 confirms that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. This issue has also been considered in the Green Belt Review 2018.
	Land stability/hazards – bell mines exist below the site, the land has been honeycombed underneath due to historic mine working.	These issues would need to be addressed as part of any development proposal. The Council is not aware of any ground conditions issues which would preclude the site from being developed in principle.
	Housing development in Billinge & Senely Green should be on HA2 instead of HA1, as there a train station, a new medical centre and a primary school.	Comment noted. The relative merits of these 2 sites have been robustly assessed in the Green Belt Review 2018. It is proposed to allocate LPPO site HA2 but not HA1.
E1549 Persimmon Homes Ltd.	Support the removal of this land from the Green Belt and its inclusion although consider it can accommodate circa 270 homes so indicative capacity should be amended accordingly.	Support noted. The site capacity of 216 dwellings given for the site is indicative only and does not preclude a higher capacity if this can be accommodated within a suitable site layout.

SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The release of Green Belt land to meet future identified housing need is unjustified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA3 is still proposed to be allocated for housing development.
	Highways impact - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 addresses the issue of traffic impacts from development.
	Increased traffic will further deteriorate local air quality with associated health impacts.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development.
	This site was previously deemed unsuitable for housing; it is not clear what has changed.	The deliverability issues concerning the site are addressed in the Green Belt Review 2018.
	Flood Risk – development of this site and development north of the A580 will increase flood risk at Blackbrook.	Policy LPC12 addresses issues of flood risk and sets criteria to ensure development will not cause an unacceptable risk of flooding on the site or elsewhere. This matter is also addressed in the relevant site profile for the site in the appendices of the LPSD.
	Wildlife/ecology – development of the site will obliterate the old part of Slag Lane which is enjoyed for its country/rural character and habitat for birds.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Detailed guidance will be set out in the Council's review of its Biodiversity Supplementary Planning Document.

**SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1571, Indigo Planning on behalf of Barratt Homes	The allocation of this site for housing is supported subject to site specific matters including access being agreed. It is considered suitable for GB release as it forms a natural extension to the settlement of Haydock. The A580 forms a distinctive boundary between the site and open countryside.	Support noted

**SITE HA4 - LAND EAST OF CHAPEL LANE AND SOUTH OF WALKERS LANE, SUTTON MANOR, BOLD**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1503, Kingsland Strategic Estates Ltd.	Agree with the release of this site from the Green Belt. The site is well placed to deliver strong and enhanced connections to Greenways and to assist in the delivery of the Bold Forest Park Area Action Plan.	Support noted. However, this site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to change the site from an allocated site to a safeguarded site. This means that it would be removed from the Green Belt but not allocated for development before 2035. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Highways impact - Chapel Lane cannot accommodate heavy goods vehicles and lorries.	Policy LPA07 addresses the issue of traffic impacts from development.
	Highway safety - Chapel Lane is used by regularly by pedestrians (young and old), increased traffic would be very dangerous.	Policy LPA07 addresses the issue of traffic impacts from development.



SITE HA4 - LAND EAST OF CHAPEL LANE AND SOUTH OF WALKERS LANE, SUTTON MANOR, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Heritage impact - development will take place on an historical site with the remains of a 200 year old factory.	Policy LPC11 requires that the historic environment will be preserved and enhanced and that, in relation to non-designated heritage assets, proposals for development will have to identify, assess and preserve those features that are judged to be of value.
	Flood risk/watercourse - there is evidence of historic drainage workings which should also be investigated	Comment noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Pendlebury Brook'.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further guidance will be set out in the St.Helens Biodiversity Supplementary Planning Document.
	Health and wellbeing of elderly residents living in bungalows will be adversely impacted.	Health and Wellbeing issues have been addressed in Policy LPA11 and open space and green infrastructure policies.
	Impact on ecology/wildlife – the site is habitat to a number of species (including toads, buzzards, bats and foxes); the farmland west of Chapel Lane is a Local Wildlife Site.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance are set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Impact on trees – Chapel Lane is lined with trees which carry a Tree Preservation Order.	This is addressed in Policy LPC10.
	Alternative uses for the site should be considered such as an education resource for children to observe wildlife.	Comment noted.

SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	The allocation of HA5 is supported.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA5 is still proposed to be allocated for housing development.
	Highway safety - there is already a great deal of traffic on the B5419 (Jubits Lane and Chester Lane) - a development on this site would increase levels and cause safety issues.	Policy LPA07 addresses the issue of traffic impacts from development.
	Highways impact – increased traffic will lead to increased noise and air pollution	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with the planned development.
	Sutton Manor and Clock Face do not have the local amenities for such a large scale development; there are not enough spaces in local GP's, schools and nurseries to allow for large scale development in the area. The local community centre (Chester Lane) has already been closed.	The LPSD addresses the impact of development on existing infrastructure. Policy LPA08 seeks to ensure satisfactory provision of all forms of infrastructure which are required to serve the needs of the local community'.

SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Bold Forest Park Area Action Plan - allowing development in the Sutton Manor, Clock Face areas would have such a massive detrimental effect on the new plan for the Bold Forest Park. The local area needs an environmental development like this and allowing residential or commercial development would put that in jeopardy and negate any of the benefits to the local area.	Policies LPA09 and LPA04.1 will address the need for the development to be sympathetic to the green infrastructure in the area. Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance will be set out in the St.Helens Biodiversity Supplementary Planning Document.
	Visual impact - the Bold Forest Park with other land from the Forestry Commission makes Sutton Manor a scenic area used by walkers, runners, dog walkers and other clubs. Development will reverse what the Council has worked hard to beautify.	Policy LPC09 addresses the visual impact from new development.
	Flood risk – this field is often water logged and if developed would have drainage issues.	Where sites proposed for Green Belt release contain areas that are a known flood risk the anticipated capacity of the site has been reduced to reflect that constraint. Details of the site assessments are set out in the Green Belt Review 2018. Where there are concerns about surface water drainage issues, the Plan is clear that development will be required to provide the necessary infrastructure and services and proposals that are brought forward that fail to meet that expectation will not be permitted.
	Wildlife/ecology – development would lead to the loss of wild life habitats including birds, frogs, bees, butterflies, newts, hedgehogs – all seen at this site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.



SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Any funding requested for an access road to the car park area in the adjacent BFP, utility service connections, education and/or off-site highway works will need to comply with the tests set out in the CIL Regulations and Framework.	Support noted. The approach in Policy LPA08 refers to the statutory tests for Section 106 agreements.

SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
		[NB In accordance with the findings of the Green Belt Review 2018, LPPO site HA6 is still proposed to be allocated for housing development and is proposed to form part of a much larger allocation, also incorporating the former LPPO site HS3].
	Landscape impact - trees cover is needed along the boundary of Bold Road from the aesthetic aspect and for noise reduction.	The updated Green Belt Review (2018) has considered the landscape value of the site. Policies LPA04.1 and LPC09 will address the impact of new development on landscape in this site.
	Development will result in the loss of agricultural land (Grades 1-3).	The sites that have been selected as development locations are those that are well-related to the existing built-up areas and that would result in the least unacceptable loss of valuable undeveloped land, including efforts to protect the best and most versatile agricultural land. Data indicates that the site is grade 3. This has been taken into account in the Green Belt Review.

SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0861, Davis Meade on behalf of J. & J. Kay	Change of use from agricultural land will threaten the security tenant farmers.	Comment noted.
	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description (E1585, Bell Ingram Design Ltd. on behalf of Essar Oil).	Comment noted

SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site should not be released from Green Belt - developers may wish to change their planning permissions to commercial development from housing.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA7 is proposed to be replaced with a much smaller site to be safeguarded to meet potential housing needs after 2035, rather than being allocated for development before 2035. The remainder of the site is proposed to remain in the Green Belt. Policy LPA06 confirms that planning permission should not be granted on safeguarded land for uses which would prejudice its future development for the use for which it is safeguarded.

SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways - there are already high levels of HGVs using Vista Road increased development will lead to increased congestion and decreased highway safety; improved measures will be needed on the highways to cope with additional traffic.	LPSD Policy LPA07 addresses the issue of traffic impacts from development.
E1463, Cllr Preston, St.Helens Borough Council - Earlestown Councillor	Development of this site will only cause major traffic problems on the Earlestown roads Vista Rd is grid locked most of the day and people get stuck in traffic trying to leave the High Marsh Estate.	Policy LPA07 addresses the issue of traffic impacts from development.
E1462, Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor	Any development on site HA7 should not include a through route for vehicles of any description so a "rat run" is not created.	Comment noted. Policy LPA07 addresses any transport related impact associated with the development.
E1462, Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor	Need to investigate what lies beneath this area. Many adjacent homes surrounding the site have had to be underpinned, due to a number of faults in the earth below. There are existing mining maps which show these faults. A truck stop should also be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Ground conditions would need to be addressed by the developer if this site is allocated for development in the future. Traffic movement in the area is being considered through the junction 23 study.
	Increased traffic congestion will result in increased air pollution	Policy LPA07 addresses the issue of traffic impacts from development.



SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Fully support the allocation of HA7 for housing although the policy should be amended to recognise that each site should 'contribute' to defined elements of a green gap so that this requirement can be met by either site should the other not be delivered.	Support noted.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.

SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site is the only piece of Green Belt left in the area. The Green Belt study's assessment of this site is challenged as it forms a clear strategic gap, and supports an important role in Green Belt purposes. This site should not be allocated at this time.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. This revised approach is in the light of the reduced housing requirement in Policy LPA05. Further reasoning is set out in the Green Belt Review 2018.

SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There are better brownfield sites near the M62 and Linkway.	The presence of these and other brownfield sites is acknowledged. They can not cumulatively meet the housing development needs of the Borough for the post 2035 period.
E1470, Cllr Haw	Contrary to Strategic Objective 6.2, site HA8 does not “safeguard the quality of the environment”. Housing here will only harm the local environment destroying both biodiversity and geodiversity.	Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.
	There is insufficient infrastructure to support housing on the site.	Infrastructure issues are addressed in Policy LPA08.
	Increased traffic result in increased traffic and pollution along surrounding roads.	Policies LPA07 and LPD09 address the issues of traffic impact and air quality associated with new development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Existing roads around the site are already inadequate and congested - on road residential parking on Portico Lane only allows for single vehicle progression and is a cause of traffic, especially near the nursery at Portico Lodge; current traffic measures make Two Butt Lane essentially a single vehicle road; on road parking on Holt Lane only allows for single vehicle progression.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.

SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Cumulative traffic impacts - the Whiston Garden Village plan will add an additional 4000+ homes plus the 140 homes on the Edmund Arrowsmith school site and 132 homes on the Scotchbarn Lane development which result in additional traffic.	Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Road safety - additional traffic on Longton Lane and Vincent Road will increase risks of accidents.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Eccleston Park station lacks sufficient car parking facilities forcing users to park on local roads.	This issue would need to be considered if the site if the site is allocated for development in a future Local Plan.
	Rainhill High School drop off and collection times already cause is a hazard with current traffic levels in the surrounding area.	Comment noted. Policy LPA07 addresses the issue of traffic impacts from development.
	Flood Risk – the site suffers from excessive surface water due to a high water table. Changes in the contours of the land may increase flood risk.	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.



SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood Risk - there is an artesian well sourced from the underlying aquifer 4 metres from rear wall of property at 15 Ryder Court that currently managed by the GC that serves to irrigate the course which if no longer used and not properly decommissioned may give potential for rapid flooding of existing properties. Should developers use artesian well as a source of water during construction the phase, this may cause unacceptable impacts on the existing residents.	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.
	Site has flooding issues and there are two large aqueduct pipes under two proposed sites (FP0456 Residents Against The Development Of Green Belt - Rainhill)	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.
E1464, Cllr De Asha	The allocation of Site HA8 is objected to due to existing severe traffic problems, air pollution, lack of local services and the proposed Halsnead development on the border. Education provision - Increased population will require larger schools at a cost to the council; local schools e.g. Eccleston Lane Ends Primary, Longton Lane Primary and Rainhill High are already oversubscribed.	Policy LPA07 addresses the issue of traffic impacts from development. Policy LPA08 addresses the impact of development on existing infrastructure. Policy LPA08 also seeks to ensure satisfactory provision of all forms of infrastructure which are required to serve the needs of the local community.
	Building on the golf course will leave no other available land in which to provide additional educational facilities.	This matter could be addressed as part of any future master plan exercise, in the event of the site being allocated for development in a future Local Plan.

SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	GP surgeries in the area are already oversubscribed with long waiting times.	Policy LPA08 addresses social infrastructure issues.
	The site border is with St Benedict's wood, managed by the Woodlands Trust and both the woodland and wildlife need protecting.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
	Tree Preservation Orders cover small parts of the site.	Policy LPC10 addresses tree and woodland issues.
	Ecology - bat activity may be impacted by development.	Policy LPC06 requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.
	Pylons across the site may pose a public health risk.	Comment noted. The pylons are insufficiently extensive to preclude development on the site as a whole.
	There is a major national pipework which may be liable for disruption if development occurs.	Comment noted. The known pipework is insufficiently extensive to preclude development on the site as a whole.
	The removal of open space will reduce opportunities for people to exercise, despite government's high priority on public health and wellbeing.	Open space protection, provision and enhancement are addressed in policies LPC05,LPD03, LPC07 and LPA09.
	Heritage - the site is 130m from the Grade 2 listed building Greenhouse Farmhouse and development is too close to conservation area and Manor Farm pub which dates back to 1662.	Policy LPC11 requires the historic environment to be preserved and enhanced.
E1488, Historic England	Site HA8 makes no reference to the nearby listed building despite the SA recommending screening in mitigation.	Heritage issues are addressed under Policy LPC11. This requires the historic environment to be preserved and enhanced.

SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	The loss of the golf course must be fully justified.	Comment noted. The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
	The golf club provides revenue and is still well used by both junior and senior members, Blundell Hill Golf Club is too hilly and senior members may have no alternative if Eccleston Park Golf Course is closed.	The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
E1555, Helen Howie on behalf of Wallace Land Investments	HA8 is not deliverable in the Plan period due to issues of highways, flooding, ecology and other site constraints - site HS23 would be a more suitable site for allocation.	Site HA8 is now proposed to be safeguarded to meet potential longer term housing development needs beyond 2035.
	Site HA8 should not be referenced in the table of safeguarded sites as it creates ambiguity.	Site HA8 is now proposed to be safeguarded to meet potential longer term housing development needs beyond 2035.
	Site HS23 is a more suitable site than HA8.	Comment noted. The merits of the 2 sites are assessed in the Green Belt Review 2018.
E1567, Savills on behalf of Crown Golf	Eccleston Park Golf Club will not compromise the purposes of the Green Belt in this location nor affect any other designations of landscape or habitat importance.	Comment noted



SITE HA8- ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1567, Savills on behalf of Crown Golf.	Based on evidence within the Golf Course Addendum (June 2016), the loss of Eccleston Park Golf Club to a residential use would not have a detrimental impact on the provision of golf courses and holes in the Borough	Comment noted
E1567, Savills on behalf of Crown Golf	This site has excellent potential due to its location and accessibility. Identifying HA8 as a strategic allocation creates a logical extension to the settlement boundary.	Support noted
E1460, Cllr Glover	Support for new build, especially for this part of the area with a high ageing population, however, access for existing traffic is already at breaking point. The pinch point at the junction of Rainhill Road and Warrington Road is unable to accept more traffic. New schools will be needed and a number of resident facilities including a medical centre. It would be desirable to create a buffer of greenery from the new build and Two Butt Lane.	Comments noted. Infrastructure, traffic and green space issues are addressed in other relevant Plan policies.

SITE HA09 -HIGHER BARROWFIELD FARM, HOUGHTON'S LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Removal of site from the Green Belt is unjustified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the small developable area within the site compared to other site allocations, the site is no longer proposed as a site allocation for housing. However, it is proposed to be identified as a minor change to the Green Belt boundary – see chapter 6 of the Green Belt Review 2018 for further details.
E1507, N. Cliffe	The site serves a limited Green Belt function so should be removed.	Comment noted
E1507, N. Cliffe	The site is available to meet housing demand.	Comment noted.
E1507, N. Cliffe	Residential use of this site would be in common with the adjacent area representing a logical 'infilling'	Comment noted.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Comment noted. Any proposal for development on the site would be subject to the requirements of Policy LPC06. This requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Any proposal for development on the site would be subject to the requirements of Policy LPC06. This requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.

SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Fully support HA10 as a site to be removed from the Green Belt and allocated.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The land represents a sustainable extension to the settlement of Haydock and abuts existing development and major roads to form an accessible housing site that can be fully integrated with the adjacent settlement.	Site is discounted as an allocation.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The site can be a comprehensively master planned to take full account of and retain relevant ecological and landscape features. Pipeline buffer zones can be respected and no flood risk issues arise. As a result, the site is appropriate for allocation for housing.	Site is discounted as an allocation.
	Once removed from the Green Belt developers may wish to change their planning permissions from housing to commercial development.	Site is discounted as an allocation.
	Water supply – the domestic water pressure around the HA10 proposed area already regularly drops below satisfactory levels.	Site is discounted as an allocation.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside)	Local Wildlife Site Ellams Brook runs along the southern perimeter. No adverse impact should be demonstrated.	Site is discounted as an allocation

SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways – Vista Road is already congested with HGVs/lorries, additional traffic will worsen this. Any development between Vista Road and Ashton Road must have traffic measures incorporated into entrance and exit of estate.	Site is discounted as an allocation.
E1457 Cllrs Gomez-Aspron, Bell & Dyer	The proposed buffer zones for site HA10, is considered too small.	Site is discounted as an allocation.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted. Site is discounted as an allocation.

SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	This land should remain as open farm or developed only for housing if developed at all	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Amenity – the quality of lives of new residents will be adversely affected by the noise from the oxygen factory and traffic on the A580.	Site HA11 has been discounted as an allocation.
	Highway safety - the new site will increase traffic to a dangerous level for pedestrians.	Site HA11 has been discounted as an allocation.



**SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Issue of health and safety of residents will need addressing - overhead power cables that cross the new site.	Site HA11 has been discounted as an allocation.

**SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site is Green Belt so should not be developed.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Recreational use - the site is used by hundreds of people for leisure purposes, this will be lost.	Comment noted. Site HA12 has been discounted as an allocation
E1457 Cllrs Gomez-Aspron, Bell & Dyer	The site is adjacent to SH3 a recognised protected area - the Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley. It is vital that these greenways are protected and not undermined by inconsiderate development.	Comment noted. Site HA12 has been discounted as an allocation.
	HA12 should be removed from the Plan or development confined within the boundary walls of the existing hospital.	Comment noted. Site HA12 has been discounted as an allocation.
	Wildlife/ecology - Trees and birds may be affected.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Old Hey Wood'.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.
	The topography of the site being on a slope will make it expensive to develop.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.
E1548, NHS Property Services	Support the allocation, although the boundary of site should be amended to include land to the south east of the Former Newton Community Hospital, to reflect the extent of land in the NHS ownership and to ensure that the most efficient use of land to be released from the Green Belt.	Support noted. Site HA12 has been discounted as an allocation in the LPSD.
E1548, Nexus Planning	Support the allocation of the site. It is a sustainable location on the edge of an existing urban area with an element of previously developed land. The site would contribute to meeting the local housing needs and provide affordable housing, integrating the development with the wider Sankey Valley. The site has a public footpath running through which would need to be retained and a number of trees that would need to be subject to an arboricultural and ecological assessment. However, the boundary of the site should be amended to take in the full extent of the site in the NHS ownership.	Support and Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1457 Cllrs Gomez-Aspron, Bell & Dyer	It is recognised site HA12 is redundant, however the hospital is of significance as a war memorial and any development should be sympathetic and apartment styled.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Object to the allocation of Site HA13, do not consider sufficient evidence to justify its loss.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA13 is still proposed to be allocated for housing development. Whilst the site contains a playing field most of it is a former community home. Any impacts of a proposed housing development on sporting or outdoor recreation facilities should be capable of being addressed under relevant Plan policies.
E1458 Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads - although we do not object to them being allocated for housing.	Support for HA13 for housing delivery is noted. LPSD Policy LPA07 addresses the issue of traffic impacts from development.

**SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook.	LPSD Policy LPC06 sets out how international, national and locally designated and non-designated sites must be addressed within any planning application
E1457 Cllrs Gomez-Aspron, Bell & Dyer	It is accepted that this site is a natural extension of the existing estate, however we request that an adequate buffer zone and greenway be protected along Sankey Valley.	Support and comment noted. This buffer can be accommodated within any development.

**SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, education, health facilities, public transport, retail outlets.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1456, Rainford PC	The access road to this site is too narrow and no plans have been put in place to cope with the extra traffic and parking.	Comment on access is noted. Site HA14 has been discounted as an allocated site in the LPSD.



SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Randles Brook' runs along the southern perimeter, development should not adversely impact this site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
	Other forms of wildlife have been spotted on the site including Kingfishers and Barn Owls.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
LPPO585, McAteer Associates on behalf of Eccleston Homes Ltd.	Concerned over the capacity of this site due to the relationship of the site to adjacent land uses and the onsite constraints.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
E1459, Cllrs Jones, Mussell & Reynolds	Development here will create further highway congestion at Windle Island. The schools and GP's would need to be extended to cope with the increase in residents and parking is an issue in the village.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.

SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	This is genuine and valid concern over flood risk. The drains are often at full capacity and the increased run-off from developed land needs to be resolved. Boxing Day 2015 saw severe flooding on some of the proposed development sites. Houses in Beech Gardens (near proposed HA 14 Lords Fold development) were inundated. Red Delph was also affected (development site HS19) along with many other properties that were dangerously close to the water line.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
E1250, Rainford Action Group	There is a lack of infrastructure, health facilities and public transport in the village and more dwellings would only add to the existing problems. The site is in a flood plain, and the area was flooded in December 2015 with dozens of homes flooded by the brook. Houses in Beech Gardens were inundated and drains are already at full capacity.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Strongly support the allocation of this site. Exceptional circumstances for Green Belt release have been demonstrated, and this site should be allocated.	Support noted. However, Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.
E1558 Savills (UK) Ltd. on behalf of The Knowsley Estate	Fully support the allocation of this site	Support noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.

### SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Landor Associates	Support the allocations at Rainford, however more land should be allocated in this area as there is a gross under provision here. The two sites proposed do not provide sufficient choice or diversity.	Support noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.

### SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1558, Savills on behalf of The Knowsley Estate	Exceptional circumstances for Green Belt release have been demonstrated, this site should be allocated, however, the number of deliverable units in Table 4.4 should not be a cap but indicative. Site HA15 could yield circa 260 - 280 dwellings at a net developable area of 75%-80% rather than 60%. Unaware of any obvious constraints of the site.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA15 is still proposed to be allocated for housing development. The site capacity stated in the LPSD (259 dwellings) is indicative. It takes account of the need to provide adequate buffer zones adjacent to protected trees and to address flood risk and drainage issues.

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	Lack of infrastructure, health facilities and public transport. The site is located on Grade 1 agricultural land. There are drainage and flooding issues here with drains already at full capacity.	Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities. Whilst data indicates that the site contains grade 1 agricultural land the same is true of many sites in the northern part of the Borough. The evidence does not indicate that flooding issues are sufficiently severe as to preclude the development of the site.
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, education, health facilities, public transport, retail outlets.	LPSD Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities.
E1456, Rainford PC	The access road to this site is too narrow and no plans have been put in place to cope with the extra traffic and parking.	Comment noted. traffic and parking issues can be addressed through the measures set out in Policy LPA07.
E1456, Rainford PC	The sites identified consist of Grade 1 agricultural land, which is a high source of employment in the village.	Whilst data indicates that the site contains grade 1 agricultural land the same is true of many sites in the northern part of the Borough. This factor has been taken into account in the Green Belt Review. Some minor changes to the levels and patterns of agricultural employment opportunities may occur over time, but it is considered that the overall impact will be negligible in comparison to other likely alterations to the existing employment patterns in the area.
E1459, Cllrs Jones, Mussell & Reynolds	Development here will create further highway congestion at Windle Island. The schools and GP's would need to be extended to cope with the increase in residents and parking is an issue in the village.	LPSD Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure. Policy LPA07 addresses the issue of traffic impacts from development.



SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Wildlife has been spotted on the site - migrating Pink Footed Geese use paddocks on site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	Under policy LPD01, any development should be of a high quality which maintains or enhances the character of the local environment.
E1563, Barton Willmore on behalf of Millar Homes	HA15 is available and deliverable within plan period and capacity should be increased to 260	Comment noted. The stated capacity is 259 dwellings in the LPSD.
E1479, Edward Landor Associates	Support the allocations at Rainford, however more land should be allocated in this area as there is a gross under provision here. The two sites proposed do not provide sufficient choice or diversity.	Support noted. The LPSD housing requirements have been objectively assessed to meet housing need across the Borough as a whole. This approach accords with national policy. There is no evidenced need to provide more housing than is proposed in the LPSD in Rainford.
	Support the allocation but delivery should be restricted until the access road from Pasture Lane serving EA10 is fully implemented (E1517, Frost Planning Ltd. on behalf of English Land Ltd.)	Support noted. The delivery of the site is not reliant on access being provided from Pasture Lane. The requested restriction on site phasing has therefore not been included.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Policy LPC06 requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document (2011).

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Councillors suggest that this allocated site and site HS19 should be removed and consider land at Ormskirk Road/By-Pass/Dairy Farm Road to be much more suitable as the sites would have better access and would be less intrusive on the village centre.	Comment noted. The LPSD allocations were subject to rigorous assessment in the Green Belt Review 2018. Site HA15 is allocated in accordance with the findings of that Review.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	More evidence is required to ensure that the proposed allocated and safeguarded sites will not have a detrimental impact on the existing biodiversity.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA16 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. This revised approach is in the light of the reduced housing requirement in Policy LPA05. Further reasoning is set out in the Green Belt Review 2018.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Housing here will only seek to harm the local environment destroying both biodiversity and geodiversity. The amount of development proposed will double the size of Eccleston, other areas should get their fair share of development.	Policy LPC06 addresses threats to biodiversity and geodiversity in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Surrounding roads are severely congested – Crantock road cannot be accessed; exiting the site along Calderhurst Drive to the junction with Bleak Hill Road will cause traffic chaos.	As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within the Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review. Policy LPA07 addresses the issue of traffic impacts from development.
	Risk of traffic accidents - the junction at the top of Dentons Green is already a dangerous bottle neck for accidents.	See earlier comments. Policy LPA07 addresses the issue of traffic impacts from development.
	Access - surrounding roads are too narrow to service the new development, notably Oak Tree Road and Ecclesfield Road.	Comment noted. Policy LPA07 addresses the issue of traffic impacts from development.
	The development proposed does not contribute to a robust and implementable Travel Plan with no consideration to provide public transport services.	Policy LPA 07 sets out detailed measures to achieve sustainable transport and active travel.
	Two large water mains have been fitted across this field and will require access at all times – these cannot be built upon.	Comment noted. Suitable easements are likely to be required if the site comes forward for development in the future.
	Development will add to the flooding issues in the area. Built a storage tank to release pressure.	Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk/drainage capacity - the sewer pipes for foul water and ground water that will be put into the site are only designed for three times dry weather flow, which means any water in excess goes into Windle Brook, which is already struggling with current flows.	Comment noted. Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.
	Flood risk – there are about Windle Brook Crescent that need considering.	Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.
	Loss of wildlife/ecology - Houghtons Lane has buzzards, Song Thrush, Corn Bunting, chaffinches, tits, sparrows, owls and hundreds of Canada Geese. Windle Brook is inhabited by water voles which should be protected as it is endangered.	LPSD LPC06 addresses threats to biodiversity and geodiversity in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Windle Brook' (E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside)	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Development of the site will result in loss of valuable agricultural land.	Data indicates that the site does include high grade agricultural land including some grade 1 land. The quality of agricultural land has been taken into account in the Green Belt Review process. Taking into account other sustainability factors (such as proximity to key services) the quality of agricultural land within the site is not considered sufficient to prevent the identification of the site as safeguarded land.
	There is a well-used footpath crossing the site.	Comment noted.



SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The local schools are already at capacity.	School capacity would need to be considered if the land is to be allocated for development in a future Local Plan. Infrastructure issues (including education) are also addressed in Policy LPA08.
	Developable area - the Green Belt Review states that for sites of over two hectares 75% of the gross area should be developable. Site HA16 is only 60% developable and should therefore be discounted.	Comment noted. LPPO site HA16 is now proposed to be safeguarded to meet potential longer term development needs after 2035. Whilst the developable area within the site is affected by pipelines and other constraints this is not considered to preclude its identification as safeguarded land.
E1558, Savills on behalf of The Knowsley Estate	Fully support the allocation of this site. Exceptional circumstances for Green Belt release have been demonstrated.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1561, Turley on behalf of Story Homes North West Ltd.	Strongly support the conclusion of the Green Belt Review that the Site HA16 is of "low importance" in Green Belt terms. The site is within a sustainable location and natural extension of the urban settlement. The site has good access to the strategic road network. An ecological survey of the Site has concluded that development will not result in the loss of an ecologically diverse habitat.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1561, Turley on behalf of Story Homes North West Ltd.	An area of land adjacent to Windle Brook is identified by the Environment Agency as a flood zone, but this area is excluded from development. Instead it presents an opportunity for recreational and ecological enhancement.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1561, Turley on behalf of Story Homes North West Ltd.	The Site is crossed by a 1200mm water main and a 900mm water main from east to west and is bounded by distribution water mains to the south. United Utilities have confirmed that one of the existing mains positions can be accommodated within the proposed layout and the other can be relocated within the development boundary. The Site is not therefore subject to any significant or insurmountable constraints which would present an obstacle to development.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1609, Liverpool St.Helens FC	Support the allocation as it could have mutual benefits, especially if an access to the north of the East Lancs Road was built into the development. The two rights of way and disused subway could be incorporated within the scheme, with our ground providing the community with a sports facility.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Policy LPC06 addresses this. It recognises the role played by Biodiversity and Geodiversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments. Policy LPC06 addresses how international, national and locally designated and non-designated sites will be dealt with at the Planning applications stage.

### SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Agree with the ambitious aims and growth for the Borough but local residents have concerns with the allocated site HA16, in terms of traffic congestion, access, poor public transport and lack of public services.	Comments noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated. Policy LPA07 addresses the issue of traffic impacts from development. It also sets out detailed measures to achieve sustainable transport and active travel. Other public services (education, health etc.) are addressed under Policy LPA08.

### POLICY LPA05.1 STRATEGIC HOUSING SITES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Object to the allocation of Site HA8 – the golf addendum does not identify that any golf courses are surplus to requirements, however, it does identify additional capacity to take on new members. There is a lack of evidence to justify its loss.	LPPO site HA8 is now proposed to be removed from the Green Belt but safeguarded to meet potential longer term development needs beyond 2035. The justification for this approach is set out in the Green Belt Review Report( 2018). The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
E1555, Helen Howie on behalf of Wallace Land Investments	Object to the allocation of Site HA8 on the grounds of highway, delivery, ecological and flooding issues.	LPPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. Traffic and infrastructure issues are addressed in policies LPA07 and LPA08. Ecology and flooding issues are addressed in policies LPC06 and LPC12 respectively.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1464, Cllr De Asha	Object to the allocation of Site HA8 due to existing severe traffic problems, air pollution, lack of local services and the proposed Halsnead development on the border.	LPPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. Traffic and infrastructure issues are addressed in policies LPA07 and LPA08. Air quality issues are addressed in Policy LPD09.
E1495, CPRE	Object to the release of GB land for housing and believe exceptional circumstances have not been demonstrated.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1467, Cllrs Glover, Neal & Baines	Concern with the allocation of Site HA16 due to various issues including traffic congestion, access, poor public transport links, lack of public services including health, education and community halls etc. And location would encourage those residents to shop in Liverpool rather than St.Helens.	Comments noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated. Policy LPA07 addresses the issue of traffic impacts from development. It also sets out detailed measures to achieve sustainable transport and active travel. Other public services (education, health etc.) are addressed under Policy LPA08.
	Three developers object to the requirement of delivering energy efficient measures 10% above most up to date Building Regulations, as this is unsound and there is no justification for the requirement, it should be done on a site by site basis.	LPSD Policy LPA05.1 has been revised to require that any planning application for development within a Strategic Housing Site must be informed by an agreed comprehensive masterplan covering the whole Site, which must set out details of measure to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13. This still sets a 10% requirement, subject practicality and feasibility. However, this applies to energy generation rather than energy efficiency.



POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Object to requirements for highway improvements – these should only be required as a direct impact from the proposed development and not for existing problems.	Comment noted. The developer contributions requirements set by Policy LPA08 will be subject to the statutory tests including being necessary to make the development acceptable.
	Three developers object to the 25m easement, and consider it should be 15m or less.	Comment noted
E1564, De Pol Associates Ltd. on behalf of Metacre Ltd.	The identified 6 strategic sites will not be able to contribute towards delivery and the five year housing supply, due to constraints and some of the delivery rates are unrealistic.	The LPSD identifies 7 sites as strategic housing sites. The housing supply as a whole will ensure that a 5 year deliverable supply of sites can be maintained from the start of the Plan period.
	Object to the financial contributions, these will be addressed at S106 stage and should not be carried out via policy.	Policy LPA05.1 has been modified and now requires development within Strategic Housing Sites: "subject to compliance with policy LPA08, to provide or make financial contributions towards the provision, expansion and/or enhancement of transport and/or other infrastructure to serve the needs of the development". This policy requirement is necessary to ensure a comprehensive approach to infrastructure delivery to serve the strategic sites.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	The proposed buffer zones for sites HA7 & HA10, are considered too small. HA7 parcel should be reduced in size'.	Comment noted. Within the LPSD, site HA10 has been removed as an allocation. Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs.
E1463, Cllr Preston	Object to the allocation of Site HA7 as this will only cause more major traffic problems.	Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs. Policy LPA07 addresses traffic impacts from development.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Any requests for funding highway infrastructure, education etc. should be done through the CIL regulations and the Framework.	Policies LPA05.1 and LPA08 address infrastructure delivery and funding issues in a manner which complies with national policy and legislation.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Object to the energy efficiency requirements on sites HA5 and HA7 as this is against national policy.	Policy LPA05.1 has been revised to require that any planning application for development within a Strategic Housing Site must be informed by an agreed comprehensive masterplan covering the whole Site, which must set out details of measures to "promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13". This still sets a 10% requirement, subject practicality and feasibility. However, this applies to energy generation rather than energy efficiency.
	Strongly support the allocation of Site HA14.	Support noted. Site now discounted – see earlier comments.
E1571, Indigo Planning on behalf of Barratt Homes	Support the allocation of Site HA3.	Support noted.
	Fully support the allocation of Site HA16.	Support noted. Site HA16 is now proposed to be safeguarded rather than allocated.
	Support the preparation of masterplan and phasing requirements, however suggest further details of when these should be agreed with the Council.	Support noted. Clause 2 of Policy LPA05.1 requires any planning application for development within a strategic housing site to be supported by a comprehensive master plan.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Fully supports the allocation of HA5 and HA7.	Support noted. Site HA7 has now been reduced in size and is proposed to be safeguarded rather than allocated.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie on behalf of Wallace Land Investments.	Site HS23 is a more suitable site than HA8.	Comment noted. The merits of the sites have been addressed in the Green Belt Review 2018.
E1556, JLL on behalf of Suttons Group.	Linkway Distribution Park is not suitable or viable for continued employment use and should be allocated either as a strategic or a non-strategic housing allocation. Site HA3 can deliver 600 units rather than the 502 stated (E1571, Indigo Planning on behalf of Barratt Homes).	Linkway Distribution Park has an extant planning permission for housing and is proposed as a housing allocation in the LPSD.
E1460, Cllr Glover	If HA8 is brought forward there would need to be serious highway improvements, provision of education facilities and new medical centre.	LPPO site HA8 is now proposed to be safeguarded to meet potential development needs after 2035. The justification for this approach is set out in the Green Belt Review (2018).
E1462, Cllr Deakin	In regards to Site HA7 further ground work investigation needs to be undertaken as many properties in the vicinity have had to be underpinned. A truck stop should also be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs. Ground conditions would need to be addressed in the event of the site coming forward for development in the future.
E1488, Historic England	Necessary that the strategic sites comply with heritage policy and demonstrate that where they would have adverse effects upon the historic environment that it is necessary to achieve public benefits which cannot be met in any other way.	Comment noted. Policy LPC11 requires the historic environment to be preserved and enhanced in accordance with national policy.

### POLICY LPA05.1 STRATEGIC HOUSING SITES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Site HA8 for example makes no reference to the nearby listed building despite the SA recommending screening in mitigation.	Comment noted. Historic environment assets were considered as part of the site assessment in the Green Belt Review 2018. This site is now proposed to be safeguarded rather than allocated.

### POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO585, Eccleston Homes	Housing allocations alone will not deliver the number of dwellings stated. Large sites will encounter deliverability issues such as ownership and access constraints.	The LPSD proposes a revised housing requirement and set of allocated sites. The proposed allocated housing and employment sites are suitable and deliverable to meet the objectively assessed needs of the Borough.
LPPO585, Eccleston Homes	Safeguarded Land should be allowed to come forward within the current Plan period if it can be demonstrated that housing needs of the Borough cannot be met through the proposed housing allocations.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Safeguarded Land should be made available to meet any shortfall - this an essential change required in the Plan.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.



POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Seek amendment to the proposed Green Belt boundary change on the proposals map at land North East of J23 of the M6 Haydock.	Comment noted. The boundary of the site has not been extended to the east as requested as this would represent a narrow 'neck' of development protruding into the Green Belt. Other boundary changes have been made to LPPO site EA4 as set out in the Green Belt Review 2018. The site is now proposed to be safeguarded rather than allocated.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The Plan does not comply with national planning policy insofar as it does not identify a proper supply of safeguarded land.	The LPSD is aligned with national policies and guidance relating to this point. Sufficient quantities of safeguarded land for employment and housing are identified.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Council must ensure that Policy LPA06 is fully consistent with Policy LPA02 and full regard is had to the implications of the SHELMA.	Comment noted. These policies are consistent in their approach and pay due regard to the SHELMA.
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	There should be a policy trigger for the release of Safeguarded Land.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	Object to the proposed changes - Site GBS_054 should also be removed from the GB.	Comment noted. This site (to the north of Rainford) is not proposed to be released from the Green Belt.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1564, De Pol Associates Ltd. on behalf of Metacre Ltd.	Land from Fleet Lane, Parr should be removed (Site GBS_121).	Comment noted. This site is not proposed to be released from the Green Belt.
L0863 Pilkington Sailing Club.	The proposed designation of Eccleston Mere as an Open Space and Recreation Site has not included the associated compound and clubhouse.	Comment noted.
E1457, Cllrs Gomez-Aspron, Bell & Dyer.	Both HS17 and HS14 should incorporate highway schemes that take traffic to the A49 - these engineering solutions should come at the start of the development and not phased.	These sites remain as safeguarded sites in the LPSD. Policy LPA07 addresses the issue of traffic impacts from development.
E1452, Rainhill Parish Council	The Parish Council deplores this Government's changed policy that requires all local councils to assign even more land for development into a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St.Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land across Rainhill.	The LPSD has made adequate provision to meet long term development needs of the Borough up to 2035 and beyond.
E1250, Rainford Action Group	In their own figures, the Council acknowledges there is enough brown field land to support development until 2026, even using their own inflated target. See Appendix 10 to Local Plan Preferred Options showing estimated capacity of 5,062 at 01.04.18. At 570 houses pa that will last nearly 9 years	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs. The LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	15 years of unnecessary green belt land would be released at once and would result in a 'trolley dash' by developers at the expense of brown field land development. St.Helens needs its many brown field sites to be developed. The release of green belt land would make this more difficult. There are no "exceptional circumstances" to justify green belt development. As a minimum, there must be no Green Belt release until the 2021 census proves if the Council's population projections are accurate.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs. The LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1459, Cllrs Jones, Mussell & Reynolds	The Rainford boundary sign reads "scenic and rural" but with the amount of land allocated over both Plan periods the village will turn into a small urban town but without the associated amenities.	Sites HA14 and sites HS18 to 21 inclusive (which were proposed to be released from Green Belt in the LPPO) are now proposed to remain in the Green Belt. Impact of new development on the character of the area would be addressed under Policy LPD01. Infrastructure needs would be addressed under policy LPA08.
E1459, Cllrs Jones, Mussell & Reynolds.	Site HS19 contains a mine shaft and part of the site is subject to flooding despite having had new drainage installed.	Comment noted. Site HS19 is discounted in the LPSD and is therefore proposed to remain in the Green Belt. The Green Belt Review (2018) provides further information.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Site HS18 should also be removed as Safeguarded Land and allocated for residential use in this Plan period.	Site HS18 is discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1572, GVA on behalf of Miller Developments.	Do not agree that Site ES-02 should be Safeguarded Land as it should be allocated within this Plan period in conjunction with Site EA1.	Site ES-02 is discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information
E1495, CPRE	The fact that 65% of St Helen's 136 km2 is Green Belt is a tremendous success and it should be celebrated and protected and we note that the 'exceptional circumstances' test remains, and no more than one or two sites should be released for development at any one time.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1559, DLP Planning Ltd. on behalf of Mr P. Reynolds	Should be amended to show increased figures for Site HS05 and include land at Gorsey Lane (GBS_156) to meet additional housing requirements.	Comment noted. Site HS05 is discounted in the LPSD. The Green Belt Review (2018) provides further information. No additional land is proposed for release from the Green Belt in this area.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Fully support sites EA4 and H10 as sites to be removed from the Green Belt and allocated.	Support noted. Site EA4 is now proposed to be safeguarded rather than allocated. Site H10 has been discounted and is therefore proposed to remain in the Green Belt. The Green Belt Review (2018) provides further information.
E1542, Barton Willmore	This strategy recognises that there is a shortage of available, deliverable and developable brownfield land.	Comment noted
E1563, Barton Willmore on behalf of Millar Homes	Fully supports the positive move taken by the Council to identify areas of Safeguarded Land.	Support noted.



POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1543, Barton Willmore on behalf of Jones Homes (North West) Ltd.	Generally supportive, however further clarification is required in relation to the circumstances in which the Plan will be reviewed and safeguarded sites are released. Consider that the exceptional circumstances for altering the GB boundaries have been demonstrated.	Support and comment noted. The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
	Two developers support the agreed approach of identifying land and removing it from GB.	Support noted
E1558, Savills (UK) Ltd. on behalf of the Knowsley Estate	Support the deletion of Sites HS09, HS19 and HS21 from Green Belt for safeguarded land.	Support noted. These sites are proposed in the LPSD to remain in the Green Belt.
	Two developers are supportive of 15 years of Safeguarded Land. However suggest the policy needs to build in flexibility to release, or phase the release of reserve sites without a formal plan review.	Support noted. No provision has been made for 'reserve sites' to be identified as there is sufficient contingency in the proposed supply of sites.
E1489, Home Builders Federation	Support policy approach providing all avenues of delivery have been explored then exceptional circumstances can be proved.	Support noted
E1445, Sefton Council	The Council should review the amount of Green Belt land it is releasing in light of the forthcoming Government's response to the Local Plan Expert Group's Report.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1460, Cllr Glover	Although it is a difficult process to clearly outline to our public (the need to reduce our greenbelt), it is the only way to set out our future the way we wish it to be.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1468, Cllr Long	It is important that land identified as Safeguarded Land is not built upon before it is needed.	Comment noted. The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
	Support policy in general, however a buffer of 20% should be applied to the total housing requirement, and the additional land required should come from allocating some of the safeguarded sites.	It is not necessary to add this buffer to the requirement figure as sufficient contingency is built into the supply.
	Support policy, land needs to be released from the Green Belt to deliver the Borough's development needs.	Support noted
E1542, Barton Willmore	The Council must not use the amount of Safeguarded Land identified within this LP as a reason not to provide for sufficient housing land in the next Plan.	The quantum of safeguarded land has been identified to ensure that the new Green Belt boundaries will endure well beyond the end of the Plan period.
E1547, Emery Planning on behalf Wainhomes (North West) Ltd.	Both sites HS17 & HS01 represent logical allocations which would deliver sustainable development and should be brought forward into this plan period.	Site HS01 has been discounted and is proposed to remain in the Green Belt. Site HS17 is proposed to be safeguarded to meet longer term development need in the Borough beyond 2035.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Strongly support the removal of Site HS23 from GB, and this site is available sooner, within this Plan period.	Site HS23 has been discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information.
E1559, DLP Planning Ltd. on behalf of Mr. P. Reynolds	Suggest that there should be a Reserve Land Site Policy in the Plan or that this Policy is amended to reference and identify Reserve Land Sites.	Comment noted. No provision has been made for 'reserve sites' to be identified as there is sufficient contingency in the proposed supply of sites.
E1580, Jockey Club Racecourse Ltd.	Brownfield land within the Haydock Racecourse site should be removed from the GB so that future enhancement of the racecourse can be achieved in line with Policy LPA04.	Comment noted. This land is still considered to perform a Green Belt function and is therefore proposed to remain in the Green Belt.
E 0119, Carmel College	Carmel College request that 30% of their estate be removed from Green Belt in order to extend its library provision.	Comment noted
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that Site HS13 is a natural extension of the existing estate, however we request that an adequate buffer zone and greenway be protected along Sankey Valley	Comment noted. Site HS13 has been discounted in the LPSD and is therefore proposed to remain in the Green Belt.
E1470, Cllr Haw	In regard to sites HS08 & HS09, Eccleston cannot cope with any additional development. The recently developed Triplex site has already put an immense strain on the existing infrastructure.	Sites HS08 and HS09 have been discounted in the LPSD and are therefore proposed to remain in the Green Belt.
E1479, Edward Landor Associates	A suitable site which meets the criteria is Rainford Golf Course. It is 11ha and has the capacity for 330 dwellings.	Comment noted. This land is proposed to remain in the Green Belt.

SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site ES01 is proposed to be safeguarded to meet long term employment needs beyond 2035.
	Brownfield land in St.Helens should be developed on first.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes.	Policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network.
LPPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens	Policy LPA07 makes clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network.
E1583, Warrington Borough Council	Do not believe the scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62. The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington therefore we do not consider it could contribute to Warrington's future employment land supply.	As the site is safeguarded it is not allocated for development within the Plan period. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development. Highways issues would need to be addressed at that time.



SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site would effectively function as part of Warrington and not St.Helens. Residents of Warrington should not have to suffer impacts of a decision made by a neighbouring authority.	Comment noted
E1572, GVA on behalf of Miller Developments	Access to this site can only be obtained via Joy Lane, which is narrow and used by adjoining agricultural holdings and is not suitable for high volumes of traffic or HGV's. This site is not deliverable and should not be considered as safeguarded land or a potential allocation.	The site is still proposed for safeguarding. Further details of the reasons are set out in the Green Belt Review (2018). This sets out robust assessment criteria and justified reasons for it to be safeguarded for employment use.
E0278, Parkside Action Group	The site could be facilitated by Warrington Council in their allocations.	Comment noted.

SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	Following further consideration site ES-02 has been discounted and is therefore proposed to remain in the Green Belt. Details of the reasons for this are set out in the Green Belt Review (2018).
	Brownfield land in St.Helens should be developed on first.	Comment noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site is adjacent to Local Wildlife Site 'Booths Wood'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	Site ES-02 has been discounted. See above.

SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens.	See above.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes.	See above.
	Site would not effectively function as part of Warrington and not St.Helens - residents of Warrington should not have to suffer impacts of decision made by neighbouring authority.	See above.
E0278, Parkside Action Group	The site could be facilitated by Warrington Council in their allocations.	See above.
E1583, Warrington Borough Council	Do not believe the scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62. The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington therefore we do not consider it could contribute to Warrington's future employment land supply.	See above.
E1572, GVA on behalf of Miller Developments	Consider this site should come forward as an allocation in order to design a layout which connects well to surrounding phases, in particular EA1.	See above.

SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	See above
LB0001, Save our Green Belt & Residents against Florida Farm Development	Development of this site will lead to more traffic congestion leading to the East Lancs around Garswood and Liverpool Road.	See above
	Flooding – drainage is poor and the site is prone to flooding in wet weather making it unsuitable for housing development.	See above
	Soil contamination – a previous proposal for a football training area was rejected because of land contamination.	See above
	Land instability/hazards – this land was subject to historic mine workings, there is a bell pit under site	See above
	Alternative uses are more appropriate - this area should be left for the welfare of horses, whilst the bottom part of the site could be turned into a station car park to relieve parking in surrounding area.	See above

SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Agree that exceptional circumstances for altering the Green Belt boundaries have been demonstrated. However, we consider this site represents a logical allocation which would deliver sustainable development in this plan period. The site would provide affordable housing and would consist of a comprehensive landscaping plan including existing features such as trees, together with contributions to local infrastructure.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	As part of any planning application a survey would be carried out to look for badgers, great crested newts and birds would be carried out. There are no major ecological constraints to the development of the site.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	There are no fundamental arboricultural constraints to the development of the site, the eastern boundary hedgerow maybe retained and restocked in order to plug gaps.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	There are no obstacles to the delivery of this site from a transport and highways perspective, there are a number of potential access points into the site.	See above



SITE HS02 - LAND SOUTH OF LEYLAND GREEN ROAD, NORTH OF BILLINGE ROAD AND EAST OF GARSWOOD ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO19, MWA on behalf of J Murphy and Sons Ltd.	This is a logical extension and complementary to the allocated site.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site HS02 is proposed to be safeguarded to meet long term housing needs beyond 2035.
	Flood risk – the site is prone to flooding.	Policy LPC12 contains criteria to ensure that new development will not cause an unacceptable risk of flooding.
	Land stability/hazards – the site has been honeycombed underneath due to mine working from Blackleyhurst Colliery, clay pits and Garners Old Mines.	Ground stability issues would need to be addressed if the site were to be proposed for development in the future.
	Infrastructure - Water and gas mains run through site.	Comment noted. The Council is not aware that this would preclude the principle of development in this location.
LPO19, MWA on behalf of J Murphy and Sons Ltd.	Support the safeguarded allocation of this site.	Support noted
1549, Persimmon Homes (North West)	Support the identification of this site. It is considered that the site is a logical and sustainable development site which can deliver housing early in the Plan period.	Support noted. There is no need for the site to be brought forward as an allocation in the Plan period, particularly in view of the reduced housing requirement.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1427, Residents of French Fields	The development will lead to merger of settlements; the conclusion drawn from the Green Belt review this site should be removed from the Green Belt is unjustified.	<p>There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. However, the Bold Garden Suburb is now proposed to be brought forward as a site allocation rather than to be designated as safeguarded land. The site has been merged with LPPO site HA6.</p> <p>It is anticipated that the overall development of the combined LPPO sites HA6 and HS03 will deliver nearly 3,000 dwellings including 480 to be delivered before 2035. Under Policy LPA05.1, a comprehensive master plan will be required to guide the development of the site.</p> <p>Further details of the reasons for the proposed approach are set out in the Green Belt Review 2018.</p>
	Access - Gorsey Lane is already dangerous and unable to cope with such scale of proposed development.	Policy LPA07 makes it clear that new development should maintain "the safe and efficient flow of traffic on the surrounding highway network."
	Noise and pollution from vehicles are already bad, additional traffic would make this worse.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with the planned development.
	Development of this land will result in the loss of valuable farmland which contributes to the British economy.	Data indicates that the site contains grade 3 agricultural land. Whilst the loss of this land is acknowledged this has been taken into account in the Green Belt Review.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0861, Davis Meade on behalf of J. & J. Kay	Change of use from agricultural land will threaten the security tenant farmers; flood risk - There is considerable gradient sloping towards Bold Road that causes surface flooding, development floodwater could enter the estate opposite.	Data indicates that the site contains grade 3 agricultural land. Whilst the loss of this land is acknowledged this has been taken into account in the Green Belt Review. Flooding issues are addressed in Policy LPC12, which sets criteria to ensure that development does not cause an unacceptable risk of flooding.
E1427, Residents of French Fields	Flood risk – significant development involving hard landscaping would increase flood risk for new and existing properties and surrounding road networks. Mitigation drainage issue would need to be addressed.	Flooding issues are addressed in Policy LPC12, which sets criteria to ensure that development does not cause an unacceptable risk of flooding.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site overlaps Local Wildlife Site 'Field North of Gorsey Lane LNR'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Development would lead to impacts on ecology, habitats and biodiversity – there is a Local Wildlife Site present and Priority Species (Skylark and Lapwing) have been witnessed.	Policy LPC06 acknowledges the important role played by biodiversity and geo-diversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments. Policy LPC06 addresses how international, national and locally designated and non-designated sites will be dealt with at the planning applications stage.
	Access to open space will be lost – public rights of way/footpaths cross the site. This will impact on people's health and wellbeing.	Comment noted. Public rights of way will need to be addressed in the master planning of the site.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Existing infrastructure (roads and services) will be unable to cope	Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements including transport network.
	Electricity pylons cross part of the site	Comment noted
	Visual impact- trees would need to be planted along Bold Road to mitigate visual impact and road noise.	LPSD Policy LPC10 addresses tree and woodland issues associated with the site. This would also need to be addressed as part of the master planning of the site.
	As an alternative the northern part of this site could be examined separately for consideration as safeguarded land leaving the remainder in Green Belt.	Comment noted. The whole site is removed from the Green Belt. The Green Belt Review 2018 sets out reasons for the proposed approach.
E1554, Barton Willmore	Support the inclusion of land at Travers Farm, Bold which could accommodate 630 residential units.	Support noted
E1542, Barton Willmore on behalf of Andrew Cotton	The site is located in a sustainable area with good accessibility to nearby services and facilities. There are limited constraints near to or within the site which would prevent the site's development for housing. A single masterplan will enable the provision of better connections through the area, which currently lacks integration.	Support noted
E1542, Barton Willmore on behalf of Andrew Cotton	The site lies well connected with the existing urban area and relates more closely to the Council's land included in site HA06, and would request the site is promoted as a single site through the Green Belt assessment.	Comment noted



SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Strongly support the identification of this site, but consider it to be deliverable and as such should be allocated for housing now. The Council should allocate it as a Strategic Housing Allocation or at least a reserve site.	Support noted.

SITE HS04 - LAND NORTH OF BELL LANE AND SOUTH-WEST OF MILTON STREET, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1504, Bell Lane Plot Owners.	The land's inclusion is supported but it should be brought forward as an allocated site rather than safeguarded as this site is deliverable.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	To encourage leisure and ecological uses a connection from Dream through this safeguarded site should be considered.	See above.

SITE HS05- LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways impact/safety - development of this site would generate additional traffic adding to existing problems on local roads especially during school drop-off.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Loss of open space - recently restored green areas of open space will now be lost to development.	See above
	Landscape impact – the semi-rural nature of this area will be permanently lost.	See above
	Wildlife/ecology – development would have a detrimental impact the habitats of species including birds, butterflies, rabbits and frogs.	See above
	Flood risk - this land is prone to flooding as a result of former mine working making it unsuitable for development.	See above
	Mining legacy – former historic and unrecorded mine workings/shafts are known to be present in this area.	See above
E1559, DLP Planning Ltd. on behalf of Philip Reynolds	This site is capable of coming forward within this Plan period and should be allocated as such. It can also yield more house numbers than that suggested in Table 4.8.	See above

**SITE HS05- LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1559, DLP Planning Ltd. on behalf of Philip Reynolds	The site offers a number of access points and lies within a good distance for facilities and services, with good public transport links. There are opportunities within the site for additional landscaping and buffering, and lies within Flood Zone 1 with no known drainage constraints.	See above

**SITE HS06 LAND OFF COMMON ROAD/SWAN ROAD, NEWTON-LE-WILLOWS**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1466, Cllr Sims	Concern over the amount of development being proposed in Earlestown including this site, all proposed sites should be fully appraised.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Development will lead to additional traffic – roads are already congested.	See above
	Traffic congestion will lead to worsening air quality.	See above

SITE HS06 LAND OFF COMMON ROAD/SWAN ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	The Trust could not identify this site on either of the screening documents so have assumed that it could be allocated. The site is adjacent to Local Wildlife Site 'The Dingle'. In the absence of any information as to how this wildlife site will be protected the Trust objects to it being allocated on the basis that its development is likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS.	See above
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	Support the allocation of the site, however it should be an allocated site within this Plan period and not as a safeguarded site. If the site is not amended to be an allocation then the site boundary should be extended to the entire 6.1ha.	See above
E1509, Nathaniel Lichfield & Partners on behalf of Taylor Wimpey UK Ltd.	Welcome the provision of this safeguarded site.	See above
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	See above



SITE HS07 - LAND BETWEEN ASHTON ROAD AND M6, EARLESTOWN, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Inadequate highway infrastructure - Ashton Road suffers from heavy congestion with traffic heading to/from the motorway. This is worst at peak times when day starts and ends at Hope Academy.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1466, Cllr Sims	Concern over the amount of development being proposed in Earlestown including this site, all proposed sites should be fully appraised.	See above
	Air quality will worsen along Ashton Road as a result of increased traffic generated by the new housing development.	See above
	Increased traffic will lead to highway safety issues near Hope Academy/Selwyn Jones sports centre.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The Trust notes that this site has been shown as partially safeguarded. Local Wildlife Site 'Ellams Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to impact a designated Local Wildlife Site. Water Voles were confirmed in 2011.	See above

SITE HS08 - LAND SOUTH OF BURROWS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1470, Cllr Haw	Eccleston cannot cope with any additional development. Recent development has already put a strain on the existing infrastructure. Development will add to the flooding issues in the area which UU have already built a storage tank to release pressure.	See above
	The proposed Green Belt boundary should not exclude the boathouse, dinghy compound and car park at Eccleston Mere (L0863 & LPPO544, Pilkington Sailing Club)	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Eccleston Mere'.	See above
	Loss of wildlife – a land survey conducted by Manchester Met University identified a number of birds and mammals on this site, three of which are RSPB red status: Yellowhammer, Skylark, grass hopper and warbles.	See above
E1446, Knowsley Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowsley residents and businesses	See above

SITE HS08 - LAND SOUTH OF BURROWS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support the allocation of this site which is capable of delivering between 185 and 215 dwellings rather than the 131 indicated and measures 8.3Ha.	See above
E1560, Pegasus Group on behalf of Redrow Homes North West.	The site should be considered as an allocated site rather than a safeguarded.	See above
E1560, Pegasus Group on behalf of Redrow Homes North West	There is sufficient capacity and opportunity within the site to provide a robust landscape and Green Infrastructure strategy. The site is considered sustainable and in close proximity to existing services. The site lies within Flood Zone 1 and there are no known physical constraints preventing development.	See above

SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	This site is under Natural England High Level stewardship scheme and should be protected from development in order to protect wildlife.	As above
E1470, Cllr Haw	Eccleston cannot cope with any additional development. Recent development has already put a strain on the existing infrastructure. Development will add to the flooding issues in the area which UU have already built a storage tank to release pressure.	As above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Eccleston Mere'.	As above
	Infrastructure – a new water main has already been repaired twice, any new developments will make it even more liable for damage.	As above
E1446, Knowlsey Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowlsey residents and businesses.	As above
E1558, Savills (UK) Ltd. on behalf of the Knowlsey Estate	Support the deletion of this site from Green Belt and its allocation as Safeguarded land.	As above



SITE HS10 - LAND SOUTH OF FORMER CENTRAL WORKS, BELLEROPHON WAY, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Clough Wood and Grassland'.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1575, DPP Planning on behalf of Tesco Stores Ltd.	This site should be released from Green Belt for housing development but should be allocated instead of safeguarded as it is in sustainable location and would be available and deliverable within the Plan period.	As above
E1483, Dickman Associates Ltd. on behalf of the Legh Trust	Support the allocation of this site however it should be allocated for housing in this Plan period. The site is well screened by established woods as well as a watercourse which would be retained.	As above

SITE HS11 - LAND SOUTH OF STATION ROAD, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site 'Clough Wood and Grassland'.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Site HS11 should be a housing allocation and not a safeguarded site.	As above

### SITE HS11 - LAND SOUTH OF STATION ROAD, HAYDOCK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO585, McAteer Associates Ltd. on behalf of Eccleston Homes Ltd.	Support the identification of this site but it should not be safeguarded given that the land is capable of delivery within the next two years. The Green Belt Assessment does not properly reflect the site's deliverability or advancement in comparison to allocated housing sites.	As above.

### SITE HS12 - LAND AT MARTINDALE ROAD, CARR MILL, MOSS BANK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Increased traffic generated from development will increase vehicle pollution particularly at Moss Bank Road, Carr Mill Road, Martindale Road and Birchley Road.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Access via Moss Bank Road or Martindale Road will give rise to highway safety issues. Moss Bank road has a 3 tonne weigh limit.	As above.
	Elevations on this site may give rise to viability issues affecting the delivery of affordable housing.	As above.
	The site is habitat to numerous species of wildlife which will be lost to development.	As above.

**SITE HS12 - LAND AT MARTINDALE ROAD, CARR MILL, MOSS BANK**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	As above.

**SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	Site is Green Belt and should not be developed.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic impact and air quality - there will be a large increase in traffic on the only access route which runs through Tyrer Road an existing estate.	As above
E1457, Cllrs Gomez-Aspron, Bell & Dyer	The Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley. It is vital that these greenways are protected and not undermined by inconsiderate development.	As above

SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1458, Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads.	As above
	There will be only one access route into the development.	As above
	Will lead to over development - there is already a large development of houses on the Tyrer road.	As above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook'.	As above
	Newton Ward has already had its fair share of new housing built to date.	As above
	There will be a lack of amenities such as places in Schools and Doctors surgeries for this large development of houses.	As above
E1458, Winwick PC	Do not object to the site being allocated for housing.	As above
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that this site is a natural extension of the existing housing estate, however we request that an adequate buffer zone and greenway be protected along the Sankey Valley.	As above.



SITE HS14 - LAND EAST OF NEWLANDS GRANGE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There is already a 'large' development of houses on the Vulcan Estate which is adjacent to this site. Newton Ward has already had its fair share of new housing built to date.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to safeguard the site but with a reduced site size. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic impact - there will be large increase in traffic on the only access route which run through the new Vulcan Estate.	Traffic impact issues will be addressed under Policy LPA07.
E1458, Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads	Traffic impact issues will be addressed under Policy LPA07. The site has also been reduced in size.
	Access - there will be only one access into the development. Over development - there is already a 'large' development of houses on the Vulcan Estate which is adjacent to this site. Newton Ward has already had its fair share of new housing built to date.	Traffic impact issues will be addressed under Policy LPA07. The site has also been reduced in size.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	The site overlaps Local Wildlife Site Newton Brook. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	Wildlife issues would be addressed under Policy LPC06.
	Lack of amenities - there will be a lack of amenities such as places in Schools, Doctors surgeries for this large development of houses.	Infrastructure issues would be addressed under Policy LPA08 in the event of the site coming forward for development.

SITE HS14 - LAND EAST OF NEWLANDS GRANGE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Loss of playing field - the loss of the Vulcan playing field which is an important green space and will impact on the quality of life and health for the residents of the Vulcan Village.	The reduced site area will exclude this playing field.
E1610, Wargrave Big Local	As an alternative Wargrave Big Local would welcome the opportunity to develop the Vulcan playing field as Community Allotments, we have the funding available to do this and it would greatly benefit the area of Wargrave and its residents.	The reduced site area will exclude this playing field.
E1458, Winwick PC	Do not object to the site being allocated for housing.	Comment noted.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	The site is suitable, available and deliverable within the first half of the Plan period so should be designated as an allocation rather than a safeguarded site.	Comment noted. There is no need for the site to be allocated for housing during the Plan period. The reasons why the site is safeguarded are set out in the Green Belt Review 2018.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Site HS14 should incorporate highway schemes that take traffic to the A49, these engineering solutions should come at the start of the development and not phased.	Highways issues would be addressed under Policy LPA07.

SITE HS15 - LAND EAST OF ROB LANE AND REAR OF CASTLE HILL, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk – the site is near to Newton Lake meaning ground is boggy and provides much needed flood plains when there is heavy rain.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	These fields are used by the local community daily as an area of natural beauty and for walking.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site is adjacent to Local Wildlife Site 'Newton Brook, Newton Lake and Southern Woodland'. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS.	See above
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Support the designation of this site but to allow for flexibility and adapt to rapid change this site should be brought forward sooner. As the site has a strong boundary with the M6 it is recognised the need for noise attenuation to the motorway, and as such the boundary should change and include land in the entire ownership of our clients to ensure a barrier is part of the scheme.	See above

**SITE HS15 - LAND EAST OF ROB LANE AND REAR OF CASTLE HILL, NEWTON-LE-WILLOWS**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that this site is a natural extension of the existing housing estate, however, it seems extreme to extend to the public rights of way, request that a buffer zone be incorporated within the site	See above

**SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	Flood risk – the site is near to Newton Lake meaning ground is boggy and provides much needed flood plains when there is heavy rain.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	These fields are used by the local community daily as an area of natural beauty and for walking	See above
	The site should be removed from the Green Belt but should be changed from Safeguarded to Allocated as site is viable now.	See above



**SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Support the designation of this site but to allow for flexibility and adapt to rapid change this site should be brought forward sooner. As the site has a strong boundary with the M6 it is recognised the need for noise attenuation to the motorway, and as such the boundary should change and include land in the entire ownership of our clients to ensure a barrier is part of the scheme.	See above

**SITE HS17- LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site is Green Belt and should not be developed.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site HS17 is proposed to be safeguarded to meet long term housing needs beyond 2035. The reasons for this are set out in the Green Belt Review 2018.
E1458 Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads - although we do not object to them being allocated for housing.	Comment noted. Traffic issues would be addressed under Policy LPA07.

SITE HS17- LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook	Comment noted. Wildlife issues would be addressed under Policy LPC06.
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Agree that exceptional circumstances for altering the Green Belt boundaries have been demonstrated. However, we consider this site represents a logical allocation which would deliver sustainable development in this plan period.	Support noted. There is no need to bring the site forward for development within the Plan period.
E1458 Winwick PC	Although concerned with highway congestion we do not object to the site being included for housing.	Traffic issues would be addressed under Policy LPA07.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Site HS17 should incorporate highway schemes that take traffic to the A49, these engineering solutions should come at the start of the development and not phased.	Comment noted. Traffic issues would be addressed under Policy LPA07.

SITE HS18- LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk - development will remove natural flood defence.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS18- LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highway safety - roads are too narrow, access onto Muncaster Drive is dangerous (previous proposal was rejected planning permission as the access road at Muncaster Drive and Higher Lane Junction was deemed too dangerous).	See above
	Will result in loss of Grade 1 Agricultural Land.	See above
E0584, J Rosbottom	The site is located on prime agricultural land and has been in an Environmental Scheme, with NE funding, for 16 years with positive results.	See above
	Land is elevated - would impact on rural character as seen when entering the village.	See above
	Site is not enclosed and lacks strong boundaries to the north and east.	See above
E0584, J Rosbottom	The site has a high risk of flooding due to the gradient of the land and heavy rainfall running down quickly with restricted drains in Rookery Drive. Rainford as a whole has a high water table with an underground lake beneath it.	See above
E0584, J Rosbottom	The site is surrounded by working farms which will cause disturbance in the summer months through noise, humidity and dust.	See above
	Creating access would result in loss of historic stone wall, mature trees and hedgerows.	See above
	Wildlife/biodiversity - site is of importance for endangered Brown Hare and bird species including Pink Footed Geese.	See above

SITE HS18- LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1456, Rainford PC	The site is prone to flooding.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	There are serious flooding issues with this site with water soaking in off the brow.	See above
E1497, National Farmers Union (NFU)	The site should be re-assessed and genuine farmland performances such as food production, conservation, flood risk reduction, education and leisure purposes should be taken into account. Sites of less importance and not Grade 1 farmland should be considered first.	See above
E1497, National Farmers Union (NFU)	This site has been in an Environmental Scheme, with NE funding, for 16 years with positive results. Payment similar to this has been made from the public purse to many farmers.	See above



SITE HS18- LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1497, National Farmers Union (NFU)	Many endangered birds use this site which is an important step for St.Helens' biodiversity. Education trips have been carried out for the last 26 years.	See above
E1497, National Farmers Union (NFU)	This site experiences flooding and development will only compound this issue, putting any development at risk. There are also highway issues in Rainford with a lack of parking in the village centre.	See above
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
	This site should be removed as Safeguarded Land and allocated for residential use in this Plan period (E1562, Barton Willmore on behalf of Church Commissioners for England).	See above

SITE HS18- LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Willmore on behalf of Church Commissioners for England	The site falls in Flood Zone 1 and does not contain any Tree Preservations Orders or areas of high landscape value. The site has no ground or land contamination issues and is located in close proximity to a number of local facilities including bus and rail connections, education and healthcare facilities.	See above
E0584, J Rosbottom	Agree with the ward Councillors that land at Ormskirk Road/By-Pass/Dairy Farm Road would be much more suitable as the sites would have better access and would be less intrusive on the village centre.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Bushy Lane is too narrow and unable to cope with additional traffic.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Drainage issues are known - the site floods each year despite new drainage.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	This site contains a mine shaft and part of the site is subject to flooding despite having had new drainage installed.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
E1456, Rainford PC.	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
	Wildlife loss - migrating birds use the woods.	See above
	The Rainford by-pass/Bushey Lane roundabout is congested and dangerous.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site could be converted into a park/dog walking area.	See above
E1484, PWA Planning on behalf of Mr L. Martin	The site is unsustainable with residents being reliant on cars due to the isolated location of the site. Significant infrastructure improvements would need to be carried out before the site would be considered sustainable. Access to the site would be difficult. The site does not represent a logical extension to the existing residential area. The site could not offer any meaningful green space/green infrastructure, leading to developer contribution elsewhere. The allocation is not consistent with paragraph 80 of the NPPF.	See above
E1558, Savills on behalf of The Knowsley Estate	Approve of meeting development needs after 2033 and deletion of this land from the Green Belt for safeguarded land is supported.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Councillors suggest that this allocated site and site HA15 should be removed and consider land at Ormskirk Road/By-Pass/Dairy Farm Road to be much more suitable as the sites would have better access and would be less intrusive on the village centre.	See above



SITE HS20- LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Development is inappropriate for Rainford and destroy its rural character.	See above
	Hazards - coal shafts and walk in tunnels exist on the site.	See above
	Flood risk - the site is prone to flooding (as in December 2015), increased surface water will worsen this Highways impact - roads are already congested including Rookery Lane, Higher Lane and Mill Lane.	See above
	Local equestrian business at Holiday Moss will be affected.	See above
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above

SITE HS20- LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Rainford appears to have more than its "fair share" of safeguarded Land for the second Plan period. Further development will add to the existing highway problems. Both health and education facilities will have to be extended, and parking is a big issue in the village due to limited spaces.	See above
E1508, PWA Planning on behalf of JMB Farming	Integration with the surrounding area is considered to be largely achievable for this site considering its proximity to the existing settlement area and location adjoining other land also designated for significant residential development.	See above
E1508, PWA Planning on behalf of JMB Farming	Site HS20 is an extremely suitable site and should be removed as a safeguarded site and become an allocation for this Plan period.	See above

SITE HS20- LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1508, PWA Planning on behalf of JMB Farming	It is an accessible site in terms of shops and transport; well contained visually as would adjoin Site HA15; is in Flood Zone 1; and support further improvements to public transport and highway improvements.	See above
E1508, PWA Planning on behalf of JMB Farming	Although agricultural land farmed presently, the landowner's farm more extensive areas within the local area and its loss would not give rise to any significant effects on the viability of the agricultural unit.	See above
E1508, PWA Planning on behalf of JMB Farming	This is a sustainable site thus should be an allocation within this plan period rather than the next.	See above

SITE HS21- LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	The site is in area of known flood risk	See above
	Wildlife - migrating birds use the woods and Read Squirrels are present.	See above

SITE HS21- LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways - roads surrounding site are too narrow.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Rainford Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Rainford appears to have more than its "fair share" of safeguarded Land for the second Plan period. Further development will add to the existing highway problems. Both health and education facilities will have to be extended, and parking is a big issue in the village due to limited spaces.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
E1459, Cllrs Jones, Mussell & Reynolds	Serious flooding issues with HS18 site, with water soaking in off the brow.	See above



SITE HS21- LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport. Much of the land is also prone to flooding.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1517, Frost Planning on behalf of English Land Ltd.	Site should be allocated to a Mixed-Use Employment/Housing Allocation for immediate release to help meet employment/housing needs and unlock the delivery of EA10.	See above
E1558, Savills on behalf of The Knowsley Estate	This site is available and deliverable in the Plan period so should be allocated for housing in this period, rather than identified as 'Safeguarded Land'. However disagree that the boundary appears to follow a flood risk boundary - this doesn't comply with the requirements of the NPPF.	See above
E1563, Barton Willmore on behalf of Millar Homes	Fully support the allocation of this land, however disagree with the site capacity, which should be 240 dwellings for this site.	See above

SITE HS22- LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of this site will start the merger of settlements contrary to Green Belt objectives.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1468, Cllr Long	Local residents are concerned over the negative impact new development will have on the existing highways and local services.	See above.
E1460, Cllr Glover	Site HS22 - this Phase 2 protected housing area will have the same issues on amenity and education and highways as Site HA8. Exiting traffic will have to use Elton Head Road as Rainhill Road into the village is not acceptable.	See above.
E0224, Rainhill Civic Society	Development of this site would lead to further highway problems. Safeguarded land should not come forward unless the Local Plan is further reviewed.	See above.
E1452, Rainhill Parish Council	We share local residents concerns that the proposal will lead to additional traffic congestion, a problem intensified should the High School extend, leading to detrimental highway safety. There will be an increase on education and health wellbeing facilities which will exacerbate existing health problems for residents.	See above.
E1400 Parish Cllr Long	Residents have strong concerns regarding the lack of infrastructure, and the pressure new development will have on the highways, education and health facilities.	See above.

SITE HS22- LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Large aqueducts run under the site, it is uncertain if these were laid to withstand development above.	See above.
	Electricity pylons on the site pose a public health risk.	See above.
	Development will worsen traffic Rainhill High School drop off and collection times is already hazard with current traffic levels.	See above.
	Access to the site is restricted – there are issues with on road residential parking near The Coach & Horses Inn on Ritherup Lane and Tasker Terrace.	See above.
	Increased traffic will worsen congestion on Rainhill Road, Elton Head Road, St.Helens Linkway, Field Way, Gardeners Way, Roby Close, Ritherup Lane, Elderswood Road, Ellaby Road and Ansdell Villas Road.	See above.
	The Elton Head Road/St.Helens Linkway Junction exceed government air pollution levels for the past four consecutive years. It will also need expansion to cope with increased traffic.	See above.
	Local primary schools are fully subscribed.	See above.
	Ecology/wildlife - are at risk losing their habitat is lost including endangered species of bees, bats, owls, hedgehogs and Skylarks.	See above.

SITE HS22- LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Pendlebury Brook'.	See above.
	Heritage impact - the site is close to the protected Bournes Tunnel and St Anne's Well.	See above.
	Flood risk - The Environment Agency Flood Zone map shows part of the site (around 15%) is in Flood Zones 2 and 3. It is considered that the part of the site in Flood Zones 2 and 3 should be allocated as water compatible open space consistent with the government's Planning Practice Guidance.	See above.
E1464, Cllr De Asha	Support in general, however there are existing highway problems that would need to be dealt with as any new development will escalate these further. Education facilities will also have to be improved and extended	See above.
E1460, Cllr Glover	Support for new build, especially for this part of the Borough with a high ageing population, however, there are existing highway problems that would need to be addressed, and new education, healthcare and public facilities are needed.	See above.
E1468, Cllr Long	It is important that land designated as Safeguarded Land is not built upon before it is needed.	See above.



**SITE HS22- LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1555, Helen Howie on behalf of Wallace Land Investments	The developable area of the site needs to be re-estimated due to the high voltage overhead lines and flood risk areas.	See above.

**SITE HS23- LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	Development of this site will start the merger of settlements contrary to Green Belt objectives.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E0224, Rainhill Civic Society	Development of this site would lead to further highway problems. Safeguarded land should not come forward unless the Local Plan is further reviewed.	See above.
E1452, Rainhill Parish Council	We share local residents concerns that the proposal will lead to additional traffic congestion, a problem intensified should the High School extend, leading to detrimental highway safety. There will be an increase on education and health wellbeing facilities which will exacerbate existing health problems for residents.	See above.

SITE HS23- LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1400 Parish Cllr Long	Residents have strong concerns regarding the lack of infrastructure, and the pressure new development will have on the highways, education and health facilities. The retention of a strip of green land along the southern side of Mill Lane should be kept to ensure the character of the nearby heritage assets are protected	See above.
	Highway impact – the junction at Mill Lane/Warrington Road is subject to congestion and need extensive traffic control measures to address the increasing traffic.	See above.
	Highway safety – the Ashton Avenue/Mill Lane junction is very busy and access route to Briscoe Estate is a blind corner making accidents likely; increased congestion would make this even worse. Many of the roads are too narrow.	See above.
	Highway safety - drop off and collection times at Tower College is a hazard with current traffic levels.	See above.
	Access and highway safety - Mill Lane is an extremely narrow road, single side pedestrian footpath. This road will need expansion to cater for additional traffic and reduce risk of accidents.	See above.

SITE HS23- LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO561, Cronton PC	Development will greatly increase traffic flow through Cronton village as motorists avoid congestion at Rainhill Stoops roundabout. Hall Lane is in part single lane and totally unsuitable for increased traffic flow	See above.
	Flood risk – the development of this land will increase risk of flooding – areas to the bottom of the hill as well as the M62 will be liable to flooding from rain water that currently goes to fields and the water table will be removed.	See above.
	Heritage inapt – proposed development will be too close to the Conservation Area and Manor Farm Pub which dates back to 1662.	See above.
	Wildlife/ecology - endangered species of bees and Skylark are at risk if their habitats are developed.	See above.
	Local primary schools are already fully subscribed.	See above.
	Development of the site will result in footpath being lost.	See above.
E1446, Knowsley Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowsley residents and businesses	See above.
	There is an over-reliance on a small number of sites that puts the Plan at risk. As such Site HS23 should be identified as an allocation for delivery in the first phase of the Plan.	See above.

SITE HS23- LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support in general, however there are existing highway problems that would need to be dealt with as any new development will escalate these further. Education facilities will also have to be improved and extended (E1464, Cllr De Asha)	See above.
	Support the removal of this site from Green Belt, however it should be allocated within this Plan period. The boundary should also extend and follow the M62 line rather than a line across a field (E1555, Helen Howie on behalf of Wallace Land Investments).	See above.
E1555, Helen Howie on behalf of Wallace Land Investments	This site is a more suitable site than HA8.	See above.
E1555, Helen Howie on behalf of Wallace Land Investments	The majority of the site is of low agricultural quality. There are no environmental designations on or adjoining the land. The site is not affected by any fluvial flooding but there are some surface water issues that will be addressed through improved drainage. There is a public right of way through the site and proposals will create a green corridor to accommodate this.	See above.



**SITE HS23- LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site is located within a SSSI Impact Risk Zone. The nearest SSSI is the Mersey Estuary which is located 6.1km to the south of the site. The proposals will have no impact on this designation. Detailed studies would be carried out in relation to the existing TPO's on site (E1555, Helen Howie on behalf of Wallace Land Investments)	See above.
E1460, Cllr Glover	Support for new build, especially for this part of the Borough with a high ageing population, however, there are existing highway problems that would need to be addressed, and new education, healthcare and public facilities are needed.	See above.

**SITE HS24- LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH**

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of the site will lead to urban sprawl and should not be removed from the Green Belt.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to safeguard the site but with a reduced site size. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS24- LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Existing traffic issues will become worse on Elton Head Road, Lowfield Lane, St.Helens Linkway, Sutton Heath Road, Nutgrove Hall Drive, The Broads and Heatherleigh Estate.	Policy LPA07 addresses the issue of traffic impacts from development.
	Increased traffic will give rise to air pollution levels and associated health impacts.	Policy LPA07 addresses this through provision to minimise traffic and associated impacts including air pollution.
	Coal seams are likely to exist at the site as geology and historic maps dating back to 1849 suggest – historic mine workings area pose risks such as noxious gases such as methane. This will need to be investigated.	Ground conditions would need to be addressed in the event of the site being proposed for development.
	The cumulative impact of this and housing sites in Rainhill and Whiston Garden Village plan will add an additional 4000+ homes will be too much for local infrastructure to cope with.	LPSD Policy LPA08 requires that, where appropriate, developer contributions be provided to fund necessary improvements.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Randles Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. The site is proposed to be safeguarded for longer term use after the plan period of 2035.

SITE HS24- LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1545, Ruth Jackson Planning on behalf of Gascoyne Holdings Ltd.	Release of land for housing in this vicinity will deliver much needed land for housing whilst safeguarding the remaining land as functional green gap	Support noted. The site is allocated to be safeguarded for longer term use after the plan period of 2035.
E1546, Ruth Jackson Planning Ltd. on behalf of Fuavel, McMahon, Platt and Gascoyne Holdings Ltd.	Strongly support the release of this land for housing.	Support noted
E1565, Frank Marshall & Co. on behalf of Mr Platt	Support the release of land from Green Belt, however it should be allocated in this Plan period and not safeguarded.	Support noted. There is no need to bring the site forward for allocation within the Plan period.
E1568, Cassidy + Ashton on behalf of the Jones family	Support the removal of the site from Green Belt but it should be an allocation rather than safeguarded. Ground conditions are likely to be similar to neighbouring sites recently approved for residential development and surface water runoff and drainage can be dealt with in a similar manner. There is relatively little ecological value, with the greatest variety of species and value likely to be of the edge within trees and hedgerows which would be retained. The site also has a good relationship to the existing built form and services.	Support noted. There is no need to bring the site forward for allocation within the Plan period.

POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two developers object to criteria 1. - last bullet point refers to 'demonstrable harm', however NPPF states 'severe' therefore the Policy is lowering the threshold and is unlikely to survive scrutiny as currently worded.	Comment noted. Policy LPA07 has been amended to reflect the 'severe harm' test in the NPPF (2018).
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	The policy refers to the adopted Ensuring a Choice of Travel Supplementary Planning Document SPD, and as such needs to be treated with caution and the Council should clarify the policy position on this.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E0442, Billinge Chapel End PC	The policy requires new developments to "maintain the safe and efficient flow of traffic on the surrounding highway network". The proposal is likely to conflict with these requirements.	Comment noted.
E1467, Cllrs Glover, Neal & Baines	The proposed development at HA16 will be contrary to Criterion 7 and will have a detrimental impact on the existing network.	See comments on site HA16.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	In respect of criteria 4, the reference to key road networks should be clarified to confirm whether this refers to the primary route network as shown on figure 4.2.	The wording of criterion 4 has been amended to make its meaning clearer and to ensure that it reflects the revised NPPF (2018)
E1462, Cllr Deakin	A truck stop should be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Comment noted. This is a matter which would need to be considered via relevant delivery agencies..



POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Welcome the reference and support given to the Skelmersdale Rail Link proposals (E1447, West Lancashire Council).	Support noted
E1494, Merseytravel	Would be useful to make reference to other transport strategies such as the LCR Rail Strategy, Bus Strategy, Freight & Logistics Strategy, etc.	Policy LPA07 refers to key strategic documents in the supporting text.
E1495, CPRE	The Plan should ensure as much development is reliant on public transport infrastructure to ensure it is truly sustainable. More progress is needed to improve public transport and sustainable models such as walking and cycling.	Policies LPA02 and LPA07 address the issue of sustainable transport. Policy LPA02 states that ..... "high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth".
E1496, Highways England	Support the policy in general, however as it references the Ensuring a Choice of Travel SPD, which is no-longer considered relevant in certain respects, the policy should include reference to supersede this document where possible.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support for criterion 6.	Support noted

POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Reference to the 'Ensuring a Choice of Travel SPD' made but is likely to be updated and/or evolve during lifetime of plan. Reference should be inserted to make clear any predecessor document will also be taken into account.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1494, Merseytravel	Improved sustainable travel access from the new Newton-le-Willows interchange should be promoted by the plan.	Policies LPA02 and LPA07 address the issue of sustainable transport. Policy LPA02 states that ..... "high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth".
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Policy needs to confirm that the most up to date SPD and/or travel studies will be used during the plan period to ensure that the most relevant and up to date information is used.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1496, Highways England	The Strategic Employment Sites are not primarily located to take advantage of sustainable and active transport, and, other than the Parkside site, are not located where freight rail can be provided.	Policy LPA04.1 reflects the need to provide sustainable and active transport provision to serve the sites.

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	There is no infrastructure plan, making it impossible to fully assess the impact of the proposals for Rainford.	The LPSD allocations are supported by a robust evidence base including the St.Helens Infrastructure Delivery Plan (IDP) 2018. The IDP will be published with the LPSD.
E1456, Rainford Parish Council	It is difficult to see how the stipulation that the water flow rate must remain the same post development as it was before will be achieved.	Comment noted. Policy LPC12 promotes the use of sustainable drainage systems in appropriate cases.
E1571, Indigo Planning on behalf of Barratt Homes	Object to wording of the policy as it is vague and unjustified.	Policy LPA08 has been revised and is aligned with national policies including the NPPF(2018).
E1571, Indigo Planning on behalf of Barratt Homes	Further clarity needed on how policy clearly satisfies tests of the Framework and CIL Regs in terms of ensuring necessity and appropriateness of contributions/provisions sought	The revised wording of policy LPA08 (clause 2) makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions. The Council intends to produce a Supplementary Planning Document on Developer Contributions to provide detailed information on how and when developers will be expected to contribute towards services and infrastructure delivery.
E1571, Indigo Planning on behalf of Barratt Homes	In terms of developer contributions these should be dealt with via S106 contributions and calculated as such rather than being policy specific.	Policy LPA08 provides a suitable policy framework on developer contributions. The policy is sufficiently flexible to deal with specific cases.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	There is no mention of external funding for major infrastructure projects, allocated sites should not be expected to "fix" existing problems.	Comment noted. Developer contributions sought under the policy would be subject to the normal statutory tests.

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Any viability studies should be wholly independent so if the developer is required to pay for the study it should be done by an agreed independent third party of qualified surveyors not the Council's retained preferred external consultant.	The policy does not seek to determine whether the Council's viability consultant should be used..
	Two developers object to the text and state that the wording should reflect the requirements set out in the NPPF and make it clear that contributions will be subject to and not merely informed by site specific financial viability.	Comment noted. The Council intends to produce a Supplementary Planning Document on Financial Contribution to provide detailed information on how developers will contribute towards services and infrastructure delivery.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Policy wording needs amending as it does not make sufficiently clear the circumstances in which certain contributions will be sought. Any financial contributions can be dealt with by way of S106 or CIL.	The Council intends to produce a Supplementary Planning Document on Financial Contribution to provide detailed information on how developers will contribute towards services and infrastructure delivery.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	The policy allowance for viability assessments is not supported.	To support policy LPA08, the Council has published a Borough-wide economic viability assessment (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Object to criterion 3 as it is unsound to phase development to coincide with the release of additional infrastructure. This can significantly delay development.	The approach in policy LPA08 is sound and aligned with national policies including the NPPF (2018).



POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Object to criterion 5, part IV should be deleted as planning obligations need to pass the statutory tests found in Reg 122 of the CIL Regulations.	The policy has been revised and is clear that its provisions are subject to these tests.
LPPO140, Merseyside Fire & Rescue Authority	Merseyside Fire and Rescue Authority are suitably reassured by the policy for infrastructure delivery and funding.	Support noted.
E1495, CPRE	Broadly supportive of policy	Support noted
E1496, Highways England	Highways England should be consulted as soon as possible on the potential infrastructure requirements considered for the IDP where these include the SRN. Further detail should be included within the specific site allocations, and sites phased accordingly within the Plan where this is identified.	Comment noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the policy in general but the Council must make sure they do not impose requirements that could make schemes unviable.	Support noted. Policy LPA08 reflects viability issues. It states that "When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development".
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The reference to viability review and ensuring funding sought for future infrastructure does not undermine viability of a scheme is welcome, and should reflect para 204 of the NPPF.	Policy LPA08 reflects viability issues. It states that "When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development".

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1563, Barton Willmore on behalf of Millar Homes	Welcome the clarity and flexibility of this policy and types and priority of infrastructure to be delivered. The Council should only seek planning obligations from developments where it can be shown to meet all the tests as set out in para 204 of the NPPF.	The Policy reflects these tests.
E1549, Persimmon Homes North West	Accepts the Council's approach to obligations and highlights para 173 of the NPPF. Sites of challenging viability need to have a clear balance between the deliverability of the scheme and the requirement for planning obligations.	Comment noted.
E1561, Turley on behalf of Story Homes North West Ltd.	Support in general however contributions should be determined on a site by site basis.	Support noted. Policy LPA08 provides a suitable policy framework on developer contributions. The policy is sufficiently flexible to deal with specific cases.
LPPO140, Merseyside Fire & Rescue Authority	The details of the proposed Developer Contributions Supplementary Planning Document and the Infrastructure Delivery Plan should also be available for consultation as part of the suite of documents to this consultation.	Comment noted. The infrastructure Delivery Plan will be published with the LPSD.
E1502, United Utilities	Future developer(s) should contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure.	Comment noted.

### POLICY LPA08 - INFRASTRUCTURE AND FUNDING

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1502, United Utilities	Many of the proposed allocated sites have UU assets running through them. All UU resources will need to be afforded due regard in the master planning process for a site.	Comment noted.

### POLICY LPA09 - GREEN INFRASTRUCTURE

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1561, Turley on behalf of Story Homes North West Ltd.	Criteria 3. - Enhancements to the Green Infrastructure network are not always necessary to ensure development is acceptable in planning terms, and as such the policy should be amended to include "where required".	LPSD Policy LPA09 is aligned with national policies especially Para.96 of the NPPF.
E1492, Sport England	Policy is supported but should be strengthened so that justification provides clarity around how playing field provision differs from other open space typologies.	Support noted. Playing fields are addressed under policies LPA08 (as a form of infrastructure) and LPC05.
E1501, Canal & River Trust	Support the provision of this policy, specific reference should be made to the role that the canal corridor can provide.	Support noted. Policies LPA09 and LPC07 provide policy provision to cover this issue.

POLICY LPA09 - GREEN INFRASTRUCTURE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Where development proposals result in some loss or fragmentation of green infrastructure, that compensatory provision can be offered and provided to offset any loss. The last sentence of the policy should be reworded to reflect this, in line with para 118 of the NPPF.	Comment noted. The scope for compensatory provision in appropriate cases is extensively covered in various parts of the Plan including policies: LPC05: Open Space and Outdoor Sports Facilities LPC06: Biodiversity and Geodiversity LPC08: Ecological Network LPC09: Landscape Protection and Enhancement; and LPC10: Trees and Woodlands
E1488, Historic England	An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF	This matter is covered by Policy LPC 11.
E1499, Natural England	Policy should be extended to define what the Green Infrastructure is and include links to definitions.	Comment noted. Clause 1 sets out the key aspects of the green infrastructure network in St.Helens.
E1503, Kingsland Strategic Estates Ltd.	This policy should retain/place significant emphasis on the objective to enhance Green Infrastructure as opposed to mitigation.	Comment noted. The revised policy contains several references to enhancement.
	Those sites proposed for release, such as Site HA4 are extremely well placed to deliver strong and enhanced connections to Greenways and to assist in the delivery of the Bold Forest Park Area Action Plan.	Comment noted



POLICY LPA09 - GREEN INFRASTRUCTURE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	The Open Spaces Study does not form part of the development plan and the current approach seeks to effectively give it development plan status by actively linking it to a policy within the LP. Policy should explicitly list space standards and only refer to the Open Spaces Study as evidence.	Comment noted. Open space standards can be found in the supporting text to Policy LPC05 (table 7.1).
E0442, Billinge Chapel End PC	Policy refers to Billinge Hill as a new nature reserve site. Therefore it is disappointing that such a significant and popular site will be adversely affected by Site HA1.	Comment noted. This site has been deleted as a site allocation.
E1492, Sport England	Sport England suggests amending point 2 of policy LPA09 to say "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."	Comment noted

<b>POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E0278, Parkside Action Group	The Omega EA1 development is linked to the Warrington BC Omega development and as such the SRFI would be better suited here. The Parkside site would be better used as an education facility such as a university.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use.
L0770, Parkside Action Group	Previous documents make it clear that Parkside West should only be set aside for the purpose of an SRFI. It is clear that the only reason to remove it from its intended purpose is to support the Council's relationship with Langtree development.	Parkside West (site 8EA) and the Parkside East site are required to provide the single largest economic development opportunity in the Borough. The parts of the site which are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.
E1458, Winwick PC	Concern that the aspirations for Parkside East to be developed as a SRFI are not realistic given movements of goods by this method of transport, which could lead to a site being used for a different purpose and further impact on local roads.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1458, Winwick PC	Development of this site would be harmful to the open aspect of this area for residents of Winwick.	Policy LPC09 addresses the visual impact from new development.
E1488, Historic England.	There is no mention that sites EA8 & EA9 lie in close proximity to designated heritage assets, despite being identified in the SA and its conclusion that the effects on them is likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.

POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Strongly object to a SRFI here as it will severely harm the ability of the Newton-le-Willows GB to fulfil its purposes, as well as causing adverse environmental and social impacts, and due to the spare capacity on the West Coast Mainline.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1495, CPRE	Query the robustness of the AECOM Study concerning the alternative options for the SRFI scheme.	The evidence supporting the LPSD policy LPA10 is robust and is aligned with national policy.
E1486, McGinn MP	Welcome the inclusion of Parkside and the identification of Earlestown as the second town centre within the Borough; however it needs to be made clear that traffic generated from the Parkside development will be directed to the motorway to minimise the impact on local roads.	Support noted. LPSD Policies LPA04.1 and LPA07 address the issue of traffic impacts from the development.
E1494, Merseytravel	Support the policy, reference should be made to the AECOM Parkside Study and other technical studies that have been produced in regards to rail connection.	Support noted

POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1496, Highways England	Site EA8 will potentially generate a number of vehicle movements which may impact on J22 of the M6, and requires direct access to the site via the M6. It should be noted that as part of the Smart Motorway upgrade J22 is identified for improvements and scheme/design for direct access to the site would need to pay due cognisance to this proposal.	Policy LPA07 and the master planning requirements within Policy LPA04.1 and LPA10 address issues concerning traffic and vehicle movement from the site.
E1496, Highways England	The IDP and transport evidence base for the site allocations is not yet available for review. As this site has the potential for significant impacts on the SRN, and require HE's cooperation in regards to a new access point, it is essential that this transport evidence base is reviewed as soon as possible	The Local Plan Transport Impact Assessment and the Infrastructure Delivery Plan (IDP) will be published with the LPSD. The Council wishes to continue working pro-actively with Highways England to address these issues.



<b>POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1570, Emerson/Orbit	Object as policy should include improvement of linkages to Linkway West and identify it as a part of the centre or at least as Retail Park on the St.Helens Core Area Map. The development will help to retain trade and spend in the town centre that is currently lost outside the Borough by providing a new bowling alley and improving the leisure and retail offer, which will create linked trips between other operators within the town centre.	Policy LPB01 has been revised and recognises (in what is now point 5) the importance of linkages between the town centre and Linkway West. The town centre boundary has not been extended to include Linkway West. The approach set out in Policy LPB01 accords with relevant policies in the NPPF.
E1482, Spawforths on behalf of Network Space	The Area of Opportunity identified on the Policies Map does not outline what would be acceptable nor the evidence to support this. It is difficult to understand how a proposal might impact or indeed work alongside the Area of Opportunity without knowing what this may be. Policy is imprecise and is therefore not effective.	The Council's 'Town Centre Strategy' sets out aspirations for the future of St.Helens Town Centre. The LPSD is aligned with this Strategy which will enable the implementation of its recommendations including the identification of potential redevelopment opportunity areas to revitalise and enhance the Town Centre's retail and leisure offer.
E1482, Spawforths on behalf of Network Space	The role of the CSA should also be considered as an Area of Opportunity and the Policy must have inherent flexibility so as to respond to market requirements and not inadvertently miss out on development opportunities.	Policy LPB01 continues to focus retail and other town centre use investment into suitable locations within the town centre as a first preference (as opposed to the remainder of the Central Spatial Area). This approach is in line with national policy.

POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1482, Spawforths on behalf of Network Space	The second criterion seeks to limit what Langtree Park Phase 2 may offer. The criterion allows leisure, food and drink uses, conferencing and hotels. It does not prevent retail or 'intensive leisure' provided that such uses do not compromise planned investment in the Town Centre. Again it is unclear what 'intensive leisure' means and hence this is too imprecise for inclusion in Policy. It is also unclear what 'planned investment' in the Town Centre means as this has not been identified. This too is unclear and so again is imprecise.	LPSD has removed point 2 of the policy LPB01 referring to uses considered acceptable on Langtree Phase 2 site as any development proposals for a main town centre use on this site would still be subject to the national policy tests concerning alternative sequentially preferable sites and the impact on existing centres.
E1501, Canal & River Trust	Support for policy seeking to secure opportunities to improve the public realm by retaining and enhancing the existing waterway of the St.Helens canal.	Support noted
E1482, Spawforths on behalf of Network Space	Network Space concur that linked trips within all facilities within the CSA should be actively encouraged as part of a wider strategic town centre vision. It is imperative that opportunities for town centre uses that would form a regional/city regional draw within the CSA must not be lost and the policy should have more flexibility to allow the Town Centre to expand to the south onto Langtree Park so that it can effectively compete with other centres in this part of the North West.	Comment noted. The LPSD does not expand the designated town centre in the manner suggested. Its approach on this point is in line with relevant evidence in the Retail and Leisure Study 2017 and national policy.

POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Vacant land adjacent to Langtree Stadium should be used for affordable housing. Rather than building houses out in semi-rural Eccleston, there needs to be more focus on regenerating the town and encouraging people to live here, which will revive and regenerate the town centre, and reduce the need to release precious GB.	Comment noted. Clause 6 of the revised Policy LPB01 confirms that proposals for housing or a mix of housing and other suitable use(s) within or on the edge of the Town Centre will be supported where they would avoid prejudicing the retail and service role of the Town Centre.

POLICY LPB02 - EARLESTOWN TOWN CENTRE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1575, Tesco Stores Ltd.	Support the inclusion of the Tesco store within the Town Centre boundary and Primary Shopping Area	Support noted
E1457 Cllrs Gomez-Aspron, Bell & Dyer	Generally support, however, wording needs amending in line with the Core Strategy by adding the following line "provide a framework for future regeneration and redevelopment".	Support and comment noted. This wording has been added in clause 4 of the policy.
E1575, Tesco Stores Ltd.	Consider it appropriate to have a separate policy specifically for Earlestown which recognises the centre's importance within the local retail hierarchy.	Support noted
	Policy needs to address air quality issues along Market Street	Policy LPD09 addresses air quality issues.

POLICY LPC01- HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO585, Eccleston Homes	The requirement that on greenfield sites of 25 or more units 5% of the market housing should be bungalows is unjustified. There is no planning reason for such an imposition and the market should be allowed to determine the mix of housing on any site.	The requirement for bungalows responds to evidence of demand in the Mid Mersey SHMA (2016) and the St.Helens SHMA update 2018. It has been retained in the policy.
LPO863, Hollis Vincent	This policy should apply only to new proposals, not to sites with extant consent for housing.	Comment noted
E1489, Home Builders Federation	Criterion 2 - the reasoning for 5% of bungalows is unclear - more evidence is required to back this up. Plus it is for all Greenfield sites regardless of their location. Recommend changes it to a supportive policy stance which encourages rather than requires	The requirement for bungalows responds to evidence of demand in the Mid Mersey SHMA (2016) and the St.Helens SHMA update 2018. It has been retained in the policy.
E1489, Home Builders Federation	Criterion 3 - this standard is inappropriate and contrary to national policy. Specific evidence is required to include such a requirement.	The reference to Lifetime Homes has been replaced with targets concerning the optional building regulations standards for 'accessible and adaptable' and 'wheelchair user' dwellings. The targets set out are justified by the evidence and are consistent with national policy.
	Thirteen developers object to the 20% requirement or more of all units to be designed to Lifetime Homes standard as they consider this to be contrary to national policy.	The reference to Lifetime Homes has been replaced with targets concerning the optional building regulations standards for 'accessible and adaptable' and 'wheelchair user' dwellings. The targets set out are justified by the evidence and are consistent with national policy.



POLICY LPC01- HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Whilst SHMA is important in identifying overall housing mix required across the Borough, new housing developments should be designed with 'reference to latest SHMA' as opposed to being required to be 'consistent with' the SHMA.	The policy retains the reference to 'consistent with' to provide certainty.
LPPO356, McCarthy & Stone	Council is commended for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population. The wording of this sub-clause contributes to this goal and an inclusive plan with respect to older people.	Support noted
LPPO538, Torus Housing	Torus/Helena committed to providing appropriate supported and specialist housing although viability of schemes is difficult in the current political environment.	Comment noted.
E1489, Home Builders Federation	Criterion 6 - support the flexibility element but should not be used to justify the unsustainable requirements of the rest of the policy	Support noted. Some other policy requirements have been revised.
E1459, Cllrs Jones, Mussell & Reynolds	Support the provision for the elderly, as Rainford needs more sheltered accommodation	Support noted
E1503, Kingsland Strategic Estates Ltd.	The policy provides certainty and clarity for landowners and developers regarding the mix of housing sites should deliver	Support noted

POLICY LPC01- HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPO356, The Planning Bureau Ltd. on behalf of McCarthy & Stone Retirement Lifestyles Ltd.	Commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population. We consider the wording of this sub-clause contributes to this goal and an inclusive plan with respect to older people.	Support noted.
E1556, JLL on behalf of Suttons Group	Support removal of the requirement for affordable housing from all brownfield sites apart from Zone 4. This is consistent with the priority afforded to the regeneration of brownfield sites within the NPPF.	Support noted
	Suggest that this policy incorporates more flexibility to allow an assessment of site specific needs.	LPSD Policy LPC01 allows flexibility in the delivery of mix of housing. It states that "New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes consistent with relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)".

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1542, Barton Wilmore	It is unclear whether the proposed approach of parts a) and b) will provide a sufficient level of housing to address this need or oversupply. More clarity should be provided on the numbers of affordable dwellings the Council expects to be delivered over the Plan period.	It is not possible to accurately predict the exact balance of housing development that will take place across the defined zones over the Plan period, nor the resultant density. That being the case, it is considered reasonable to set out the proportion of dwellings brought forward for implementation that are to be affordable.
E1542, Barton Wilmore	Zones 2 and 3 should be merged to create a single area, allowing for the policy to be simplified	The Council's approach to this point is informed by its viability evidence. Consideration is being given to this point.
E1542, Barton Wilmore	Unable to support the proposed percentages outlined within this policy due to the lack of evidence regarding viability supporting the plan	The St.Helens Local Plan Economic Viability Report 2018 shows that there are geographical disparities in viability and this has informed the zonal approach proposed. Policy LPC02 contains affordable housing zones which follow ward boundaries as presented in Figure 6.1.
E1560, Pegasus Group on behalf of Redrow Homes North West	Accept that some brownfield sites benefit from lower affordable housing targets compared to greenfield, however, we have not seen evidence on this matter.	The lower requirement for affordable housing on brownfield sites is a result of the overall assessment of the viability of such sites in relation to greenfield site. This is considered by the St.Helens Local Plan Economic Viability Assessment (2018), which is referenced in the Reasoned Justification.
E1560, Pegasus Group on behalf of Redrow Homes North West	Question whether the 30% requirement could be reduced for some zones assuming the annual affordable housing requirement could still be met.	The St.Helens Local Plan Economic Viability Report 2018 shows that there are geographical disparities in viability and this has informed the zonal approach proposed.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Disagree with brownfield sites only having to provide 10% whereas greenfield sites have to provide 30%. A flat affordable housing requirement should be provided which is supported by robust and up to date evidence	Comment noted. The disparities in affordable provision on greenfield and brownfield land are due to viability differences. If a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
EFPO260, Billinge PC	New homes need to be affordable	Comment noted
E1571, Indigo Planning on behalf of Barratt Homes	Policy should recognise the requirement for starter homes and be included on residential sites from the outset.	Comment noted. Starter homes are only part of the range of affordable housing options that are available. Clause 3 has been revised to support affordable home ownership in line with national policy.
LPPO538, Torus	Some sites in Zones 2 and 3 where affordability is an issue, therefore shared ownership schemes may be a viable option on some of these sites	Comment noted
LPPO863, Hollis Vincent	The viability for affordable homes should be assessed on a site by site basis, as provided for by point 3 of the Policy, and should not apply to schemes with extant planning consent	Comment noted. Policy LPC02(4) states that “provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development”.
E1445, Sefton Council	The Plan does not appear to include an affordable housing requirement. NPPF para 159 states that Local Plans should address the needs of all housing types including affordable housing. This would help justify the requirements for affordable housing in Policy LPC02.	Policy LPC02 is aligned with national policy and guidance. Evidence of the numbers of affordable homes needed in the Borough as a whole is set out in the supporting text to Policy LPC01.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Newton-le-Willows is in Zone 4, but the subscript to Figure 6.1 states that this zonal designation only applies to part of the area, but does not go on to say which particular areas. More clarity for landowners will be required to assess the levels of affordability impacts on viability.	The affordable housing zones have been revised in the light of the Economic Viability Assessment 2018 and follow ward boundaries.



POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds	Welcome 30% of allocations having to provide affordable housing, to enable 2nd and 3rd generations to gain access on the property ladder. However developers always submit applications to remove the affordable housing element from the scheme, this must not be allowed to happen.	Support noted.
E1561, Turley on behalf of Story Homes North West Ltd.	Welcome efforts to improve affordability; however the variation in the level of provision needs to be fully evidenced and tested. Part 3 represents a sensible and practical approach ensuring flexibility.	Support noted. The zonal variation in the provision of affordable housing is supported by St.Helens Local Plan Economic Viability Report (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Note a degree of flexibility, however there should be some reference to starter homes within the policy and Part 1 should be deleted as affordable housing is not restricted to provision by Registered Providers of Social Housing.	Comment noted. Starter homes are only part of the range of affordable housing options that are available. Clause 3 has been revised to support affordable home ownership in line with national policy.
E1469, Cllrs Banks, Bond & Burns	Lack of affordable housing in potential new developments disproportionately affects local residents and has a direct effect on social mobility and is a driver of regeneration and prosperity in post-industrial communities.	Comment noted. Policy LPC02 addresses this.
E1503, Kingsland Strategic Estates Ltd.	Recommend that the policy specifically incorporate a level of flexibility for those sites close to the boundaries. The dynamics of local markets will change over the plan period and the policy should recognise and allow for this.	Comment noted. The zones follow ward boundaries as indicated by the St.Helens Economic Viability Assessment 2018.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Generally supportive of policy, however, it remains unclear how the Council arrived at a 30% provision of affordable housing requirement. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.	Support noted. Affordable housing requirements are informed by evidence in the St.Helens Strategic Housing Market Assessment Update 2018 and the St.Helens Local Plan Economic Viability Report (2018).
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Welcome this approach as opposed to a Borough wide target. However levels of affordable housing provision must be based on the results of the Economic Viability Report.	Support noted. The targets in policy LPC02 are informed by evidence including the St.Helens Local Plan Economic Viability Report (2018).
	Support the flexibility of this policy in terms of site by site basis and viability assessments.	Support noted
E1542, Barton Wilmore	Support criteria 3 & 4 of this policy	Support noted
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	The caveat to relax affordable housing provision following a viability assessment is supported.	Support noted
E1549, Persimmon Homes North West	Supports part 3, and it is considered important that the Council demonstrate flexibility in renegotiating the amount and tenure of affordable housing.	Support noted.
E1556, JLL on behalf of Suttons Group	Support removal of the requirement for affordable housing from all brownfield sites, apart from Zone 4.	Support noted.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Generally supportive of policy but there is a lack of viability evidence to back up the zonal requirements.	Support noted. The targets in policy LPC02 are informed by evidence including the St.Helens Local Plan Economic Viability Report (2018).
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	In total agreement with this policy regarding the distribution and variation of affordable housing requirements.	Support noted
LPPO538,Torus	Specific brownfield sites may be unviable if affordable provision is required. However there will be sites within Zones 2 and 3 where affordability is an issue and new build market sale, even within these lower value areas, will be out of reach for aspiring home owners. Shared ownership may be viable on some of these sites.	Comment noted. Where a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.
E1489, Home Builders Federation	Without a published viability report, which considers the cumulative impacts of all plan policies and obligations, it is not possible to determine whether the proposed policy would retain viability in the majority of cases.	The LPSD is informed by an-up-date viability report.

### POLICY LPC03 - GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The sites are adjacent to Local Wildlife Site 'Thatto Heath Meadow'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	No change made. Local Wildlife Sites are given adequate protection by policy LPC06.
E1488 Historic England	A criterion should be included safeguarding the historic environment from unjustified harm in order to guide any future sites which may come forward.	No change made. Heritage assets are given adequate protection by policy LPC11.

### POLICY LPC04 - RETAIL AND TOWN CENTRES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, The Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the exclusion of the Linkway West development site, which is an accessible town centre site and the town centre boundary amended to include this area.	The LPSD does not extend the town centre to include the Linkway West site. The St.Helens Retail and Leisure Study 2017 states that the existing St.Helens town centre boundary as defined by the adopted development plan is relatively extensive, particularly to the north covering large areas of residential uses and other non-town centre uses. The study highlights that the A58 ring-road acts as a 'natural' boundary to the south west of the town centre. It recommends that the new Linkway development at Westpoint is not included within the town centre boundary. This is primarily due to the lack of any direct and accessible crossing over the A58. This consolidated boundary reflects the appropriate character of the in line with the approach in the NPPF (2018).



POLICY LPC04 - RETAIL AND TOWN CENTRES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, The Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the absence of Millfields Court, Eccleston Grange from the proposed retail hierarchy. By the time that the Local Plan is adopted in late 2018, it is anticipated that Millfields Court will be fully operational. This should be designated as a Local Centre in the Plan.	Millfields Court has not been added to the list of centres. The hierarchy of centres listed in policy LPC04 accords with the findings of the St.Helens Retail and Leisure Study 2017. The centre boundaries will be kept under review in line with the NPPF to reflect changing needs.
E1575, DPP Planning on behalf of Tesco Stores Ltd	Object to the exclusion of the Tesco store from the draft Clipsley Lane local centre boundary.	This change has not been made. The boundaries of the local centre accord with the findings of the St.Helens Retail and Leisure Study 2017. The Tesco store is across a busy main road from the local centre.
	The proposed Rainhill District centre map is not consistent with national policy as there are no defined Primary Shopping Areas, Primary Retail frontages and Secondary retail frontages.	This change has not been made. The Council's Retail and Leisure Study (2017) provides robust evidence to justify defining Rainhill as a District Centre. The centre has a diversity of uses and facilities which are consistent with a district centre designation. It is however insufficiently large to justify having a separately defined Primary Shopping Area, or separate Primary and Secondary retail frontages.
E1563, Barton Willmore on behalf of Millar Homes.	Generally supportive, specifically the identification of Rainford as a Local Centre.	Support noted
E1482, Spawforths on behalf of Network Space	The general approach to the policy is sound, however the role and opportunities that the Central Spatial Area presents must be recognised to improve the critical mass of the Town centre	Comment noted. Policy LPC04 in the LPSD is considered to provide a positive framework for the regeneration of the town centre and the Central Spatial Area as a whole.
	Updated retail and Leisure Needs Evidence should be made available when finalised.	The St.Helens Retail and Leisure Study (2017) has been published on the Council website.

POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSPD
LPPO544, Pilkington Sailing Club	The clubhouse, car park and dinghy compound at Eccleston Mere should be included in the Open Space and Recreation Site designation as is associated infrastructure.	The boundaries of designated open space at Eccleston, Pilkington Sailing Club have been amended on the Policies Map to reflect the area that fulfils the open space function.
	There is insufficient green open space in Rainford. In particular: Rainford has no parks; only has 1.92 ha per 1000 population of natural and semi natural green space (this is below the threshold set out in your core strategy); and only has 0.28 ha per 1000 of amenity green space - this is the lowest in the Borough and analysis of these sites also show they are of poor quality.	The St.Helens Open Space and Recreational study (2016) concludes that the Rainford area is served by the following typologies of open space and recreational facilities: Natural and Semi-Natural Green Space (20ha); Amenity Green Space (2.90ha); Children and Young People (0.98ha); Cemeteries and/or Churchyards (1.07ha). Under Policy LPC05, the Council will seek to protect existing areas of open space unless specified criteria in the policy are satisfied. Under Policy LPD03, the Council will also require new housing development to be served by an appropriate quantity of new open spaces to serve the new population where there would otherwise be a deficiency in the quantity, accessibility or quality of open space in that area.
E1492, Sport England	Policy is supported but should be strengthened so that justification provides clarity around how playing field provision differs from other open space typologies and how local standards are not appropriate for outdoor sports as they cannot take account of sports catchment areas	Support noted. Policy LPC05 has been reviewed to reflect comments. A table in the supporting text (setting out the standards for different types of open space) refers – in the case of outdoor sport – to the needs assessment and site-specific recommendations in the Council's latest Playing Pitch Strategy and Action Plan.
E1479, Edward Landor Associates	Support the Policy, Rainford Golf Course is covered by this policy and as such should be removed from the GB.	Support noted.

### POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Needs to recognise open spaces are possessed of historic interest. Cemeteries, parks and gardens may be registered. The policy could give additional definition and protection to historic and archaeological resources and assets.	Comment noted. Policy LPC05 supporting text references all typologies of open space including parks and gardens and cemeteries. Policy LPC05 has not been changed to refer to historic and archaeological assets as these are covered adequately by Policy LPC11.
E1503, Kingsland Strategic Estates Ltd.	This policy underpins the Vision and many of the Strategic Aims, perhaps the criteria could be re-ordered making it clear that the threshold is not to retain but to enhance facilities.	Comment noted. Enhancement is referred to in clause 1 of the Policy.
	Playing fields at Sidac should be designated as Local Green Space.	The Sidac Playing Field has received planning permission (Ref.P/20170890) for residential development. The site is not designated as a Local Green Space.

### POLICY LPC06 - BIODIVERSITY AND GEOLOGICAL CONSERVATION

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1499, Natural England	Policy need amending to bring it in line with the NPPF, with more emphasis on designated sites (para 113 of the NPPF).	Policy LPC06 has been amended to align with national policies and guidance including the NPPF (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	Do not consider that this policy is balanced and in order to be sound the policy should be amended to state that if appropriate mitigation is proposed it is acceptable.	Policy LPC06 is robust and is aligned with national policies and guidance including the NPPF(2018). The circumstances in which mitigation should be pursued are appropriately addressed in the policy wording.

POLICY LPC06 - BIODIVERSITY AND GEOLOGICAL CONSERVATION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Four developers object to Criteria 4 and the requirement for a 3:1 ratio for new off-habitat, and a 25 year management and implementation plan.	Policy LPC06 has been revised. However, the emphasis on avoiding harm to biodiversity (and on providing adequate mitigation and/or compensation as a last resort) has not been weakened. This is in line with national policy.
	Four developers query whether development viability has been taken into account; a more flexible approach is recommended.	Comment noted.
E1503, Kingsland Strategic Estates Ltd.	Welcomed policy, however, criteria 4 could be made clearer; acknowledging that in certain instances, there may be a benefit to the Borough to accept an offsite contribution.	Comment noted. The policy appropriately sets out the circumstances in which off-site mitigation may be considered.
E1499, Natural England	Generally supportive but the policy could be strengthened to ensure delivery and achieve the Vision for the Borough.	Comment noted. The policy as amended is considered to be sufficiently strong.
E1560, Pegasus Group on behalf of Redrow Homes North West	Policy needs to be amended in line with the NPPF and state 'where possible' with regards to a net increase in biodiversity.	LPSD Policy LPC08 covers net gains in biodiversity.
E0442, Billinge Chapel End PC	Site HA1 has a border with a local wildlife site (LWS14) and it is not clear how the conflict between a housing development and the Council's commitment to safeguard this local wildlife site will be addressed.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
E1492, Sport England	Policy quite rightly does not provide a local standard for outdoor sport	Comment noted.



### POLICY LPC07 - GREENWAYS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1503, Kingsland Strategic Estates Ltd.	We support the concept of the Greenways but suggest that the proposed release of sites from the Green Belt provide an opportunity to extend this important network.	Support noted. Greenways have a primary function of providing sustainable movement and ensuring links to vital local communities' assets including access to employment sites, healthy facilities, recreational facilities and environmental assets such as wildlife habitat and wildlife corridors. The site profiles for the strategic sites refer to the need where appropriate to consider opportunities to extend greenway linkages.
E1495, CPRE	We would encourage the Council to identify areas of Tranquillity and set out policy accordingly.	The need for areas of tranquillity, or how they would be defined is not clearly set out in national policy. The LPSD does not therefore identify such areas.

### POLICY LPC08 - ECOLOGICAL NETWORK

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1457, Cllrs Gomez-Aspron, Bell & Dyer	HA12 site is adjacent to SH3 a recognised protected area - the Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley.	Site HA12 has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	The sites proposed for release from the Green Belt are uniquely placed to deliver enhancements and this opportunity should be grasped.	Comment noted.

### POLICY LPC09 - LANDSCAPE PROTECTION AND ENHANCEMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
Rep.ref.no.	Summary of main issue	How each main issue has been addressed
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Whilst the rationale of this policy is correct, further clarity is needed in relation to when assessments of landscape sensitivity and visual impact assessments are needed and that essentially this needs to be determined on a case by case basis.	Policy LPC09 has been revised. The policy wording contains appropriate flexibility by confirming that clause 1 applies having regard to the scale and nature of the proposal.
E1488, Historic England	Welcome the reference to the European Landscape Convention in the supporting text, but fails to recognise its landscape protection definition. Similarly, St.Helens is covered by the Merseyside Historic Landscape Characterisation project but neither are mentioned in the policy.	Policy LPC09 has been revised to incorporate the Merseyside Historic Character Study.

### POLICY LPC10 - TREES AND WOODLAND

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Three developers raised concern in respect of part 5 and replacement tree ratios. Further clarity is required on these issues to ensure that this Policy requirement is sound.	The 2 for 1 tree replacement ration in Policy LPC10 is aligned with the requirement in the NPPF to contribute to and enhance the natural and local environment. It has therefore been retained.i

POLICY LPC10 - TREES AND WOODLAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Fails to recognise that many trees and areas of woodland are of heritage conservation value in their own right, some may benefit the setting of a listed building or lie along historic rights of way	Clause 7 of policy LPC10 refers to the heritage value of woodland. The policy also gives clear protection for example to veteran trees. Policy LPC11 is also relevant to this issue in specific cases.
E1503, Kingsland Strategic Estates Ltd.	This is a balanced policy that sets clear criteria.	Support noted
E1500, Environment Agency	Biodiversity Action Plans have been superseded by the Government's Biodiversity 2020 national strategy	Comment noted
E1571, Indigo Planning on behalf of Barratt Homes	Question the necessity for policy to refer to protection of trees already subject to TPO and also references to 'veteran trees' and 'hedgerows'.	Comment noted

POLICY LPC11- HISTORIC ENVIRONMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Policy is not supported by robust local evidence on historic environment	The LPSD has a robust policy framework for the protection, enhancement and management of Historic assets. The Council's Heritage Background Paper (2018) will set out a positive strategic approach towards the protection and enhancement of heritage assets across the Borough of St.Helens. The LPSD is also informed by Heritage Impact Assessments (HIA) which will be published as supporting local evidence.
E1488, Historic England	Policy is silent on how historic environment issues would be addressed through the vision.	Policy LPC11 has been revised and contains appropriate provisions to protect and enhance the historic environment. The vision in chapter 3 also refers appropriately to the Borough's unique heritage.
E1488, Historic England	The NPPF makes it clear that even 'less than substantial' harm to either designated or non-designated heritage assets will be unsustainable it is not outweighed by public benefits part 1 c. is unsound therefore. Part 5 should reference the Merseyside Historic Landscape Characterisation project.	Comment noted. The revised policy is considered to comply with the relevant sections of the NPPF (2018).
E1503, Kingsland Strategic Estates Ltd.	Agree with the underlying objective but consider the policy could be expanded and include the need for developers to undertake a desktop review of the history of the site and help the Council and local residents to record any historic interest.	Comment noted. This matter is addressed in clause 2 of the revised policy.



### POLICY LPC11- HISTORIC ENVIRONMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0228, Rainford Heritage Society	The sites allocated in Rainford will bring Rainford closer to neighbouring parishes which will intrude into our heritage.	Policy LPC11 sets out how the Council will seek to conserve St.Helens' historic environment and promote awareness of its shared heritage. All proposals for development which may affect heritage assets or their settings are required to be accompanied by an Assessment of Significance which forms part of a Design and Access Statement and/or a Heritage Impact Assessment.
L0228, Rainford Heritage Society	Development will affect existing footpath network which are part of Rainford's heritage.	Most footpaths are not subject to any designation or identification as a heritage asset. However, they are (where they form a right of way) protected under other legislation.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Historic buildings often provide valuable habitats for wildlife (e.g. bats). The policy should contain a requirement for such habitats to be protected and for planning applications to be accompanied by an ecological assessment.	This matter is adequately covered by policy LPC06, which addresses how ecological habitats and protected species should be addressed in planning applications.
E1488, Historic England	Historic and cultural assets could bring considerable impact on the value of a much broader range of economic sectors.	Comment noted

### POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Object to the draft policy, specifically point 11) as currently worded - it is not the role of new development to 'enhance' water quality of existing water resources.	The NPPF (2018) has been revised to indicate that development should "wherever possible, help to improve local environmental conditions such as air and water quality".

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC.	Rainford is prone to flooding and it is difficult to see how the stipulation that water flow rate remains the same will be achieved.	Policy LPC12 seeks to ensure that new development will not cause an unacceptable risk of flooding and water quality and sets out the requirements for developers to demonstrate how flood risk will be addressed.
E1491, NFU	The last sentence is confusing and should be re-written. What is riparian development? Attenuation is recognised but sometimes on farmland this can have significant implications for farmers	Comment noted. The phrase 'riparian' no longer appears in the policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Support the ambition to ensure that flood risk arising from new development is attenuated, however, it is considered this should be determined on a site-by-site basis.	Support noted. The policy has been revised and is considered to include suitable criteria to determine when attenuation will be required.
E1488, Historic England	New development in inappropriate places may alter the hydrology of other areas, thereby potentially giving rise to concomitant threats to buried archaeology.	Comment noted. Clause 4 of the policy refers to the need to protect buried archaeology.
E1491, NFU	A future proofed progressive policy should recognise that flooding and "slowing the flow" will be more of an issue and it may require a local resolution linked to work on natural capital or eco-system services.	Comment noted. Policy LPC12 has been revised and is considered to include a suitable emphasis on these matters.

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1499, Natural England	Generally supportive but have some concerns that the policy does not recognise the need to protect habitats from water related impacts only minimise damage and should seek enhancements, would like to see this section, cross referenced with the Green Infrastructure section to ensure consistency and evidence of policy linkages are maintained.	Support noted. LPSD Policy LPC06 acknowledged the important role played by Biodiversity and Geodiversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments.
E1500, Environment Agency.	There needs to be some consistency in regards to the reference to the Sankey Catchment Action Plan.	Comment noted
E1500, Environment Agency	Criterion 5 – needs amending to emphasise the need to attenuate and filter surface water, improving water quality and reducing peak flow during flooding.	Policy LPC12 has been revised to reflect this comment – see clause 5.
E1500, Environment Agency	Criterion 9 is confusing - it is not clear whether this is related to biodiversity and nature conservation or WFD. The two are linked but are not necessarily the same, depending on what exactly is meant by biodiversity asset/nature conservation.	Policy LPC12 has been revised for clarity.
E1500, Environment Agency	Criterion 10 also needs amending	Policy LPC12 has been revised for clarity.
E1500, Environment Agency	In regards to SUDs the wording needs to emphasise the need to attenuate and filter surface water, improving water quality and reducing peak flow during flooding and improve clarity in relation to the WFD.	LPC12 has been revised to reflect this comment.

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1500, Environment Agency	Note that Biodiversity Action Plans have been superseded by the Government's Biodiversity 2020 national strategy.	Comment noted
E1502, United Utilities	Development within Groundwater Source Protection Zones should be in accordance with the Environment Agency position statement entitled 'Groundwater Protection: Principles and practice (GP3)'. The development should be supported by an appropriate risk assessment which considers the impact on the groundwater environment.	Comment noted
E1502, United Utilities	Development proposals should be supported by a construction management plan which sets out how the risk to the groundwater environment during any construction process will be managed.	Comment noted. This is addressed in clause 7 of the policy.
E1502, United Utilities	Developers will need to ensure that any water and wastewater assets will be protected from development that could compromise their physical integrity or effective maintenance. We would be keen to see this requirement incorporated into your planning policies.	This matter is addressed by clause 14 of the revised policy.



POLICY LPC13 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Nine developers strongly object to Part 2 - as they suggest it is unclear what justification or evidence there is for the requirement for a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regs, policy it appears overly onerous	The revised clause 4 of policy LPC13 requires proposals for new development within a strategic employment site or a strategic housing site to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s) unless this is shown not to be practicable or viable. This approach is considered to accord with the policy in the NPPF to promote the use of low carbon forms of energy.
E1489, HBF	Criterion 2. 1.- 'fabric first' approach is unjustified and contrary to national policy. The proposed policy requirement would have significant viability implications.	Policy LPC13 has been revised and does not refer to a 'fabric first' approach.
	Broadly supportive of policy (E1495, CPRE)	Support noted
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support the opportunities presented through the deployment of decentralised, low carbon and renewable energy where there is sufficient mixed-use development to provide the necessary heat load.	Support noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Generally supportive but policy should not include a requirement that exceeds Building Regs.	Comment noted
E1563, Barton Willmore on behalf of Millar Homes	Further evidence is required to demonstrate that this Policy is sound, including testing through the Viability Assessment.	The LPSD is supported by an up-to-date viability assessment report (2018). This will be published as part of the evidence supporting the Plan.

POLICY LPC14 - MINERALS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Note that the western section of the land south west of J23 at Haydock is within a mineral safeguarding area for coal measures. Criteria 2 considers development in such areas, however the lower threshold for Green Belt sites should be removed and other exceptions allowing information submissions in support of development proposals should be retained.	Comment noted. The distinction between Green Belt and non-Green Belt sites has been removed.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Policy should state that allocated sites are exempt from MSAs (as implied in para 7.103). The policy should be more flexible and the benefits of development should be considered against the quantum of land potentially sterilised by non-minerals development.	Comment noted. The policy allows for a balanced consideration of a proposal's benefit. Non-mineral development may be permitted where the need for the proposed development outweighs the need to safeguard the mineral resource.
E1493, The Coal Authority	Criterion 2 - pleased to note that the policy defines the generic Mineral Safeguarding Areas, with a detailed surface coal resource area	Comment noted
E1493, The Coal Authority	Criterion 4 - welcomes the acknowledgement for the potential for future proposals for the exploitation of onshore oil and gas resources (including unconventional hydrocarbons)	Comment noted
	Broadly supportive of policy (E1495, CPRE)	Support noted

POLICY LPC15 – WASTE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Broadly supportive of policy	Support noted

POLICY LPD01- ENSURING QUALITY DEVELOPMENT IN ST.HELENS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Reference of need to ‘avoid loss of high quality soils’ at point 2) i) not explained or justified and in the absence of evidence, we object to this particular part of the draft policy.	The reference to protection of soils has been retained as this is considered to be an important sustainability issue. The policy allows for loss of or damage to soils where justified by wider benefits.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	There is a notable absence of any reference to wildlife/ecology/biodiversity. There should be a requirement for all proposals to have regard to the ecology of the site and the surrounding area and for new development proposals to be accompanied by an ecological assessment.	This matter is covered extensively in other policies, for example: LPC06 (Biodiversity and Geological Conservation); LPC08 (Ecological Network); LPC09 (Landscape Protection and Enhancement); and LPC10 (Tree and Woodland).
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Significant concerns to criteria 3(ii) which requires new development to use local and recycled building materials. The wording of this policy is too prescriptive and criterion 3(ii) should be deleted.	The policy still encourages the use of recycled and/or locally sourced materials. This is by means of a cross reference to the Merseyside and Halton Joint Waste Local Plan, which is part of the adopted development plan.
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	Support noted. This is covered in policy LPA11 ‘Health and Wellbeing’ and in other parts of the LPSD which relate to open space and green infrastructure networks.
	Fully support this policy.	Support noted

POLICY LPD01- ENSURING QUALITY DEVELOPMENT IN ST.HELENS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1493, The Coal Authority	Criterion 2 (iv) - although not referring to coal mining legacy, this part is a welcome inclusion.	Comment noted
E1495, CPRE	Support this policy, the Council must promote a sense of pride in its places as new development comes through.	Support noted
	Part 3. ii. - should be amended and the words "where possible" should be added.	Comment noted
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.
E1493, The Coal Authority	Wish to highlight that 'unstable' should be taken to include land within the defined Coal Authority Development High Risk Area, and development proposals within this area should be accompanied by a Coal Mining Risk Assessment.	Comment noted
E1502, United Utilities	Council and the developer to consider proximity to existing United Utilities wastewater treatment works.	Comment noted



POLICY LPD02 - DESIGN AND LAYOUT OF NEW HOUSING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Wording introducing the policy unclear therefore object on this principle basis.	Policy LPD02 has been updated.
E1499, Natural England	There is a notable absence of any reference to ecology and biodiversity. There should be more reference in the policy to such matters.	This matter is covered extensively in other policies, for example: LPC06 (Biodiversity and Geological Conservation); LPC08 (Ecological Network); LPC09 (Landscape Protection and Enhancement); and LPC10 (Tree and Woodland).
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	Support noted. This is covered in policy LPA11 'Health and Wellbeing' and in other parts of the LPSD which relate to open space and green infrastructure networks.
E1495, CPRE	Support the use of local materials, we are seeing too many copy book housing developments coming forward that are incongruous with the St.Helens locality.	Support noted. This approach is reflected in Policy LPD02.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	There is significant overlap with policy LPD01.	Comment noted
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.

POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPD
E1492, Sport England	A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas. It is suggested that policy makes clear that the on-site open space requirement does not include outdoor sport but that off- site contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.	Supporting text has been revised to make clear that Open Space Standards do not apply to outdoor sports provision. The policy and supporting text has been revised with more detail added to offer greater clarity to developers over when the Council will expect new residential development to provide new open space, where and in what form.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	The requirements seem unduly prescriptive	The approach in policy LPD03 is consistent with national policies and guidance including the NPPF.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Generally supportive, however, whilst reference is made in the sub-text to the provision requirements in SHUDP Policy GEN 6 'which have worked successfully', no justification is given in the policy for the requirement for 40m2 of open space per dwelling	Comment noted. Relevant evidence concerning this issue is set out in the St.Helens Economic Viability Assessment 2018.
E1499, Natural England	It is important for ecosystem services to have space to absorb rainwater, provide habitat and connections for wildlife, and space for people to play sport and spend time relaxing outdoors.	Comment noted
	Three developers suggested that further detail and robust justification and evidence for the open space requirements is needed	Policy LPD03 is supported by robust and up-to-date evidence in the St.Helens Open Space, Sports and Recreation Assessment
	Three developers suggested that provision should be on a site by site basis.	Policy LPD03 is robust and aligned with the NPPF.

### POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two developers comment that the policy does not take into account the size of dwellings, their own private space or if there is any existing open space.	The local evidence supporting this policy is robust and consistent with national policies including the NPPF. The revised policy wording also takes account of whether there would be any deficiencies in open space provision in the area as a result of a development being implemented.

### POLICY LPD04 - HOUSEHOLDER DEVELOPMENTS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.
E1488, Historic England	Development should take account of the status and significance of heritage assets	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.

### POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There is no reference to the need to protect wildlife habitats in older buildings, for example bat roosts (E1499, Natural England)	This matter is adequately covered by policy LPC06, which seeks to protect wildlife habitats and protected species from harmful development.

<b>POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1491, NFU	Welcome the reference to conversions and agricultural workers dwellings. However, the policy should go further and seek to promote diversification opportunities that will support farm businesses.	This matter is covered by clause 7 of Policy LPA02, which confirms that 'the Council will support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses'.
E1488, Historic England	Policy conveys no clear requirement for development to respect the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.

<b>POLICY LPD06 - DEVELOPMENT IN PROMINENT GATEWAY LOCATIONS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E0442, Billinge Chapel End PC	Appears to be conflict between this policy and Policy LPC02.	Policy LPD06 is robustly prepared and is aligned with national and local policies.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Sites HS15 & HS16 both have strong boundaries with the M6 and as such the clients full land ownership should be included in the safeguarded area to ensure such a barrier is part of the scheme.	Sites HS15 and HS16 have been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the sites in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.



### POLICY LPD07 - DIGITAL COMMUNICATIONS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd ) and Peel Energy	Object to the requirement for the provision of fibre enabled broadband. Media network providers should have installed the necessary infrastructure within a region and it is not for developers to meet this requirement.	This requirement is considered to be justified and is still included in the policy. The Government has brokered an agreement between Openreach and the Home Builders Federation to offer access to full fibre broadband for all new developments, free of charge for developments of over 30 dwellings registered from November 2016, or as part of a co funded initiative.
E1488, Historic England	The word 'normally' is unnecessary, it provides no control or clarification (part (iv))	Comment noted and addressed in the LPSD.

### POLICY LPD08 - ADVERTISEMENTS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
None	None	N/A

### POLICY LPD09 - AIR QUALITY

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	This policy is not strong enough, only focussing on not making air quality any worse. It should make firm commitments to work towards improved air quality.	Comments noted. The policy is considered to be sufficiently positive, through its promotion of sustainable modes of transport.

POLICY LPD09 - AIR QUALITY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Object to Criteria 2 as development proposals should assess the impact of potential emissions generated by the proposal on existing air quality levels. It should not be necessary to reduce existing air quality/pollution issues, unless this can be achieved as a further benefit of a proposal	Comment noted. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
LA399, Newton Resident & Friends Assoc.	Proposals will result in increase in traffic which will add to air pollution in the surrounding area - it is already deemed inadequate in High Street area.	Comment noted. Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
E1499, Natural England	Generally supportive but would like to see the policy strengthened to recognise impacts on European and National sites. The policy does not take into account the cumulative impacts on air quality, from individual sites, in the context of European and National designated sites.	Support noted. Policy LPC06 has been revised to reflect these comments.
L0770, Parkside Action Group	Wholeheartedly support this policy	Support noted
E1461, Croft PC	Increased traffic volumes are likely to have a negative impact on air quality	Policies LPD09 and LPA07 address the issues of air quality and traffic impact associated with planned development.
E1464, Cllr De Asha	Proposed development at Rainhill will lead to a significant impact on air pollution and lead to dangerous levels of pollution for residents.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact associated with planned development.

### POLICY LPD09 - AIR QUALITY

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1494, Merseytravel	DEFRA published a new national Air Quality Plan, which is to be amended in line with EU regulations and as such that document could have implications for St.Helens as the LCR will be required to tackle the increasing air quality challenge.	Comment noted

### POLICY LPD10 - HOT FOOD TAKEAWAYS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, the Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the proposed exclusion zones for new hot takeaways, as it incorrectly presumes all takeaways are unhealthy. The policy as worded is too negative and the SPD was not tested through examination.	Policy LPD10 and its supporting text have been revised. However, the criteria concerning the location of hot food uses are retained. They are considered to be justified on the basis of evidence, and in order to promote healthy eating habits and reduce the rate of childhood obesity.

### POLICY LPD11 - HEALTH AND WELLBEING

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	This has been addressed in Policy LPD11 (clause 5).

POLICY LPD11 - HEALTH AND WELLBEING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1503, Kingsland Strategic Estates Ltd	Support this Policy.	Support noted
L0770, Parkside Action Group	Completely support this policy.	Support noted
E1488, Historic England	An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.	Comment noted.
E1495, CPRE	Life expectancy in St.Helens is significantly lower than the national average. Access to good quality urban green space and local countryside is vital in the future to promote improved fitness of the population through walking, cycling and other leisure activities.	The provision of urban open space is covered under policies LPC05 and LPD03 of the LPSD.

DRAFT POLICIES MAP		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1518, Cass Associates on behalf of Redrow Homes Ltd.	The map does not exclude the land at Junction Road/Stanley Avenue from the Green Belt.	Comment noted. This site is still included in the Green Belt. The reasoning behind this decision is set out in the Green Belt Review 2018.



DRAFT POLICIES MAP		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Our site (FDL Packaging Site (Site Ref: 153-SHLAA 2016) is not covered by any site specific policy within the emerging Local. The fact the site is unallocated for any land use could be seen as an indicator for flexibility in the future use and development of the site.	Comment noted
	The fact there are no proposed housing allocation sites on non-Green Belt land through the Draft policies maps is evidence of the significant shortfall in housing land supply. The situation in terms of Employment Land by comparison is considered to be less serious.	Comment noted
LPPO544, Pilkington Sailing Club	The clubhouse, carpark and dinghy compound at Eccleston Mere should be removed from the Policies Map as GB as it is included in the Open Space and Recreation Site designation as is associated infrastructure.	The boundaries of designated open space at Eccleston, Pilkington Sailing Club have been amended on the Policies Map to reflect the area that fulfils the open space function
	Key sites with planning permission for housing should be shown as being allocated for housing development on the Policies Map.	The largest sites with current planning permission are now marked on the LPSD Policies Map.

## APPENDIX 1

### Reference Index 1: List of respondents contributing to LPPO 'Main Issues' (and Ref. No.)

Barton Willmore.....	E1542
Barton Willmore on behalf of Andrew Cotton .....	E1554
Barton Willmore on behalf of Avenbury Properties.....	E1519
Barton Willmore on behalf of Church Commissioners for England.....	E1562
Barton Willmore on behalf of Jones Homes (North West) Ltd .....	E1543
Barton Willmore on behalf of Millar Homes .....	E1563
Bell Ingram Design Ltd. on behalf of Essar Oil .....	E1585
Bell Lane Plot Owners.....	E1504
Billinge & Seneley Green PC .....	LPPO801
Billinge Chapel End PC .....	E0442
Billinge PC.....	FP0260
Canal & River Trust.....	E1501
Carmel College .....	E0119
Cass Associates on behalf of Redrow Homes Ltd. ....	E1518
Cassidy + Ashton on behalf of FDL Packaging Group .....	E1566
Cassidy + Ashton on behalf of the Jones family.....	E1568
Cllr De Asha .....	E1464
Cllr Glover .....	E1460
Cllr Haw.....	E1470
Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor.....	E1462
Cllr Long.....	E1468
Cllr McCauley .....	LPPO808
Cllr Mitchell (Burton & Winwick Ward).....	LPPO534
Cllr Preston, St.Helens Borough Council - Earlestown Councillor.....	E1463
Cllr Sims.....	E1466
Cllrs Bond, Burns & Banks (Haydock Ward Councillors).....	E1469
Cllrs Glover, Neal & Baines.....	E1467
Cllrs Gomez-Aspron, Bell & Dyer .....	E1457
Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors) .....	E1459
CPRE .....	E1495
Croft PC .....	E1461
Cronton PC .....	LPPO561
Culcheth and Glazenbury PC.....	E1453
Davis Meade on behalf of J. & J. Kay.....	L0861
De Pol Associated on behalf of Metacre Ltd. ....	E1564
Dickman Associates Ltd. on behalf of Legh Trust .....	E1483
DLP Planning Ltd. on behalf of Mr P. Reynolds .....	E1559
DPP Planning on behalf of Tesco Stores Ltd .....	E1575
Edward Landor Associates.....	E1479
Edward Landor Associates on behalf of Z. Mallik.....	E1472
Emery Planning on behalf of Wainhomes (North West) Ltd. ....	E1547
Environment Agency .....	E1500
Frank Marshall & Co. on behalf of Mr Platt.....	E1565
Frost Planning on behalf of English Land Ltd.....	E1517
Great Sankey PC .....	LPPO592
GVA on behalf of Miller Developments.....	E1572
Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.....	FP0717
Helen Howie on behalf of Wallace Land Investments .....	E1555
Highways England.....	E1496
Historic England .....	E1488

Hollis Vincent .....	LPPO863
Home Builders Federation.....	E1489
Homes & Communities Agency.....	E1510
How Planning on behalf of Taylor Wimpey UK Ltd.....	E1544
Indigo Planning on behalf of Barratt Homes.....	E1571
J Rosbottom .....	E0584
JLL on behalf of Suttons Group.....	E1556
Jockey Club Racecourse Ltd.....	E1580
Kingsland Strategic Estates Ltd. ....	E1503
Knowlsey Council .....	E1446
Lane Head Residents' Association.....	E1532
Liverpool St.Helens FC .....	E1609
McAteer Associates Ltd. on behalf of Eccleston Homes Ltd. ....	LPPO585
McGinn MP .....	E1486
Merseyside Fire & Rescue Authority .....	LPPO140
Merseytravel.....	E1494
Michael Sparks associates on behalf of Canmoor Developments Ltd.....	E1521
MWA on behalf of J Murphy and Sons Ltd. ....	LPPO19
N. Cliffe .....	E1507
Nathaniel Lichfield & Partners on behalf of Taylor Wimpey UK Ltd.....	E1509
Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd. ....	E1512
National Farmers Union (NFU).....	E1491
National Farmers Union (NFU).....	E1497
Natural England .....	E1499
Network Rail.....	E1490
Newton Resident & Friends Assoc. ....	LA399
Nexus Planning on behalf of BXB Ltd .....	E1569
Nexus Planning on behalf of NHS Property Services.....	E1548
Parish Cllr Trisha Long.....	E1400
Parkside Action Group .....	E0278
Parkside Action Group .....	L0770
Pegasus Group on behalf of Redrow Homes North West .....	E1560
Persimmon Homes North West.....	E1549
Peter Brett Assoc. on behalf of Smith Property Developments and Interland ....	E1557
Pilkington Sailing Club.....	L0863
Pilkington Sailing Club.....	LPPO544
PWA Planning on behalf of JMB Farming .....	E1508
PWA Planning on behalf of Mr L. Martin .....	E1484
Rainford Action Group.....	E1250
Rainford Action Group.....	LPPO588
Rainford Heritage Society .....	L0228
Rainford PC.....	E1456
Rainhill Civic Society .....	E0224
Rainhill PC .....	E1452
Residents Against The Development Of Green Belt - Rainhill .....	FP0456
Residents of French Fields.....	E1427
Ruth Jackson Planning on behalf of Fuavel/McMahon/Platt/Gascoyne .....	E1546
Ruth Jackson Planning on behalf of Gascoyne Holdings Ltd.....	E1545
Save our Green Belt & Residents against Florida Farm Development.....	LB0001
Savills (UK) Ltd. on behalf of the Knowsley Estate .....	E1558
Savills on behalf of Crown Golf .....	E1567
Sefton Council.....	E1445
Spawforths on behalf of Network Space .....	E1482
Spawforths on behalf of Parkside Regeneration LLP.....	E1481
Sport England .....	E1492

The Coal Authority.....	E1493
The Emerson Group on behalf of Orbit Investments (Properties) Ltd.....	E1570
The Planning Bureau Ltd. on behalf of McCarthy & Stone .....	LPPO356
Torus.....	LLPO538
Torus Housing.....	LPPO538
Turley on behalf of Peel Holdings (Land and Property Ltd ) and Peel Energy ...	E1511
Turley on behalf of Story Homes North West Ltd. ....	E1561
United Utilities .....	E1502
Wargrave Big Local .....	E1610
Warrington Borough Council .....	E1583
West Lancashire Council.....	E1447
Wigan Council .....	E1448
Wildlife Trust for Lancashire, Manchester & North Merseyside .....	E1498
Winwick PC .....	E1458
Y. Fovargue MP for Makerfield.....	E1465

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## APPENDIX 2

### Reference Index 2: Location of LPPO 'Main Issue' responses by Ref. No.

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## APPENDIX 3

### METHODS OF CONSULTATION EMPLOYED AT VARIOUS STAGES

	Document preparation	Regulation 18 Stage	Post consultation feedback	Publication of Local Plan
Stakeholder Meetings	●		●	
Individual Consultation Letter/email		●		●
Publication in Community Magazine	●	●	●	●
Publication on Website		●	●	●
Public Notice <sup>2</sup> or press release		●		●
Deposit in Public Buildings <sup>3</sup>		●	●	●
Presentation offered to business and community groups		●	●	●
Consultation Letter/email to interest groups	●	●	●	●
Articles in Specialist Publications		●		●

<sup>2</sup> Where required by Regulation

<sup>3</sup> as Listed in appendix 3



## **APPENDIX 4**

### **SPECIFIC CONSULTATION BODIES AS SET OUT IN THE 2012 LOCAL PLAN REGULATIONS**

“specific consultation bodies” means the following—

- (a) the Coal Authority,
- (b) the Environment Agency,
- (c) the Historic Buildings and Monuments Commission for England (known as English Heritage),
- (d) the Marine Management Organisation,
- (e) Natural England,
- (f) Network Rail Infrastructure Limited (company number 2904587),
- (g) the Highways Agency,
- (h) a relevant authority any part of whose area is in or adjoins the local planning authority’s area,
  - (i) any person—
    - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and
    - (ii) who owns or controls electronic communications apparatus situated in any part of the local planning authority’s area,
- (j) if it exercises functions in any part of the local planning authority’s area—
  - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(9) or continued in existence by virtue of that section;
  - (ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989(10);
  - (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(11);
- (iv) a sewerage undertaker; and
- (v) a water undertaker;
- (k) the Homes and Communities Agency(12); and
- (l) where the local planning authority are a London borough council, the Mayor of London

## **APPENDIX 5**

### **GENERAL CONSULTATION BODIES AS SET OUT IN THE 2012 LOCAL PLAN REGULATIONS**

“general consultation bodies” means the following—

- (a) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area,
- (b) bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,
- (c) bodies which represent the interests of different religious groups in the local planning authority's area,
- (d) bodies which represent the interests of disabled persons in the local planning authority's area,
- (e) bodies which represent the interests of persons carrying on business in the local planning authority's area;

## APPENDIX 6

### LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT SCOPING STAGE

*[N.B. 120 'private' individuals names have been excluded from this list.]*

A Crithcley & Sons  
Accent North West  
Accountable Officer for St.Helens CCG  
AIDAPT  
Aimia Foods Limited  
Al Amin Indian Takeaway  
ALG Investments  
Alliance Planning  
Alps Group Ltd  
Altius Property Development LLP  
Anchor Housing Trust  
Ancient Monuments Society  
Ansar Homes Ltd  
Ansdell Villas Road Residents Association  
Arriva North West & Wales  
Arts Council North West  
Ash Grove Farm  
Ashfield  
Ashtons Green Community Allotment  
Ashurst T & R  
Ashurst Tenants & Residents Assoc  
Avalon Town Planning & Architectural Design Consultants  
Avenbury Properties  
Banks Property Group  
Barratt Homes - Planning Manager  
Barratt Homes (Manchester)  
Barrow & Cook  
Barrow Farm  
Barton Willmore Planning Partnership  
Bell Ingram  
Bellway Homes Ltd (North West Division)  
Beresford Adams  
Bericote Properties Ltd.  
Berrys Bros  
Bickerstaffe Parish Council  
Bidwells  
Billinge Chapel End Parish Council  
Billinge Community Library  
Billinge Historical Society  
Billinge Tenants and Residents Association

Bizspace  
Bloor Homes  
BNP Paribas Real Estate  
Bold heath Equestrian Centre  
Bold Parish Council  
Bond Byran  
Bovis Homes  
Bradford & Northern Housing Association  
Bridgewater Trust  
Brimble Lea & Partners  
British Trust for Conservation Volunteers North West Region  
Broadway Malyan Ltd  
Brunswick Road Tenants and Residents Association  
Bryant Homes North West Ltd  
Buckingham Portfolio Management Ltd  
Burtonwood & Westbrook Parish Council  
C B Richard Ellis Ltd  
CA Planning  
Caddick Development  
Canal & River Trust  
Canter Levin & Berg  
Cantra New Street Tenants and Residents Association  
Carr Mill and Clinkham Wood Tenants & Residents Association  
Carter Jonas LLP  
Cass Associates  
Cass Associates  
CGMS Consulting  
Chair of Ansdell Villas Road Residents Association  
Chair of Friends of Victoria Park  
Chair of Learning in St.Helens Group  
Chair of Safer St.Helens Group  
Charlton House Farm  
Cheshire Police  
Cheshire West and Chester Council  
Chester Lane Centre Local History Group  
Chris Thomas Ltd  
Church Commissioners for England  
Civic Trust (Northern Office)  
Civil Aviation Authority  
Civitas Planning  
Clark Planning Consultants Ltd  
Cliff Walfingham  
Commercial Estates Group  
Common Estate Tenants and Residents Association  
Communities Agency  
Concept Developments  
Cornell Group  
Cory Environmental



Cosey Homes  
Cottrell Commercial  
Council For The Protection Of Rural England (CPRE) (Lancashire Branch)  
Country Land and Business Association  
Countryside Properties  
CPRE  
Croft Parish Council  
Cronton Parish Council  
Cuerdley Parish Council  
Culcheth & Glazebury Parish Council  
Cunningham Planning  
Dalton Warner Davis LLP  
David L Shaw Town Planning Consultant  
David Wilson Homes  
De Pol Associates Ltd  
Deloitte Real Estate  
Derek Hicks & Thew Partnership  
Design Council  
Development Executive  
Development Solutions  
DfT - Regional & Local Transport Delivery  
Dickman Associates Ltd  
Diocese of Liverpool  
Director of Commissioning for NHS England (Merseyside)  
Disability Advice & Information St.Helens  
Dixon Webb Property Consultants  
DK Architects  
DPDS Consulting Group  
DPP One Ltd  
Drivers Jonas Deloitte  
DTZ  
E Cook & Sons  
Easter Developments Ltd  
Eccleston Hall Management Company  
Eccleston Parish Council  
Elan Homes  
Electricity North West  
Electrovision Ltd  
Elm Construction  
Emersons  
Emery Planning Partnership  
English Heritage (North West Region)  
Environment Agency  
Environmental Advisory Service (EAS)  
ESSAR OIL UK (formerly SHELL UK) (c/o Bell Ingram)  
Fairhurst  
Fire & Rescue Service  
Fisher German

FJH Associates Ltd  
Forestry Commission  
Forster and Company  
FPCT LLP  
Frank Marshall and Company  
Frost Planning Ltd  
Fusion on line limited  
G L Hearn Property Consultants  
G V A Grimley  
Garswood Community Library  
Garswood Gates Farm  
Gladman Developments  
Great Sankey Parish Council  
Greater Manchester Police  
Greater Manchester Police Commissioner  
Green Edge  
Green Pastures  
Gregory Gray Associates  
Greystar Europe  
GVA Grimleys Ltd  
Halton & St.Helens VCA  
Halton Borough Council  
Halton Primary Care Nhs Trust  
Hammerson PLC  
Harris Lamb  
Hate Crime Co-ordinator  
HCA  
Helena Housing  
Helena Partnership  
Henderson Homes Ltd C/o Agent  
Heys House Farm  
Higham & Co  
Higher Barrowfield Farm  
Highway Authority (Cheshire West & Chester)  
Highway Authority (Halton)  
Highway Authority (Knowsley)  
Highway Authority (Lancashire)  
Highway Authority (Liverpool)  
Highway Authority (Sefton)  
Highway Authority (St.Helens)  
Highway Authority (Warrington)  
Highway Authority (Wigan)  
Highway Authority (Wirral)  
Highways Agency  
Himor Group  
Holliss Vincent  
Holmes-Antill  
Home Builders Federation Ltd

Homes & Communities Agency  
Hourigan Connolly  
Housing 21  
How Planning  
Hutchinson 3G UK Limited  
ID Planning  
Improving St.Helens  
Indigo Planning Ltd  
J Murphy & Sons Ltd  
JASP Planning Consultancy Ltd  
JB & B Leach  
JLPS  
Job Centre Plus  
Jones Homes  
Jones Lang Lasalle  
JPE Consultancy  
JWPC Ltd  
KDP Architects  
Keith Swain Design  
King Sturge LLP  
KKA Ltd  
Knowsley MBC  
Lambert Smith Hampton  
Lancashire County Council  
Lancashire County Property Group  
Lancashire Police  
Lancashire Wildlife Trust/The Wildlife Trust for Lancashire, Manchester and North Merseyside  
Langtree Group plc  
Lawrenson Associates  
Legh Family Estates  
Leith Planning Ltd  
Lex Northwest Ltd  
Liverpool Airport Plc  
Liverpool City Council  
Local Development Plans  
Local Enterprise Partnership  
Local Nature Partnership  
Lowe Property Developments Ltd  
Marine Management Organisation  
Marshall Surveyors  
Matthews and Goodman LLP  
Mayor of London  
Maypole Barn  
MCP Planning  
Meller Braggins  
Mersey Forest  
Mersey Valley Golf and Country Club Ltd

Merseycare NHS Trust  
Merseyside Environmental Advisory Service  
Merseyside Fire & Rescue Authority  
Merseyside Industrial Heritage Society  
Merseyside Police  
Merseyside Police (St.Helens)  
Merseyside Traveller Forum Irish Community Care  
Merseyside Waste Disposal Authority  
Merseytravel  
Michael Sparks Associates  
Miller Homes  
Mineral Products Association  
Mobile Operators Association c/o Mono Consultants Ltd  
Morley Estates  
Morris Homes  
Morston Assets Ltd  
MPSL Planning and Design Ltd  
Nathaniel Lichfield Partnership  
National Electricity Power Authority  
National Farmers Union  
National Federation of Gypsy Liaison Groups  
National Grid  
National Housing Federation  
Natural England  
NBS Construction  
Network Rail  
Newton and Earlestown Community Group  
Newton le Willows Friends & Residents Association  
Newton Residents Association  
NHS Halton & St.Helens  
NHS North West  
NHS Property Services  
NLP  
North West Ambulance Service  
North West Museum of Road Transport  
Npower Renewables Ltd  
NW Planning Aid  
O2  
Office of the Police and Crime Commissioner for Merseyside  
Open Spaces Society  
Orange PCS Ltd  
Osborne Clarke  
Owen Ellis Architects  
P Wilson & Company  
Parkside Action Group  
PCT  
Peacock and Smith Ltd  
Peel Investments (north) Ltd



Peel Land & Property  
Penketh Parish Council  
Persimmon Homes  
Philips Ryley & Co LLP  
Pickard Finlason Partnership  
Pilkington  
PLANIT-IE  
Planning Aid  
Planware Ltd  
Powergen  
Prescot Town Council  
Principal Arts Officer (Acting)  
Promised Land Farm  
Property Surveyor  
Rainford Allotment Association  
Rainford Civic Society  
Rainford Community Library  
Rainford Hall Estate Ltd  
Rainford Parish Council  
Rainhill Civic Society  
Rainhill Parish Council  
Rainhill Railway & Heritage Society  
Rapleys LLP  
Red Bank Schools Ltd  
Red Delph Farm  
Redcat Property Investments Ltd  
Redrow Homes (Lancashire) Ltd  
Redrow Homes (North West) Ltd  
Renova Developments  
Revelan Group  
Revelan UK Ltd  
RG+P  
Riverside  
Rocktownsend  
Roman Summer Associations Ltd  
Rowland Homes  
Royal Society for the Protection of Birds (RSPB)  
Russell Homes (UK) Ltd  
Salvation Army Housing Association  
Sanderson Weatherall LLP  
Sankey Canal Restoration Society  
Savills  
Sefton Council  
Seneley Green Parish Council  
Sherdley Estates  
Sherdley Remec Ltd  
SHINE  
Showmen's Guild of Great Britain

Silcocks Amusements  
Simonswood Parish Council  
Smiths Gore  
Social Care Housing & Health Directorate  
Spawforth Associates  
Sport England (North West)  
SSA Planning  
ST Group LTD  
St.Helens & Knowsley Hospital Trust  
St.Helens Age Concern  
St.Helens CEN Coordinator  
St.Helens Chamber  
St.Helens Coalition of Disabled People  
St.Helens College  
St.Helens District Sports Council  
St.Helens Heritage Network  
St.Helens Historical Society/St.Helens Assoc. for Research into History  
St.Helens Multi-Cultural Group  
St.Helens Chamber of Commerce - Director of Business Services  
St. Peter's C.E. Primary school  
St.Helens Cooperative Community Members Group  
St.Helens Green Party  
St.Helens LSP  
Steven Abbott Associates  
Stewart Ross Associates  
Storey Homes  
Sustainability Forum  
Sustainable St.Helens Forum  
Suttons Group  
Suttonside Farm  
Swindell's Roofing  
T Mobile UK Ltd  
T&TK Drinkall  
Taylor Wimpey UK Ltd  
Taylor Woodrow Developments Ltd  
Taylor Young  
Temptation House  
Terence O'Rourke  
Tesni Homes  
The Barracks  
The Coal Authority  
The Garden Centre Company c/o Gregory Gray Associates  
The Garden History Society  
The Gauchwin Group  
The Gypsy Council for Education Culture Welfare and Civil Rights  
The Haydock Park Racecourse Company Ltd  
The Mersey Forest  
The Office of Rail Regulation

The Planning Studio  
The Stanley Estate & Stud Company  
The Theatres Trust  
The Winwick Educational Foundation  
The Woodland Trust  
Thomas Jones & Sons  
Torus  
Transport for London  
Traveller Law Reform Project and Friends, Families and Traveller  
Tree Tops  
Turley Associates  
Unifrax Ltd. (UK)  
United Co-op Ltd (Property Division)  
United Utilities PLC  
United Utilities Property Solutions  
Upholland Parish Council  
Viridor Waste Management  
Vodafone  
Wainhomes (North West) Ltd  
Wainhomes Developments Ltd  
Walton & Co (Planning Lawyers) Ltd  
Warrington Borough Council  
West Lancs District Council  
Whiston Town Council Offices  
White Peak Planning  
White Young Green  
Wigan Council  
William Fishwick & Son Ltd  
Willowbrook Hospice  
Windle Farm  
Windle Parish Council  
Winwick Parish Council  
Wirral MBC  
Woodhouse Farm  
Woodland Trust  
Woodland Trust - Government Affairs Officer (Local)  
Worthington Land Settlements

## **APPENDIX 7**

### **LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT PREFERRED OPTIONS STAGE**

*[N.B. 237 'private' individuals names have been excluded from this list.]*

A Crithcley & Sons  
Accent North West  
AGMA  
AIDAPT  
Al Amin Indian Takeaway  
ALG Investments  
Alps Group Ltd  
Altius Property Development LLP  
Anchor Housing Trust  
Ancient Monuments Society  
Ansar Homes Ltd  
Arcus Consultancy Services Ltd  
Arriva North West & Wales  
Arts Council North West  
Ash Grove Farm  
Ashfield  
Ashtons Green Community Allotment  
Ashurst T & R  
Ashurst Tenants & Residents Assoc  
Avalon Town Planning & Architectural Design Consultants  
Avenbury Properties  
Banks Property Group  
Barrow & Cook  
Barrow Farm  
Barton Willmore  
Bell Ingram  
Bell Ingram Limited  
Bellway Homes Ltd (North West Division)  
Bericote Properties Ltd.  
Berrys Bros  
Bickerstaffe Parish Council  
Bidwells  
Billinge Chapel End Parish Council  
Billinge Community Library  
Billinge Historical Society  
Billinge Tenants and Residents Association  
Bizspace  
Bloor Homes  
BNP Paribas Real Estate  
Bold Heath Equestrian Centre



Bold Parish Council  
Bond Byran  
Bovis Homes  
Bradford & Northern Housing Association  
Bridgewater Trust  
Brimble Lea & Partners  
British Trust for Conservation Volunteers North West Region  
Broadway Malyan Ltd  
Brunswick Road Tenants and Residents Association  
Bryant Homes North West Ltd  
Burtonwood & Westbrook Parish Council  
C B Richard Ellis Ltd  
CA Planning  
Caddick Development  
Canal & River Trust  
Canter Levin & Berg  
Cantra New Street Tenants and Residents Association  
Carr Mill and Clinkham Wood Tenants & Residents Association  
Cass Associates  
CGMS Consulting  
Chair of Ansdell Villas Road Residents Association  
Chair of Friends of Victoria Park  
Chair of Learning in St.Helens Group  
Chair of Safer St.Helens Group  
Charlton House Farm  
Cheshire West and Chester Council  
Chester Lane Centre Local History Group  
Civic Trust (Northern Office)  
Civil Aviation Authority  
Civitas Planning  
Clark Planning Consultants Ltd  
Cliff Walfingham  
Commercial Estates Group  
Common Estate Tenants and Residents Association  
Communities Agency  
Concept Developments  
Cornell Group  
Corporate and Financial Affairs Department, EE  
Cory Environmental  
Cosey Homes  
Cottrell Commercial  
Council For The Protection Of Rural England (CPRE) (Lancashire Branch)  
Country Land and Business Association  
Countryside Properties  
CPRE  
CPRE Lancashire  
CPRE St.Helens  
Croft Parish Council

Cronton Parish Council  
Cuerdley Parish Council  
Cuerdly Parish Council Warrington  
Culcheth & Glazebury Parish Council  
Cunningham Partnership  
Dalton Warner Davis LLP  
David L Shaw Town Planning Consultant  
David Wilson Homes  
De Pol Associates  
Design Council  
Development Solutions  
Dickman Associates Ltd  
Diocese of Liverpool  
Director Environmental Protection  
Director of Commissioning for NHS England (Merseyside)  
Disability Advice & Information St.Helens  
Dixon Webb Property Consultants  
DK Architects  
DPP One Ltd  
Drivers Jonas Deloitte  
DTZ  
E Cook & Sons  
Eccleston Hall Management Company  
Eccleston Parish Council  
Elan Homes  
Electricity North West  
Electrovision Ltd  
Elm Construction  
Emerson  
Emery Planning Partnership  
EMF Enquires  
English Heritage (North West Region)  
Environment Agency  
Environmental Advisory Service (EAS)  
ESSAR OIL UK (formerly SHELL UK) (c/o Bell Ingram)  
Fairhurst  
Fire & Rescue Service  
Fisher German  
FJH Associates Ltd  
Forestry Commission  
FPCT LLP  
Frank Marshall and Company  
Frost Planning Ltd  
G L Hearn Property Consultants  
G V A Grimley  
Garswood Community Library  
Garswood Gates Farm  
Gladman Developments

Great Brighams  
Great Sankey Parish Council  
Greater Manchester Police  
Greater Manchester Police Commissioner  
Green Edge  
Green Pastures  
Greystar Europe  
GVA Grimley  
GVA Grimleys Ltd  
Halton & St.Helens VCA  
Halton Borough Council  
Halton Primary Care Nhs Trust  
Hammerson PLC  
Hate Crime Co-ordinator  
HCA  
Helena Housing  
Helena Partnership  
Helena Partnerships Head Office  
Henderson Homes Ltd C/o Agent  
Heys House Farm  
Higher Barrowfield Farm  
Highway Authority (Cheshire West & Chester)  
Highway Authority (Halton)  
Highway Authority (Knowsley)  
Highway Authority (Lancashire)  
Highway Authority (Liverpool)  
Highway Authority (Sefton)  
Highway Authority (Warrington)  
Highway Authority (Wigan)  
Highway Authority (Wirral)  
Highways Agency  
Himor Group  
Holliss Vincent  
Home Builders Federation Ltd  
Homes & Communities Agency  
Hourigan Connolly  
Housing 21  
How Planning  
ID Planning  
Improving St.Helens  
Indigo Planning Ltd  
J Murphy & Sons Ltd  
JB & B Leach  
JLPS  
Job Centre Plus  
Jones Homes (North West) Limited  
Jones Lang LaSalle  
JPE Consultancy

JWPC Ltd  
KDP Architects  
Keith Swain Design  
King Sturge LLP  
Kingsland Strategic Estates  
KKA Ltd  
Knowsley MBC  
Lambert Smith Hampton  
Lancashire County Council  
Lancashire Police  
Lancashire Wildlife Trust/The Wildlife Trust for Lancashire, Manchester and North Merseyside  
Langtree group plc  
Lawrenson Associates  
Lex Northwest Ltd  
Liverpool Airport Plc  
Liverpool City Council  
Local Development Plans  
Local Enterprise Partnership  
Local Nature Partnership  
Love Bros  
Lowe Property Developments Ltd  
Marine Management Organisation  
Mayor of London  
Maypole Barn  
McAteer Associates Ltd  
MCP Planning  
Meller Braggins  
Mersey Forest  
Mersey Valley Golf and Country Club Ltd  
Merseycare NHS Trust  
Merseyside Environmental Advisory Service  
Merseyside Fire & Rescue Authority  
Merseyside Industrial Heritage Society  
Merseyside Police  
Merseyside Police (HQ)  
Merseyside Police (St.Helens)  
Merseyside Traveller Forum Irish Community Care  
Merseyside Waste Disposal Authority  
Merseytravel  
Michael Sparks Associates  
Mineral Products Association  
Morley Estates  
Morris Homes (North) Limited  
MPSL Planning and Design Ltd  
Nathaniel Lichfield & Partners  
National Farmers Union - Environment & Land Use Advisor  
National Farmers Union NE & NW Regions



National Federation of Gypsy Liaison Groups  
National Grid  
Natural England  
NBS Construction  
Network Rail  
Newton and Earlestown Community Group  
Newton le Willows Friends & Residents Association  
NHS Halton & St.Helens  
NHS North West  
NHS Property Services  
NLP  
North West Museum of Road Transport  
Npower Renewables Ltd  
NW Planning Aid  
O2  
Office of the Police and Crime Commissioner for Merseyside  
Open Spaces Society  
Osborne Clarke  
Owen Ellis Architects  
P Wilson & Company  
Parkside Action Group  
Peacock and Smith Ltd  
Peel Investments (north) Ltd  
Peel Land & Property  
Penketh Parish Council  
Persimmon Homes  
Pickard Finlason Partnership  
Pilkington  
PLANIT-IE  
Planning Aid  
Planware Ltd  
Powergen  
PPS Group  
Prescot Town Council  
Rainford Allotment Association  
Rainford Civic Society  
Rainford Community Library  
Rainford Hall Estate Ltd  
Rainford Parish Council  
Rainhill Civic Society  
Rainhill Parish Council  
Rainhill Railway & Heritage Society  
Rapleys LLP  
Red Bank Schools Ltd  
Red Delph Farm  
Redcat Property Investments Ltd  
Redrow Homes (Lancashire) Ltd  
Redrow Homes (North West) Ltd

Revelan UK Ltd  
Riverside  
Rocktownsend  
Roman Summer Associations Ltd  
Rowland Homes  
Royal Society for the Protection of Birds (RSPB)  
Russell Homes (UK) Ltd  
Salvation Army Housing Association  
Sankey Canal Restoration Society  
Savills  
Secretary of Ansdell Villas Road Residents Association  
Sefton Council  
Seneley Green Parish Council  
Sherdley Estates  
Sherdley Remec Ltd  
Showmen's Guild of Great Britain  
Silcocks Amusements  
Simonswood Parish Council  
Smiths Gore  
Social Care Housing & Health Directorate  
Spawforth Associates  
Sport England (North West)  
SSA Planning  
St.Helens & Knowsley Hospital Trust  
St.Helens Age Concern  
St.Helens CEN Coordinator  
St.Helens Chamber  
St.Helens Coalition of Disabled People  
St.Helens Council - Urban Regeneration & Housing - Inward Investment  
St.Helens District Sports Council  
St.Helens Heritage Network  
St.Helens Historical Society/St.Helens Assoc. for Research into History  
St.Helens Multi-Cultural Group  
St.Helens Chamber of Commerce - Director of Business Services  
St. Peter's C.E. Primary school  
St.Helens Cooperative Community Members Group  
St.Helens Green Party  
St.Helens LSP  
Steven Abbott Associates  
Stewart Ross Associates  
Storey Homes  
Stratus Environmental Limited  
Sustainability Forum  
Sustainable St.Helens Forum  
Suttons Group  
Suttonside Farm  
Swindell's Roofing  
T Mobile UK Ltd

T&TK Drinkall  
Taylor Wimpey - Strategic Land and Planning Manager  
Taylor Wimpey UK Ltd  
Taylor Woodrow Developments Ltd  
Taylor Young  
Temptation House  
Terence O'Rourke Ltd  
The Barracks  
The Coal Authority  
The Garden Centre Company c/o Gregory Gray Associates  
The Garden History Society  
The Gauchwin Group  
The Gypsy Council for Education Culture Welfare and Civil Rights  
The Haydock Park Racecourse Company Ltd  
The Home Builders Federation  
The Mersey Forest  
The Office of Rail Regulation  
The Planning Studio  
The Stanley Estate & Stud Company  
The Theatres Trust  
The Winwick Educational Foundation  
The Woodland Trust  
Thomas Jones & Sons  
Torus  
Transport for London  
Traveller Law Reform Project and Friends, Families and Traveller  
Tree Tops  
Turley Associates  
Unifrax Ltd. (UK)  
United Utilities  
United Utilities Property Solutions  
Upholland Parish Council  
Vodafone  
Wain Developments - Strategic Land Manager  
Wainhomes (North West) Ltd  
Walton & Co (Planning Lawyers) Ltd  
Warrington Borough Council  
West Lancs District Council  
Whiston Town Council Offices  
White Peak Planning  
Wigan Council  
William Fishwick & Son  
Willowbrook Hospice  
Windle Farm  
Windle Parish Council  
Winwick Parish Council  
Wirral MBC  
Woodhouse Farm

Woodland Trust  
Woodland Trust - Government Affairs Officer (Local)  
Wyevale Garden Centres Ltd

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# **Appendix 5**

St. Helens Cabinet Report 12.12.2018

## **APPENDIX 5**

### **St Helens Local Plan: Preferred Options consultation - number of responses by area**

(NB these figures are drawn from addresses given by respondents and do not necessarily relate to wards or other administrative areas. They do not include responses from persons or organisations which did not give an address in St Helens Borough).

<b>Area</b>	<b>No. of responses</b>
Rainford (incl. Crank)	977
Newton-le-Willows	804
Eccleston (incl. Eccleston Park, Eccleston Mere)	672
Billinge (incl. Billinge & Seneley Green, Garswood)	593
Haydock	557
Rainhill	554
Windle	303
Bold (incl. Sutton Manor, Clock Face)	88
Moss Bank	72
Thatto Heath	72
West Park	52
Blackbrook	41
Sutton	40
Parr	40
Town Centre	34
Earlestown	11
<b><i>Sub total</i></b>	<b>4910</b>

# **Appendix 6**

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**APPENDIX 6 - CHANGES TO HOUSING AND EMPLOYMENT SITE ALLOCATIONS COMPARED TO THOSE IN THE LOCAL PLAN - PREFERRED OPTIONS 2016**

**TABLE A – CHANGES TO SITES PROPOSED TO BE ALLOCATED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

<b>LPPO site reference (2016)</b>	<b>Site Name at Preferred Options stage (2016)</b>	<b>Local Plan Submission Draft site ref. (2018)</b>	<b>Local Plan Submission Draft site name</b>	<b>Change to proposed status</b>
HA1	Land adjoining Ash Grove Farm, Beacon Road, Billinge	N/A	N/A	<b>Allocated to Discounted</b>
HA2	Land South of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood	1HA	Land South of Billinge Road, East of Garswood Road and West off Smock Lane, Garswood	<b>Allocated to Allocated</b>
HA3	Land at Florida Farm (south of A580), Slag Lane, Blackbrook	2HA	Land at Florida Farm (South of A580), Slag Lane, Blackbrook	<b>Allocated to Allocated</b>
N/A	N/A	3HA	Former Penlake Industrial Estate, Reginald Road, Bold	<b>Brownfield Site – now to be Allocated</b>
HA4	Land East of Chapel Lane and south of Walkers Lane, Sutton Manor	6HS	Land East of Chapel Lane and South of Walkers Lane, Sutton Manor	<b>Allocated to Safeguarded</b>
HA5	Land South of Gartons Lane and	5HA	Land South of Gartons Lane and	<b>Allocated to Allocated</b>



**TABLE A – CHANGES TO SITES PROPOSED TO BE ALLOCATED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

	former St. Theresa’s Social Club, Gartons Lane, Bold		former St. Theresa’s Social Club, Gartons Lane, Bold	
HA6 & HS03	Land south of Reginald Road / Bold Road - Northern Section (Phase 1), Bold	4HA	Land Bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	<b>Mix of Allocated/Safeguarded to Allocated</b>
HA7	Land between Vista Road and Ashton Road, Newton -le-Willows	2HS	Land between Vista Road and Belvedere Road, Earlestown	<b>Allocated to Safeguarded (reduced site size)</b>
N/A	N/A	6HA	Land at Cowley Street, Cowley Hill, Town Centre	<b>Brownfield Site – now to be Allocated</b>
HA8	Eccleston Park Golf Club, Rainhill Road, Eccleston	3HS	Former Eccleston Park Golf Club, Rainhill Road, Eccleston	<b>Allocated to Safeguarded</b>
HA9	Higher Barrowfield Farm, Houghton's Lane, Eccleston	N/A	N/A	<b>Allocated to minor change to Green Belt boundary</b>
HA10	Land south west of M6 J23 between Vista Road and Lodge Lane, Haydock	N/A	N/A	<b>Allocated to Discounted</b>
HA11	Land at Moss Bank Farm, Moss Bank Road, Moss Bank	N/A	N/A	<b>Allocated to Discounted</b>

**TABLE A – CHANGES TO SITES PROPOSED TO BE ALLOCATED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

HA12	Former Newton Community Hospital (Simms Ward), Bradlegh Road, Newton-le-Willows	N/A	N/A	<b>Allocated to Discounted</b>
HA13	Former Red Bank Community Home, Winwick Road, Newton-le-Willows	7HA	Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows	<b>Allocated to Allocated</b>
HA14	Land south east of Lords Fold, Rainford	N/A	N/A	<b>Allocated to Discounted</b>
HA15	Land South of Higher Lane and east of Rookery Lane, Rainford	8HA	Land South of Higher Lane and East of Rookery Lane, Rainford	<b>Allocated to Allocated</b>
HA16	Land south of A580 between Houghtons Lane and Crantock Grove, Windle	8HS	Land South of A580 between Houghtons Lane and Crantock Grove, Windle	<b>Allocated to Safeguarded</b>
N/A	N/A	9HA	Former Linkway Distribution Park, Elton Head Road, Thatto Heath	<b>Brownfield Site – now to be Allocated</b>
N/A	N/A	10HA	Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton	<b>Brownfield Site – now to be Allocated</b>

**TABLE B – CHANGES TO SITES PROPOSED TO BE SAFEGUARDED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

<b>LPPO site reference (2016)</b>	<b>Site Name at Preferred Options stage (2016)</b>	<b>Local Plan Submission Draft site ref. (2018)</b>	<b>Local Plan Submission Draft site name</b>	<b>Change to proposed status</b>
HS01	Land east of Garswood and west of M6	N/A	N/A	<b>Safeguarded to Discounted</b>
HS02	Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	<b>Safeguarded to Safeguarded</b>
HS03	Bold Forest Garden Suburb: land south of Reginald Road / Bold Road / Traver's Entry, west of Neil's Road, north of Gorsey Lane and east of Crawford Street, Bold	4HA	Land Bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	<b>Safeguarded to Allocated</b>
HS04	Land north of Bell Lane and south-west of Milton Street (individual plots), Bold	N/A	N/A	<b>Safeguarded to Discounted</b>
HS05	Land to west of Bridge Road and Sweet Brier Court, off Clock Face Road, Bold	N/A	N/A	<b>Safeguarded to Discounted</b>

**TABLE B – CHANGES TO SITES PROPOSED TO BE SAFEGUARDED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

HS06	Land off Common Road / Swan Road, Newton-le-Willows	N/A	N/A	<b>Safeguarded to Discounted</b>
HS07	Parcel B (Housing), Land between Ashton Road and M6, Earlestown, Newton-le-Willows	N/A	N/A	<b>Safeguarded to Discounted</b>
HS08	Land south of Burrows Lane, Eccleston	N/A	N/A	<b>Safeguarded to Discounted</b>
HS09	Land south of Howards Lane / east of Gillars Lane, Eccleston	N/A	N/A	<b>Safeguarded to Discounted</b>
HS10	Land south of former Central Works, Bellerophon Way, Haydock	N/A	N/A	<b>Safeguarded to Discounted.</b>
HS11	Land south of Station Road, Haydock	N/A	N/A	<b>Safeguarded to Discounted</b>
HS12	Land at Martindale Road, Carr Mill, Moss Bank	N/A	N/A	<b>Safeguarded to Discounted</b>
HS13	Land at Old Hey Farm, south of Tyrer Road, Newton-le-Willows	N/A	N/A	<b>Safeguarded to Discounted</b>
HS14	Land east of Newlands Grange, Newton-le-Willows	4HS	Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-	<b>Safeguarded to Safeguarded (with reduced site size)</b>



**TABLE B – CHANGES TO SITES PROPOSED TO BE SAFEGUARDED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

			Willows	
HS15	Land east of Rob Lane and rear of Castle Hill, Newton-le-Willows	N/A	N/A	<b>Safeguarded to Discounted</b>
HS16	Land to rear of 6 Ashton Road and Elms Farm and west of Rob Lane, Newton-le-Willows	N/A	N/A	<b>Safeguarded to Discounted</b>
HS17	Land west of Winwick Road and south of Wayfarers Drive, Newton-le-Willows	5HS	Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows	<b>Safeguarded to Safeguarded</b>
HS18	Land east of Higher Lane / South of Muncaster Drive / at White House Lane, Rainford	N/A	N/A	<b>Safeguarded to Discounted</b>
HS19	Land south of Bushey Lane / Red Delph Farm, Red Delph Lane, Rainford	N/A	N/A	<b>Safeguarded to Discounted</b>
HS20	Land south of Higher Lane and west of Mill Lane, Rainford	N/A	N/A	<b>Safeguarded to Discounted</b>
HS21	Land south of Rookery Lane and east of Pasture Lane, Rainford	N/A	N/A	<b>Safeguarded to Discounted</b>
HS22	Land at Hanging Bridge Farm,	N/A	N/A	<b>Safeguarded to Discounted</b>

**TABLE B – CHANGES TO SITES PROPOSED TO BE SAFEGUARDED FOR HOUSING AT ‘PREFERRED OPTIONS’ (LPPO) STAGE**

	Elton Head Road, Rainhill			
HS23	Land south of Mill Lane, east of Hall Lane, west of Norlands Lane and north of M62, Rainhill	N/A	N/A	<b>Safeguarded to Discounted</b>
HS24	Land south of Elton Head Road (from Nutgrove Road to St. John Vianney Primary School), Thatto Heath	7HS	Land South of Elton Head Road (adjacent to St. John Vianney Catholic Primary School), Thatto Heath	<b>Safeguarded to Safeguarded</b>

**TABLE C – CHANGES TO SITES PROPOSED TO BE ALLOCATED FOR EMPLOYMENT AT ‘PREFERRED OPTIONS’ (LPPO)  
STAGE**

<b>LPPO site reference (2016)</b>	<b>Site Name at Preferred Options stage (2016)</b>	<b>Local Plan Submission Draft site ref. (2018)</b>	<b>Local Plan Submission Draft site name</b>	<b>Change to proposed status</b>
EA1	Omega South Western Extension, Phase 1, land north of Finches Plantation, Bold	1EA	Omega South Western Extension, land north of Finches Plantation, Bold	<b>Allocated to Allocated</b>
EA2	Florida Farm North, Slag Lane, Haydock	2EA	Land at Florida Farm North, Slag Lane, Haydock	<b>Allocated to Allocated</b>
EA3	Land North of Penny Lane, Haydock	3EA	Land North of Penny Lane, Haydock	<b>Allocated to Allocated</b>
EA4	Land North East of Junction 23 M6, south of Haydock Racecourse, Haydock	2ES	Land to the East of M6 Junction 23, (South of Haydock Racecourse), Haydock	<b>Allocated to Safeguarded (enlarged site size)</b>
EA5	Land South of Penny Lane, Haydock	4EA	Land South of Penny Lane, Haydock	<b>Allocated to Allocated</b>
EA6	Land to the West of Haydock Industrial Estate, Haydock	5EA	Land to the West of Haydock Industrial Estate, Haydock	<b>Allocated to Allocated</b>
EA7	Land west of Millfield Lane, south of Liverpool Road and north of	6EA	Land West of Millfield Lane, South of Liverpool Road and North of	<b>Allocated to Allocated</b>

**TABLE C – CHANGES TO SITES PROPOSED TO BE ALLOCATED FOR EMPLOYMENT AT ‘PREFERRED OPTIONS’ (LPPO)**  
**STAGE**

	Clipsley Brook, Haydock		Clipsley Brook, Haydock	
EA8	Parkside East, Newton-le-Willows	7EA	Parkside East, Newton-le-Willows	<b>Allocated to Allocated</b>
EA9	Parkside West, Newton-le-Willows	8EA	Parkside West, Newton-le-Willows	<b>Allocated to Allocated</b>
EA10	Land to the West of Sandwash Close, Rainford	9EA	Land to the West of Sandwash Close, Rainford	<b>Allocated to Allocated</b>
EA11	Land at Lea Green Farm West, Thatto Heath	10EA	Land at Lea Green Farm West, Thatto Heath	<b>Allocated to Allocated</b>
EA12	Gerards Park, Phases 2 and 3, College Street, St. Helens Town Centre	11EA	Land at Gerards Park, College Street, St. Helens Town Centre	<b>Allocated to Allocated</b>



**TABLE D – CHANGES TO SITES PROPOSED TO BE SAFEGUARDED FOR EMPLOYMENT AT ‘PREFERRED OPTIONS’ (LPPO)  
STAGE**

<b>LPPO site reference (2016)</b>	<b>Site Name at Preferred Options stage (2016)</b>	<b>Local Plan Submission Draft site ref. (2018)</b>	<b>Local Plan Submission Draft site name</b>	<b>Change to proposed status</b>
ES-01	Omega North Western Extension, Bold	1ES	Land North of M62, and South of Gorsey Lane, Bold	<b>Safeguarded to Safeguarded</b>
ES-02	Omega South – Western Extensions Phase 2, :and north of Booth’s Wood, Bold	N/A	N/A	<b>Safeguarded to Discounted</b>

# **Appendix 7**

St. Helens Cabinet Report 12.12.2018



St.Helens  
Council

# **INFRASTRUCTURE DELIVERY PLAN**

DRAFT 2018



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## ABBREVIATIONS LIST

AMP	Asset Management Programme
BCIS	Building Cost Information Service
CA	Combined Authority
CCG	Clinical Commissioning Group
CIL	Community Infrastructure Levy
CSP	Community Safety Partnership
DfE	Department for Education
DfT	Department for Transport
DIAP	Digital Infrastructure Action Plan
FTTP	Fibre to the Premises
FWMA	The Flood & Water Management Act (2010)
GDNs	Gas Distribution System
HBF	Home Builders Federation
HE	Highways England
ICT	Information and Communications Technology
IDP	Infrastructure Delivery Plan
LCR	Liverpool City Region
LCRCA	Liverpool City Region Combined Authority
LEAP	Local Equipped Area for Play
LEP	Local Enterprise Partnership
LFFN	Local Full Fibre Networks
LGS	Local Geology Sites
LLFA	Lead Local Flood Authority
LLFRMS	Lead Local Flood Risk Assessment
LNR	Local Nature Reserves
LPPO	Local Plan Preferred Options
LPSD	Local Plan Submission Document
LTP3	Merseyside Local Transport Plan
LWS	Local Wildlife Sites
MOVA	Microprocessor Optimised Vehicle Actuation
NPPF	National Planning Policy Framework
NTS	National Transmission System
OSSRA	Open Space, Sport and Recreation Assessment (2016)
ONS	Office for National Statistics
PPG	Planning Practice Guidance
SCOOT	Split Cycle Offset Optimisation Technique
SFRA	Strategic Flood Risk Assessment
SHC	St.Helens Council
SHELMA	Strategic Housing & Employment Land Mark Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SRFI	Strategic Rail Freight Interchange
SSSI	Sites of Specific Scientific Interest
STEP	Sustainable Transport Enhancement Package
STIA	Sustainable Transport Impact Assessment
SuDS	Sustainable Drainage Systems
SW	Surface Water
TIA	Transport Impact Assessment
UU	United Utilities
WTE	Whole Time Equivalent



## 1. INTRODUCTION

- 1.1 The Infrastructure Delivery Plan (IDP) is a supporting document to the St.Helens Borough Local Plan and covers the Plan period 2020 to 2035. The IDP sets out what level of new or improved infrastructure will be required to deliver the growth proposed in the St.Helens Borough Local Plan. It is an essential element in ensuring that the Local Plan is robust and deliverable.
- 1.2 The IDP aims to identify the costs, delivery agents and means of funding for the infrastructure required to support growth proposed in the Local Plan. It is not appropriate for this document to include every scheme or project planned by every infrastructure provider or service operator in the Borough, nor should this document be read as a shopping list for developer contributions. Instead it should be read as a tool to help ensure that the infrastructure requirements for growth proposed in the Local Plan are understood and clearly identified.
- 1.3 The IDP focuses on infrastructure the Local Plan can help facilitate, improve or upgrade. This will help ensure that new development and infrastructure are planned for and delivered in a timely and co-ordinated manner. It is important to note that infrastructure planning is an iterative process and the precise nature of infrastructure needed to support future development is influenced by a range of factors and arrangements that change over time.
- 1.4 Due to the increasing reliance on infrastructure and service provision the infrastructure outlined within this document will be delivered by a number of departments within St.Helens Council as well as external partners. Some types of infrastructure, including places of worship and shopping and leisure facilities such as cinemas are provided solely by private and community sector organisations and are not covered in this document. The provision of these will be driven by market demand.
- 1.5 The preparation of this IDP has been informed by detailed consultation with a range of stakeholders and key service providers and draws together the latest evidence and information available to the Council. The IDP is intended to be a living document that is monitored through the annual Authority Monitoring Report (AMR) process and updated as appropriate.

### What is Infrastructure?

- 1.6 'Infrastructure' is the umbrella term given to a range of services and facilities required to support daily activities. Infrastructure can take many forms and can be defined in physical, social and environmental terms and is therefore at the heart of town planning. This required infrastructure is funded through different mechanisms. It includes, but is not restricted to the following:



- **Community Services:** libraries, community centres, youth services, social services, older peoples support, special needs and disability, courts, prisons, hostels, places of worship, cemeteries and crematoria;
- **Culture and Leisure:** museums and galleries, performance venues (theatres and cinemas), sports and fitness centres, swimming pools;
- **Education:** nursery and pre-school facilities, primary and secondary, further, higher and adult education;
- **Emergency Services:** police, fire service and ambulance;
- **Energy:** power generation, distribution and provision, decentralised and renewable or low carbon energy;
- **Green Infrastructure Network:** open space, parks, children's play areas, sports pitches and courts, country parks and accessible natural green space, Local Wildlife Sites (LWS), forests and woodlands, allotments;
- **Gypsy, Travellers and Travelling Showpeople Sites and Facilities;**
- **Health:** hospitals, health centres, GP surgeries, dental practices, opticians, hospices and pharmacies, public health and prevention;
- **Information and Communication Technology:** telecommunications, internet and broadband, public phones, cable television.
- **Mineral Workings;**
- **Post Offices:** main post offices, sub-post offices, sorting offices, post boxes;
- **Public Realm:** footways, street furniture, planting, historic environment protection;
- **Retail:** town centre, neighbourhood shops, markets, out of town retail parks;
- **Transport:** roads, air travel, railways, trams, bus facilities, taxi ranks, cycling, pedestrian, car and coach parking and park-and-ride facilities, waterways, vehicle charging facilities, vehicle testing stations freight interchanges;
- **Water Supply:** water mains, sewers, wastewater treatment, surface water, drainage facilities, sustainable drainage systems (SuDS), flood defences and flood risk management;
- **Water Bodies:** Rivers, streams, ditches, ponds, lakes, canals, reservoirs; and
- **Waste Management:** refuse collection and disposal, recycling, treatment, transfer stations, landfill.





- 1.7 While the term infrastructure is very broadly defined, this does not mean that this IDP seeks to cover in detail all of the above items. That would make the process unmanageable. This IDP aims to give a broad overview of what specific infrastructure is planned and envisaged and the agencies and stakeholders likely to be involved in its delivery. It also looks in more detail at costs and likely funding mechanisms for some items of infrastructure, in particular those that are critical to delivering the Local Plan.
- 1.8 During the IDP preparation process the Council has used information provided by infrastructure and service providers to help identify existing capacity and deficits, to establish any programmes of future work and to assess specific impacts of proposed growth.
- 1.9 For each infrastructure sector and service area the infrastructure assessment has sought to answer the following questions:
- What is the capacity of existing infrastructure?
  - What are the infrastructure requirements arising over the Local Plan period?
  - When would new or improved infrastructure be required?
  - What are the likely costs of new infrastructure?
  - Are there any issues or risks to delivery?
- 1.10 The results of the infrastructure assessment have been incorporated into the Infrastructure Delivery Schedule presented in Section 7.
- 1.11 The IDP focuses on the following key areas of infrastructure provision that will help support the growth of St.Helens and the delivery of the Local Plan:

**Table 1: Types of Infrastructure and Delivery Agency**

Infrastructure Type	Delivery Agencies
<b>Physical Infrastructure</b>	
<b>Physical – Transport</b>	
Roads and Highways	St.Helens Council , Liverpool City Region Combined Authority, Highways England (HE), Department for Transport
Rail Services	Merseytravel, Network Rail
Bus Services	Merseytravel, Private Sector Operators
Walking, Cycling and Rights of Way	St.Helens Council, Liverpool City Region Combined Authority
<b>Physical – Utilities</b>	
Electricity	National Grid, Private Utility Providers
Gas	National Grid, Private Utility Providers



Water and Sewerage	United Utilities
Waste	St.Helens Council, Liverpool City Region (LCR) Partners, Private Sector Companies
Flood Risk Management	St.Helens Council, Environment Agency (EA)
Telecommunications	British Telecom (BT), Private Telecommunications Providers
<b>Social Infrastructure</b>	
<b>Social and Community – Education</b>	
Primary Schools	Department for Education, St.Helens Council
Secondary Schools	Department for Education, St.Helens Council
Higher and Further Education	Department for Education, St.Helens Council, St.Helens College
<b>Social and Community – Health and Social Care</b>	
Primary Health Care	NHS England, St.Helens Clinical Commissioning Group
Adult and Elderly Care	St.Helens Council, Private Sector Companies
<b>Social and Community – Emergency Services</b>	
Police	Merseyside Police
Fire and Rescue	Merseyside Fire and Rescue Service
Ambulance	North West Ambulance Service
<b>Social and Community – Communities and Leisure Services</b>	
Libraries	St.Helens Council, Parish Councils, Neighbourhood and Community Groups
Leisure/Sports Centres	St.Helens Council, Parish Councils, Neighbourhood and Community Groups
Cemeteries	St.Helens Council
<b>Environmental Infrastructure</b>	
Greenway Infrastructure (including Waterways)	St.Helens Council, Parish Councils, Voluntary Sector, Neighbourhood and Community Groups, Natural England, the Mersey Forest, The Forestry Commission, Wildlife Trust, Local Nature Partnership, British Waterways, EA, Canal and River Trust, Healthy Rivers Trust, United Utilities
Natural and Semi-Natural Spaces	St.Helens Council, Parish Councils, Voluntary Sector, Neighbourhood and Community Groups, Natural England, the Mersey Forest, The Forestry Commission, Wildlife Trust, Local Nature Partnership
Amenity Greenspace (including Outdoor Sports and Leisure)	St.Helens Council, Parish Councils, Voluntary Sector, Neighbourhood and Community Groups, Private Sector Companies



Parks and Gardens	St.Helens Council, Town and Parish Councils, Voluntary Sector, Neighbourhood and Community Groups
Allotments	St.Helens Council, Town and Parish Councils, Voluntary Sector, Neighbourhood and Community Groups



## 2. POLICY CONTEXT

### National Policy

- 2.1 The National Planning Policy Framework (NPPF), July 2018 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

*'infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);'* (NPPF, Paragraph 20).

- 2.2 It further states that strategic policy-making authorities should collaborate and engage with relevant infrastructure providers and bodies as:

*'Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'* (NPPF, Paragraph 26).

- 2.3 Paragraph 34 refers to development contributions and states:

*'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.'*

- 2.4 Accordingly the Council has undertaken a viability assessment of the Local Plan to ensure the requirements of the policies can be met. However, affordable housing needs and expected contribution and distribution are covered by Policy **LPC02: Affordable Housing Provision** of the Local Plan which is based on information and data contained in background evidenced based documents, such as the Strategic Housing Market assessment (SHMA) and the Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA), and not within this IDP.

- 2.5 The National Planning Practice Guidance (PPG) explains how local authorities can show that a Local Plan is capable of being delivered including provision for infrastructure:

*'A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of*





*land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development’ (Reference ID: 12-018-20140306).*

- 2.6 Many infrastructure and service providers plan in five year timescales. Therefore, within this IDP there is a greater degree of detail and certainty about the infrastructure capacity and needs in the first five years of the Local Plan. This is in accordance with the national PPG, which states:

*“The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how this relates to the anticipated rate and phasing of development...For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain”*  
(Reference ID: 12-018-20140306).

## Emerging St.Helens Borough Local Plan

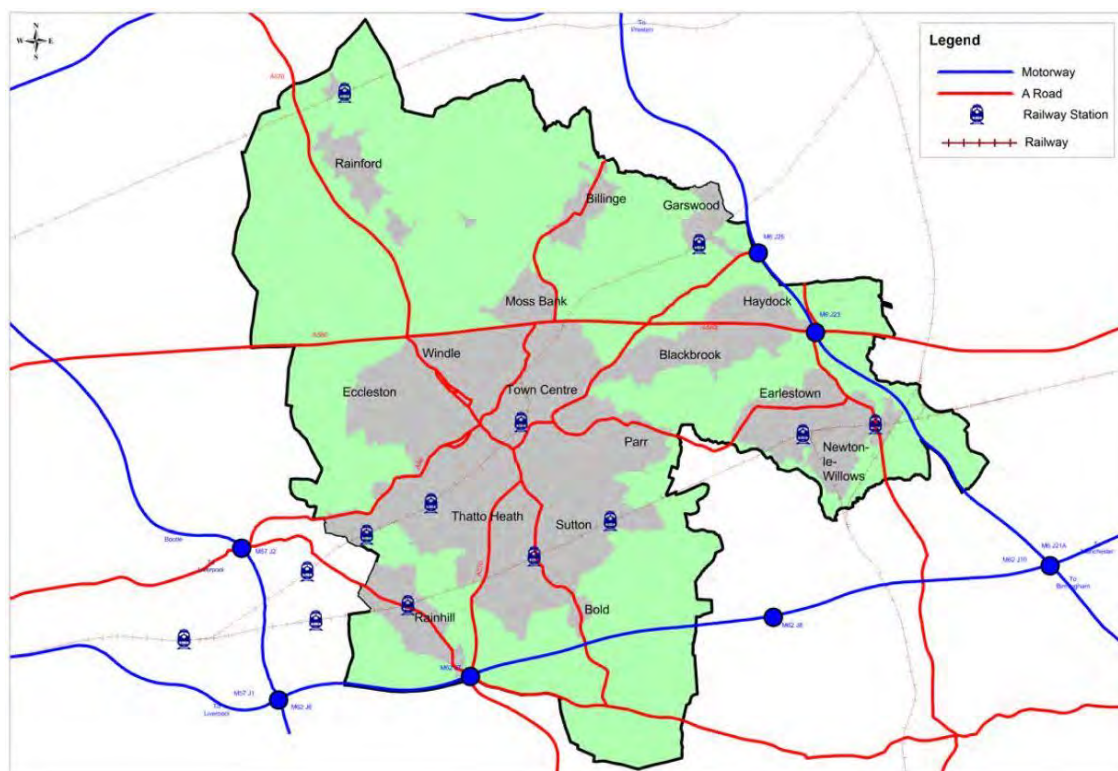
- 2.7 The Council is currently (as at December 2018) preparing its new Local Plan for St Helens. Following a consultation on ‘Preferred Options’ in late 2016/early 2017 the Council approved the St Helens Local Plan: Submission Document’ (LPSD) in December 2018. All references to the emerging Local Plan in the following parts of this document refer to the LPSD. It is proposed that the Plan will be submitted to the Government for independent examination in 2019 and adopted in 2020.
- 2.8 A key policy that establishes the infrastructure requirements for the Local Plan is Policy **LPA08: Infrastructure Delivery and Funding**. This sets out in broad terms how the Council will seek and secure contributions for various infrastructure provisions within the Borough. Policies **LPA04.1: Strategic Employment Sites** and **LPA05.1: Strategic Housing Sites** set out requirements for comprehensive master planning of the strategic sites identified for development in the Plan. Planning applications for development within the non-strategic site allocations identified on the Local Plan Policies Map will also need to be supported by the required infrastructure at the appropriate phase of delivery.
- 2.9 Policy **LPA07: Transport and Travel** sets out the key transport improvements that will be required in the Borough during the Local Plan period. This includes new public transport facilities, improvements to the local and strategic road networks, parking facilities and the cycling and pedestrian networks.
- 2.10 The Local Plan includes provision for a minimum of 9,234 net additional new dwellings to be provided between 1 April 2016 and 31 March 2035, and at least 215.4 hectares of new employment land to be developed across the Borough between 1 April 2018 and 31 March 2035. Through the adoption of an integrated strategic approach to planning and infrastructure development, the Council will seek to ensure that new and improved infrastructure is provided in a timely and co-ordinated manner to support new growth and development.

### 3. PHYSICAL INFRASTRUCTURE

#### Transport

- 3.1 Transport and accessibility infrastructure supports the economy, promotes social inclusion and can help deliver solutions that address some of the causes of climate change. At a sub-regional level, the Merseyside Local Transport Plan (LTP3) provides a long term strategy to improve transport in Merseyside up to 2024, including the promotion of sustainable travel.
- 3.2 A Transport Impact Assessment (TIA) has been prepared to identify the transport implications and issues that may arise from the levels of growth proposed in the emerging Local Plan.
- 3.3 Figure 1 illustrates the main road and rail transport connections in St.Helens (Appendix C: Key Ward Diagrams – shows these connections on a ward by ward basis). The M6 and M62 run along the eastern and southern sides of the Borough respectively, whilst the A580 runs across the centre of the Borough providing a further route towards Manchester to the east and Liverpool to the west. The M58 is also located nearby to the north. Other principal roads within the Borough include the A570 (Rainford Bypass) (which links to Ormskirk and further afield), and the A58 that connects to Ashton-in-Makerfield and the M57.

**Figure 1: Transport routes in St.Helens**





### **Highway Network**

- 3.4 Highways England (HE) is responsible for the national strategic road network, including motorways and some A roads/trunk roads that link cities, ports and airports and areas of high population in England. Within the Borough Highways England has responsibility for the M6 and the M62. Most other roads are managed and maintained by St.Helens Council although there are a small number of private roads.
- 3.5 Recent data from Liverpool City Region Combined Authority (LCRCA) Household Travel Surveys suggest that the way in which people travel has changed. Between 2003 and 2017, the average numbers of vehicle journeys undertaken by households in St. Helens reduced by 13%, with a noticeable fall in 'non-essential trips'. This could be due to a number of factors, including the rise in new technology that enables people to carry out errands and everyday tasks online (such as banking, grocery shopping etc.) with delivery straight to their homes. St.Helens also has an aging population, with the older generation making fewer vehicle journeys.
- 3.6 The data also suggests that 80% of daily trips are for distances of less than 10km, which in some instances could be carried out on foot or by bicycle. It also illustrates that driving trips to places of education and work have been growing considerably, with bus and walking trips on the decline.
- 3.7 However, as in much of the UK, car ownership in St.Helens has increased in recent years. A reported 42.63% of local residents in St.Helens now own at least one car or van. Households in the Borough own a total of approximately 84,400 cars or vans, which is a 14% increase since 2001.<sup>1</sup> The increase in car ownership has a number of possible implications including greater congestion and higher pollution levels; increased pressure on the road network and the subsequent need for additional maintenance and increasing demand for parking provision (particularly on-street parking).

### **Liverpool City Region Key Route Network**

- 3.8 As part of the Council's joint working with the LCRCA, an 'Invest for Growth' key route network programme for the City Region has been produced. The scheme is an integrated programme of investment for the strategic highway routes that contribute to growth in the LCRCA. It is considered that the key route network programme will be integral to the success of the LCRCA Growth Strategy. The key route network will support the economic growth of the region and maximise the benefits for residents, visitors and businesses.

### **Transport Impact assessment (TIA) and Sustainable Transport Impact Assessment (STIA)**

- 3.9 The Council commissioned WSP transport consultants to undertake a Transport Impact Assessment (TIA) and a Sustainable Transport Impact Assessment

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<sup>1</sup> Office for National Statistics (ONS) - Census



(STIA) to assess the likely transport implications and issues that may arise from the housing and employment growth which was proposed in the LPPO. Both assessments were commissioned in 2017. They have informed the subsequent work in developing the Local Plan and will be used to inform future related transport work.

- 3.10 The St Helens Local Plan TIA (June 2018) provides a high level assessment of the potential implications of the site allocations proposed at Local Plan Preferred Option (LPPO) stage and identified further studies, interventions, and initiatives that could be undertaken over the Plan period. However, more detailed highways assessments will need to be completed at the masterplanning and planning application stages as specific proposals for development come forward.
- 3.11 The TIA identified that as with most urban areas across the UK, the highway network in and around St.Helens currently experiences congestion, queues and delays during weekday peak periods. It confirmed that, even if growth is limited to sites which may be developed anyway i.e. without the impact of the new site allocations proposed in the LPPO, traffic growth is forecast to exacerbate the level of operation at many of the key junctions during peak periods. It is likely however that this will be mitigated to a certain degree by the introduction of committed highway schemes.
- 3.12 The additional traffic growth associated with traffic from the sites proposed at LPPO stage is also forecast to impact on the level of operation at some locations.
- 3.13 Based on the analysis presented in the TIA, a need has been identified to address a number of pressure points within the highway system, including the following:

Location of Junction	Potential Improvement	Current Status
M6 Junction 23	Unknown at this stage	Currently the subject of a joint study recently commissioned by SHC and HE
A580 Haydock Lane	New junction design and signal timings	On site complete in early 2019
A580 corridor	Reduction in speed limit along the route	Future Study to support capacity improvements at J23
Church Street / Southworth Road, Newton-le-Willows	Possible change in signal timings	Review underway
Liverpool Road/Millfield Lane, Haydock	Unknown at this stage	Scheme delivered in 2017 providing short term benefits. Longer term option to be developed.
Sherdley Roundabout, Thatto Heath	Junction improvement and redesign to signals	Scheme on site 2019





Location of Junction	Potential Improvement	Current Status
M62 Junction 7	Unknown at this stage	Currently the subject of a study commissioned by HE
M62 Junction 8	Unknown at this stage	Scheme completed in 2018. Further work depending on Adopted Local Plans in St Helens and Warrington and HE Route Management
Penny Lane/Lodge Lane, Haydock	Junction redesign and signal timings	Review underway

- 3.14 Therefore a key infrastructure requirement for the Local Plan period will be improvement works to the junctions and corridors identified in para 3.13. It is expected that in addition to other funding sources, developer contributions will (subject to compliance with relevant planning legislation) be needed to contribute towards funding these junction improvements. Additional junctions / highways may require improvements following more detailed assessments of the transport impacts of individual development proposals.
- 3.15 In a similar vein to the TIA, the St Helens Local Plan Sustainable Transport Assessment (STIA) (May 2018) has assessed the LPPO strategic sites from a sustainable transport perspective. The assessment also identifies interventions that need to be considered in order to mitigate the transport impacts of St.Helens' growth aspirations.
- 3.16 The STIA identified that the proposed site allocations in the LPPO are mostly located in areas that either currently benefit from good sustainable and active travel options, as well as a range of local facilities and services, or could benefit from these through a package of targeted interventions that could be delivered through the sites' development. Sustainable and active travel at those locations can also be further enhanced through a number of wider-reaching measures across the Borough.
- 3.17 A need is also identified to require electric car charging infrastructure in new development and public car parks, plus promotion for shared transport infrastructure (bays for car clubs, etc.). The Council has acknowledged this need and has included a requirement for the appropriate provision of charging points for electric vehicles in Policy **LPA07: Transport and Travel** of the proposed submission version of the Local Plan (2018).

### **M6 Junction 23 and M62 Junction 7 Capacity Studies**

- 3.18 St.Helens includes (within its area) two junctions on the strategic road network, at M6 Junction 23 in Haydock and M62 Junction 7 in Rainhill. Both these junctions are close to the border with neighbouring Local Authorities (Wigan Council and Halton Council, respectively).



- 3.19 M6 Junction 23 connects the M6, A580 East Lancashire Road and A49 and suffers congestion, delay and safety issues, particularly during the evening peak hours and when events take place at Haydock Racecourse. These result in queuing on all of these sections of highway, with queuing on the M6 mainline managed via a MOVA system at the junction.
- 3.20 Each of the highways served by Junction 23 plays an important role in the strategic and/or local road networks. Furthermore, a number of the sites identified for allocation or safeguarding in the LPPO would result in development that increases traffic flow at this junction. The Council has commissioned a study into improvement options at the junction, which is being undertaken in partnership with Wigan Council and Highways England. Opportunities to secure funding as part of this joint working arrangement are also being investigated, to secure delivery of an identified optimum solution.
- 3.21 Junction 7 of the M62 connects the M62, A570 St.Helens Linkway, A557 (in Halton Borough) and the A57. Queuing is known to occur on all approaches to the junction during the PM peak and on the M62 and A57 approaches to the junction during the AM peak.
- 3.22 The opening of the Mersey Gateway Bridge has resulted in additional traffic flow at this junction, as would further development to meet the needs of St.Helens, Halton and Warrington Councils. HE has recently completed a first stage feasibility study for potential improvements at this junction. This has been undertaken in consultation with St.Helens and Halton Borough Councils, and aims to identify improvement scheme options. Further work is proposed, as well as investigations to identify funding opportunities to deliver a suitable improvement scheme.

### **Parkside Link Road Development**

- 3.23 The Parkside East and Parkside West sites are proposed to be allocated for a mix of employment uses in the LPPO. In the case of Parkside East there is potential to develop a Strategic Rail Freight Interchange (SRFI) thereby helping to meet the needs for such uses set out in national planning policy. To support the proposed development of the Parkside sites, the Council has developed a scheme to provide a link road that would connect the A49 Newton le Willows to Junction 22 of the M6.
- 3.24 The Parkside East and West sites have the potential to contribute substantially to the regeneration of the local economy. It is envisaged that the development of all three phases of the combined site will have the potential to create over 7,700 additional jobs. The development of the site will also play a strategic role in creating a M6 growth corridor and help meet needs generated by regional developments such as the Liverpool 2 initiative and Atlantic Gateway at the Port of Liverpool, as well as opportunities that come from being part of both the Northern Powerhouse and the Liverpool City Region (LCR).
- 3.25 In order to sustain the growth of Parkside an improved, resilient and reliable highway network will be required to allow quick and easy vehicle access to the



M6 and prevent congestion on neighbouring roads. A planning application for the Parkside Link Road was submitted in 2018 and is (as at December 2018) awaiting determination. At its meeting on 19 October 2018 the Liverpool City Region Combined Authority approved the Full Business Case for the Parkside Link Road scheme and agreed to make a conditional maximum capital grant award of £23,790,786 from the Single Investment Fund to deliver the scheme.

### **Windle Island Junction Improvements**

- 3.26 A scheme to improve the Windle Island junction by an upgrade of current signalling and junction layout is currently (as at December 2018) under construction. The junction is a key strategic point in the LCR road network, being the crossing point of the A570 and A580 East Lancs Road (one of the main routes into Knowsley and Liverpool).
- 3.27 The junction exceeds capacity daily, especially during peak periods. This leads to congestion as well as delays for motorists and freight. The current scheme is identified within the third Local Transport Plan for Merseyside and is part of the Strategic Freight Network for Merseyside. The scheme involves:
- the establishment of controlled left turn links;
  - signalised pedestrian and cycling crossing facilities; and
  - the installation of a SCOOT traffic system to optimise capacity.
- 3.28 It is anticipated that the scheme will be completed in 2019, at a cost of £7,247,000.
- 3.29 A little over half of the funding for the scheme has been secured via the Local Growth Fund through the LCRCA's Single Investment Fund, whilst the remainder is funded by St. Helens Council.

### **The A570 Linkway Improvements Scheme**

- 3.30 The A570 forms a vital north-south link through St.Helens. It facilitates strategic access from the heart of St Helens via the motorway network and A580 to key growth areas and sites such as Knowsley Business Park, Haydock Industrial Park, Parkside, Liverpool City Centre, Warrington, Wigan, Widnes, Runcorn and Manchester.
- 3.31 With its transport partner Merseytravel, the Council has secured funding to improve to the A570 Linkway (which links St Helens town centre to the M62). Work started in September 2018 on the A570 Linkway Improvements scheme, which is a £5.5m project to improve capacity, reduce congestion and address safety issues along the route. The scheme consists of junction improvements to Sherdley Roundabout (A570 / Sherdley Road / Scorecross / Burtonhead Road) and Sutton Hall Roundabout (A570 / Elton Head Road), and safety enhancements to the pedestrian crossings.

### **A58 Liverpool Road/A580 East Lancs Road Junction Improvement Scheme**



- 3.32 The Council and LCRCA are currently considering the scope to improve the junction of the A580 with the A58 at Blackbrook as part of a wider package of improvements to the A580 employment corridor. Proposals and potential schemes are at early stages but £500,000 has been secured from the development of the Florida North site to address this issue. Because modelling has indicated that the junction will be over-capacity by 2021, consideration is also being given to development of a short-term solution.

### **Rail Services**

- 3.33 Merseytravel is the public body that provides professional, strategic and operational advice to the LCRCA concerning public transport. It also delivers transport projects that support the economic growth of the LCRCA, including St.Helens.
- 3.34 Merseytravel is responsible for maintaining the integrated transport network within the region and St.Helens, including bus and train services. St.Helens benefits from 10 railway stations across the Borough, which provide direct services to Liverpool, Wigan, Manchester, Warrington, Chester and parts of North Wales.
- 3.35 Network Rail owns and operates Britain's rail infrastructure, and has an obligation to maintain and enhance its network. However, Network Rail does not own or operate passenger or commercial freight rolling stock.
- 3.36 Electrification of some rail lines is being delivered by Network Rail in partnership with train operating companies and other stakeholders. The cost of electrification in the North West is being funded from the £1.3 billion allocated by government for Network Rail's network electrification programme. In the past 5 years (up to 2018) the Huyton to Wigan and Chat Moss Lines in St.Helens have been electrified allowing for improved and additional rail services.

### **Parkside Rail Access for Freight**

- 3.37 The emerging Local Plan proposes to allocate land to the east of Parkside, Newton-le-Willows to facilitate rail enabled development. The site is considered suitable in principle for development as a Strategic Rail Freight Interchange (SRFI) of regional and national significance. The development of the site would allow for fast-moving consumer goods to be transported to Parkside and then distributed to the wider region. The realisation of this would play a key role in meeting the objectives of the emerging Local Plan and facilitate the long term rail strategy for the north, as confirmed in The Liverpool City Region Freight and Logistics Strategy.<sup>2</sup>

### **Newton-le Willows Interchange**

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<sup>2</sup> Details of The Liverpool City Region Freight and Logistics Strategy can be found in the Liverpool City Region Combined Authority 'A Transport Plan for Growth 2015/16' document, which can be found via the Liverpool City Region website at [http://liverpoolcityregion-ca.gov.uk/uploadedfiles/documents/Item\\_5a\\_Transport\\_Plan\\_for\\_Growth\\_App1.pdf](http://liverpoolcityregion-ca.gov.uk/uploadedfiles/documents/Item_5a_Transport_Plan_for_Growth_App1.pdf)





- 3.38 There has been significant recent and ongoing investment at Newton-le-Willows Interchange following improvements to services which have occurred since the electrification of the line between Liverpool and Manchester and the introduction of new trains by Northern Rail. Works which are currently on-going (as at 2018) will make provision for better links between local, regional and national transport by improving facilities and facilitating easier access.
- 3.39 The Newton-le-Willows Interchange scheme includes:

- New south side entrance
- New ticket office as south side entrance
- Bus interchange
- 400+ space car park
- Electric vehicle charging points
- New toilet facilities
- Improved passenger waiting facilities
- Step free access to and between the platforms
- Additional cycle parking
- Dedicated drop-off and pick-up area
- Local highways improvements

#### **New Railway Station at Carr Mill**

- 3.40 The potential to provide a new railway station at Carr Mill is currently being considered as part of a wider aspiration for the Borough, capitalising on the opportunities to substantially enhance services between Liverpool, Manchester and Wigan as a result of the Northern Hub and electrification investment. Carr Mill is considered an ideal location to improve connectivity for local residents in Blackbrook, who currently have no nearby access to rail services. The proposal has the potential to provide for direct train services to and from Liverpool, Wigan and Manchester.

#### **Re-instatement of the rail link between St.Helens Central and St.Helens Junction**

- 3.41 There is a long-standing intention to investigate the scope to re-open the disused railway line between St.Helens Junction and St.Helens Central stations. Re-opening the line would expand the choice of travel for local residents and has the potential to increase sustainable travel options. There would also be potential to add new stations along the line. The Council continues to work with its partners to investigate this scheme as part of the rail aspirations of the Northern Hub.

#### **Bus Services**

- 3.42 St.Helens Council's works with Merseytravel and other local bus operators to provide and enhance bus services within the Borough. St.Helens currently has

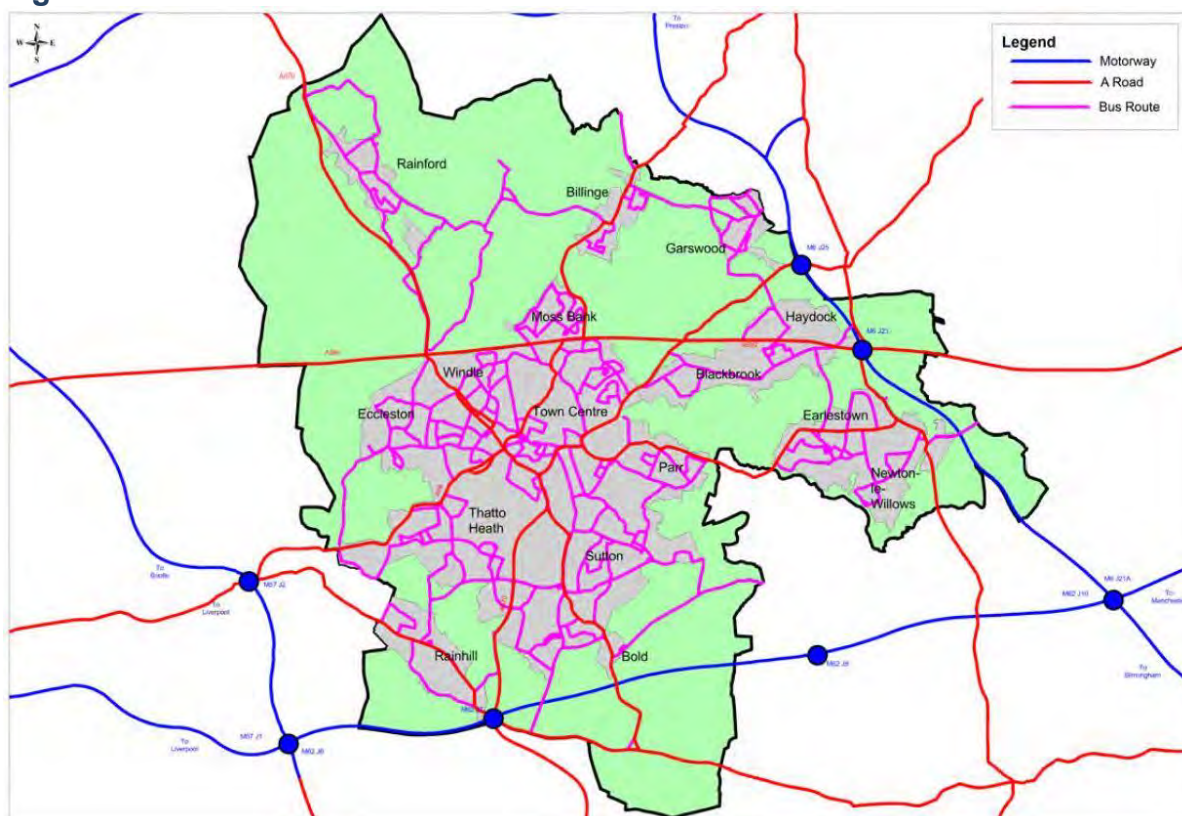
an extensive network of services, from high frequency services serving the urban areas, to rural services providing vital community links.

- 3.43 As part of an initiative by the LCRCA, Arriva, Stagecoach and Merseytravel have signed a new agreement that will deliver more than £25m of investment in bus services over a five year period (2019 – 2024). The LCR Bus Alliance is a key element of the comprehensive bus strategy for the region: built around the idea of a ‘multimodal’ transport experience for passengers, changing between rail and bus services will be simplified making journeys easier and more enjoyable.

### Bus Services and Future Development in St.Helens

- 3.44 The provision of public transport connections to new developments will be an essential requirement to both manage future traffic growth and achieve sustainability goals. Future bus routes to serve new developments will need to ensure that as part of the bus strategy, ‘best value’ is demonstrated, in order to minimise costs and subsidies.

**Figure 2: Bus Routes in St.Helens**



### Active Travel

- 3.45 Walking and cycling instead of car-use can help to reduce congestion, cut carbon emissions, and improve health and wellbeing. It also provides a leisure pursuit and a low cost mode of transport to access employment and education. Improving the walking and cycling infrastructure is likely to have multiple



benefits. Consequently, where appropriate the provision of active travel routes (cycleways and pedestrian routes) will be sought in new developments.

- 3.46 Perceived highway safety concerns and lack of convenience have been identified as reasons why people sometimes choose not to walk and/or cycle. Journeys need to be safe, attractive and convenient to encourage residents and visitors to undertake them by foot or bike and the available infrastructure must be good enough to encourage more people to walk and/or cycle. The provision of off-road routes is one means of increasing the number of those walking and cycling in the Borough.
- 3.47 The Council is currently (as at December 2018) producing a Local Cycle and Walking Infrastructure Plan, as part of the wider LCR Local Journeys Strategy. This Plan will identify current gaps in walking and cycling networks, and where existing networks require improvements.

### Public Rights of Way, Footpaths and Bridleways

- 3.48 St.Helens includes a network of approximately 6km of byways (open to all traffic), 11km of bridleways and 170km of footpaths. These exclude other off-road 'paths' that are also available to members of the public in the Council's parks and gardens, and along disused railway lines and cycle tracks.
- 3.49 The main policy document concerning the Borough's public rights of way network is the 'Merseyside Rights of Way Improvement Plan'. This has recently been updated to cover the period from 2018 to 2028, and forms part of the suite of documents for the LCRCA. A copy of the Plan can be found on the Merseytravel website<sup>3</sup>.
- 3.50 Included in the Plan are various improvement schemes which relate to St.Helens. these include:
- Pedestrian and cycling improvements in the Haydock area – these will improve connectivity and help to support the delivery of the proposed employment growth in this area;
  - A package of walking and cycling measures in the Haydock and Newton-le-Willows areas, enabling better connectivity to the town centre; and
  - New multi-modal provision around urban villages in the south of the Borough, linking in with the existing footpath network, and improving access around new housing sites.

### Future Plans

- 3.51 The implementation of future transport schemes in St.Helens is largely dependent on funding. Sources of funding will continue to be varied and likely to include devolved funding to the LCRCA, the Integrated Transport Block from the Department of Transport (DfT), central and local capital and revenue funds, National funding from agencies such as Highways England and Network Rail, developer contributions included in agreements made under Section 106 of the

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<sup>3</sup> Merseytravel website is <https://www.merseytravel.gov.uk/Pages/Welcome.aspx>



Planning Acts, private sector infrastructure for new developments and European Union funds up to 2020.

- 3.52 Ongoing monitoring of the transport network is carried out by central government, the DfT, and by the LCRCA (using indicators identified in the LCR Transport Plan for Growth). This will inform future transport strategies and development sites within the period of the Local Plan. The LCR Transport Plan for Growth currently runs to 2024 and it is anticipated that a replacement plan will be in place for the remaining period of the emerging Local Plan.





## Utilities

### Electricity

- 3.53 National Grid is the operator of the high voltage electricity transmission system for Great Britain and its offshore waters, and owns, manages and operates the high-voltage transmission (typically 275,000kV and 400,000kV – overhead lines) system in St.Helens. The Council has not been made aware by National Grid through the consultation process of any issues with the level and location of growth proposed in the emerging Local Plan.
- 3.54 Whilst National Grid operates the electricity transmission network, it does not distribute electricity to individual premises. In the St.Helens area, this is the role of Electricity North West which owns, operates and maintains the North West's electricity distribution network. The bulk of electricity enters Electricity North West's network from the National Grid and travels through the network to substations where the voltage is transformed to enter the network, ensuring safe delivery of electricity to homes and businesses. Some business users have identified that they need higher voltages.
- 3.55 Electricity North West is normally able to provide the required infrastructure to serve new development by exercising their statutory powers through a process of agreement with the relevant parties. The projected increase in load growth associated with new development is anticipated to be accommodated from existing capacity. Electricity North West has not notified the Council through the consultation process on the emerging Local Plan of any issues with the level and location of proposed growth.
- 3.56 Within a given area, the Distribution Network Operator (in St.Helens this is Scottish Power Energy Networks) maintains records of network capacity within its systems and can determine where available capacity exists to meet the demand arising from any new requested connections. Following consultation on the emerging Local Plan, Scottish Power has not made the Council aware of any capacity issues in meeting the needs of future development. However, the Council advises developers to discuss their development proposals with Scottish Power at the earliest opportunity. The Council continues to consult with Scottish Power at every stage to keep them informed of the Council's proposals and progress of the Local Plan.

### Gas

- 3.57 National Grid owns and operates the National Transmission System (NTS) and the distribution network in the North West. Gas is delivered by producers to nine reception points, or terminals, from where it enters the NTS, which is the high-pressure part of National Grid's pipeline network.
- 3.58 There are eight gas distribution networks (GDNs), each of which covers a separate geographical region of Great Britain. Cadent owns and manages the North West network. The role of Cadent is to transport gas through its pipelines to all properties. However Cadent does not sell gas. The gas provided to homes



or businesses is supplied by separate Gas Supplier companies. Developments will require their own connection(s). It is anticipated that gas will continue to be provided by the private sector over the Local Plan period.

- 3.59 The Council has not been advised of any substantive constraints on the ability to provide sufficient gas to serve the development needs of the Borough. It is anticipated that the required infrastructure to serve new development will be implemented by the private sector.

### Water

- 3.60 United Utilities Plc (UU) has a statutory duty to develop and maintain an efficient and economical system of water supply within its area. It also has a statutory duty to ensure that adequate water treatment infrastructure is provided to meet the requirements of new development.
- 3.61 All water companies have a duty to produce water resource plans covering how they intend to provide sufficient water to meet their customers' needs over a 25 year period. In addition, water companies submit proposals to determine price limits to the regulator, Ofwat, every five years. Therefore, while water resource management plans may identify projects to ensure the provision of reliable supplies of water over a 25 year period, it is through the five-year planning cycle that the funding for new resource development or improvements is secured. As a result there is a degree of uncertainty regarding funding of projects beyond the five year planning cycle.
- 3.62 Proposals for the five year period are contained in the published five-year Asset Management Programme (AMP). The AMP covers the building and modernising of water pipes to ensure a reliable supply, the reduction of the number of overflows from sewers and improvement of water and wastewater treatment works to deal with growing population and climate change.
- 3.63 UU is currently creating a new underground service reservoir in St.Helens (from two existing non-operational service reservoirs) that will serve over 60,000 new homes in the area. By using an existing asset, construction costs have been kept low and disruption to residents minimised. The new service reservoir will have a storage volume of 32 mega litres, equivalent to 120 million glasses of water, and is due to be constructed by the end of 2018.
- 3.64 UU has confirmed that it does not consider that the level of development proposed in the emerging Local Plan will result in any water supply capacity issues. If improvements are deemed to be necessary to increase capacity levels these will be incorporated into future funding bids made by UU via the AMP process.
- 3.65 However, UU has advised that a significant number of assets run through various sites which are being considered for allocation in the emerging Local Plan. It is the responsibility of developers to ensure that these are taken into account in the planning and construction of developments. Developers are



advised to contact UU at an early stage to discuss water and wastewater infrastructure requirements connected to the delivery of their proposals.

### Wastewater and Drainage

- 3.66 United Utilities is responsible for sewerage services across the Borough, and has a legal obligation to ensure that adequate sewer treatment infrastructure is provided to meet the requirements of new development.
- 3.67 The sewerage industry works in five-year planning cycles, in which proposals are submitted to the water and sewerage regulator, Ofwat, to determine future price limits. Due to this 5 year funding arrangement, there can be uncertainty about the funding to meet longer term needs. Funding to deliver infrastructure for a new development can only be allocated when it is certain that the development will take place.
- 3.68 Although UU has highlighted the presence and location of various assets within proposed development sites, it has not indicated that any improvements to the existing treatment works are necessary to increase capacity levels. It is assumed that the scale of any works will be assessed by UU and any improvements required will be incorporated into future funding bids via the AMP process.
- 3.69 Table 2 below sets out details of how surface water from each site which is proposed to be allocated or safeguarded in the emerging Local Plan (proposed submission version 2018) is expected to be dealt with. The drainage of all sites must take account of the sustainable drainage hierarchy in Policy **LPC12: Flood Risk** as follows (with (a) being the preferred option and (d) being the least favourable option):
- (a) an adequate soakaway or other form of infiltration system;
  - (b) an attenuated discharge to watercourse;
  - (c) an attenuated discharge to public surface water sewer; and
  - (d) an attenuated discharge to public combined sewer.

**Table 2: Proposed development and surface water drainage**

Allocated Housing Sites		
Ref. Number	Site Name	Destination
1HA	Land South of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood	No watercourse available - follow drainage hierarchy
2HA	Land at Florida Farm (south of A580), Slag Lane, Blackbrook	Discharge surface water to watercourse via Clipsley Brook will be expected before mains sewer.
3HA	Former Penlake Industrial Estate, Sutton	No comments
4HA	Land Bounded by Reginald	There is a watercourse adjacent to



	Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb )	the northern boundary of the site. UU will expect the developer to explore options to discharge surface water (SW) to this watercourse.
5HA	Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold	Watercourses lie to the south of the site - discharge to these should be considered before mains sewer.
6HA	Land at Cowley Street, Cowley Hill, Town Centre	No comments
7HA	Land West of The A49 Mill Lane and to the East of the West Coast Mainline Railway Line, Newton-le-Willow, Newton-le-Willows	No watercourse available - follow drainage hierarchy
8HA	Land South of Higher Lane and east of Rookery Lane, Rainford	There is a water main running the length of southern boundary (within the site) behind Sandwash Business Park and Rookery Farm. Surface water drainage will be expected to drain into this watercourse and a suitable distance maintained for a maintenance strip.
9HA	Former Linkway Distribution Park, Thatto Heath	No comments
10HA	Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton	No comments
<b>Allocated Employment Land</b>		
<b>Ref. Number</b>	<b>Site Name</b>	<b>Destination</b>
1EA	Omega South Western Extension, Phase 1, Land north of Finches Plantation, Bold	A watercourse lies to the north and south of the site. UU will expect the developer to explore options to discharge SW to these water bodies.
2EA	Land at Florida Farm North, Slag Lane, Haydock	There are a number of surface water bodies in the form of ponds on site. UU will expect the developer to explore options to discharge SW to these water bodies.
3EA	Land North of Penny Lane, Haydock	The West East Link Main (large pressurised treated water main) and surface water sewer passes through the site, and will need to be given due consideration in the site masterplanning. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
4EA	Land South of Penny Lane, Haydock	A pressurised water main passes through the site, and will need to be given due consideration during the





		site masterplan process. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
5EA	Land to the West of Haydock Industrial Estate, Haydock	The site borders Millfield Service Reservoir, and a pressurised distribution main runs through the site. All of which will need to be given due consideration in the masterplanning of the site. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
6EA	Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock	Clipsley Brook flows along the south of the site. UU will expect the developer to explore options to discharge SW to this watercourse.
7EA	Parkside East, Newton-le-Willows	A gravity sewer, live treated water main (and associated easements) run through the site. These will need to be given due consideration in the masterplanning of the site. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
8EA	Parkside West, Newton-le-Willows	A gravity sewer, live treated water main (and associated easements) run through the site. These will need to be given due consideration in the masterplanning of the site. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
9EA	Land to the West of Sandwash Close, Rainford	A main combined sewer is situated to the southern edge of the site. These will need to be given due consideration in the masterplanning of the site. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
10EA	Land at Lea Green Farm West, Thatto Heath	No comments
11EA	Gerards Park, Phases 2 and 3, College Street, St.Helens Town	No comments



	Centre	
<b>Safeguarded Sites for Housing</b>		
<b>Ref. Number</b>	<b>Site Name</b>	<b>Destination</b>
1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	No watercourse available - follow drainage hierarchy
2HS	Land between Vista Road and Belvedere Road, Earlestown	A brook runs through the site, UU would expect surface water to be disposed via this watercourse.
3HS	Eccleston former Park Golf Club	There are a number of surface water bodies in the form of ponds on site, and a watercourse running to the south of the site. UU will expect the developer to explore options to discharge surface water to these water bodies.
4HS	Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	A watercourse runs to the north of the site and UU will expect the developer to explore options to discharge surface water into this rather than mains sewer.
5HS	Land west of Winwick Road and south of Wayfarers Drive, Newton-le-Willows	Newton Brook runs to the south of the site. UU would expect surface water to be disposed of via this watercourse.
6HS	Land East of Chapel Lane and south of Walkers Lane, Sutton Manor	Sankey Brook lies to the south east and south west of the site therefore discharge to watercourse will be expected before mains sewer.
7HS	Land South of Elton Head Road, adjacent to St. John Vianney Catholic Primary School, Thatto Heath	A brook runs down the western boundary of the site, UU would expect surface water to be disposed via this watercourse.
8HS	Land South of A580 between Houghtons Lane and Crantock Grove, Windle	A brook runs through the site, UU would expect surface water to be disposed via this watercourse.
<b>Safeguarded Sites for Employment</b>		
<b>Ref. Number</b>	<b>Ref. Number</b>	<b>Ref. Number</b>
1ES	Land North of M62, and South of Gorsey Lane, Bold	There is a watercourse adjacent to the western boundary of the site. UU will expect the developer to explore options to discharge SW to this watercourse.
2ES	Land North East of Junction 23 M6, Haydock	The West East Link Main, Lodge Lane Wastewater Pumping Station, a pressurised foul sewer and a gravity foul sewer all lie within the site and



		will need to be afforded due consideration in the site masterplanning. The far north east corner of the site lies within groundwater Source Protection Zone (SPZ) 2. Adequate mitigation will need to be put in place to ensure protection of groundwater in this location. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.
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- 3.70 It is anticipated that these requirements will be developer led and funded, subject to Environment Agency approval.

### Waste

- 3.71 The Merseyside and Halton Joint Waste Local Plan (adopted in 2013) is the first Local Plan to have produced as a result of successful collaboration between Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral Councils.
- 3.72 The Joint Waste Local Plan identifies the opportunities that exist to improve the management of waste, and provides the context to address them by developing a network of sustainable waste management facilities, as a key part of the ambition to promote a low carbon economy. Historically, many of Merseyside's landfill sites have been located in St.Helens. Existing built waste management facilities in the Borough are concentrated in central St.Helens and Earlestown.
- 3.73 The Joint Waste Local Plan provides the Liverpool City Region with a clear direction for future waste management development to 2027, both in terms of site allocations and detailed development management policies. It forms part of the statutory development plan for each of the local authorities within the City Region.
- 3.74 There will continue to be a demand for waste management capacity from existing industries and businesses in St.Helens and any expansion or growth in industries promoted by the emerging Local Plan will increase that demand. It is anticipated that any waste infrastructure required as a result will be addressed through the Joint Waste Local Plan 2013, or a future review of this.

### Telecommunications

- 3.75 Telecommunications industries form a vital enabler of economic competitiveness, emergency response and recovery and quality of life. Residents and businesses expect to be provided with good quality communications and the demand for telecommunications infrastructure is expected to grow in line with housing and employment growth over the period covered by the emerging Local Plan.



- 3.76 Telecommunications cannot operate without a network of base stations and supporting infrastructure. It is therefore important that the necessary infrastructure can be delivered over the Local Plan period in line with growth across the Borough. Telecommunications infrastructure is continually evolving, and the Council will work with operators to ensure that new and improved telecommunications infrastructure is delivered sustainably in line with technological advances.

### Broadband

- 3.77 Good communication networks such as high speed broadband and improved mobile services have been identified as being needed to allow businesses to work efficiently and remain competitive in the market. The UK ranks next to last (27<sup>th</sup> out of 28) in the EU league table of fibre deployment, with just 2% of premises having a fibre connection compared to 85% in Portugal. The UK Government has devised the Local Full Fibre Networks (LFFN) programme as part of its £740million National Productivity Investment Fund, to stimulate investment in full fibre networks and improve competitiveness.
- 3.78 The majority of St. Helens currently has a good standard of broadband access, with over 98% of the Borough being covered by superfast broadband. The Council is however working closely with its LCRCA partners to develop a Digital Infrastructure Action Plan (DIAP). This work is collaborative and, whilst being led by the LCRCA and Local Enterprise Partnership (LEP), also involves officers from the six city region districts and Merseytravel.
- 3.79 In addition, the North West is expected to get a multi-million pound boost from an initiative that sees local communities forming partnerships with Openreach to bring high-speed fibre broadband to rural homes and businesses. The programme will, it is estimated, be worth £14.5 million to the region over the next 15 years.
- 3.80 The Government is also working with Openreach and the Home Builders Federation (HBF) to deliver superfast broadband connectivity to new build properties in the UK. This agreement will mean that fibre based broadband is offered to all new developments registered to be built from 5th February 2016 onwards, either for free or as part of a co-funded initiative. For developments of 100+ dwellings, Fibre to the Premises (FTTP) will be provided for free.
- 3.81 Openreach supplies to developers a guide on how to provide a network across a development that is suitable for communication services for future occupants, including information on matters such as laying ducts under carriageways and wiring homes for broadband.
- 3.82 Developers are also encouraged to use 'Dig Once' principles, in which they install fibre duct in the ground during the initial construction of a development (even where there is no immediate use for the duct) so that cabling can be installed at a later date with significantly reduced costs and disruption.





- 3.83 British Telecom has an obligation to provide telephone connectivity to new developments. The main constraint in relation to broadband is the location of existing telephone exchanges and cabinets. It is anticipated that new development proposals in the period covered by the emerging Local Plan will be linked to the national broadband and telephone network on a site-by-site basis by the site developer. Openreach recommends that sites are registered at least nine months before the anticipated first occupancy date. For many sites, Openreach is likely to recommend use of FTTP technology, for which a nine months lead time is required.
- 3.84 The Council will continue to work with operators to ensure that new and improved broadband infrastructure is delivered sustainably over the Local Plan period in line with technological advances.

## **Flood Risk Management**

- 3.85 The St.Helens Strategic Flood Risk Assessment (SFRA) 2014 was prepared by JBA Consulting in consultation with the Environment Agency. It provides information to help inform decisions made on planning applications, options for the allocation of land and policies for flood risk management in the Local Plan.
- 3.86 The Flood and Water Management Act (FWMA) 2010 legislates for the management of risks associated with flooding and places a number of roles and responsibilities on local Councils by designating them as Lead Local Flood Authorities (LLFAs). This requires them to manage 'local' flood risk within their area. 'Local' flood risk refers to flooding or flood risk from surface water, groundwater or from ordinary watercourses.
- 3.87 As the Lead Local Flood Authority (LLFA) the Council has developed a Lead Local Flood Risk Management Strategy (LLFRMS) to understand and manage flood risk within the Borough. The strategy sets out a six year time scale cycle of a programming of works. The first cycle is now completed and the second cycle is currently being updated for viewing on the Council's website:  
<https://www.sthelens.gov.uk/traffic-travel-parking/highway-maintenance/flooding-and-drainage/flood-and-water-management/>
- 3.88 The Council has consulted with its LLFA officer throughout the Green Belt Review as part of the process of allocating and safeguarding land for housing and employment in the Local Plan, seeking to ensure that proposed locations for development do not require land that lies within flood zone 2 or 3.
- 3.89 The Council has also, in partnership with the Environment Agency and other partners, helped to prepare the Sankey Catchment Action Plan (2018). The Sankey Catchment covers most of St Helens Borough, along with parts of Warrington and Halton. It recommends a range of actions to be implemented in order to:
- reduce the reactive nature of the catchment by “Slowing the Flow” in the rural headwaters, filtering agricultural run-off and improving water quality and wildlife habitats;



- address issues in the urban areas of the catchment such as inadequately designed connections; and
- remove pinch-points that can contribute to poor water quality and localised flooding.



## 4. SOCIAL AND COMMUNITY INFRASTRUCTURE

- 4.1 Social infrastructure comprises of a range of activities, organisations and facilities supporting the formation, development and maintenance of social relationships in a community. For this IDP social infrastructure has been defined as:

- Education Facilities
- Health and Social Care Facilities
- Emergency Services
- Leisure Services
- Community Facilities

### Education Facilities

#### Provision of Education Facilities

- 4.2 Education covers nursery, primary (ages 4-11), secondary (ages 11-16), further education (post 16) and special education in the Borough. As at May 2017, the structure of schools in St.Helens was as follows:

- 1 Community Nursery School
- 23 Community Primary Schools
- 15 Catholic Voluntary Aided Primary Schools
- 1 Catholic Voluntary Aided Infants School
- 1 Catholic Voluntary Aided Junior School
- 4 Church of England Voluntary Aided primary Schools
- 1 Other Voluntary Aided Primary School (Methodist)
- 6 Voluntary Controlled Schools
- 3 Primary School Academies
- 2 Community Secondary Schools
- 3 Voluntary Aided secondary Schools
- 4 Secondary School Academies
- 3 Community Special Schools
- 2 Pupil Referral Units (1 Primary & 1 secondary)

### Early Years

- 4.3 The Childcare Act 2006 placed statutory responsibilities on councils to secure better outcomes for children and their families. These duties require Councils to:
- Take the strategic lead in their local childcare market, planning, supporting and commissioning childcare. This includes the requirement for councils to assess the local childcare market and to secure sufficient childcare for working parents.
  - Provide information, advice and assistance to parents and prospective parents on the provision of childcare in their area and other services



which may be of benefit to parents, prospective parents or children and young persons in their area.

- Secure a free minimum amount of early education for eligible 2 year olds and for all 3 and 4 year olds whose parents want it.

- 4.4 The provision of Early Years education in St.Helens is complex, being a mixture of child-care / child minding and nursery classes, and is provided in various Local Authority run (maintained) and private, voluntary and independent facilities (including children's centres, private, voluntary aided childcare settings and/or nurseries, and within primary schools).
- 4.5 There is a good balance of pre-school nurseries throughout the Borough. This allows for most existing settlements to have good access to a pre-school facility.
- 4.6 The Council provides a Family Information Service that advises parents on what Early Years care is available at <https://www.sthelens.gov.uk/schools-education/family-information-service/family-information-service-directory/>

### **Primary and Secondary Schools**

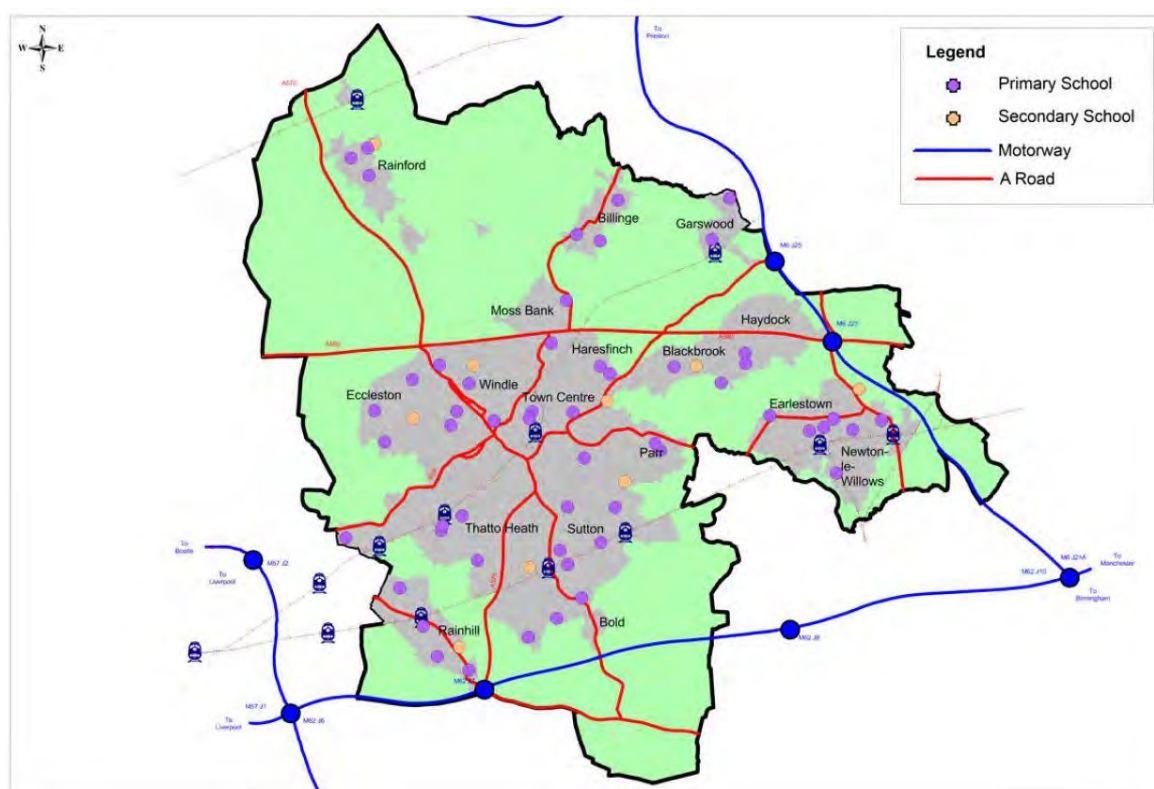
- 4.7 The Council has a statutory responsibility for the provision of sufficient school places. Pressure for additional school places can be created by an increase in birth rate, new housing developments, greater inward migration and parental choice. The Council responds to changes in demand over time by increasing or removing capacity. This can be achieved by:
- Amalgamating or closing schools
  - Reducing places at existing schools
  - Extending existing schools
  - Building new schools
- 4.8 The Council's Education Department updates Primary Pupil Projections over 4 years and Secondary Pupil Projections over 6 years, on an annual basis. The Council plans for pupil places by designated Pupil Place Planning Areas and cannot provide projections for individual schools. The projections are based on the following data sources:
- Current and previous years' school census information containing numbers on roll
  - Inward and outward migration of pupils between planning areas <sup>4</sup>
  - Previous recent trends on school preference applications
  - School Net Capacity assessments
  - ONS Live birth data
  - Approved Planning Application Housing Data obtained from the Planning Department

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<sup>4</sup> To facilitate effective pupil forecasting planning, the Council's Education Department has split the Borough into 11 Primary Pupil Planning Areas and two Secondary Pupil Planning areas.



**Figure 3: Primary and Secondary Schools in St.Helens**



### Primary Schools

- 4.9 In the period 2001 to 2012 the ONS population projections for births across the whole Borough suggested a rise, and as a consequence, this has led to increasing numbers of pupils entering primary schools in St.Helens since 2005/06.<sup>5</sup> The main growth in school age population has been in wards across the middle of the Borough running east to west (the most densely populated areas), with Rainford and Billinge in the north of the Borough being less affected.
- 4.10 However, population projections from 2013 onwards indicate that birth numbers in St.Helens have declined, particularly in the most deprived areas such as Parr, Haydock, Sutton and Bold. This will start to feed through to reception pupil intakes in 2018 to 2021.
- 4.11 Pressure on pupil places in primary schools continues in a number of areas, and work has already been undertaken to identify suitable schools in Rainhill and Eccleston/Windle for expansion to deal with the emerging demand.

<sup>5</sup> Source: Office for National Statistics (ONS): population mid-year estimates



### **Rainhill**

- 4.12 Funding for a new classroom extension in Rainhill was approved in August 2017, following the publication of the statutory school organisation process and work has now been completed (a temporary bulge class at Longton Lane primary was delivered for 2017/18).

### **Eccleston/Windle**

- 4.13 In Eccleston/Windle a bulge class was provided in 2016/17 to deliver a temporary increase and in autumn 2018 the Council consulted on the need for a permanent expansion of the same school for 2019/20.

### **Secondary Schools**

- 4.14 Secondary schools in the Borough have seen falling numbers of pupils for a long period as a consequence of decreasing birth rates in the respective wards. However, the increasing numbers of pupils in primary schools are now feeding through to secondary schools and there has been a rising trend in intake numbers to Year 7 from 2013/14 to 2017/18. This is likely to continue in 2018/19 and beyond. Following an increase in school class sizes at some popular secondary schools and an improvement in Ofsted ratings in other secondary schools the proportion of primary school children transferring to St.Helens secondary schools has increased, with fewer children travelling out of the Borough. Work is ongoing with secondary schools to identify suitable options to deliver additional capacity and pupil places for 2019/20 and beyond.

### **Calculating developer contributions towards school places**

- 4.15 Where it is demonstrated that existing school places are not sufficient to accommodate the potential additional pupils arising from a new development, the Council will seek to secure developer contributions towards additional school places. These would normally be sought through agreements made under Section 106 of the Town and Country Planning Act 1990. Such contributions are likely to be needed to mitigate the impact of new development on educational needs, ensuring that necessary and appropriate school provision is made.
- 4.16 For the very largest development site(s) it is anticipated that any contribution(s) may also include a contribution (potentially in the form of land) towards the provision of at least one new primary school. Whilst the Council normally seeks to provide places in existing schools, this may not be feasible in all cases given the size of at least one of the housing site allocations in the emerging Local Plan (at Bold). If the need for provision of a new school is identified then the Council will seek to secure any necessary developer contribution as part of the overall development proposal. The size of any land provided for a new school would need to comply with Department for Education (DfE) guidance<sup>6</sup>.

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<sup>6</sup> Guidance on space standards for primary schools can be found here:  
<https://www.gov.uk/government/publications/primary-and-secondary-school-design/primary-and-secondary-school-design>



- 4.17 If a shortfall of pupil places is identified at schools within the catchment of a proposed development, a contribution will be calculated. The contribution sought from developers will be used to mitigate the direct impact from the development and would not be used to address any existing shortfall.
- 4.18 The Council will use the primary and secondary school projections to ascertain whether St.Helens primary schools within 2 miles (safe walking distance) and/or St.Helens secondary schools within 3 miles (safe walking distance) of the proposed development are:
- Already over-subscribed, or
  - Projected to become over-subscribed within 5 years
- 4.19 If a shortfall is identified, the contribution sought will be for the full potential pupil yield of the development. If only a partial shortfall of places is identified, the Council will seek contributions for the projected shortfall of places resulting from the development.
- 4.20 To calculate the level of required developer contributions towards new school provision it is necessary to consider the likely cost of each school place and the expected pupil yield from the development. Guideline data<sup>7</sup> indicates that the cost of providing each school place would be £12,439 for primary school places and £16,171 for secondary school places.
- 4.21 The Council's data on the pupil yield (i.e. the number of new school places that would be typically generated per new dwelling) indicates that each new dwelling would generate a need for 0.037 primary school places and 0.016 secondary school places. However, this data is very dated, being based on evidence gathered in 2004, and indicates that St. Helens requirements are far lower than those in neighbouring authorities in Lancashire and Warrington. The Council intends to undertake further research on the number of pupils generated by new developments, and it is likely that the pupil yield calculation in St. Helens will increase as a result.
- 4.22 The Government has also begun a consultation exercise (September 2018), to assess pupil yield from housing developments. It is expected that following the consultation, the DfE will develop guidance for local planning authorities on how to secure, maximise and sustain contributions for education where relevant and reasonable.
- 4.23 The Council continues to assess the impact of the developments proposed in the Local Plan on school provision. However, it should be noted that current Government policy does not allow for schools in 'special measures' or 'requiring improvements' to be expended, aesthetically improved, or be given additional funding, thereby adding to the already difficult process of trying to plan ahead as this status could apply at various junctures to the schools in the Borough.

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<sup>7</sup> Based on the DfE's published guidance contained in the Basic Need Funding Summary of the 2018-19. This includes a 2015 BCIS location factor adjustment of 0.92.



### Higher and Further Education

- 4.24 Improved skills at all levels are crucial to the growth of the St.Helens economy. St.Helens is fortunate in that it has five sixth form colleges within existing secondary schools, alongside two other standalone colleges. St.Helens College caters for students from 14 years upwards, and offers a range of courses at varying levels from GCSEs, A-Levels, Vocational/BTEC, apprenticeships, and adult courses to Degrees. Carmel College offers a range of A-level and BTEC courses to school leavers. All provide an important role in delivering further education within the Borough.



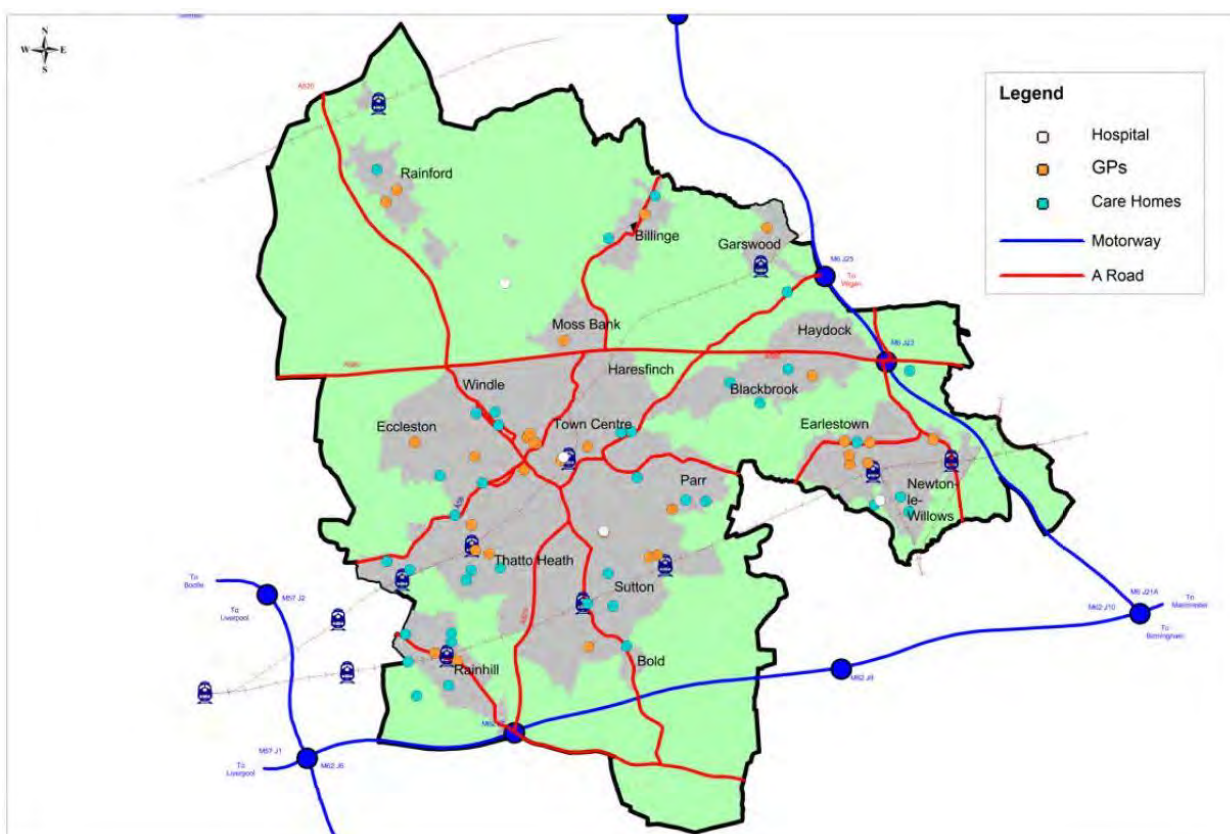


## Health and Social Care Facilities

- 4.25 Health inequalities are a significant concern in St.Helens, and the difference between the deprived and affluent areas of the Borough are clear and persistent. Within the Borough there is an 11-year difference in life expectancy between the most and least deprived areas for females and a six year difference for males.<sup>8</sup> Almost 40% of people not in work are economically inactive due to long-term sickness, much higher than the national average of 21%.<sup>9</sup> The areas of highest deprivation are concentrated in the south of the Borough. The rate of alcohol-related harm hospital stays is 850\*, worse than the average for England. This represents 1,481 stays per year. The rate of self-harm hospital stays is 387<sup>10\*</sup>, worse than the average for England.<sup>11</sup> This represents 670 stays per year. The rate of smoking related deaths is 371\*, worse than the average for England. Estimated levels of adult excess weight and physical activity are worse than the England average.

**Figure 4: Healthcare facilities in St.Helens**

4.26



C  
covered by the St. Helens Clinical Commissioning Group (CCG). In April 2013, CCGs became responsible for planning and buying or 'commissioning' local health services (including hospital, community care and GP out-of-hours services) and for improving quality in general medical practices. NHS England is

<sup>8</sup> Source: Office for National Statistics (ONS)

<sup>9</sup> Source: ONS – Census data

\* rate per 100,000 population

<sup>11</sup> Source: Public Health England – St. Helens Health Profile 2017



responsible for commissioning primary medical care, primary, community and secondary care, dental services, pharmacy, optometry, health and justice services, military and veteran health, and specialised services, and some public health services. NHS England works closely with local CCGs and local authorities in relation to these services.

### **General Practitioners Provision**

- 4.27 The current General Practice (GP) registered population served by the St. Helens CCG is 196,627 (NHS Digital, May 2017). This exceeds the overall population of the Borough by 9% for various reasons including the existence of cross-boundary patients.
- 4.28 NHS St.Helens CCG is made up of 34 general practices, with approximately 73 GP Principals, 21 salaried GPs, 10 Locum GPs, 45.5 WTE (whole time equivalent) Practice Nurses, 20 direct patient care staff and 207 administrative staff (St.Helens CCG, February 2018). Sixteen of the practices are small with only one or two GPs.
- 4.29 The GP Practices have list sizes varying from 684 patients at the specialist Eldercare service, up to 14,246 at the Rainbow Medical Centre. On average, there are 21,318 general practice appointments in the Borough a week. Nationally, there is an average of 65 GPs per 100,000 head of weighted population (including registrars and retainers). The figure for St.Helens CCG is considerably lower with only 52 GPs per 100,000, 27% of whom are aged over 55 years. Due to the impact of potential GP retirements, this is likely to present significant recruitment challenges over the next 5-10 years across the current general practices.
- 4.30 There is currently no consistent way of collecting GP vacancy data, but anecdotally many practices across St.Helens report difficulties in filling GP posts. Practices also report that where posts are filled, these are more likely to be salaried or locum GPs rather than partners.
- 4.31 There will be a need to provide care services to expanded populations whenever significant housing developments are planned. The impact of the strategic development sites on GP capacity is outlined below.

### **Strategic Locations for Development**

- 4.32 NHS St.Helens Clinical Commissioning Group does not object to the proposed strategic development sites in principle, however they have stressed that budgets and funding are limited and there are significant disparities around the Borough that would need to be addressed should development come forward in those areas. In particular, there will be a requirement for additional provision to the south in the Borough (Sutton, Parr and Bold) within the Plan period to accommodate pressures caused by development of the proposed strategic sites nearby.



- 4.33 Table 3 sets out the current capacity and future capacity of GP practices within the Borough. An increase and change in the composition of St.Helens' population over the Local Plan period could place additional pressure on health care facilities in the Borough and generate the requirement for improvements to existing facilities or direct provision or contributions towards new purpose built premises. As the table illustrates, there is a need for improvements to health facilities across St.Helens. These works will be funded by a mixture of NHS funding and any developer contributions which are obtained via the provisions of Policy LPA08 of the emerging Local Plan.

**Table 3: Current and future capacity at GP Practices**

Site (in Ward order)	Forecast and Current Capacity	Proposed Housing Growth 2020 - 2035	Future Capacity
<b>Billinge &amp; Seneley Green</b>			
1HA - Land South of Billinge Road, East of Garswood Road and West off Smock Lane, Garswood	Garswood surgery is a purpose built modern facility.	There are 216 new dwellings expected between 2020 – 2035, none of which currently have planning permission	It is considered that there is sufficient flexibility/capacity in Garswood to cater for the expected increase in demand.
<b>Blackbrook</b>			
2HA - Land at Florida Farm (South of A580), Slag Lane, Blackbrook	Haydock currently has three practices, two of which are located in a purpose built new facility.	There are 522 new dwellings expected between 2020 – 2035, none of which currently have planning permission	One of the Haydock practices is in a small terraced property with no capacity to expand. However, the other two practices have the capacity to expand, subject to the ability to recruit.
<b>Bold</b>			
3HA - Former Penlake Industrial Estate, Sutton	There are four practices likely to be affected. Only one practice has the potential to physically	There are 340 new dwellings expected between 2020 and 2035. Planning permission was	There are already capacity issues in this area and due to the growth and scale of new development and potential new patients there is a probable need for a new



Site (in Ward order)	Forecast and Current Capacity	Proposed Housing Growth 2020 - 2035	Future Capacity
	expand.	granted in 2015.	surgery to be constructed to accommodate the increased demand for healthcare in Bold (and from surrounding areas).
4HA - Land Bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	As above	There are potentially 2988 being proposed at this site, with 480 expected to be built before 2035. No permission has been granted as yet.	As above
5HA - Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold	As above	There are 569 new dwellings expected between 2020 – 2035, none of which currently have planning permission	As above
<b>Moss Bank</b>			
6HA - Land at Cowley Street, Cowley Hill, Town Centre	There is one practice in Moss bank, and a number of practices within the Town Centre, which may be easier to access from this site but are already over-stretched	There are potentially 816 being proposed at this site, with 495 expected to be built before 2035. No permission has been granted as yet	There is expected to be sufficient capacity in the existing surgery in Moss Bank to cater for increased demand subject to recruitment. However, the overall growth expected in the Town Centre will add significant pressure on existing facilities, which may warrant a new practice.





Site (in Ward order)	Forecast and Current Capacity	Proposed Housing Growth 2020 - 2035	Future Capacity
<b>Newton-le-Willows</b>			
7HA - Land West of The A49 Mill Lane and to the East of the West Coast Mainline Railway Line, Newton-le-Willow.	There are two practices operating from three locations in this area, all have limited or no capacity to physically expand.	There are 181 new dwellings expected between 2020 – 2035, none of which currently have planning permission	There is no current capacity for the existing practices to expand. However, one practice is considering closing its branch in Burtonwood and as such may be able to absorb more capacity.
<b>Rainford</b>			
8HA - Land South of Higher Lane and East of Rookery Lane, Rainford	There are two practices in Rainford.	There are 259 new dwellings expected between 2020 – 2035, none of which currently have planning permission	There is expected to be sufficient capacity in existing surgeries to cater for increased demand subject to the ability to recruit.
<b>Thatto Heath</b>			
9HA - Former Linkway Distribution Park, Thatto Heath	There are four practices within this area, none of which have the ability to physically extend.	There are 350 new dwellings expected between 2020 and 2035. Planning permission was granted in 2018.	Growth of this scale will place additional pressure on the existing facilities in Thatto Heath. It is anticipated that capacity issues can be overcome subject to the ability to recruit.
<b>Town Centre</b>			
10HA - Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton	See response to 13HA. Capacity in the Town Centre is already over-stretched.	There are potentially 802 being proposed at this site, with 495 before 2035 expected to be built before 2035. Planning permission	See response to 13HA



Site (in Ward order)	Forecast and Current Capacity	Proposed Housing Growth 2020 - 2035	Future Capacity
		was granted in 2007	

- 4.34 The Council will continue to engage with the St.Helens CCG to determine the infrastructure required to support the distribution of development identified in the emerging Local Plan.

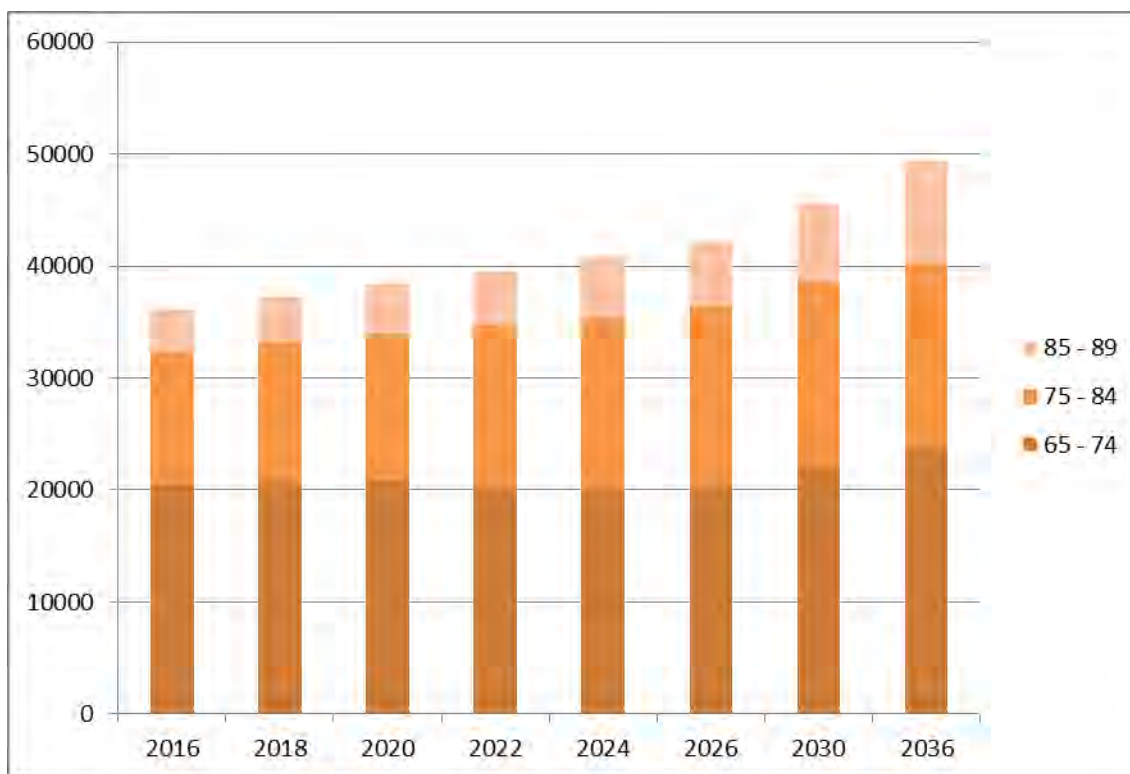
### Hospital Provision

- 4.35 St.Helens and Knowsley Teaching Hospitals NHS Trust provides a full range of acute and intermediate healthcare services across their sites at St.Helens, Whiston and Newton hospitals. The Trust employs over 7,000 staff, and serves a population of approximately 350,000 across St.Helens, Knowsley, Halton, Liverpool and further afield.
- 4.36 St.Helens and Whiston hospitals offer a range of inpatient and outpatient services, with Whiston also offering maternity and accident and emergency services. The Mersey Regional Burns and Plastic Surgery Unit at Whiston Hospital provides treatment for patients across Merseyside, Cheshire, North Wales, the Isle of Man and other parts of the North West, serving a population of over 4 million people.
- 4.37 Newton Community Hospital provides intermediate care in a community setting, including nursing, medical, therapy and social care interventions for patients who require specialist care and support to address their short-term needs.
- 4.38 Consultation with St.Helens and Knowsley Teaching Hospitals NHS Trust has not highlighted any need to increase capacity as a result of the development proposed in the Borough.

### Care for the Elderly and Disabled

- 4.39 In St.Helens, the number of people over the age of 55 years is on the increase, as people live longer on average and it is expected that the numbers and proportions of older persons will increase further. It is estimated that by 2025 the number of people aged 65 and above will reach 22% of the total population, and by 2030 24%<sup>12</sup>. In total for St.Helens, this means an expected average of 630 extra patients aged 75 years and above, each year, for the next ten years. As so many diseases and conditions are linked to increasing age, this could potentially put a significant strain on health and social care services in future years.

<sup>12</sup> Source: ONS Life Expectancy Data 2014 - 2016



**Figure 5: Ageing Population Projections<sup>13</sup>**

4.40 There are issues regarding the availability of suitable accommodation in the Borough. The latest SHMA update (August 2018) identifies that St.Helens has a higher level of disability when compared with the rest of the country, and as the Borough's population is aging, the number of people with disabilities is expected to increase substantially in the future. Evidence within the SHMA suggests that there is a clear need to increase the supply of accessible and adaptable homes and wheelchair user dwellings (data suggests a need for around 6-7% of dwellings to be for wheelchair users) within the Borough. Policy **LPC01: Housing Mix** makes provision for 20% of new dwellings on greenfield sites of 25 or more new homes to be accessible and adaptable, as set out in Part M4(2) of the Building Regulations 2010 (as amended) and 5% designed to the wheelchair user standard as set out in Part M4(3) of the Building Regulations 2010 (as amended).

### Pharmacies and Opticians

4.41 Pharmacies in the community are independently provided but their number and location are regulated in relation to the distribution of GP practices. Every pharmacy has to have a qualified pharmacist available throughout all of its contractual hours, to ensure services are available to patients. In general, pharmacy services are provided free of charge, without an appointment. Pharmacists dispense medicines and appliances as requested by "prescribers" via both NHS and private prescriptions.

<sup>13</sup> Source: Population Bulletin, info4St.Helens, January 2018



- 4.42 The local NHS operates a minor ailments scheme that is accessible to all at their local Chemist/Pharmacy. Under the scheme, a local pharmacist can be seen for a private consultation, usually without an appointment, for a wide range of ailments. If a patient is not required to pay for prescriptions, then any medication the Pharmacist prescribes is free of charge, and open to anyone who is registered with a Doctor within the St.Helens Borough.
- 4.43 St.Helens has 29 pharmacy contractors who between them operate out of a total of 46 pharmacy premises. Of the 46 pharmacies:
- 40 deliver a minimum of 40 hours service per week
  - 6 deliver a minimum of 100 hours service per week
- 4.44 Access to pharmacy services is considered satisfactory, and the locations of pharmacies in the Borough match areas of higher population density or high footfall (e.g. retail parks). There are also a number of pharmacies available for St.Helens residents close by in neighbouring authorities, and so pharmacy provision for St.Helens residents living near the border of the Borough is also considered adequate. The six pharmacies that provide services for 100 hours per week are also spread across the Borough, suggesting good coverage.
- 4.45 Optician services are commercially provided. 'Optician' is a general term that covers both optometrists and dispensing opticians. Optometrists carry out sight tests to check the quality of vision and eye health. They look for signs of eye disease that may need treatment from a doctor or eye surgeon and prescribe and fit glasses and contact lenses. Dispensing opticians fit glasses and contact lenses, but do not test eyes. There is no known shortage of Opticians facilities within the Borough.

### **Clinics and District Nursing**

- 4.46 Increasingly minor procedure and treatment clinics are being provided in community health centres and GP surgery buildings, as well as these premises providing a base for district nurses visiting people in their own homes to assist with recovery from major operations.

### **Dental Services**

- 4.47 Most dentists are independent servicers, with responsibility for their own premises and staff. National Health Service (NHS) dental services are provided by dentists who hold NHS contracts and in recent years the number of practitioners has been increased to meet the once serious shortfall of dentists that provided NHS services as well as private dental consultations and treatment.
- 4.48 It is anticipated that the private sector will provide dental practices, opticians and pharmacies in line with market demand over the Local Plan period (2020 to 2035).





## Emergency Services

### Police

- 4.49 The Merseyside Police and Crime Commissioner sets the strategic vision for police and crime by: providing a voice for Merseyside communities; setting a Police and Crime Plan; and commissioning services to increase community safety, support victims and reduce reoffending. Working with the Chief Constable and other partners, the Commissioner also tackles issues such as probation, health, education and the use of voluntary organisations to fight crime and anti-social behaviour.
- 4.50 The Merseyside Police and Crime Plan has 4 key priorities:
- Prevent crime and anti-social behaviour
  - Provide a visible and accessible neighbourhood policing style
  - Tackle serious and organised crime
  - Support victims, protect vulnerable people and maintain public safety
- 4.51 The Merseyside Police Authority has a statutory responsibility to ensure that St.Helens Borough is a safe place to live and work, and where crime and the fear of crime are reduced. The Merseyside Police Authority is funded by Government grants, inclusive of business rates, plus other income, such as service income and earned income on surplus cash and council tax. As with other public services, long term funding is difficult to predict.
- 4.52 There are now only two Police Stations left within the Borough and many of the local neighbourhood stations are permanently closed. St.Helens Town Centre Police Station is open 8am – 10pm Monday to Saturday and 8am - 5pm on Sundays. Newton-le-Willows Police Station is open 8am – 10pm Monday to Saturday and closed on Sundays.
- 4.53 The Council has undertaken various consultations with Merseyside Police, and is now aware of any identified requirements for additional police stations in the Borough over the Local Plan period. Crime rates in St.Helens have reduced significantly in recent years. Whilst the Merseyside Police Authority faces on-going budgetary pressures it should also be noted that crime levels have reduced in recent years.
- 4.54 The St.Helens Community Safety Partnership (St. Helens CSP) includes representatives from Merseyside Police, St.Helens Council, Merseyside Fire and Rescue Service, Merseyside Probation Trust and Health services. The St.Helens CSP works together to develop and implement strategies to protect local communities from crime and to help people feel safe. It is considered to be well placed to manage its workload, with strong multi-agency processes in place to coordinate initiatives and resource allocations.



### **Merseyside Fire and Rescue Authority**

- 4.55 The Merseyside Fire and Rescue Authority was established on 1st April 1986 under the Local Government Act 1985. Although the Authority does not have all the powers of a district authority, it is nonetheless a Local Authority in its own right, separate and distinct from the constituent councils. It is made up of 19 Members, including 18 Councillors from the five constituent local authorities of Merseyside (Knowsley, Liverpool, Sefton, St.Helens and Wirral).
- 4.56 Members of the Authority have a responsibility to the whole community of Merseyside and are directly accountable to the people of Merseyside for the running of the Fire and Rescue Service. Members work closely with Officers (the staff employed by the Authority) to develop policies, plans and strategies to give direction to the Service and to ensure that services are delivered in line with the Authority's objectives.
- 4.57 There are currently three fire stations located within the Borough, St.Helens (Parr), Eccleston and Newton-le-Willows. There are plans to replace the two fire stations in St.Helens and Eccleston with a larger new facility within the Town Centre.
- 4.58 The Council has not been made aware through consultation with the Merseyside Fire and Rescue Service of any requirement for new or enhanced fire station capacity covering St. Helens as a result of the development proposed in the emerging Local Plan.

### **North West Ambulance Service**

- 4.59 The North West Ambulance Service NHS Trust provides a 24 hours a day, 365 days a year emergency service to those people in need of emergency medical treatment. It also provides a non-emergency Patient Transport Service.
- 4.60 There are two Ambulance Stations in the Borough, located at Newton-le-Willows and St.Helens Town Centre. The Council has not been made aware of any issues in relation to coverage of ambulance stations in St.Helens through discussions with the NHS and it is not expected that the level of growth set out in the Local Plan will require additional stations to be provided.
- 4.61 It is anticipated that further information on the infrastructure requirements of emergency service providers will be provided as the Local Plan progresses.



## Community and Leisure Services

### Libraries

- 4.62 St.Helens Council currently, following a recent restructure, runs 12 libraries. These are located at Billinge; Bold; Eccleston; Garswood; Haydock; Moss Bank; Newton-le-Willows; Parr; Peter Street (Town centre); Rainford; Rainhill and Thatto Heath. Whilst the Central Library located within the Gamble Institute is currently closed, it still houses the Local History and Archive Catalogue, which can be accessed by appointment only.
- 4.63 The Borough's libraries offer a varied number of services, including:
- Free book, comic and magazine loans, digital and hardcopies;
  - CD & DVD for hire;
  - Reading groups for adults, teenagers and children;
  - Story and rhyme time sessions for pre-school children;
  - Homework clubs (with staff on hand to direct homework queries using a host of books and on-line resources);
  - Free public access to the internet;
  - Adult and community learning courses;
  - Cultural hubs (from art displays to mini theatre productions); and
  - Home delivery service.
- 4.64 The library service now offers a variety of 24 hours online services including a mobile phone app, self-service bookings, and account management.

### Leisure/Sports Centres

- 4.65 The St.Helens Indoor and Built Sports Facilities Needs Assessment, Playing Pitch Strategy Assessment and Action Plan and the Open Spaces Study Assessment (OSSRA) were all completed in 2016 and form the principal sources of evidence concerning needs for sports and other leisure facilities in the Borough.
- 4.66 Rugby league is a major participation and spectator sport for St.Helens and as such has a significant presence. Football, rugby league, and rugby union (both senior and junior) continue to be the main pitch sports in the Borough. There is also a growing interest in hockey, and the Prescot Hockey Club re-located to St.Helens four years ago.
- 4.67 There are a growing number of junior football teams in the Borough and there is a move toward having a more centralised league with multiple teams based on one large site rather than the traditional home and away set up of many small playing fields.
- 4.68 Cricket is represented by eight clubs, which is considered significant for a Borough the size of St.Helens.



- 4.69 Given the mix of rural and urban wards in the Borough, there is also a complex mix of site ownership and management. For example, there are seven Parish Councils in the Borough, three of which (Rainhill, Eccleston and Garswood) own and manage playing pitch facilities.
- 4.70 The Play Pitch Assessment identified a number of issues over a broad range of sports, the findings of which have been summarised in Appendix A. The OSSRA documents can be accessed and downloaded via the Council website.
- 4.71 Linked to the proposed allocation of Eccleston Park Golf Club in the LPPO (site ref: HA8) for housing, the Council carried out a Golf Course Addendum to the Indoor and Built Sports Facilities Needs Assessment. This concluded that there did not appear to be any unmet demand for golf participation across the Borough, with capacity available at nearly all of the golf courses within the area, even with the projected increase in population. The sport is in decline with fewer people seeking to play golf in a golf club environment. Since 2007 participation has fallen by 158,000 placing a financial strain on many clubs. However, Sport England has confirmed that insufficient evidence exists at present to justify the loss of the golf course. This site is now identified in the LPSP as a safeguarded site for possible housing allocation after 2035, rather than as a site allocation for development before then as previously proposed.
- 4.72 Of all the local authorities in Merseyside, St.Helens has the second lowest number of sports halls and sports courts per head of population. The Indoor and Built Sports Facilities Needs Assessment identified that of the total population of St.Helens 94.4% of demand was being met, of which 71% was being met by existing facilities in St.Helens.
- 4.73 A summary of facilities available in 2014 identified 19 sports halls on 15 sites across the Borough. There are four Council run leisure centres across St.Helens offering a range of facilities as shown in Table 4 (below):

**Table 4: Leisure Centre facilities**

	Queens Park Health & Fitness	Selwyn Jones Sports Centre	Sutton Leisure Centre	Parr Swimming & Fitness Centre
Swimming Pool	✓	✓		✓
Outdoor Pitch	✓	✓	✓	
4 Courts Sports Hall	✓	✓	✓	
Gym (fitness suite)	✓	✓		✓
Therapy Room	✓			
Athletics Track			✓	
Squash Courts			✓	

- 4.74 The leisure centres are mostly located in the Borough's larger more densely populated wards. This allows a large proportion of the population to easily access a centre by a choice of transport, including walking and cycling. The centres are also close to public transport.





- 4.75 In addition to the Council-run leisure centres there are also a number of privately run centres that have similar amenities but with only one offering swimming facilities. Many of the secondary schools offer leisure classes and outdoor pitch provision for community groups outside of school hours.

### **Cemeteries**

- 4.76 Cemeteries and churchyards are important resources, offering both recreational and conservation benefits. As well as providing burial space, cemeteries and churchyards can also offer important low impact recreational benefits (e.g. dog walking, wildlife watching) and quiet places for contemplation.
- 4.77 The Borough of St.Helens contains 19 sites classified as cemeteries, with a combined area of 48 hectares (ha). St.Helens Council is responsible for the management and maintenance of two cemeteries, namely St.Helens Cemetery and Crematorium and Newton-le-Willows Cemetery. The Council also maintains Emanuel Church and St Ann's Church Ground, which are both closed sites that no longer provide any new burial provision. All other churchyards in St.Helens are maintained by the churches themselves.
- 4.78 The Bereavement Services department of St.Helens Council has indicated that remaining capacity is sufficient to meet needs over a period of about 15 years at Newton Cemetery and 25 years at St.Helens Cemetery. St.Helens Cemetery and Crematorium has recently had a new extension. The figures suggest that Newton-le-Willows Cemetery will be full for Cremation plots in 2033 and full for full depth burial plots in 2029. Based on the current rate of usage St.Helens Cemetery would become full in 2043. Whilst the wards of West Park and Thatto Heath wards have no cemetery provision, there is otherwise a fairly even distribution of provision across the Borough.
- 4.79 Having regard to these figures, it is considered that there is sufficient burial capacity to meet needs over much of the Plan period. However, there is a need to monitor demand and capacity so that any resultant need for additional burial provision may be addressed as the Plan period progresses.



## 5. ENVIRONMENTAL INFRASTRUCTURE

### Green Infrastructure

- 5.1 Green Infrastructure in St.Helens comprises a network of multi-functional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside areas, which are shown on the Key Ward Diagrams in Appendix C. It provides a range of benefits including space for recreation, improved air quality, natural flood management and wildlife habitat.
- 5.2 At a strategic level, four key initiatives drive the Green Infrastructure agenda in St.Helens, namely the Mersey Forest, The Town in the Forest, the Bold Forest Park Area Action Plan, and the Sankey Catchment Action Plan.

#### The Mersey Forest

- 5.3 The Council is a longstanding partner in the Mersey Forest, which was established in 1991 with a vision to “get more from trees” to help make Merseyside and North Cheshire one of the best places in the country to live. Since then woodland cover has doubled, from 4% to 8%, at a rate of three times the England average. The maturing woodland, including the former colliery sites now collectively known as Bold Forest Park, provides a recreation resource for much of the borough and neighbouring areas. The Mersey Forest Plan is a long term and strategic guide to the work of the Forest and its partners.

#### The Town in the Forest

- 5.4 The Town in the Forest initiative is a partnership between the Council and the Mersey Forest which aims to deliver key outputs of the Government-backed Northern Forest in St.Helens. It aims to create a strong woodland framework for the Borough through an extensive tree-planting programme which will balance the impacts of growth.

#### Bold Forest Park Area Action Plan

- 5.5 Bold Forest Park Area Action Plan (adopted in 2017) is a statutory development plan document that aims to develop the Bold area in the south of the Borough into an outdoor recreation destination which will drive inward investment through the visitor economy. Partners in this project include The Mersey Forest, The Forestry Commission and Bold Parish Council.

#### The Sankey Valley Catchment Action Plan

- 5.6 The Sankey Catchment Partnership consists of a number of local authorities and Lead Local Flood Authorities, The Environment Agency, The Mersey Forest, UU and the Healthy Rivers Trust.



- 5.7 The Sankey Catchment Action Plan aims to reduce flooding, improve river water quality and enhance the habitat for water dependent wildlife. It also underpins a strategic project to develop the 15-mile long Sankey Canal Corridor as a “Cultural Corridor” highlighting the heritage of the industrial landscape. The project is being developed in partnership with Halton and Warrington Councils, The Canal and Rivers Trust and Sankey Canal Restoration Society.

### Emerging Local Plan Green Infrastructure policies

- 5.8 Policy **LPA09: Green Infrastructure** and other relevant policies in the emerging Local Plan seek to protect Green Infrastructure from undue harm from development, and ensure that new development, where justified, supports the delivery of Green Infrastructure projects. Key green spaces are identified on the **Policies Map**.
- 5.9 **Policy LPC05: Open Space**, seeks to ensure the protection and management of the Borough’s existing open spaces in the most effective way by supporting the implementation of programmes and strategies that manage and enhance open spaces and resist development proposals that would result in the unjustified loss of open space. It also sets standards of provision for different types of open space. Appendix C identifies all the designated open spaces on a ward by ward basis.
- 5.10 Policy **LPD03: Open Space and Residential Development**, requires proposals for new residential development of 40 dwellings or more to (where justified) make provision for open space, or the enhancement or expansion of existing open space. The Council intends to work pro-actively with developers and other stakeholders to determine the most appropriate means of ensuring new residential developments are adequately served by open space.

### Green-space typologies

- 5.11 The St Helens Council Open Spaces Assessment Report 2016 forms part of the wider suite of OSSRA documents and identifies 286 open space sites covering a total of over 1,004ha in area in St. Helens Borough. These are split into the following typologies: natural and semi natural green space; amenity green space; children and young people’s provision; parks and gardens; and allotments. The Assessment concluded that most of the open spaces provision was of high value. The OSSRA documents can be viewed and downloaded from the Council’s website.

### Natural and Semi-Natural Greenspace

- 5.12 Natural and Semi-Natural Green space includes trees and woodlands, scrub, grasslands and wetlands. The emerging Local Plan seeks to recognise, protect and enhance these key assets. They provide key wildlife habitats and corridors and in some cases form important recreational resources. Some sites are formally designated for their wildlife or geological interest (see separate section below).



### Amenity Greenspace

- 5.13 The Open Space Assessment 2016 identified 87 amenity green space sites across the Borough with a total area of 164.83 ha. The highest provision (63.76 ha) was in the Parr, Sutton and Bold area. It identified that the quality of provision was good in overall terms.

### Children and young people

- 5.14 The Open Space Assessment identified a total of 74 sites across the Borough that had play provision for children and young people, with a high proportion of the Local Equipped area for Play (LEAP) sized play areas being of a high quality. Proportionally Eccleston, Windle, Earlestown, Newton and Rainford wards had the highest amount of provision per 1,000 residents. However, some gaps in provision existed in the West Park and Thatto Heath wards, and a number of wards lacked play provision mostly for older age ranges.

### Parks and Gardens

- 5.15 16 sites are classified as parks and gardens across the Borough, covering a total of 135ha. The OSSRA identified that three wards (Blackbrook, Haydock and Rainford) had no formal parks and gardens provision. However, these areas are served by other types of open space which, whilst not comprising 'parks' provision, offered access to similar recreational activities to those typically provided by parks.
- 5.16 The largest park in St.Helens is Sherdley Park which is located in the West Park and Thatto Heath analysis area and provides access to a wide range of uses and benefits. Other large parks include Taylor Park (19ha) and Victoria Park (13.6ha).

### Allotments

- 5.17 There are 18 allotment sites across St.Helens. There are 12 Council managed allotment sites, three self-managed allotment sites and three private allotment sites.
- 5.18 There is a significantly uneven distribution of allotments across the Borough. Large areas such as Parr, Sutton and Newton-le-Willows have good access to allotments but many wards do not have easy access to any allotments, with only one self-managed and two private allotments sited in the north of the Borough.
- 5.19 There are currently a limited number of vacant plots, with a waiting list for all the sites (nine of which have large numbers of 10 or more). An additional 213 plots have been created since January 2015 by splitting some of the larger plots in half. The waiting list in 2015 was 607, and the current waiting list is 301 (minus self-managed sites).
- 5.20 There is scope to provide additional allotments through the provision of public open space as required by Policy **LPC05: Open Space** of the emerging Local





Plan. The length of the waiting lists in some areas suggests that there is a need for additional plots to be provided in the future as and when opportunities arise.

### Greenways

- 5.21 The Borough of St Helens contains several greenways which can provide off-road routes as part of the Borough's network of footpaths, cycle and bridleways, and a range of other social and environmental benefits. Policy **LPC07: Greenways** of the emerging Local Plan seeks to protect and where justified extend the strategic network of greenways (shown on the **Policies Map**). Potential funding sources for measures to enhance the greenway network include the Local Growth Fund (via the Sustainable Transport Enhancement Package (STEP)) to be supplemented where appropriate by developer contributions obtained via Section agreements.

### Designated wildlife sites

- 5.22 St.Helens currently has:
- Two Sites of Specific Scientific Interest (SSSI);
  - Seven Local Nature Reserves (LNR);
  - 11 Local Geology Sites (LGS); and
  - 122 Local Wildlife Sites (LWS).
- 5.23 The Council works pro-actively with partner organisations to manage, restore and enhance natural and semi natural greenspace. This approach includes the pooling of resources and the use where justified of funds received under Section 106 agreements with developers. As examples of what can be achieved, the Forever Meadows and Plan Bee projects (undertaken in partnership with the Wildlife Trust for Lancashire, Greater Manchester and North Merseyside) have allowed important Local Wildlife Sites to be cost-effectively managed for a modest capital outlay. Section 106 funding has been used on a number of other projects, undertaken in partnership with the Mersey Forest, to provide match funding and thereby in effect double the benefit of funding from other sources.

### Maintenance of open spaces

- 5.24 A key requirement is to ensure that open space provision is adequately maintained. The Council manages much of the current open space provision, undertaking grass cutting, weeding and general site preservation (e.g. bin emptying, bench refurbishment and path checks). Many sites receive a visit every two weeks. At sites containing play equipment this is more frequent.



## 6. INFRASTRUCTURE FUNDING

- 6.1 Infrastructure requirements are likely to be funded by a variety of different mechanisms that will vary over the Local Plan period. Whilst in some cases funding is likely to be provided by infrastructure providers themselves, in other cases statutory planning powers will be used to secure contributions from developers. Potential sources of funding are set out in table 5 below.

**Table 5: Potential funding sources for infrastructure provision**

### Section 106 obligations

Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended) often take the form of agreements made between the Council and the developer. They can be used to enable planning permission to be granted for development proposals that would otherwise be unacceptable in planning terms and are focused on addressing the specific impacts of individual development proposals.

All planning obligations must meet the statutory tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended). These are that the obligation is:

- a. necessary to make the development acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development.

The Regulations set a limit on the use of 'pooled' contributions, under which no piece of infrastructure can be funded by more than five separate Section 106 obligations made since April 2015. National planning policy states that contributions should not be sought from developments of 10 dwellings or less and which have a maximum combined floor-space of no more than 1,000 square metres.

Despite these limitations, there are likely to be many circumstances where developers can justifiably be requested to enter into Section 106 obligations. In addition to enabling necessary infrastructure to be provided (within the constraints set out above) Section 106 obligations can also be used to secure the provision of (or contributions towards the provision of) affordable housing.

### Agreements under the Highways Act 1980

Sections 38 and 278 of the Highways Act 1980 provide discretionary powers for a highway authority (such as St. Helens Council) to enter into an agreement with a developer to adopt a new highway or improve an existing highway.



## Planning conditions

Conditions set out within a planning permission provide an important mechanism for providing essential on-site design requirements and critical infrastructure within the site.

National planning policy requires all planning conditions to be: necessary; relevant to planning and to the development to be permitted; enforceable; precise; and reasonable in all other respects.

## Other funding sources

Other potential sources of funding over the Local Plan period include: the funding programmes of public and private sector infrastructure providers; the Government's Regional Growth Fund; the Liverpool City Region Single Investment Fund (SIF); National Lottery funding; and other sources specific to individual infrastructure types.

## Community Infrastructure Levy (CIL)

A Community Infrastructure Levy (CIL) is a fixed schedule of charges that the Council can decide to introduce through powers in the planning legislation in order to help fund new infrastructure. Any proposed CIL charging schedule can only be introduced following statutory consultation and if it is found to be 'sound' by a Government Inspector. The Council has no current proposals to introduce a CIL charging regime in St Helens.



## 7. INFRASTRUCTURE DELIVERY SCHEDULE

Infrastructure category	Project	Need for project (policy link)	Lead	Partners	Estimated Cost	Anticipated Funding Source	Additional funding required	Timeframe	Notes
Highways	Parkside Link Road, Newton-le-Willows	To improve capacity to support the delivery of employment development at Parkside	St.Helens Council	St.Helens Council, LCR, HE, Warrington Council	Circa. £40m	LCR, private developer, St.Helens Council	TBC	To be completed within the Plan period	LCR Combined Authority conditionally agreed to provide ca £23.8 million funding (October 2018) £9 million is expected from Joint Venture group The remaining £7.2 million would be from St.Helens Council
Highways	Windle Island Junction Improvements	To improve capacity	St.Helens Council	LCR	£7,247,000	St.Helens Council, LCR	TBC	2018 - 19	On-site
Highways	A570 Southern Corridor Improvements	To improve capacity	St.Helens Council	Merseytravel	£5,500,000	St.Helens Council, LCR	TBC	To be completed within the Plan period	On-site
Highways	A58/A580 Junction Improvement	To improve capacity	St.Helens Council	LCR	£2,677,500	St.Helens Council, LCR, Developer Contributions	TBC	2019-2020	
Highways	The M6 (junction 23 improvements)	To improve capacity	Highways England	St.Helens Council, LCR	>£50m	Highways England	TBC	To be completed within the Plan period	A project of region-wide strategic significance. A study is currently on-going which is funded by the LCR SIF fund and involves St Helens and Wigan Councils and Highways England. The study aims to identify options for how the junction could be reconfigured.
Highways	The M62 - junction improvements	To improve capacity	Highways England	St.Helens Council, LCR	£10 - £50m	Highways England	TBC	To be completed within the Plan	





Infrastructure category	Project	Need for project (policy link)	Lead	Partners	Estimated Cost	Anticipated Funding Source	Additional funding required	Timeframe	Notes
								period	
Various Transport	Town Centre Movement Strategy (Includes Active Travel, Bus Capacity upgrades, Rail Station enhancement, Parking provision and vehicle movement improvements)	To improve capacity, encourage sustainable travel, support wider town centre regeneration and improve local and regional movements	St.Helens Council	Merseytravel, LCR, Network Rail, Bus operators, and neighbouring authorities	>£50m	Various	TBC	Continuous	A Combination of Various schemes
Various Transport	Southern Gateway (Lea Green Interchange)	To improve capacity and promote sustainable travel options	St.Helens Council	Network Rail, Merseytravel LCR	£10 - £50m	LCR, private developer, St.Helens Council	TBC	To be completed within the Plan period	
Rail	New Railway Station at Carr Mill	To improve capacity and promote sustainable travel options	St.Helens Council	Network Rail, LCR	£10 - £50m	Merseytravel, National Rail, Developer Contributions	TBC	TBC	
Rail	St.Helens Central to Junction Link	Reopening disused line with potential to relocate St.Helens Central to offer Liverpool-St.Helens Central service-Manchester.	St.Helens Council	Network Rail, LCR	>£50m	Network Rail/TfN	TBC	TBC	Wider capacity improvements needed on North West Rail Network before option viable
Rail	Parkside Rail Connection	New rail link into employment site	St.Helens Council	Merseytravel	£39m	Network Rail/TfN	TBC	2024-34	Feasibility Funding secured
Cycling	Adopt and deliver Active Local Cycling and Walking Plans	To provide networks for active modes of transport	St.Helens Council	Landowners, Developers	TBC	TBC	TBC	Continuous	Various schemes on site via Transport Plan for Growth via STEP funding
Footpaths	Public Rights of way creation and enhancement	To improve health and wellbeing and promote sustainable modes of	St.Helens Council	Possibly LCR	TBC	TBC	TBC	Continuous	



Infrastructure category	Project	Need for project (policy link)	Lead	Partners	Estimated Cost	Anticipated Funding Source	Additional funding required	Timeframe	Notes
		transport							
<b>Education</b>	Additional secondary school places - through the expansion of existing schools	To accommodate additional pupils to the Borough	St.Helens Council	N/A	Access Linking Schools	St.Helens Council (and s106 contributions if statutory tests are met)	TBC	To be completed within the Plan period	Costs will be identified in line with the latest National School Delivery Cost Benchmarking document
<b>Education</b>	Additional primary school places in Bold	To accommodate additional pupils to the Borough	St.Helens Council	N/A		St.Helens Council (and s106 contributions if statutory tests are met)	TBC	To be completed within the Plan period	Costs will be identified in line with the latest National School Delivery Cost Benchmarking document
<b>Healthcare</b>	Potential new health care facility in Parr, Sutton and Bold	To ensure adequate health services and facilities for new residents and new models of care	St.Helens CCG	St.Helens Council	TBC	NHS	TBC	To be completed within the Plan period	
<b>Healthcare</b>	Expansion of health facilities in other locations as necessary	To ensure adequate health services and facilities for new residents and new models of care	St.Helens CCG	St.Helens Council	TBC	NHS	TBC	To be completed within the Plan period	
<b>Telecoms</b>	Improvements to the mobile phone network as required	As required	Mobile phone operators	Not known	TBC	TBC	TBC	Continuous	
<b>Telecoms</b>	Improvements to the broadband network as required	As required	Broadband providers	Not known	TBC	TBC	TBC	Continuous	
<b>Energy</b>	Improvements to the gas supply network may be required to support new development	As required	National Grid/Cadent	Not known	TBC	National Grid	TBC	Continuous	



Infrastructure category	Project	Need for project (policy link)	Lead	Partners	Estimated Cost	Anticipated Funding Source	Additional funding required	Timeframe	Notes
<b>Energy</b>	Improvements to the electricity supply network may be required to support new development	As required	Electricity Northwest	Not known	TBC	Electricity Northwest	TBC	Continuous	
<b>Water</b>	The creation of a new underground service reservoir.	To increase water storage for the area	United Utilities	Not known	Not known	United Utilities	Not known	Completed by 2018	The new service reservoir will have greater storage capacity and will serve over 60,000 homes in the area.
<b>Water and Wastewater</b>	Upgrades to water supply and waste water treatment systems to support new development	As required	United Utilities	TBC	TBC	United Utilities	TBC	Continuous	
<b>Emergency Services</b>	Improvements and alterations to the ambulance service network may be required in response to changing patterns of demand	As required	North West Ambulance Service	N/A	TBC	TBC	TBC	Continuous	
<b>Emergency Services</b>	Improvements and alterations to the police service network may be required in response to changing patterns of demand	As required	Merseyside Police Service	N/A	TBC	TBC	TBC	Continuous	
<b>Emergency Services</b>	Improvements and alterations to the fire service network may be required in	As required	Merseyside Fire and Rescue Service	N/A	TBC	TBC	TBC	Continuous	



Infrastructure category	Project	Need for project (policy link)	Lead	Partners	Estimated Cost	Anticipated Funding Source	Additional funding required	Timeframe	Notes
	response to changing patterns of demand								
<b>Green Infrastructure</b>	Town in the Forest Initiative	To expand woodland coverage around the town	Mersey Forest	St.Helens Council, Mersey Forest	TBC	TBC (S106 funding where statutory tests met)	TBC	On-going	
<b>Green Infrastructure</b>	Sankey Catchment Action Plan	To reduce flooding, improve river water quality and enhance water dependent wildlife	The Sankey Catchment Partnership	Neighbouring Local Authorities, Lead Local Flood Authorities, Environment Agency, Mersey Forest, United Utilities, Healthy Rivers trust	TBC	TBC (S106 funding where statutory tests met)	TBC	On-going	
<b>Green Infrastructure</b>	Bold Forest Action Plan	To implement the Bold Forest Action Plan	St.Helens Council	N/A	TBC	TBC (S106 funding where statutory tests met)	TBC	On-going	
<b>Green Infrastructure</b>	Allotment provision	To improve access and availability	St.Helens Council			TBC (S106 funding where statutory tests met)		Continuous	
<b>Green Infrastructure</b>	New parking facilities at Sutton Manor	To implement the Bold Forest Action Plan	St.Helens Council	N/A	TBC	TBC (S106 funding where statutory tests met)	TBC	To be completed within the Plan period	





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## APPENDIX A: GLOSSARY

Accessibility	Consideration of sites based on how accessible a site is by sustainable modes of transport to key services; Food, Retail, Health, Employment & Education.
Affordable Housing	Meets all the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
Asset Management Programme (AMP)	A tactical plan for managing an organisation's infrastructure and other assets to deliver an agreed standard of service.
Atlantic Gateway	A long term vision agreed by the Liverpool City Region, Greater Manchester and Cheshire & Warrington Local Enterprise Partnerships (LEP) which focuses upon the co-ordination of LEP activities relating to infrastructure and high growth sectors.
Building Cost Information Service (BCIS)	The Building Cost Information Service (of the Royal Institute of Chartered Surveyors) provides cost and price information to the construction industry.
Bulge class	A 'one off' expansion of a school which is normally only in place for a year.
Capital	The budget that funds acquisition of a fixed asset.
Clinical Commissioning Group (CCG)	A body which commissions most of the hospital and community NHS services in the local areas for which they are responsible. Commissioning involves deciding what services are needed for diverse local populations, and ensuring that they are provided.
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy (the 'levy') is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area. The introduction of a CIL charging schedule is subject to various requirements, including consideration of its impact on development viability. The Council currently has no proposals to introduce a CIL charging schedule in St Helens.
Community Safety Partnership (CSP)	CSPs are made up of representatives from the police, local authorities, fire and rescue authorities, health and probation services (the 'responsible authorities'). The responsible authorities work together to protect their local communities from crime and to help people feel safe.
Department for	A Government department that is responsible for children's services and



Education (DfE)	education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
Department for Transport (DfT)	A Government department that works to plan support and invest in the UK transport network.
Development Plan Document (DPD)	A spatial planning document that sets out policies and proposals for development and use of land and buildings within a specified area. Part of the Local Development Framework (LDF).
Dig Once	A principle whereby developers are encouraged to install fibre duct in the ground during the initial construction of a development so that cabling can be installed at a later date with significantly reduced costs and disruption.
Digital Infrastructure Action Plan (DIAP)	The Digital Infrastructure Action Plan works to map existing infrastructure assets identify opportunities to use the assets effectively and suggest potential operating models. The Plan also sets out specific actions to maximise digital connectivity and drive economic growth.
Environment Agency (EA)	Is a public body with the responsibility for preventing or minimising the effects of pollution on the environment and which issues permits to monitor and control activities that handle or produce waste. They are also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.
Fibre to the Premises (FTTP)	Is a fibre optic cable delivery medium that provides Internet access directly to a user or groups of users from an Internet service provider (ISP).
The Flood & Water Management Act (2010) (FWMA)	An Act to make provision about water, including the management of risks in connection with flooding and coastal erosion.
Flood Zones	The Environment Agency (EA) has devised a set of flood zones for guidance by developers, councils and communities to explain the probability of river and sea flooding. There are 3 flood zones that are assessed against guidance in the NPPF when land is being considered for development. Flood zone 1 and 3 has the lowest and highest probability of flooding respectively.
Gas Distribution Networks (GDNs)	Gas needs to travel through the high pressure transmission system, then through the medium and low pressure distribution networks to reach the consumer.
Highways England (HE)	A statutory body responsible for operating, maintaining and improving England's motorways and major A roads.
Hectare (ha)	A unit of land area equivalent to 10,000 square metres or 0.01 of a square kilometre. One hectare is approximately equal to 2.5 acres.
Home Builders Federation (HBF)	The Home Builders Federation is the representative body of the home building industry in England and Wales.



Infrastructure	Collective term for physical structures, facilities and services needed by the community, for example, buildings, roads, power supplies, affordable housing, health, sports, leisure and educational facilities, village halls, doctor's surgeries, churches and open space.
Lead Local Flood Authority (LLFA)	A body which is responsible for developing, maintaining and applying a strategy for local flood risk management in its area and for maintaining a register of flood risk assets.
Liverpool 2 Initiative	A £400 million investment program to enable a new deep water container terminal to be constructed at the Port of Liverpool.
Liverpool City Region (LCR)	An area covering the local authority areas of Halton, Knowsley, Liverpool, Sefton, St.Helens and Wirral
Liverpool City Region Combined Authority (LCRCA)	A formal body comprising representatives from the six local councils (Halton, Knowsley, Liverpool, Sefton, St.Helens & Wirral) and other partner organisations
Local Equipped Area for Play (LEAP)	An area of open space that is designated and equipped for children of early school age.
Local Enterprise Partnership (LEP)	Voluntary partnerships between local authorities and businesses set up in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within the local area.
Local Full Fibre Networks (LFFN)	Full-fibre networks, also referred to as Fibre to the Premises (FttP) or Fibre to the Home (FttH) consists of fibre optic cables running from the local exchange directly to the premises.
Local Geological Sites	Local Geological Sites (formerly known as Regionally Important Geological Sites – or RIGS) are non-statutory sites that have been identified by local geo-conservation groups as being of importance.
Local Nature Reserves (LNR)	Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. Parish and Town Councils can also declare LNRs but they must have the powers to do so delegated to them by a principal local authority. LNRs are for people and wildlife. They are places with wildlife or geological features that are of special interest locally.
Local Plan Preferred Options (LPPO)	A specific stage of the draft Local Plan.
Local Wildlife Sites (LWS)	Previously known as Sites of Biological Importance (SBI) or Sites of Interest for Nature Conservation (SINC) - are areas which are locally important for the conservation of wildlife. They are identified and selected for the significant habitats and species that they contain.
Lottery funding	A range of projects covering topics such as health, education and the environment etc. can apply for funding from the lottery to support its





	delivery.
Mersey Forest project	A partnership project which aims to create woodlands which bring benefits to people, wildlife and the economy.
MOVA system	A MOVA (Microprocessor Optimised Vehicle Actuation) is a method of controlling the traffic signals based on the presence of vehicles detected on the approach to a signalised junction. It controls one junction at a time rather than looking at traffic flow as a whole.
National Planning Policy Framework (NPPF)	The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
National Transmission System (NTS)	The high pressure gas network which transports gas from the entry terminals to gas distribution networks, or directly to power stations and other large industrial users.
New Homes Bonus	A Government grant provided to local authorities to reflect and motivate housing growth in their areas. An additional payment is available for the provision of affordable homes.
Northern Forest	A Government plan to plant 50 million trees from Liverpool to Hull within a 25year period to create one continuous forest landscape in the North of England.
Northern Hub	A program led by Network Rail that will provide targeted upgrades to rail infrastructure across the north of England to enable improved connectivity between towns and cities. Such improvements are designed to facilitate economic growth.
Northern Powerhouse	A phrase used by the Government to describe its ambition to promote economic growth in the North of England, including in the "Core Cities" of Manchester, Liverpool, Leeds, Sheffield, Hull and Newcastle.
Openreach	A company who provides maintenance and support services to ensure that electronic communication services such as broadband are delivered throughout the UK.
Planning Policy Guidance (PPG)	Guidance produced by the Government setting out national planning policy.
Regional Growth Fund	A Government fund that supports private sector investment projects which stimulates growth in the economy and provides long-term employment opportunities.
Renewable	A natural resource or source of energy not depleted when used.
SCOOT	SCOOT, or Split Cycle Offset Optimisation Technique, is one method of traffic signal control where vehicles are detected as they approach a signalised junction well in advance of the stop line. This detection, from multiple junctions, is fed into a central system, which models the flow of traffic in the area. This minimises unnecessary green phases and allows



	the traffic to flow most efficiently.
Sites of Specific Scientific Interest (SSSI)	A Site of Special Scientific Interest (SSSI) is a conservation designation denoting a protected area in Great Britain.
Strategic Flood Risk Assessment (SFRA)	An SFRA takes into account the impacts of climate change and assesses the impact that land use changes and development in the area will have on flood risk.
Strategic Rail Freight Interchange (SRFI)	A Strategic Rail Freight Interchange (SRFI) is a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems. It has rail-served warehousing and container handling facilities. Rail Freight Interchanges (RFI) enable freight to be transferred between transport modes, thus allowing rail to be used to best effect to undertake the long-haul primary trunk journey, with other modes (usually road) providing the secondary (final delivery) leg of the journey.
Surface Water	Water that collects on the surface of the ground.
Sustainability	The ability to be maintained at a certain rate or level and the avoidance of the depletion of natural resources in order to maintain an ecological balance.
Sustainable Drainage Systems (SuDS)	Approaches to manage surface water that take account of water quantity (flooding), water quality (pollution) biodiversity (wildlife and plants) and amenity.
Sustainable Transport Enhancement Package (STEP)	Sustainable Transport Enhancements Package (STEP) is split into four overarching packages, integral to the LCR Growth Plan and Strategic Economic Plan: Transport Investment for Growth, Sustainable Access to Employment and Opportunity, Transport and Low Carbon Opportunities, Travel for the Visitor Economy. The investment programme is targeted geographically in areas identified by the Growth Plan as Growth Zones that will benefit from investment in businesses, housing and training and employment opportunities over the coming years.
Sustainable Transport Impact Assessment (STIA)	A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.
Town in the Forest Initiative	A partnership between the Council and the Mersey Forest, which aims to deliver the Government-backed Northern Forest in St. Helens



## APPENDIX B: PLAYING PITCH STRATEGY ASSESSMENT SUMMARY

Sport	Findings of the Assessment	Identified Shortfall	Potential Future Delivery
Football (grass pitch)	<p>A total of 134 football pitches are located in the Borough. Of these, 127 are available, at some level, for community use.</p> <p>Approximately 328 teams play on these pitches.</p> <p>Most football pitches available for community use are assessed as being of poor quality (56%) or standard quality (37%), with less than a quarter (7%) assessed as good.</p> <p>There is displaced demand mostly from mini and girls teams accessing central venues in certain leagues. Rainhill Town FC and St.Helens Town FC both export demand due to a reported lack of suitable facilities in the area.</p>	<p>There is current unmet demand of one team at mini level reported by Bleak Hill Rovers JFC.</p> <p>There is a shortfall of youth match sessions at both 9v9 and 11v11 formats to accommodate current and future demand, whilst increases in future demand would cause a shortfall at the mini 5v5 level.</p> <p>If community use is lost at unsecured sites, 20 match equivalents that take place on such pitches would need to be relocated.</p>	<p>The Council has plans to develop Ruskin Drive Sports Ground to include a new 'stadium' pitch on the site, which may be used by St.Helens Town FC amongst other clubs.</p> <p>The SDCFL and SRJAFL are investigating the possibility of amalgamation in order to provide a pathway from youth football into adult teams.</p> <p>There is a total of 29.75 match sessions of actual spare capacity across the Borough, of which 22.25 are on adult pitches. There is one mini 5v5 pitch at Bishop Road Playing Fields available for community use but has no recorded play.</p>
Cricket	<p>In total, there are 10 grass cricket squares and five artificial wickets identified in St.Helens, all of which are in secured community use, accommodating 50 teams</p>	<p>Ancillary facilities are a key issue to several clubs. Changing room and shower provision is poor at Newton Sports Club and Sutton CC. Car</p>	<p>Overplay at Haydock CC is temporary and is not a long term concern. Otherwise, overplay is considered to be minimal and can be absorbed by current</p>



Rugby Union	<p>(26 senior and 24 junior teams).</p> <p>Two squares are assessed as good quality (Sutton CC and Rainhill CC) and eight as standard. No squares are assessed as poor.</p>	<p>parking is a problem at Rainford.</p> <p>Three sites are overplayed, to a total of 15 match sessions at Haydock CC, Rainhill CC and Rainford CC.</p>	<p>quality of provision.</p> <p>Ruskin Drive Sports Ground is the only Council owned site and is underutilised with a significant amount of spare capacity.</p> <p>There is sufficient capacity within St.Helens to accommodate overplay unmet and future demand at the required peak times.</p>
	<p>In total, seven senior rugby union pitches are located across four sites in the Borough, all of which are available for community use. There are no junior or mini pitches.</p> <p>There are four clubs in St.Helens, fielding a total of 31 teams. There are nine senior men's' teams, 12 mini teams and ten junior teams, of which two are girls' teams.</p> <p>All pitches are located at sports club sites, with the exception of Ruskin Drive Sports Ground which is managed by the Council.</p> <p>The majority of pitches are assessed as poor quality. Three pitches are assessed as standard quality and none as good.</p>	<p>Newton-le-Willows RFC highlight the changing facilities at Newton Sports Club as poor quality and a key issue. Changing rooms at Ruskin Drive Sports Ground and Liverpool St.Helens are also poor.</p> <p>There is no spare capacity at any of the four sites with rugby union pitches.</p> <p>Overall there are insufficient pitches in St.Helens to service current and future demand, totalling a future requirement for a further 17.5 match equivalent sessions.</p> <p>A lack of floodlit pitch provision for rugby union (both grass and</p>	<p>Liverpool St.Helens Club is seeking grant funding to make improvements to their changing rooms.</p> <p>The Council has notable plans for the development of the Ruskin Drive Sports Ground site. This would include a new World Rugby Regulation 22 AGP available for training and match play.</p>





Rugby League		AGP) is a key contributing factor to overplay in the Borough. More accessible floodlit pitches would allow for greater distribution of training demand and would help reduce existing levels of overuse.	
	<p>There are 37 dedicated rugby league pitches in the Borough (31 senior, two junior and four primary) across 24 sites. All but four pitches are available for community use.</p> <p>Pitches are generally assessed as standard (54%) or poor (43%) quality. Only one pitch at Cowley Language College Playing Fields is assessed as good.</p>	<p>There is a need for 25.5 match equivalent sessions on senior pitches in St.Helens in order to accommodate overplay and future demand. The main issue is that almost half of rugby league pitches are poor quality, limiting the recommended capacity.</p> <p>There are enough primary pitches to accommodate current demand but a requirement for an additional 3.5 match sessions to cater for anticipated future demand.</p>	<p>Council plans for the development of Ruskin Drive Sports Ground include a new AGP suitable for rugby league training and match play.</p> <p>Clubs generally overuse match pitches and have the attitude that they can be used for training because summer season daylight hours allow. There is also a general reluctance to access AGPs from most clubs which tend to view them as unaffordable.</p>
Hockey	There are five AGPs suitable for competitive hockey within St.Helens, of which there are three sand filled and two sand dressed surfaces. Only Sutton Leisure Centre is currently accommodating	St.Helens is adequately provided for with regards to AGPs suitable for hockey matches at present. However, future demand from Prescott HC (which could result in five	Rainford High Technology College AGP is unavailable at peak hockey times for competitive use (school policy) and the school is in discussion with Rainford Rangers FC about its possible



Artificial Grass Pitches (AGP)	<p>hockey use.</p> <p>Selwyn Jones Sport Centre is rated as good quality and has recently been resurfaced. The remaining four AGPs are assessed as standard quality.</p> <p>Sutton Leisure Centre AGP is over ten years old and is assessed as standard quality. It would normally be considered for resurfacing but Prescott HC reports it to be well maintained.</p>	<p>new teams) would require access to a further pitch for Saturday matches. There is spare capacity for hockey match play at Ruskin Drive Sports Ground and Selwyn Jones Sports Centre; however, this is not ideal for Prescott HC.</p> <p>Generally there is very limited capacity for hockey training in the evenings due to football bookings.</p>	<p>conversion to a 3G surface in the future (circa five years when the carpet needs resurfacing).</p> <p>De La Salle High School is available at weekends between 9am and 3pm but a lack of floodlighting limits use to two or three hockey games per day in winter.</p> <p>Selwyn Jones Sport Centre is available for hockey matches at weekends but is played to capacity midweek by football usage/training.</p> <p>Plans are in place for Ruskin Drive AGP to be resurfaced from sand to 3G.</p>
	<p>There are seven AGPs in St.Helens made up of two 3G surfaces, and five sand based. There is one FA certified 3G pitch at Rainhill High School Media Arts College.</p> <p>Three of the seven pitches in St.Helens are assessed as good quality. Four sites are assessed as standard quality, with no poor quality pitches.</p> <p>In summary, supply and demand analysis (including FPM findings)</p>	<p>The carpet of an AGP usually lasts for approximately 10 years. Pitches at Ruskin Drive Sports Ground and Sutton Leisure Centre are considered to require imminent carpet replacement as both are more than nine years old.</p> <p>The FA estimates that one full size AGP can service 60 teams. On the basis there are 326 teams playing competitive</p>	<p>In the main, availability of provision in the peak period is generally good. Where there is provision on education sites, this is generally made available after school and at weekends.</p> <p>There are plans for the construction of a new World Rugby Reg 22 and FA certified 3G at Ruskin Drive Sports Ground to replace the existing pitch. There is also the possibility that the pitch at Rainford High Technology</p>



Bowling Greens	<p>highlights that St.Helens is currently well served for hockey suitable AGPs but 3G pitches are operating at capacity for football training.</p>	<p>football in St.Helens, there is a recommended need for five full size 3G pitches to cater for football demand, currently there are two (this is based on the assumption all teams would be willing to train and play on AGP rather than grass given the opportunity).</p>	<p>College may be converted to 3G.</p>
	<p>There are 39 bowling greens in St.Helens provided across 34 sites. The majority are located at club sites or pub sites, with ten owned by the Council.</p> <p>Bowling green distribution is not evenly spread throughout St.Helens. The Eccleston &amp; Windle area has nine, representing around a quarter of greens in the Borough. Five of the nine analysis areas have two greens or fewer.</p> <p>The number of greens in St.Helens has decreased in recent years. Eleven greens have been lost, including seven at Council owned sites; Ruskin Drive Sports Ground, Victoria Park and Queens Park Recreation Ground.</p>	<p>There are five greens showing evidence of overplay at Vulcan Sports Ground, Birchley St Mary's Parochial Club, Chancery Lane, St Patricks Social Centre and Eccleston BC.</p> <p>St.Helens is generally well served for bowling greens at present. The key issue facing bowls clubs is the decrease in playing members and sports development factors rather than a lack of accessible facilities.</p>	<p>There are plans for the development of a new green at Vulcan Sports Ground to provide for the loss of the existing green to housing development. However, this will not be sufficient to accommodate the existing overplay.</p> <p>Plans for the Council redevelopment of Ruskin Drive Sports Ground include the resurfacing of the two existing greens and a new shared changing facility.</p>



Tennis	<p>All greens in the Borough are assessed as good (76%) or Average (24%) quality.</p> <p>There is a general perception that the quality and maintenance of privately/club owned and maintained greens are of a better standard than greens at pub sites. This is likely to be due to cost of upkeep or a lack of equipment and knowledge of maintenance.</p> <p>There are 40 clubs using bowling greens in St.Helens. Generally clubs in St.Helens report that membership levels have either remained static or decreased in the last three years due to aging players. Only Vulcan BC cites a planned increase in teams and membership.</p>		
	<p>There are a total of 59 tennis courts provided in St.Helens across 16 sites, three of which provide floodlit courts. Provision can be found on a range of sites including sports clubs and parks. There are 20 courts across Council managed sites.</p> <p>In addition, there are six secondary schools</p>	<p>Of particular concern is the current poor quality of courts at Ruskin Drive Sports Ground which is affecting usage and subsequent membership at Ruskin Park TC.</p> <p>Although there is adequate number of courts in St.Helens, poor quality is restricting access and</p>	<p>There are four tennis clubs located in St.Helens. Rainford TC and Ruskin Park TC suggest they have development plans or aspirations to improve current facilities, including the Council redevelopment of Ruskin Park Sports Ground to provide five or six new tennis courts.</p>





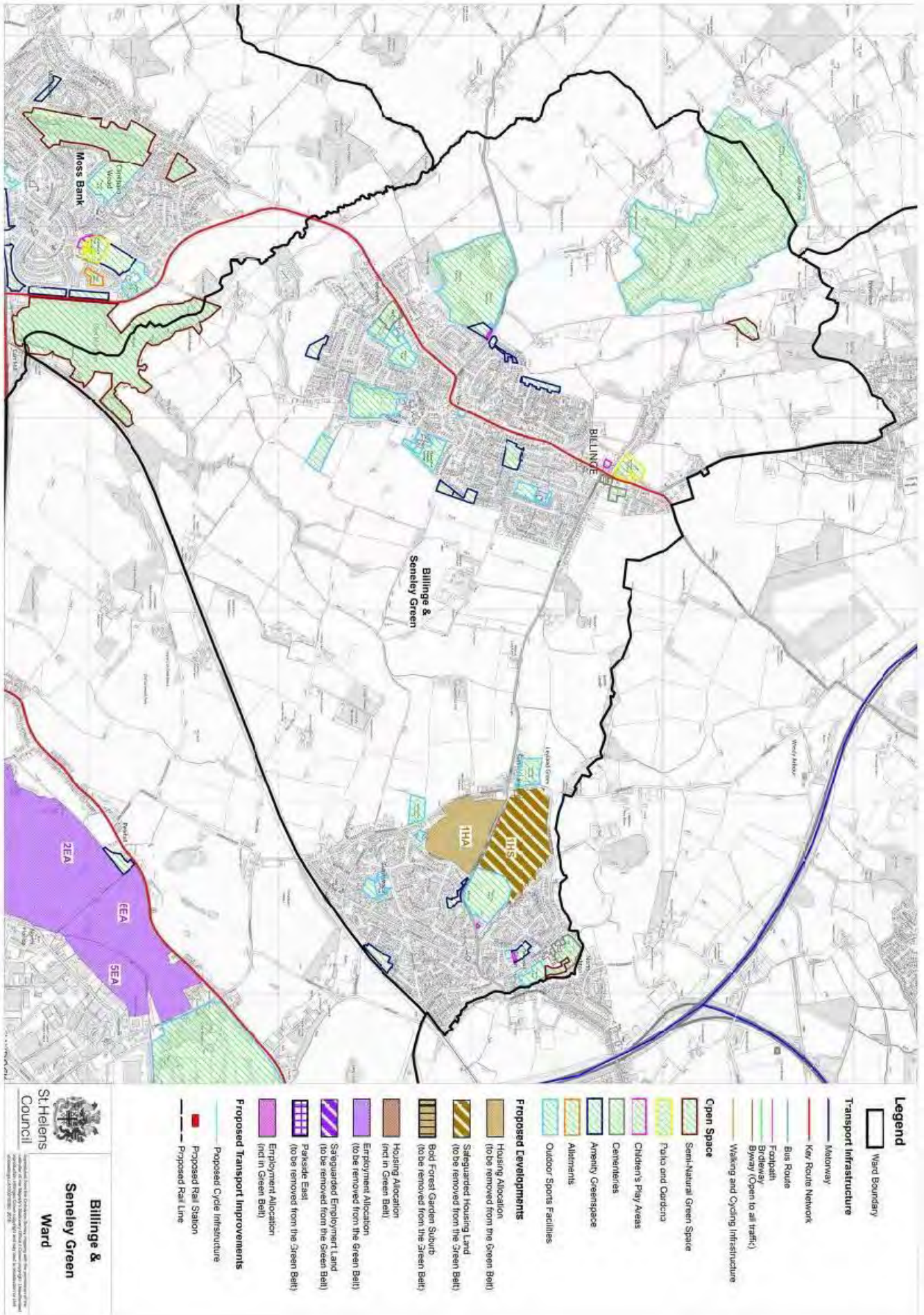
Golf Courses	<p>providing 25 courts, 11 of which are available to the community, located at Hope Academy and Rainford High Technology College.</p> <p>A total of 26 courts (44%) are assessed as good quality and 14 courts (24%) assessed as average quality. The remaining 19 courts (32%) are assessed as poor quality.</p>	<p>is the priority to address. A lack of floodlights also appears to be limiting court usage on some sites.</p>	
	<p>There are eight 18 hole and one 9 hole golf courses in the Borough. These can theoretically accommodate 4,650 adult 7 day / full members.</p> <p>Courses in St.Helens are considered good or very good although the ancillary facilities can vary. Sherdley Park is considered to have the weakest of the ancillary facilities.</p>	<p>The Sport England segmentation data identifies circa 6,596 potential and existing golfers in St.Helens which would indicate an under supply of golf courses in St.Helens (based on assumption all current potential golfers actually took part in the sport). However, only one golf course in the Borough indicated it had a waiting list.</p>	<p>Demand for golf and, in particular, membership of a golf club has fallen significantly over the past decade according to Sport England and England Golf. Consultation undertaken in St.Helens confirms that most clubs in the Borough are following this trend.</p> <p>At the same time as the fall in general membership, there has been a rise in 'Nomads', i.e. golfers who like to play golf but are not interested in affiliating to the NGB, obtaining a CONGU handicap or joining a golf club preferring instead to play a variety of courses, mostly in good weather with friends and family, taking advantage</p>



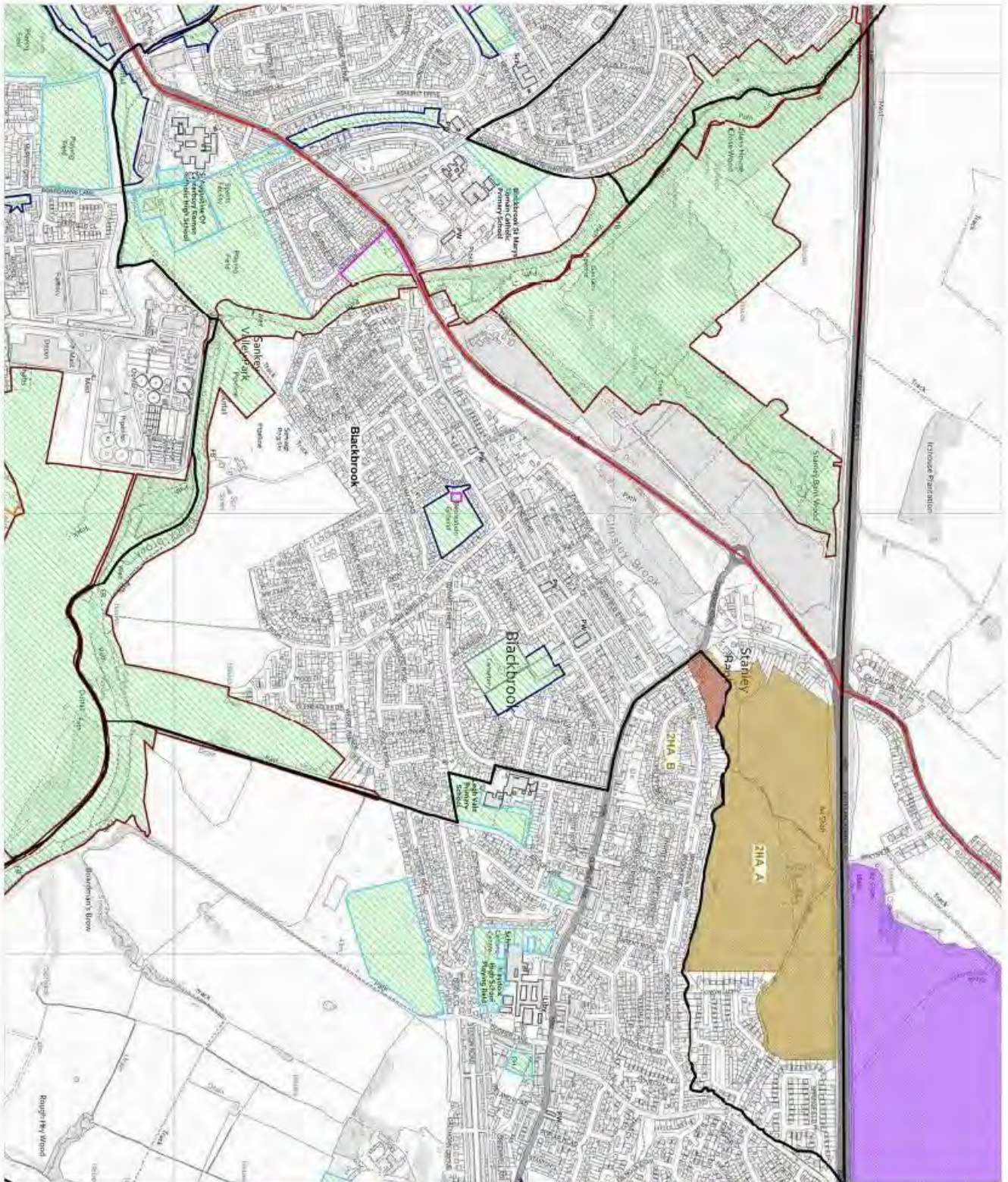
			<p>of offers and discounts to play off-peak.</p> <p>The population in St.Helens is projected to rise by 7.5% by 2037. Given the current spare capacity on golf courses in St.Helens, this rise is unlikely to lead to a rise in the demand for more courses, but rather current courses will be able to accommodate it.</p>
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## APPENDIX C: WARD KEY DIAGRAMS







#### Legend

Ward Boundary

#### Transport Infrastructure

- Motorway
- Key Route Network
- Bus Route
- Footpath
- Bridleway
- Bway (Open to all traffic)
- Walking and Cycling Infrastructure

#### Open Space

- Semi-Natural Green Space
- Parks and Gardens
- Children's Play Areas
- Cemeteries
- Amenity Greenspace
- Allotments
- Outdoor Sports Facilities

#### Proposed Developments

- Housing Allocation (to be removed from the Green Belt)
- Sequestered Housing Land (to be removed from the Green Belt)
- Bod Forest Garden Suburb (to be removed from the Green Belt)
- Housing Allocation (not in Green Belt)

- Employment Allocation (to be removed from the Green Belt)
- Sequestered Employment Land (to be removed from the Green Belt)
- Parkside East (to be removed from the Green Belt)
- Employment Allocation (not in Green Belt)

#### Proposed Transport Improvements

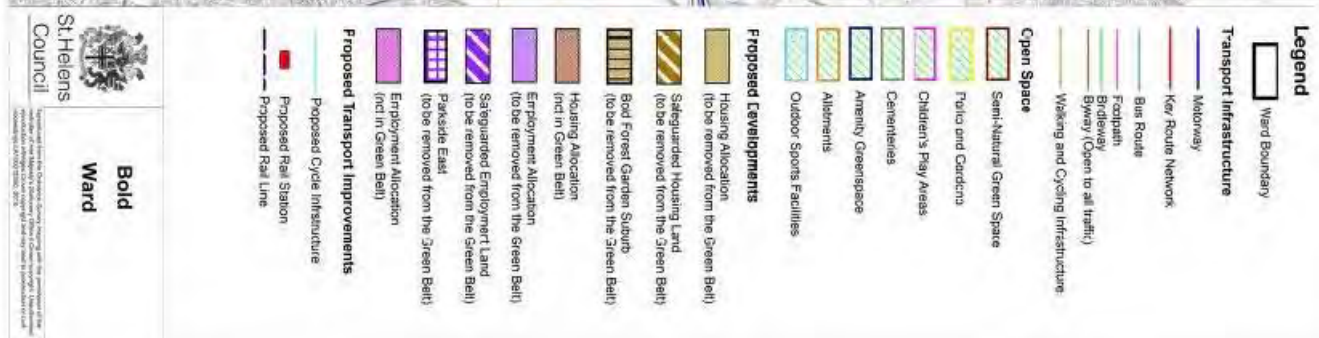
- Proposed Cycle Infrastructure
- Proposed Rail Station
- Proposed Rail Line



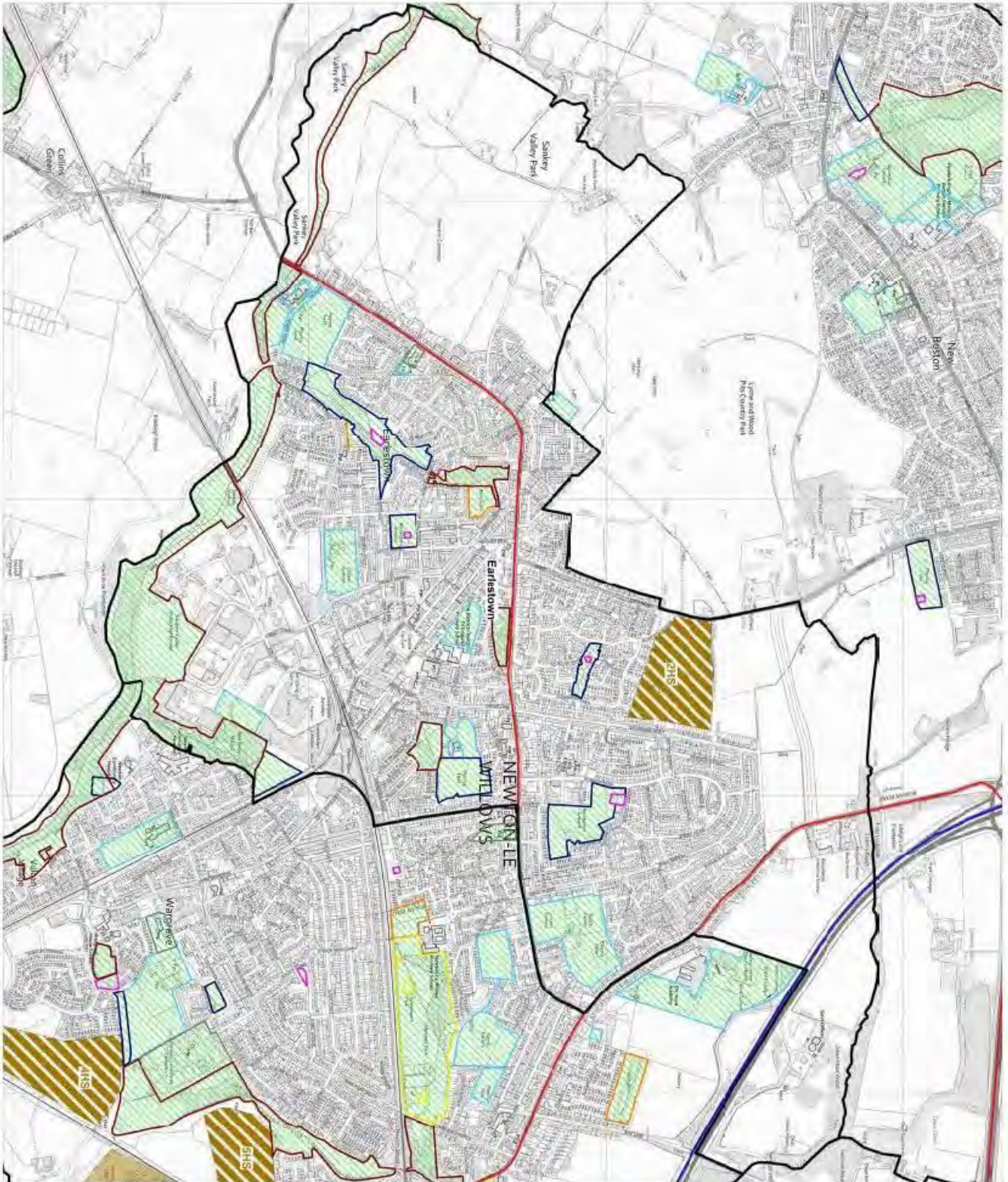
St. Helens Council

**Blackbrook Ward**









#### Legend

Ward Boundary

#### Transport Infrastructure

Motorway

Key Route Network

Bus Route

Footpath

Bridleway

Bypass (Open to all traffic)

Walking and Cycling Infrastructure

#### Open Space

Semi-Natural Green Space

Parks and Gardens

Children's Play Areas

Cemeteries

Amenity Greenspace

Alleys

Outdoor Sports Facilities

#### Proposed Developments

Housing Allocation

Safeguarded Housing Land

Bad Forest Garden Suburb

Housing Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

Employment Allocation

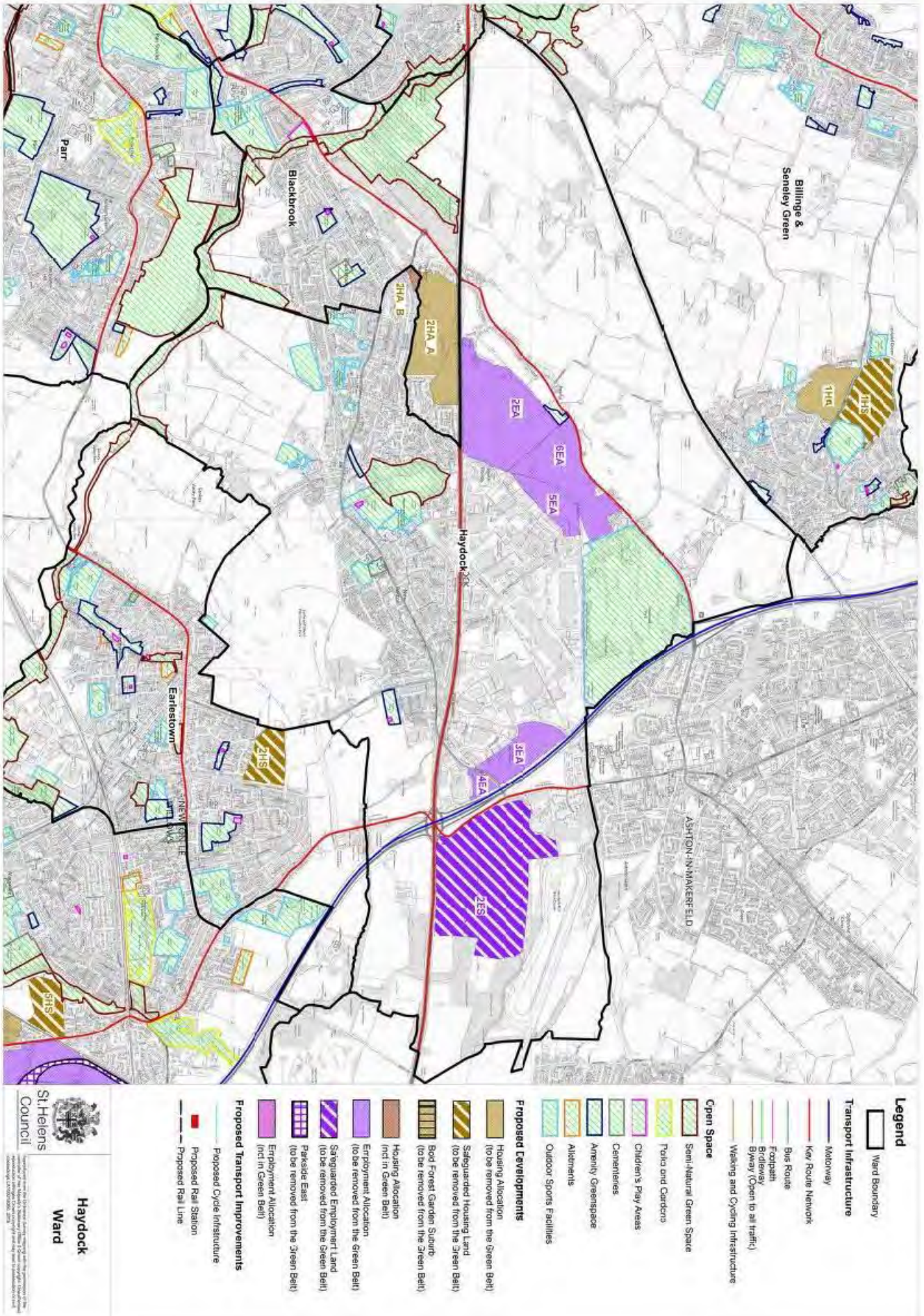
Employment Allocation

Employment Allocation

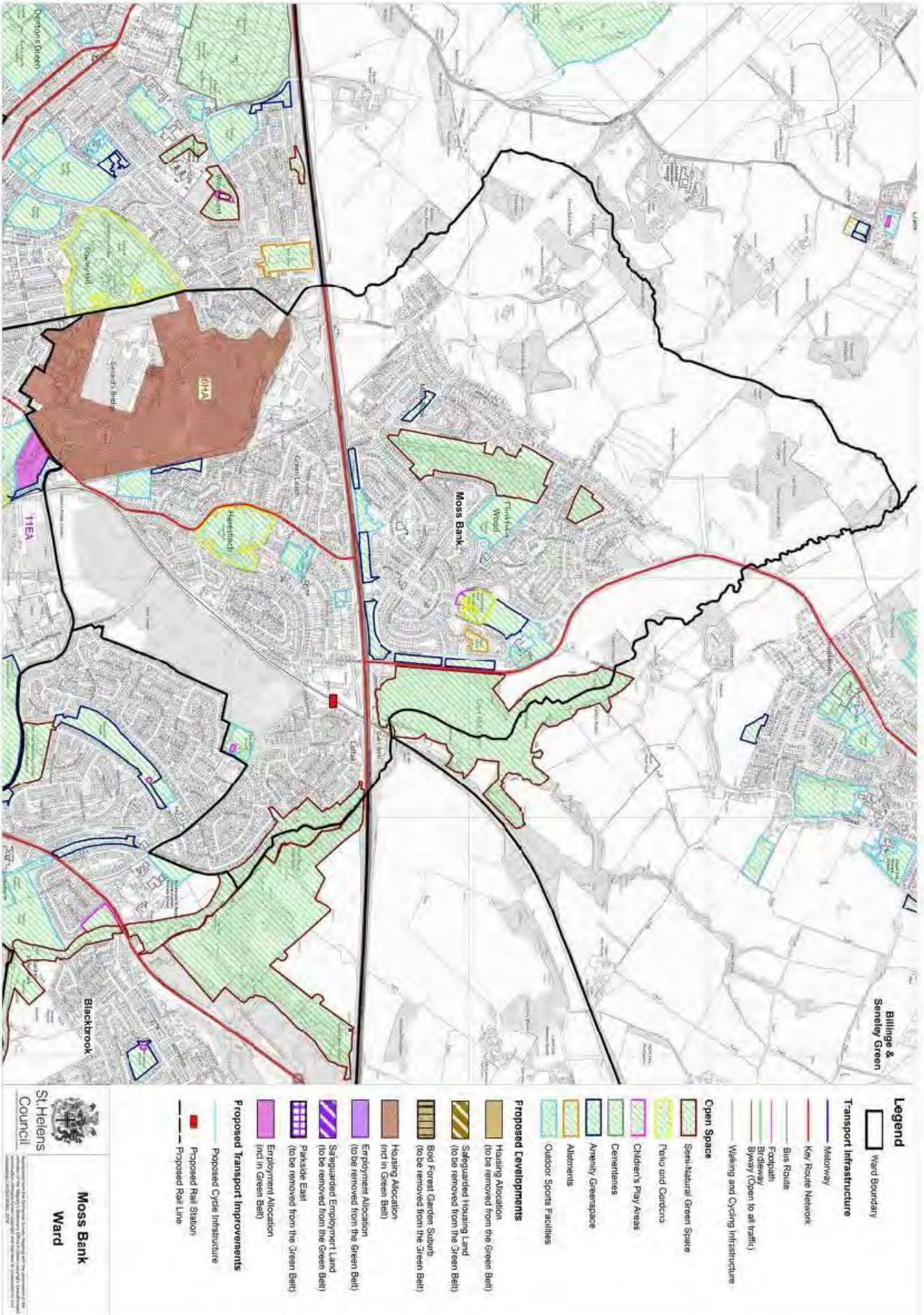




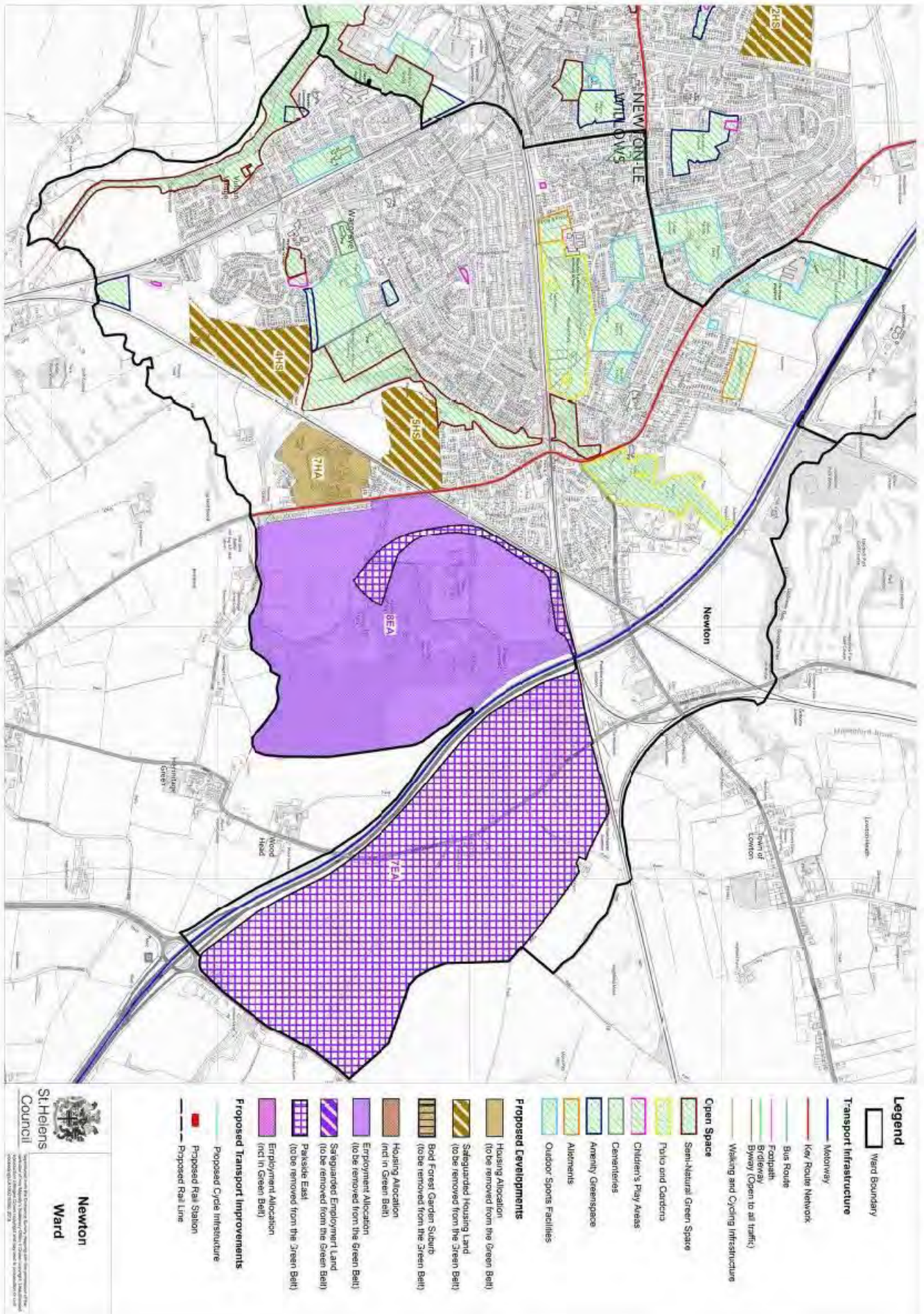




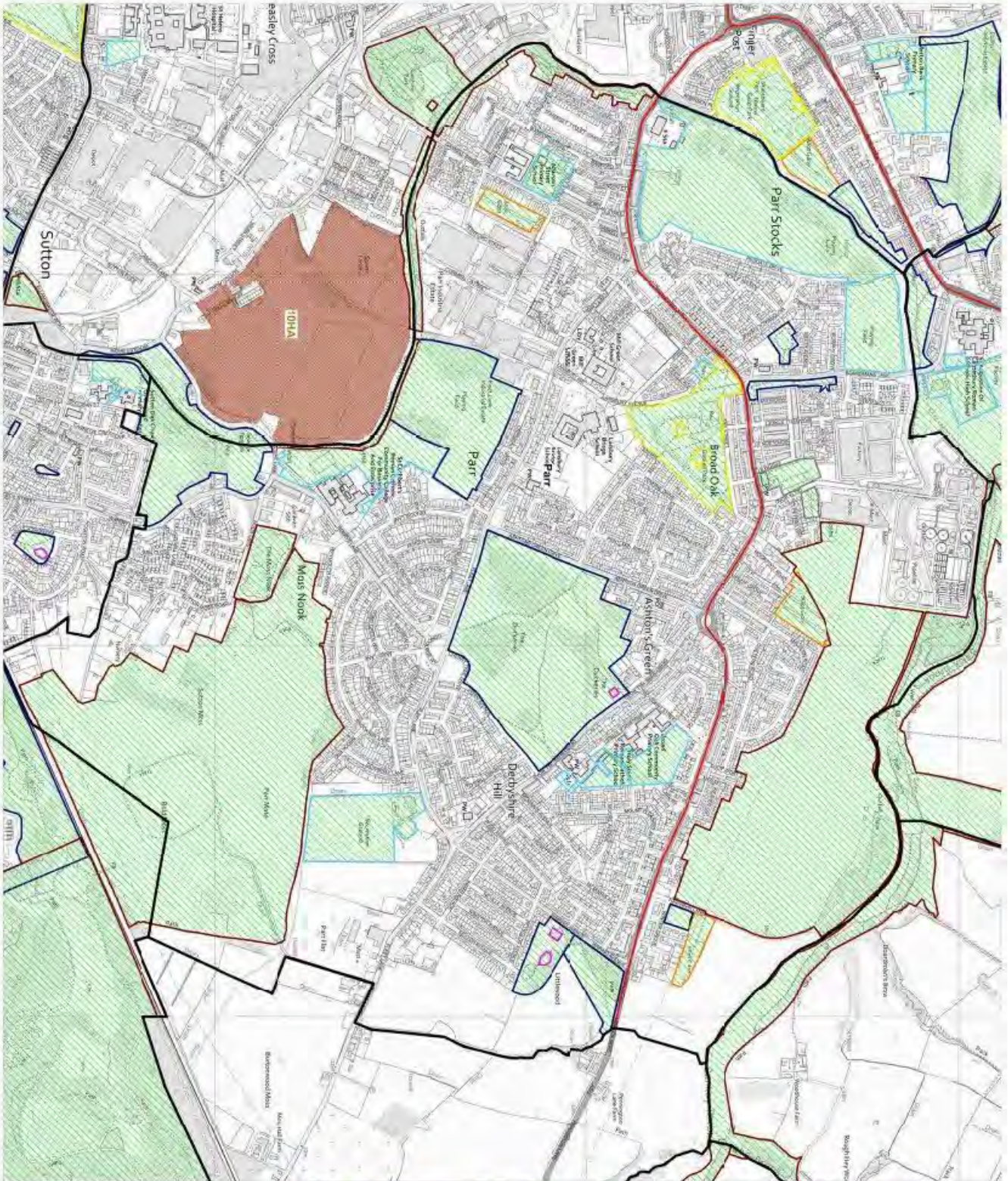




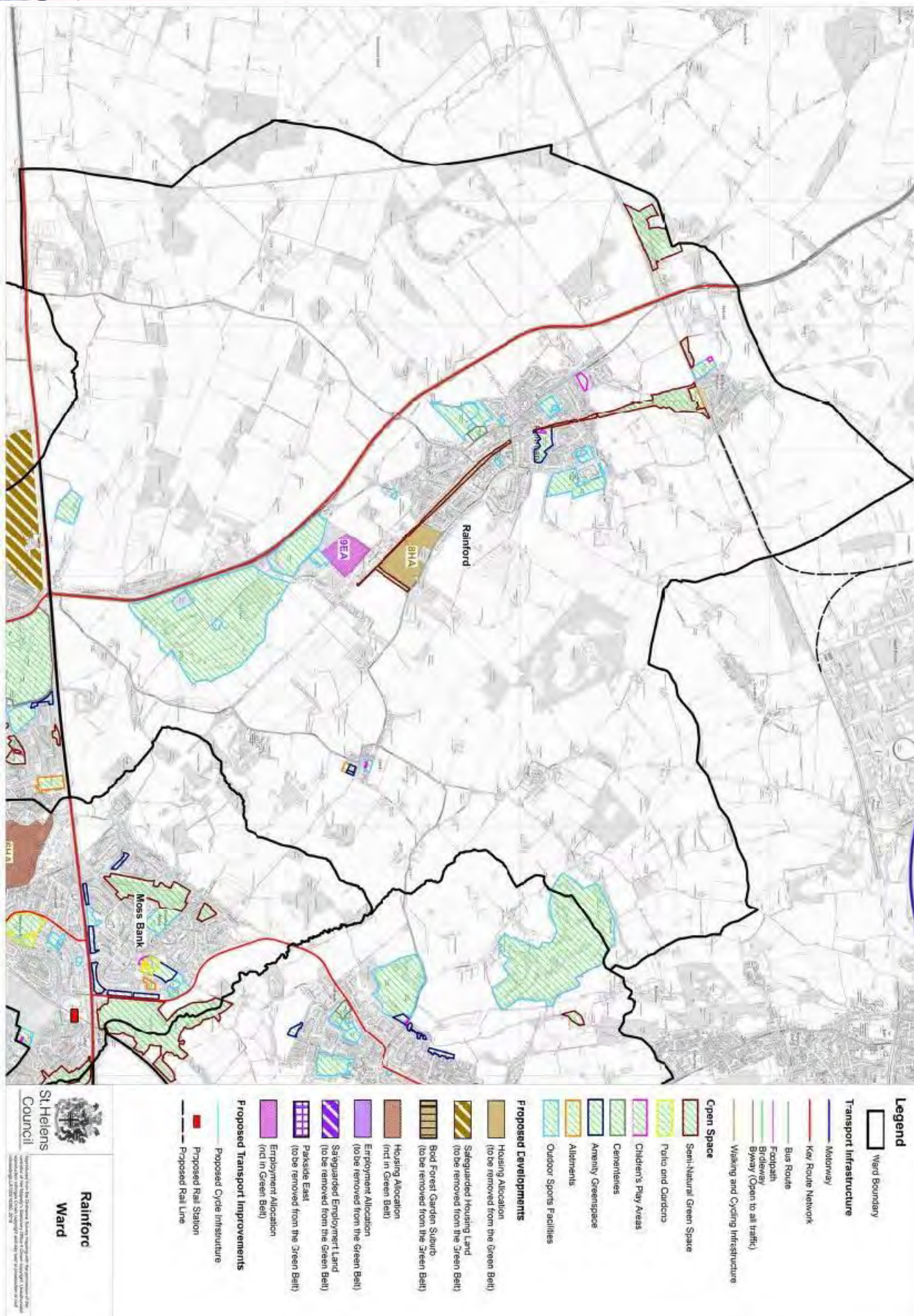




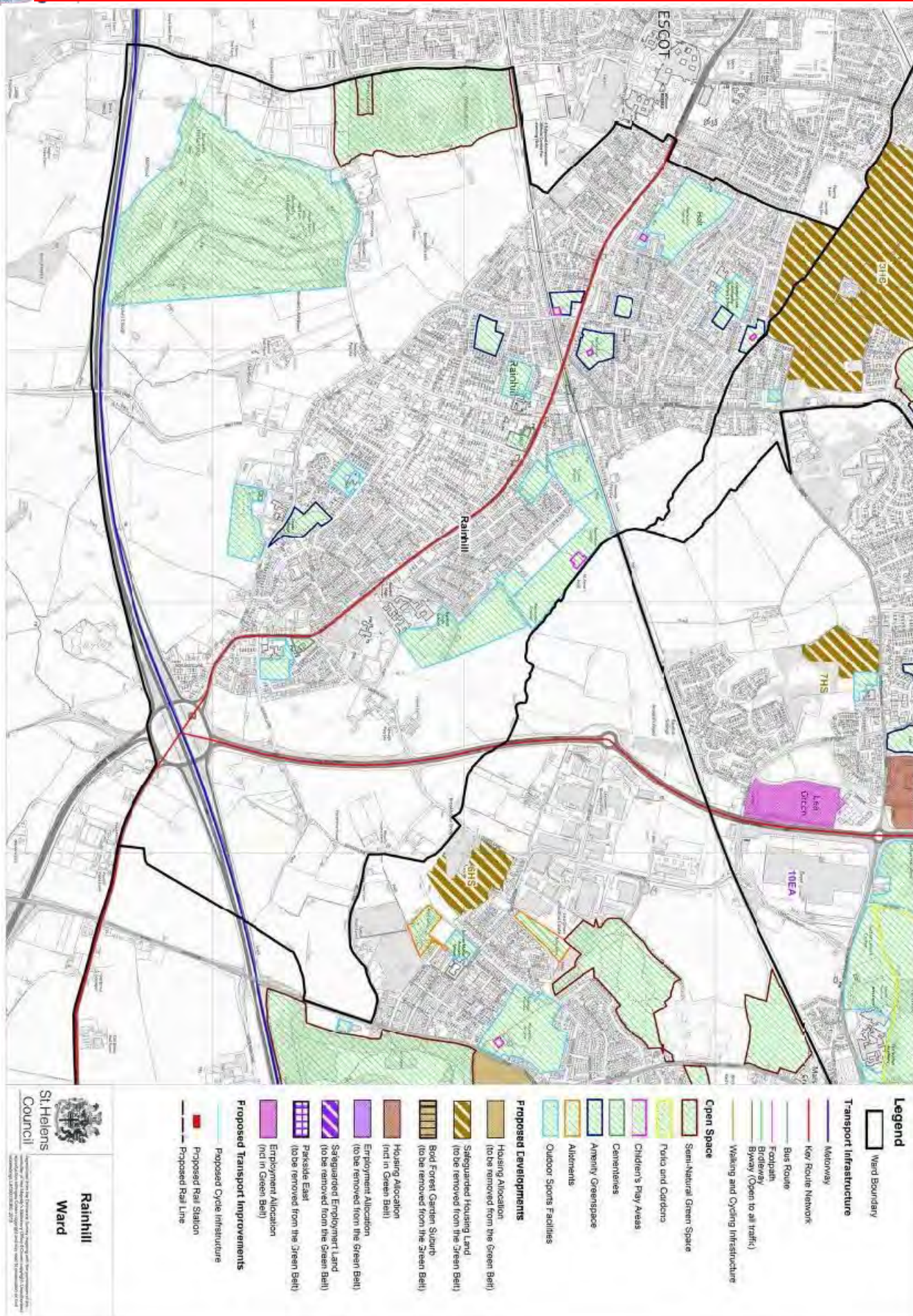




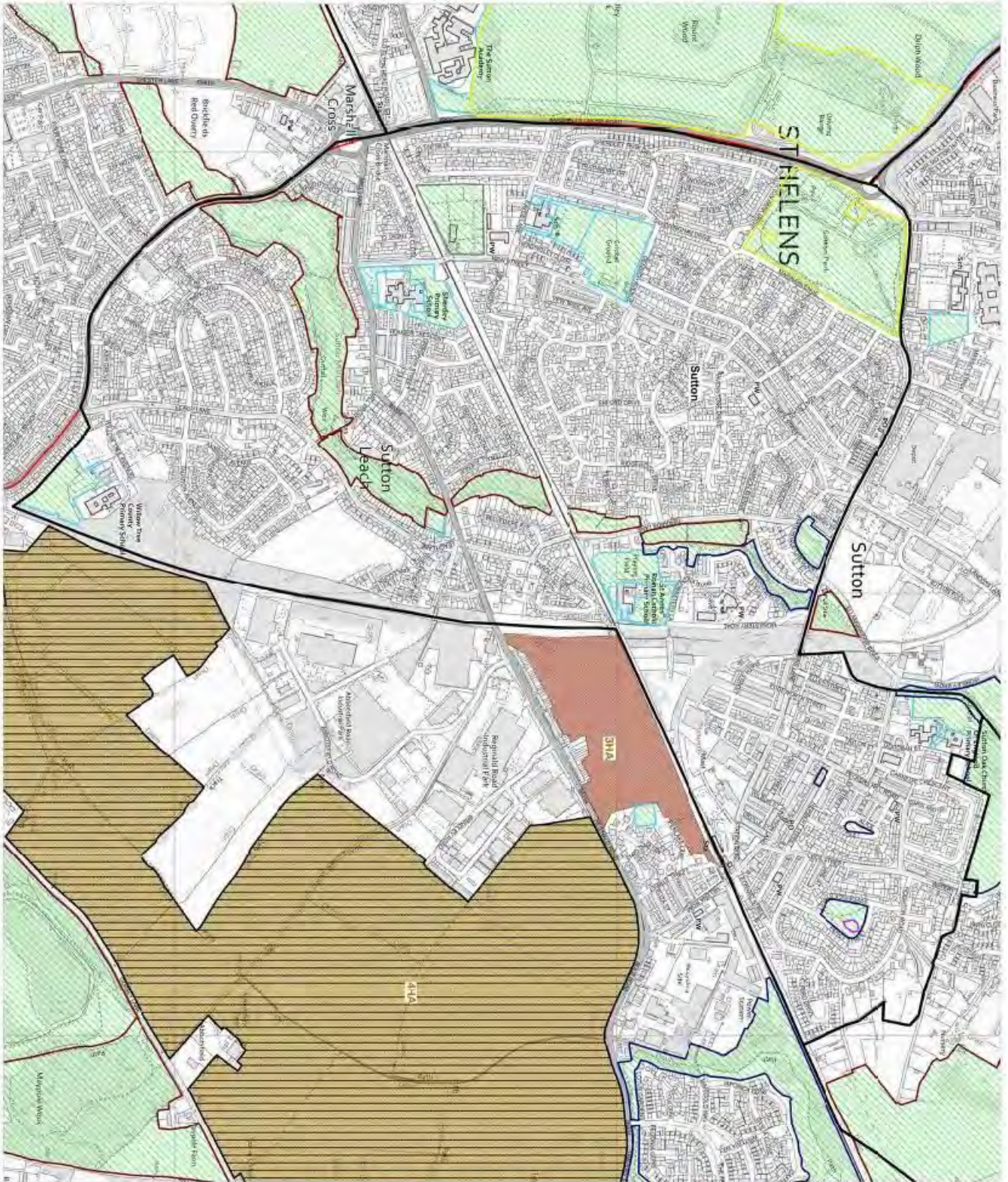












#### Legend

Ward Boundary

#### Transport Infrastructure

- Motorway
- Key Route Network
- Bus Route
- Footpath
- Bridleway
- Bwyer (Open to all traffic)
- Walking and Cycling Infrastructure

#### Open Space

- Semi-Natural Green Space
- Parks and Open Space
- Children's Play Areas
- Cemeteries
- Amenity Greenspace
- Allotments
- Outdoor Sports Facilities

#### Proposed Developments

- Housing Allocation (to be removed from the Green Belt)
- Safeguarded Housing Land (to be removed from the Green Belt)
- Biod Forest Garden Stunts (to be removed from the Green Belt)
- Housing Allocation (incl. in Green Belt)
- Employment Allocation (to be removed from the Green Belt)
- Sequestered Employment Land (to be removed from the Green Belt)
- Parkside East (to be removed from the Green Belt)
- Employment Allocation (incl. in Green Belt)

#### Proposed Transport Improvements

- Proposed Cycle Infrastructure
- Proposed Rail Station
- Proposed Rail Line

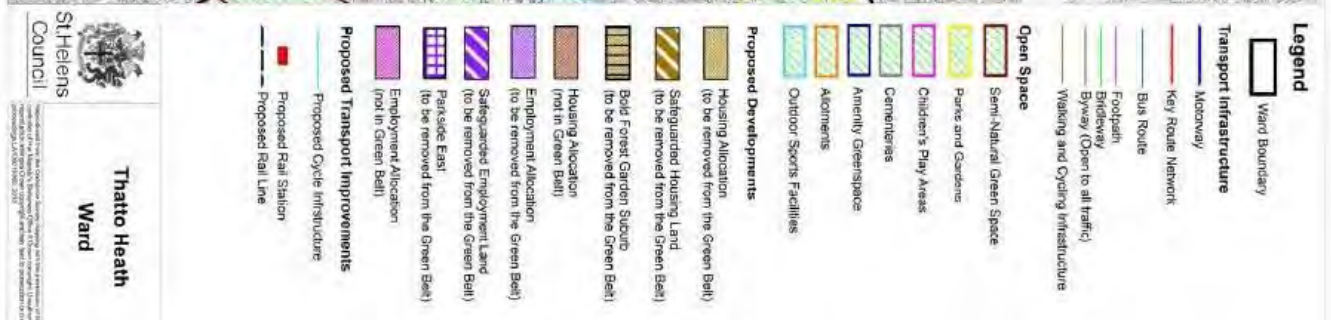


Sutton  
Ward

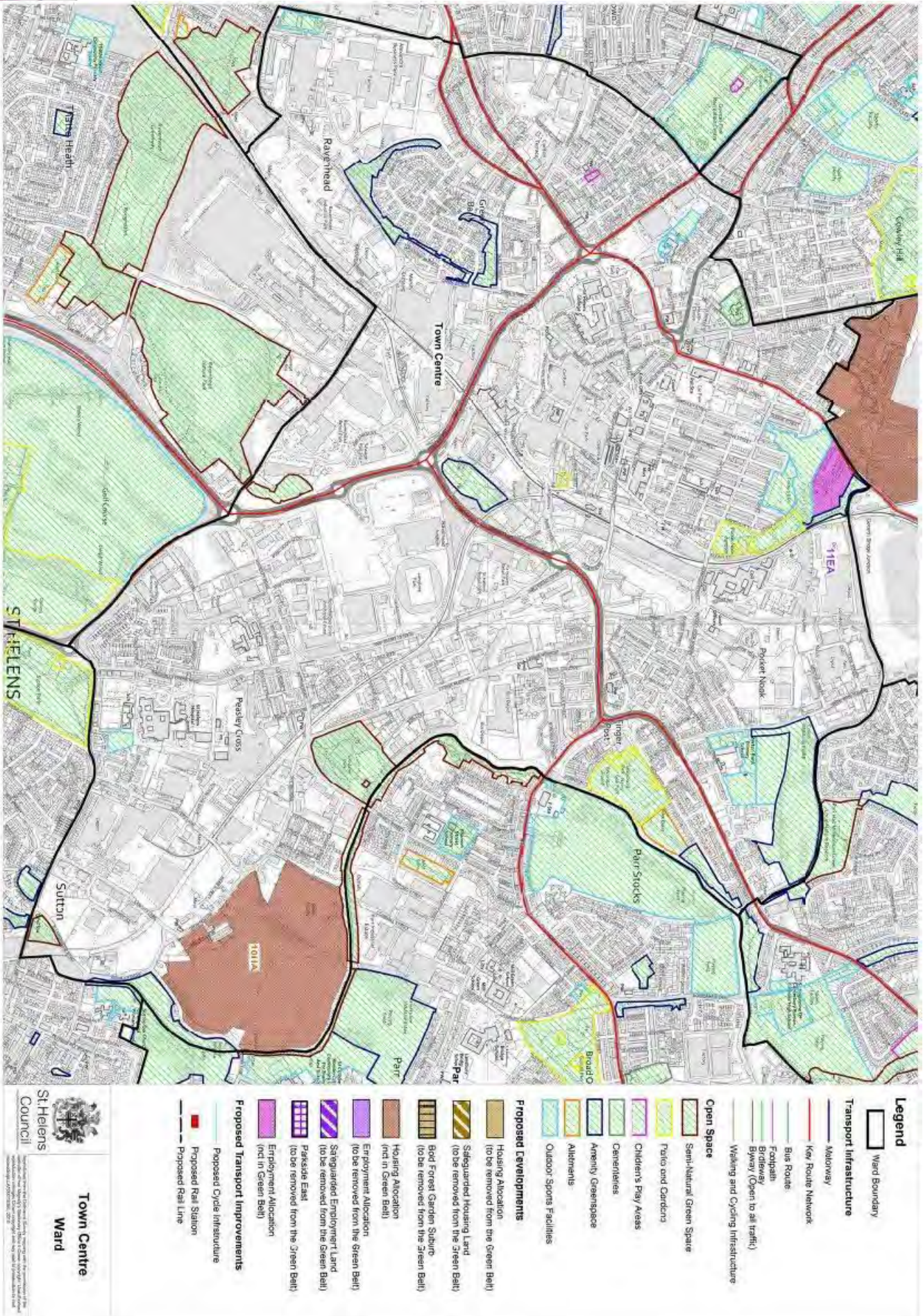
St Helens  
Council

Information from the Council's Planning Committee and the Infrastructure Delivery Plan 2020-2035. The map is for information only and does not constitute a formal planning application. For more information, please contact the Council's Planning Department.

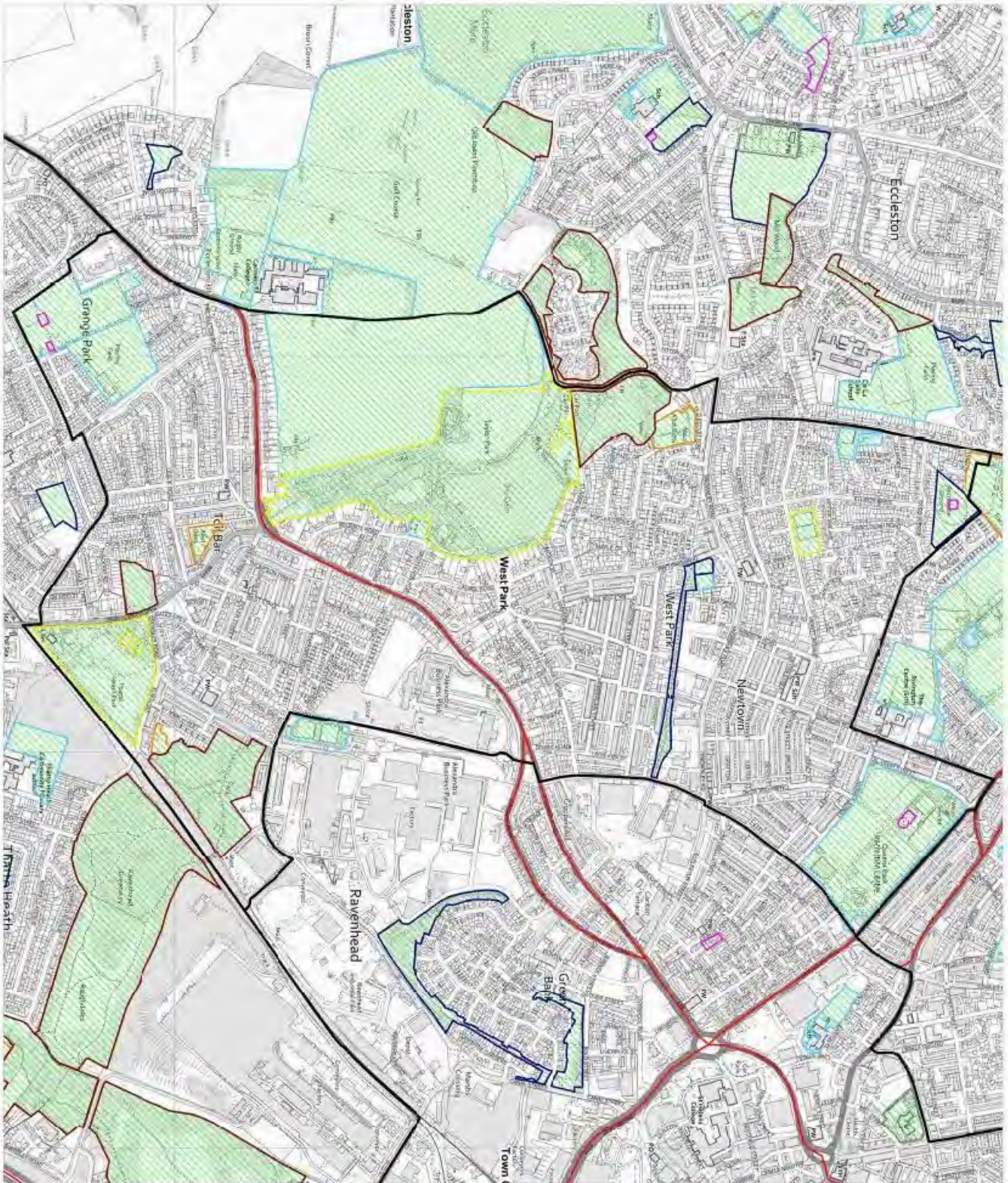




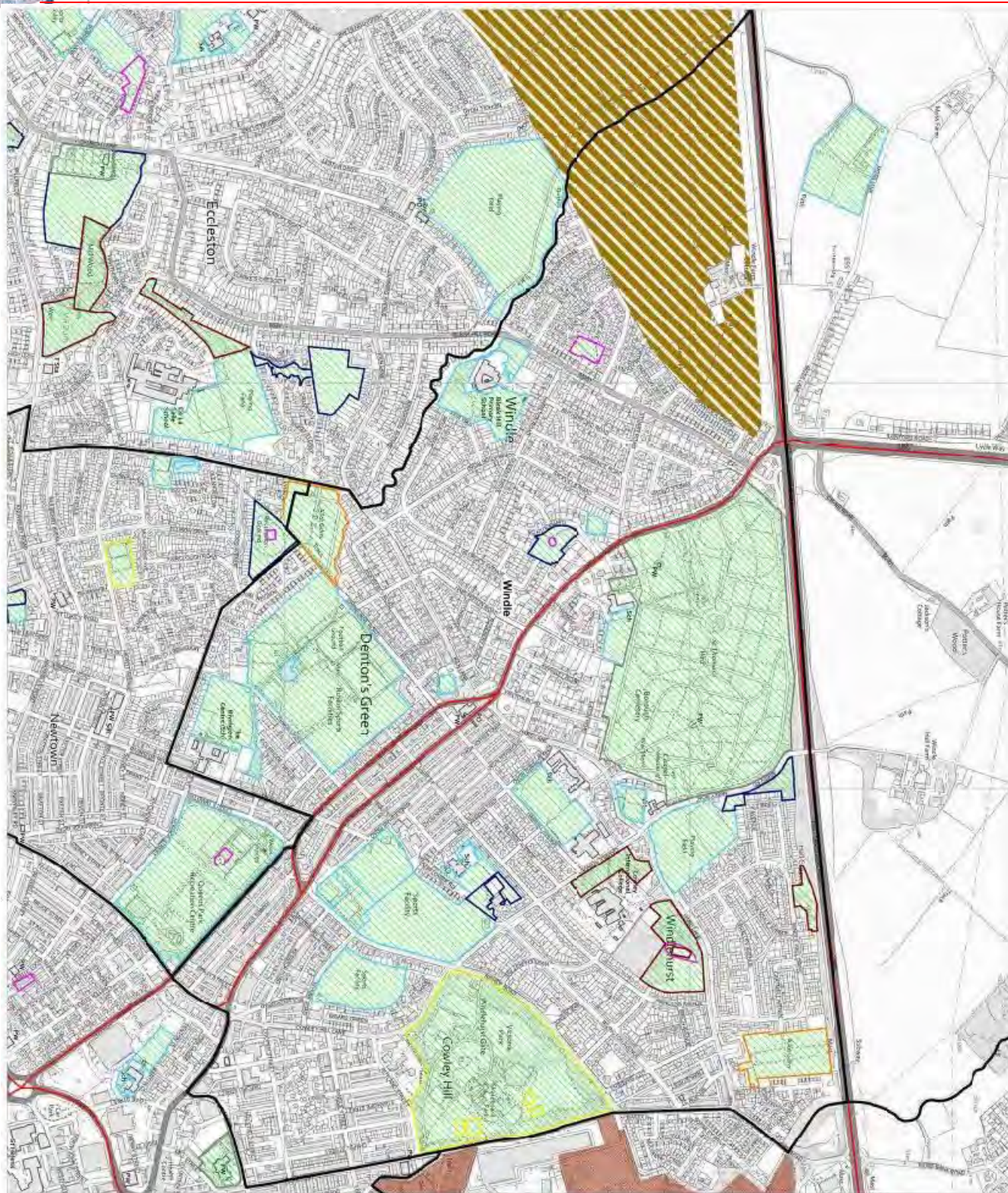














# **Appendix 8**

St. Helens Cabinet Report 12.12.2018





St. Helens  
Council

# LOCAL DEVELOPMENT SCHEME

2018 - 2021

**[DRAFT - SUBJECT TO APPROVAL BY CABINET/COUNCIL]**



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	➤ The emerging St.Helens Borough Local Plan	6
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## **1. INTRODUCTION**

### **Role of the Local Development Scheme (LDS)**

- 1.1 Section 15 of the Planning and Compulsory Purchase Act 2004 requires the Council to prepare and maintain a document known as the Local Development Scheme (LDS).
- 1.2 The LDS must identify which existing and proposed documents (referred to as development plan documents) are intended to comprise the statutory 'development plan' for the Borough. It must also identify:
  - the subject matter, geographical coverage and timetable for the preparation of each development plan document; and
  - any development plan documents which are to be prepared jointly with one or more other planning authorities.
- 1.3 The legislation requires all local authorities to make their LDS available to the public and to keep it up to date. The previous LDS for St.Helens was prepared in November 2015 and is now considered to be out of date.





## **2. THE DEVELOPMENT PLAN FOR ST.HELENS**

### **Currently adopted development plan documents**

2.1 The following documents make up the current 'development plan' for St.Helens and can be viewed at <https://www.sthelens.gov.uk/planning-building-control/planning-policy/adopted-local-plans>.

- St.Helens Local Plan Core Strategy (adopted in 2012);
- 'Saved Policies' of the St.Helens Unitary Development Plan (adopted in 1998);
- Bold Forest Park Area Action Plan (adopted in 2017); and
- Merseyside and Halton Joint Waste Local Plan (adopted in 2013).

2.2 As each of these documents form part of the adopted 'development plan' they each play a key role in guiding decisions on planning applications for new development.

#### **St.Helens Local Plan Core Strategy**

2.3 The St.Helens Local Plan Core Strategy sets out the overall strategy guiding new development in St.Helens. It identifies how much development is required, broadly where development should be located and how it should be delivered in the period up to 2027. It contains strategic policies for housing, economy and employment, community facilities, quality of life and accessibility.

#### **'Saved policies' of the St.Helens Unitary Development Plan**

2.4 The St.Helens Unitary Development Plan (UDP) replaced all previous adopted development plans for the Borough when it was adopted on 2 July 1998.

2.5 Several of the policies in the UDP lapsed as a result of a direction issued by the Secretary of State issued in 2007. Some other UDP policies lapsed when the St.Helens Core Strategy was adopted in 2012. Appendix 4 of the Core Strategy identifies which UDP policies continued to be saved beyond 2012 and which were replaced at that point. Two 'saved policies' covering waste issues were replaced by the Merseyside and Halton Joint Waste Local Plan in 2013.

#### **Bold Forest Park Area Action Plan**

2.6 Area Action Plans (AAPs) are a type of development plan document that provide a planning framework for a specific area of opportunity, change or conservation. They set out specific policies to shape development within that area.

2.7 The Bold Forest Park Area Action Plan was prepared in consultation with local stakeholders including the Mersey Forest and Bold Parish Council and adopted in July 2017. It aims to encourage inward investment via rural entrepreneurship in the visitor economy and provide leisure opportunities for the community.



- 2.8 The Plan covers the entire Bold Forest Park area, which covers an area of about 1,808 hectare in size and is strategically situated in the south of the Borough.

#### Merseyside and Halton Joint Waste Local Plan

- 2.9 The Merseyside and Halton Joint Waste Local Plan 2013 covers the period from 2013 to 2027. It was prepared jointly by Halton, Knowsley, Liverpool, Sefton, St.Helens and Wirral Councils and covers all 6 of these Council areas.
- 2.10 The Plan was prepared by the Merseyside Environmental Advisory Service (MEAS) and contains 16 policies and 18 site allocations dealing with all aspects of waste management from waste prevention to energy from waste facilities. Further details can be found via the MEAS website at:  
<http://www.meas.org.uk/1090>.

#### The adopted Policies Map for St.Helens

- 2.11 The Policies Map is maintained as a separate document and is updated each time a new development plan document which allocates or designates land is adopted. The existing Policies Map for St.Helens is substantially based on the Proposals Map which formed part of the St.Helens UDP. It includes adjustments made as a result of the adoption of policies in the other development plan documents referred to above.

#### The emerging St.Helens Borough Local Plan

- 2.12 The Council is currently preparing a new Local Plan which will provide a new spatial strategy for the whole of the Borough. The new Plan will include:
- A vision and objectives setting out what type of place St Helens should be in 2035 and beyond;
  - strategic policies guiding the future development and use of land (for housing, employment, retail and other uses);
  - allocations of sites for particular types of development;
  - areas where development is to be constrained; and
  - more detailed policies to help guide the determination of planning applications.
- 2.13 The preparation of local plans must include a number of stages as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). These include:
- Regulation 18 – initial consultation and preparation;
  - Regulation 19 – publication of the local plan;
  - Regulation 20 – representations relating to the local plan;
  - Regulation 22 – submission of documents and information to the Secretary of State;
  - Regulation 24 – independent examination by an appointed person



- Regulation 25 – publication of the recommendations of the appointed person; and
- Regulation 26 – adoption of the local plan.

2.14 The emerging St.Helens Borough Local Plan will replace the St.Helens Core Strategy and the currently remaining ‘saved policies’ of the UDP.

2.15 The preparation of the new St.Helens Borough Local Plan is a key priority for the Council. The following table sets out the expected steps and timescales leading up to adoption of the Plan. Further details are set out in the programme in Appendix 1 to this document.

Stage (Regulation)	Stage (Description)	Stage / Milestone (Date)
Regulation 19	Publication of the Local Plan	January 2019
Regulation 20	Period given for any representations to be submitted on the Local Plan	January – March 2019
Regulation 22	Submission of documents and information to the Secretary of State	July 2019
Regulation 24	Examination in Public Hearing Sessions	Autumn - Winter 2019
Regulation 25	Publication of the Inspector’s Report	Early 2020
Regulation 26	Adoption of the Local Plan	Mid 2020

2.16 A revised version of the adopted Policies Map will be prepared as part the Local Plan and will illustrate the proposed site allocations and land designations.

### **Supporting documents**

2.17 The Council has prepared or commissioned a number of other documents which support its existing and emerging development plan documents. These include:

- **The St.Helens Statement of Community Involvement** – this sets out how the Council will consult the community and stakeholders during the production of the Local Plan.
- **Evidence base documents** – these cover a wide range of topics and provide evidence to underpin the policies of the emerging Local Plan.



- **Sustainability and other appraisal documents** – these must be prepared to inform any new Local Plan document which is being prepared.

### **Joint working**

- 2.18 The Council has a legal duty (under the Localism Act 2011) to cooperate with a wide range of statutory bodies when preparing the Local Plan. The Council works closely with a wide range of bodies in compliance with this duty.
- 2.19 The Council is not currently preparing any development plan document jointly with any other local planning authority. It has also not agreed to establish any joint committee under section 29 of the Planning and Compulsory Purchase Act 2004 to formulate such a joint plan. It should be noted however that the Liverpool City Region Combined Authority proposes to prepare a Spatial Development Strategy including strategic policies covering the whole City Region (including St.Helens). This work is currently at an early stage.
- 2.20 The Merseyside and Halton Joint Waste Local Plan is currently being reviewed to identify whether it remains up-to-date. Any decision to update or replace the Merseyside and Halton Joint Waste Local Plan (in whole or in part) will be reflected in a future review of this LDS.





### **3 MONITORING AND REVIEW**

#### **Monitoring and Review**

- 3.1 The Council has a legal duty, under Section 15 of the Planning and Compulsory Purchase Act 2004 to provide up-to-date information to the public showing the state of the authority's compliance with its timetable for the preparation of development plan documents. In accordance with this duty the Council will publish regular updates concerning the progress in preparing its new Local Plan on its website. Further details will also be set out in its Authority Monitoring Reports, which must be published each year.

#### **Availability of Published Documents**

- 3.2 Further details concerning the emerging St.Helens Borough Local Plan, and the other matters set out in this document, are available on the Council website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). You may also request to see hard copies at Planning Reception, Town Hall, Victoria Square, St. Helens.



# **Appendix 9**

St. Helens Cabinet Report 12.12.2018

## COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

1. **Title of Proposal:** St Helens Borough Local Plan  
**Service:** Planning Policy  
**Department:** Place Services  
**Responsible Officer:** Carla Waring  
**Date Completed:** 30 November 2018

**Aims:** Please identify the main aims of the policy, decision or function?

The new Local Plan will contain a vision which will set out how the Borough and the places within it will be developed. It will be locally distinctive, realistic and in the best interests of the local people, businesses and the environment. There are 7

Strategic Aims:

1. Supporting Regeneration and Balanced Growth
2. Ensuring Quality Development
3. Promoting Sustainable Transport
4. Meeting Housing Needs
5. Ensuring a Strong and Sustainable Economy
6. Safeguarding and Enhancing Quality of Life
7. Meeting Resource and Infrastructure Needs.

## 2. Community Impact Assessment

The Impact Assessment tool helps to identify the benefits to the local community of the work. All policies, decisions or functions will have an impact on the local community in St Helens. This tool acts as a prompt to identify what difference the work will make and how.

It provides an opportunity to think about where we might be able to reduce negative impacts, identify missed opportunities, and capitalise on positive impacts. It will build broader portfolio support for your work.

**Community:** Please describe how your work will benefit the council & staff/ local community.

The Local Plan contains a comprehensive range of policies which aim to improve quality of life in St Helens. For example, Policy LPA11 confirms as follows:

The Council will work with its health and wellbeing partners to promote public health principles, maximise opportunities for people to lead healthy and active lifestyles, and reduce health inequalities for residents within the Borough. Planning decisions and processes will be used. It will use its planning powers to:

- 1) Encourage improved access to a choice of homes and jobs that meet the needs of the area;
- 2) Ensure the provision of easy-to-maintain, safe and attractive public areas and green spaces to serve new development which minimise the opportunity for and fear of crime and which promote social cohesion and mental wellbeing;
- 3) Encourage people to be physically active by providing opportunities for walking, cycling, outdoor recreation and sport, including, where appropriate, the provision of opportunities for physical activity within the design of new development;
- 4) guide the location of food and drink uses such as hot food takeaways,



- drinking establishments, restaurants, cafes and other uses which may have negative health impacts having regard to their impact on other land uses in the local area;
- 5) maximise the levels of accessibility between homes, educational establishments, jobs, public transport services, health and other services, recreational opportunities and community, cultural and leisure facilities;
  - 6) Encourage measures to achieve affordable warmth;
  - 7) Promote active design principles as established by Sport England; and
  - 8) Manage air quality and pollution.

### 3. How to use this tool

**3.1 At the planning stage: *This is the best time to consider the difference this will make to the local community.*** Look down the checklist and identify how what you are doing will impact on people in St Helens. Engage with the Health, Sustainability and Equality leads, which will meet with you and talk through with you what you aim to achieve and how they can help.

### 3.2 Developing Key decisions:

Engage with the Health, Sustainability and Equality leads to go through the tool and identify how your work will make a difference to the local community in St.Helens. Work with them to complete the tool and to frame the key decision. Agree actions to show what has happened.

### 3.3 Evaluation

This tool identifies actions that will ensure that your work has the most benefit to people in St.Helens. Reviewing the actions 6 or 12 months following the decision helps to evaluate your work and to demonstrate the impact that your work has had. This demonstrates the broader value that the work is having in equality, sustainability and health and builds broader support for this work.

### 4. Publishing the results of the assessment:

This Impact Assessment Report must be used to inform Decisions, Scrutiny Reviews, Service Level Agreements Service and Contract specifications, policy or service evaluations and reviews. The key issues from the impact assessment must be included within the documents, and the impact assessment must be attached.

## COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

**NB** Only fill in the “Action” column if there is an action which you have identified as a result of completing the Community Impact Assessment.  
 If you add in any “Action”, then you must complete the “Who / When” column  
 Ensure that the “Action” is completed by the date required  
 Once the “Action” is completed, then it should be removed from the "Action" column and added to the "How will this be taken into account column."

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
<b>HEALTH</b> - How will the work impact on the following areas?					
Social And Economic:					
Employment, skills, income or economy	Y		By providing a range of sites for employment development the plan will help to promote employment, skills and the local economy. The plan also contains a range of policies to address issues such as air quality, sustainable transport and sustainable design.		
Living and working conditions			The Plan aims to ensure that the effects of new development on the living conditions of existing residents, and the environment surrounding existing employment uses, are adequately controlled.		
Healthy lifestyles:					
Healthy lifestyles/risk taking behaviour (e.g. healthy eating, physical activity, obesity, smoking, drug or alcohol, sexual health)			Policy LPD10 of the Plan seeks to control the location of hot food takeaways.		
Mental wellbeing					
Protecting health and wellbeing:					
Public safety and hazards			The Plan policies aim to ensure that new development is satisfactory in terms of flood risk,		

# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
			highway safety and location in relation to hazardous installations.		
Geographical impact / impact on different council wards	Y		Sites for both Employment and Housing will be allocated for development, and this will provide jobs and new homes in specific wards. Whilst new development will be likely to have effects on the environment the Plan contains policies to mitigate these. Sites identified for development in the Plan have been subject to a process of sustainability appraisal which assesses the economic, social and environmental effects of developing them.		
Link with Health and Wellbeing Strategy Priority					
<b>SUSTAINABILITY</b> - What contribution does this activity make to?					
Energy Consumption	Y		New developments will be required to meet high standards of sustainable design and construction, in order to minimise carbon emissions as outlined in Policy LPC13.		
Air quality and greenhouse emissions	Y		Policy LPD09 states that the Council must designate an Air Quality Management Area (AQMA) where air pollution exceeds or is likely to exceed an air quality objective. The Plan also promotes the use of sustainable modes of transport (e.g. walking, cycling and public transport) and will require new development to include appropriate provision of charging points for electric vehicles.		
Land and water contamination	Y		Development which would adversely affect the		

# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
			water quality will not be permitted. Any planning application for development which could (without effective mitigation) cause such harm, must be supported by a Construction Management Plan which sets out how the water environment will be protected during the construction process, as set out in Policy LPC12.		
Land, soil and water conservation			Policy LPC12 promotes the use of sustainable drainage systems and 'slow the flow' initiatives to reduce flood risk and enhance biodiversity. Whilst the Plan would result in some loss of agricultural land to meet needs for new development the great majority of such land which is in the Borough will not be affected.		
Waste minimisation, reuse, recycling	Y		The sustainable management of waste will be promoted in accordance with the waste hierarchy. The Plan refers to the Merseyside and Halton Joint Waste Local Plan which seeks to identify and safeguard waste management sites and assist in the implementation of a resource-recovery led strategy for sustainable waste management. Policy LPC15 summarises these factors.		
Use sustainable sources of materials					
Sustainable transport	Y		Policy LPA07 explains that the strategic priorities for the transport network are to promote growth and access to opportunity, improve air quality and minimise carbon		



# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
			emissions, in relation to the social, environmental and climate impacts.		
Noise minimisation			The Plan aims to ensure that new development does not cause significant levels of noise for existing residents, and ensure that new housing is located where its occupants would not experience unacceptable levels of noise.		
Conserve and enhance biodiversity	Y		Policy LPC06 describes how the focus of significant harm and the approach regarding avoidance, mitigation, replacement or other compensatory provision to secure no net loss of biodiversity is in line with principles set out in the National Planning Policy Framework (NPPF).		
Sustainable design	Y		All proposals for development within the Borough will be expected, as appropriate having to their scale, location and nature, to meet or exceed a number of requirements which are set out in Policy LPD01.		
The Local "Low Carbon" Economy	Y		Policy LPC13 states that in order to support the transition to a low carbon economy, it is also necessary to encourage the greater use of renewable and low carbon energy in new development.		
<b>EQUALITY</b> - What positive or negative impact might this proposal or function have on the following protected characteristics? – Age, Disability, Gender, Race, Religion, Sexual Orientation, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity.					
Advance equality of opportunity					
What opportunities are there to promote equality of opportunity in access to facilities, information,	Y	Due regard to the duties of the	The Plan aims to promote balanced, inclusive and sustainable communities that benefit all. Many of the policies within the Plan will benefit		

# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
guidance and support?		Equality Act 2010.	<p>the wider community in St.Helens and not specifically those with protected characteristics, either positively or negatively.</p> <p>However, some policies will have the potential for some direct or indirect impact on equalities issues, such as <i>Policy LPC03: Gypsies, Travellers and Travelling Showpeople</i>. The Housing Act 2004 and the Government's 2012 Planning Policy for Traveller Sites (PPTS), require local authorities to assess Gypsy and Traveller and Travelling Showpeople accommodation needs and ensure steps are taken to meet those needs, including through the allocation of sites in the Local Plan. Policy LPC03 of the Plan sets out how St. Helens Council aims to meet these requirements.</p> <p>-----</p> <p>The Strategic Aims and Objectives within the Spatial Vision Section - include the strategic objective to promote sustainable transport. This will have a positive impact on the following groups who share protected characteristics of the Equality Act 2010 - older people, disabled people, pregnant women, and parents/guardian of young children</p> <p><b>Accessibility</b></p> <p>Strategic Aim 3: Creating an Accessible St. Helens</p> <p>Strategic Objective 3.1: To improve access for</p>		

# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
			all by facilitating sustainable transport choices, development in accessible locations, an integrated public transport network, and targeted improvements to the transport network.		
Eliminate discrimination, harassment and victimisation					
What opportunities are there to eliminate risk of discrimination, harassment and victimisation, or to report hate crime?	Y	Due regard to the duties of the Equality Act 2010.	The Local Plan has been prepared in accordance with the Equality Act 2010. The Plan aims to ensure the sustainable development of St. Helens up to 2035 and beyond. The promotion of balanced and inclusive communities that benefit all is integral to achieving this. The policies set out within the Plan will guide development and promote opportunities, for example by: allocating housing sites to meet need; allocating employment sites for commercial development to boost and support the economy; and by protecting and enhancing the natural and built environment.		
What opportunities are there to promote community cohesion?					
Through valuing local history and heritage, understanding diversity, promoting a positive attitudes towards disability, getting people involved, and bringing people together	Y	Due regard to the duties of the Equality Act 2010.	The Plan policies are inclusive and aim to foster good relations with all sections of the community; this includes those within the protected characteristics classifications, as set out in <i>Policy LPD02: Design and Layout of New Housing</i> – which outlines providing adequate outdoor amenity space, making it easy for residents and visitors (of all abilities) to find their		

# COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

Checklist - impact on different aspects and sections of Community and Staff Groups					
Add rows as required	Impact Y/N	Issue	How will this be taken into account	Action	Who / When
			<p>way around, and creating safe and secure neighbourhoods. Policy LPC01: Housing Mix will require specified proportions of new housing to be designed to 'accessible and adaptable' and 'wheelchair user' standards.</p> <p>-----</p> <p>The Strategic Aims and Objectives within the Spatial Vision Section include a strategic objective to support wellbeing, which is designed to promote community cohesion good community relations between groups who share different protected characteristics.</p> <p><b>Wellbeing</b></p> <p>Strategic Aim 6: Safeguarding and Enhancing Quality of Life in St. Helens</p> <p>Strategic Objective 6.1: To increase convenience and reduce the need to travel by ensuring appropriately located integrated provision for a wide range of community facilities.</p>		
What could be done, or is being done, to support vulnerable people? e.g.					
Families and lone parents, older people, younger people, carers, armed forces, people with autism	Y	Due regard to the duties of the Equality Act 2010.	The plan and policies aim to help to meet the housing needs of vulnerable people to help them live independently and in a dignified manner, whilst also being affordable, as set out in <i>Policy LPC01: Housing Mix</i> .		



## COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

### Appendix 1- Further useful information - This is not an exhaustive list

#### Equality General Issues Include

- Accessibility – Parking, signage, buildings, toilets, lifts, information, opening times etc.
- Hate crime – racism, homophobia, transphobia, disablism, religious bigotry
- Translation / Interpretation arrangements - e.g. British Sign Language, foreign languages.
- Meeting the need of disabled people, even when that means treating them more favourably than non-disabled people

**N.B** If the project, policy, contract, service etc., requires the monitoring of any of the following - consultation, complaints, outcomes, satisfaction, service access or membership, then use the Corporate Standard for Equality Monitoring to assess if there is any added value from the inclusion of equality profiles (age, gender, race, disability etc.) within the monitoring process. This enables the results to be disaggregated to show any variation in outcomes for different groups.

#### Do changes have an impact?

If there are any proposed changes to a service, then the CIA must record the equality assessment of the impact of the proposed changes, where the proposed changes have a potential to disadvantage any group of people who share a protected characteristic, then the Council is required to explore mitigation to that disadvantage, and record the mitigation within the Impact Assessment.

These are the questions to answer in the CIA:

1. Compared with previous arrangements, are there any changes to
  - a) the amount of budget or funding?
  - b) the service requirements or delivery specification?
  - c) the number or skill set of the workforce?
2. Will the changes impact upon or affect (i) the service quality, or (ii) the equality of service access, for people who share a specific protected characteristic (a disability, a gender, a sexual orientation, a religion, a certain age group, a racial origin, etc.?)
3. Is this a positive impact or a negative impact?
4. If this is a negative impact what are we doing to lessen or remove the impact upon this group?

**Staffing Proposals:** It is essential that decisions on staffing issues do not leave the Council vulnerable to equal pay or discrimination claims. This means that decisions must promote consistency in structure, job description / qualifications and pay grading. You must seek advice from Personnel before proceeding and record the outcome in the CIA.

**Community, Faith or Voluntary sector Compact:** If the CIA is for a decision relating to the Community, Faith or Voluntary sector then it must comply with the St. Helens Compact.

**Contract / Commissioning / Procurement:** If the CIA is for a decision relating to a contract then add the following statements as “General Issues”, under the “Issue” of Procurement.

- **Equalities** “The pre-tender or PQQ document for this contract included the Procurement Equality Standard, which requires potential providers to send the Council an analysis of their Equality Policy against the equality duties upon employers. If an organisation so wishes, it can adopt a template business equality policy developed by the Council's Procurement Team, which is compliant with all current employment equality duties. Once awarded, the Contract will be added to the Council's Corporate Contract Database, which requires providers to send the Council their Equality Profile.”

## COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS

- **Sustainability:** “The contract includes conditions that ensure the provider will comply with the Council’s Environmental Policies. These include the requirement not to purchase or use products on the Council’s Prohibited Products list, if an alternative product method is available.”

### **Sustainability Issues Include**

Sustainability in its widest sense covers socio-economic, equality as well as environmental issues. The equality and socio-economic issues are fairly well covered above but it is also essential to consider the impact of our actions on the environment. The Climate Change Act 2008 and Carbon Reduction Commitment Energy Efficiency Order 2010 have placed duties on Local Government to reduce its carbon emissions as well as mitigate its impact on other contributing factors to Climate Change, such as waste. There is also a range of other British and European legislation relating to environmental management that must be considered in reviewing or introducing new services/ policies.

Finally, the Council’s Environmental Management System (EMS) requires the environmental impact of all business activities to be considered and minimised. Failure to consider the wide range of environmental issues could result in non-compliance being identified during EMS accreditation visits, or prosecution for failure to adhere to legislation.

## COMMUNITY IMPACT ASSESSMENT OF RELEVANT POLICIES, DECISIONS OR FUNCTIONS