

**St. Helens Local Plan  
Preferred Options  
December 2016  
Sustainability Appraisal:  
Interim SA Report**

**Non technical summary**

**December 2016**

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# Introduction

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# 1 INTRODUCTION

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## 1.1 Background

- 1.1.1 AECOM has been commissioned by St Helens Borough Council to undertake a sustainability appraisal (SA) in support of the new St Helens Local Plan (the 'Plan').
- 1.1.2 The new Local Plan will set out the amount of housing and employment land that needs to be planned for, where and where not it will be acceptable in principle, and policies for assessing planning applications.
- 1.1.3 A draft Plan has been prepared by the Council, which sets out a preferred approach based upon the best available evidence to date. The Plan could be amended further in light of further evidence, and the findings of key studies such as the SA and Habitats Regulations Assessment.
- 1.1.4 The interim SA Report reports on the findings of the sustainability appraisal process at this point in time. It includes:
- A summary of the SA Scope
  - Consideration of alternative approaches to the key issues of housing and employment provision/strategy
  - Appraisal of reasonable site options
  - Appraisal of the draft Plan

## 1.2 The St Helens Local Plan

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

1. Regenerating and growing St Helens
2. Ensuring quality development in St Helens
3. Creating an accessible St Helens
4. Providing quality housing in St Helens
5. Ensuring a strong and sustainable St Helens economy
6. Safeguarding and enhancing quality of life in St Helens
7. Meeting St Helen's resource and infrastructure needs.

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**Scoping**

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## 2 SCOPING

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### 2.1 Background

- 2.1.1 The Scoping stage of the SA process is used to establish the key issues that should be the focus of the appraisal, as well as the assessment methodologies.
- 2.1.2 A Scoping Report was prepared and published for consultation in January 2016. Following consideration of the comments received, the scope of the SA has been determined and has provided the baseline position against which appraisals have been undertaken.
- 2.1.3 The scope of the SA will be updated throughout the plan making process in light of new evidence.

### 2.2 Key issues

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

**Table 2.1: Key sustainability issues identified through scoping**

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#### 1. Biodiversity, Flora and Fauna

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

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#### 2. Cultural Heritage

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

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#### 3. Landscape

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

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#### 4. Geodiversity

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

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#### 5. Soil

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

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#### 6. Contaminated Soils

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

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#### 7. Air Quality

There are four Air Quality Management Areas within the Borough which are

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**Table 2.1: Key sustainability issues identified through scoping**

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exceeding annual mean objectives for Nitrogen Dioxide affecting local air pollution and human health.

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### **9. Climate Change**

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

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

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

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### **11. Flood Risk**

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

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

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

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

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

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

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### **14. Deprivation**

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

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

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

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

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### **16. High Unemployment Rate**

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

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**Table 2.1: Key sustainability issues identified through scoping**

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**17. Educational Underachievement**

Relatively low proportion of young people not in education, employment or training.

Low levels of educational attainment and skills.

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**18. Transport and Accessibility**

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

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## 2.3 SA Framework

Table 2.2 sets out the twenty SA objectives that have been established as a result of the scoping process. The SA objectives have been grouped into eleven SA Topics to present the findings more succinctly and avoid duplication (where objectives are very similar or complimentary).

**Table 2.2: SA topics and objectives**

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



# Alternatives appraisal: **Spatial strategy**

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## 3 ALTERNATIVES APPRAISAL: SPATIAL STRATEGY

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### 3.1 Introduction

- 3.1.1 The need to prepare a new Local Plan has arisen mainly due to a large increase in the demand for employment land and lack of sufficient deliverable sites to meet the Borough's housing needs following the success of the Borough in recycling previously developed land ("brownfield").
- 3.1.2 In developing the new Local Plan, there is a need to explore alternative approaches that will deliver the Vision for St Helens. This involves determining what level of growth (employment and housing) to plan for and where it should be located.

### 3.2 Consideration of alternatives

#### Economic growth

- 3.2.1 A key driving factor behind the new Local Plan is the aspiration to take advantage of opportunities for economic growth.
- 3.2.2 Taking the Councils economic growth ambitions, evidence of needs, and the comments received from consultation into consideration, the employment land requirement for the Plan has been set at 306ha.
- 3.2.3 Alternative levels of growth were considered by the Council but all were found to be unreasonable:

*Alternative Option 1: Provide less employment land than identified objectively assessed needs*

- 3.2.4 *Reason for Rejection:* This option would not be compliant with the NPPF and would result in slower growth in the Borough's economy.

*Alternative Option 2 - Provide significantly more employment land than the identified employment land requirement*

- 3.2.5 *Reason for Rejection:* A significant oversupply of employment land could result in pressure for more housing, create labour supply difficulties and could therefore result in unsustainable commuting. It could also result in a large oversupply of development land, with many of the allocated sites remaining vacant.

#### Housing growth

- 3.2.6 The delivery of sufficient housing to meet local needs is a key objective of the Local Plan. The starting point for assessing different approaches is therefore to establish the full objectively assessed housing need (OAHN).

- 3.2.7 The full objectively assessed housing need has been identified in the Mid-Mersey Strategic Housing Market Assessment (2016) at 451 dwellings per year. This takes account of economic factors and affordable housing requirements.
- 3.2.8 The Council considers that housing growth below this level would not meet local housing needs and would therefore **not be a reasonable alternative** given that a key objective of the plan is to support economic growth and housing delivery.
- 3.2.9 Where there is evidence to justify potentially higher levels of growth, there is potential for reasonable alternatives to exist. Table 3.1 below outlines a range of alternative growth scenarios considered by the Council as part of the plan-making process.

**Table 3.1: Alternative scenarios for housing growth**

Growth scenario	Rationale
<b>Scenario A</b> Meeting OAHN	This is a reasonable alternative, as it represents the evidence that St Helens should plan for a minimum of 8569 homes from 2014 to 2033.
<b>Scenario B</b> The preferred approach  (20% Buffer for flexibility)	<p>This alternative incorporates an uplift of just over 20% from the FOAHN (an increase to 541 per year) to take account of:</p> <ul style="list-style-type: none"> <li>the Borough's ambitions to continue stabilising and increasing the population;</li> <li>allow for more housing choice and competition so more households can afford to form, allow for significant economic growth; and</li> <li>to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession.</li> </ul> <p>A further requirement of 29 units per annum is added to accommodate the demolitions and round the figure up to 570 dwellings per annum.</p>
<b>Scenario C</b> 60% buffer for flexibility and additional 'contingency'	<p>This alternative would set the housing requirement at 712 dwellings per annum, which is approximately 25% above the Preferred Option and current Core Strategy requirement of 570 in order to:</p> <ul style="list-style-type: none"> <li>To further support additional economic growth, make homes more affordable and, encourage household formation.</li> <li>Provide a buffer should the SHELMA identify a higher level of housing need for the Borough or the housing market area.</li> <li>Meet additional unmet need that might arise from other authority areas in the sub-region.</li> </ul>
'Higher' levels of growth	It is considered <b>unreasonable</b> to test even higher levels of growth that are not based upon evidence of needs.

## Distribution of housing development

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

3.2.11 Determining the distribution of housing growth involves consideration of strategic objectives, as well as the availability of suitable land. To help establish the preferred approach the Council have explored a variety of alternative distribution strategies, set out in table 4.2 below. There are elements of the strategy that are common to each alternative:

- Each alternative includes 1207 dwellings already completed and 1911 amount of dwellings already committed and 1365 windfall /small sites allowance
- Brownfield land is already maximised for each alternative.
- Levels of employment growth would reflect the target identified in the Plan which is the only reasonable alternative identified (i.e. 304ha).
- The distribution of employment sites is not set in stone at this stage, but strategic opportunities along key routes (M6/M62) have driven higher projections for housing, and taking advantage of these opportunities is a key Plan objective. It is therefore presumed that employment growth would be located in key areas of opportunity (town centre, M6/M62 corridors).

*Table 3.2: Alternative approaches to the distribution of housing growth*

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

Focus housing growth close to employment opportunities along key transport routes	Cluster new housing growth around existing settlements along the M6 and M62 corridor to compliment employment allocations.	This would see higher levels of growth at key settlements in close proximity to the M6/M62 strategic junctions such as Haydock (M6/A580), Newton-le-Willows (M6/M62) and Earlestown and Bold/Rainhill (M62). Conversely, there would be lower levels of growth at settlements to the north of the Borough such as Billinge, Rainford, and to the west at Eccleston.
Limited Green Belt dispersal and focus on large scale Sustainable Urban Extension	Limited dispersal to existing Green Belt sites on the edge of main settlements and focus majority of Green Belt release in large scale Sustainable Urban Extension	<i>This would see a large volume of new housing (circa 2200 units) focused in a sustainable urban extension to the south east of the Borough at proposed safeguarded site Bold Forest Garden Suburb (HS03).</i>

### Combining growth and distribution scenarios

3.2.12 The spatial strategy is 'built-up' from different elements including the level and distribution of employment and housing land. The table below sets out the three growth scenarios and the distribution alternatives that are considered to be reasonable at each level of growth. The preferred approach is shaded green.

A: Meet OAHN needs (451 dpa)	B: 20% buffer for flexibility (570 dpa)	C: 912 DPA for flexibility and additional contingency
A1. Proportionate growth	B1. Proportionate growth	Proportionate growth
A2. Balanced growth	B2. Balanced growth	C1. Balanced growth plus focus on the south east
A3. Focus on South east	B3. Focus on South east	C2. Focus on south east plus focus on a new settlement
A4. Focus on new settlement	B4. Focus on new settlement	Focus on new settlement

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

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

3.2.15 Under growth scenario C, the alternatives become more limited. It would be difficult to maintain a proportionate approach as some settlements do not have the identified land to accommodate the level of growth. Therefore, this alternative (C1) is considered to be unreasonable. Focusing on a new settlement would not be sufficient to meet needs under growth scenario C, and therefore this alternative is not reasonable. It ought to be possible to still deliver a 'balanced approach', though this would involve much more growth and may need to include 'a new settlement', or a greater focus on opportunities to the south east.

### **3.3 Summary of appraisal findings**

- 3.3.1 Overall, the lower growth scenarios A1-B4 would have the fewest significant effects. Whilst this might be favourable from an environmental perspective, these scenarios would not take advantage of opportunities for economic growth and social development.
- 3.3.2 At the preferred level of growth (570 dpa), the positive effects for each distribution alternative (B1-B4) are broadly greater than for A1-B4. This higher level of growth would therefore be more attractive in terms of tackling deprivation and boosting economic growth which is a key aim of the Plan. However, at this level of growth the potential for negative effects on environmental factors increases, mainly related to increased pressure on landscapes and the character of the built and natural environment.
- 3.3.3 In terms of distribution, alternatives A1 and A2 spread the benefits of development more evenly, and so are also less likely to have significant negative effects in any one area. This contrasts with alternatives B3 and B4, which would have major positive effects on housing and would benefit some communities greatly, but would increase the potential for localised negative effects such as congestion, and not meeting housing needs in some settlements.
- 3.3.4 The higher growth options C1-C2 would be very positive in terms of driving housing and employment growth. However, this would be at the expense of significant negative effects upon landscape, heritage, agricultural land and air quality. Furthermore, it is uncertain whether infrastructure could cope with this level of development, which could lead to negative effects on the transport networks, water quality and access to services such as health and education.

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

#### Growth Scenario 1: 470 dwellings per year

- 3.4.1 All four alternatives have been rejected by the Council, in the main due to the inadequate amount of growth in housing involved. The Council consider that the alternatives:
- do not reflect the Borough's ambitions to continue stabilising the population,
  - do not allow for more housing choice and competition so more households can afford to form;
  - does not allow for significant economic growth;
  - fails to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession; and
  - do not allow for non-delivery or slippage from SHLAA sites and not allowing for extra Green Belt sites to allow for choice, flexibility and to compensate for lead-in times for site delivery would instead increase the risk of there not being an adequate supply of sites and would therefore fail in maintaining a five year supply of land leading to less planning control and increasing the likelihood of a Local Plan review to bring forward safeguarded sites, causing cost and delay.

#### Growth Scenario 3: 712 dwellings per year

- 3.4.2 Both alternatives C1 and C2 have been rejected by the Council.

- 3.4.3 A 712 unit per year target is substantially above the amount of housing achieved in the last two years (603.5), than on average over the past 5 years (478) and 10 years (422), indicating that the local housing market and infrastructure could struggle to absorb this number of dwellings and the development industry could struggle to supply this level of housing.
- 3.4.4 It is unlikely that with a 712 target that a five year land supply could be maintained for a number of years at the start of the plan period, reducing planning control over development. The housing could lead to unsustainable commuting patterns if not well connected to new jobs being created and existing jobs.

Growth Scenario 2: 570 dwellings per year

- 3.4.5 A housing requirement of 570 dwellings per annum is the Council's preferred approach. This is the same as the annual average net housing target of 570 set in the St. Helens Local Plan Core Strategy (2012).
- 3.4.6 The Core Strategy target was set by the Regional Spatial Strategy for the North West and was a target for growth that was above housing need estimates. A growth approach in Local Plan is still considered appropriate to help meet St. Helens development needs and economic growth plans and it is considered realistic as this target has been met in years including 2013/14 and 2015/16.
- 3.4.7 The preferred approach (alternative B2) is considered to be the most appropriate and sustainable way of delivering this level of growth as it allows for additional new housing to be provided in every Key Settlement, taking into account constraints and opportunities. This approach will also ensure that all communities have access to new market and affordable housing.
- 3.4.8 Alternative B1, which would also meet the preferred housing target of 570 dwellings has been rejected because the Green Belt assessment did not identify enough land as being suitable for release from the Green Belt to enable such a distribution. Furthermore, there is insufficient data on housing needs per settlement to justify releasing sites from the Green Belt around each settlement to meet these needs rather than being primarily led by suitability for release from the Green Belt.
- 3.4.9 Alternative Option B3 has been rejected because there is unlikely to be enough suitable Green belt land in the Haydock and Newton-le-Willows areas to meet both employment and housing needs, leading to less suitable land (in Green Belt release terms) being released, potentially leading to merging of settlements . This may also lead to harmful impacts on local shared infrastructure (i.e. roads). If land was restricted to that with the least Green Belt impact, then there would not be enough land to meet the employment and housing targets.
- 3.4.10 Alternative B4 has been rejected as it would lead to a concentration of housing that would be very unlikely to meet the needs of each Key Settlement area.



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# **Appraisal findings: Site Options**

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## 4 APPRAISAL FINDINGS: SITE OPTIONS

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### 4.1 Introduction

- 4.1.1 The Council consider that there is a need to allocate strategic sites for employment and housing land development in the Plan. This will help to ensure that housing and employment needs are met.
- 4.1.2 Part of the strategy is to maximise brownfield redevelopment, but this does not satisfy the demand for land, and in some instances the land is not suitable for the high quality employment land being promoted. Therefore, there has been a need to consider Green Belt sites and whether they can make a contribution to these needs without having unacceptable effects on the Green Belt.
- 4.1.3 To identify potentially suitable land, the Council undertook a 'call for sites' in January-March 2016.
- 4.1.4 Of those sites that were received, all non-Green Belt sites have been assessed in the St. Helens Strategic Land Availability Assessment 2016 (SHLAA) and all Green Belt sites have been assessed in the Draft Green Belt Review. A number of sites were found to be undeliverable in the Stage 1 Green Belt Review and were sieved out of the Green Belt Review and not progressed to the Stage 2 Green Belt Review. The remaining sites that form part of the Stage 2 Green Belt Review were those that are considered to be reasonable alternatives in the context of the SA.

#### The site options

- 4.1.5 A total of sixty-two sites were identified as reasonable alternatives for housing development. The majority of these sites relate to discrete parcels of land, though some represent a combination of one or more pieces of land.
- 4.1.6 Two sites for Gypsy and Traveller accommodation were also identified.
- 4.1.7 A total of sixteen sites were identified as reasonable alternatives for employment uses. One further site for Leisure uses was identified.
- 4.1.8 Each site option has been appraised against a site appraisal framework. The findings of the appraisal are summarised below in a series of matrices.

### 4.2 Summary of site appraisal findings

- 4.2.1 Tables 4.1 and 4.2 below illustrate the scores for each site option against the site appraisal criteria.

**Table 4.1: Employment site options**

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA8. Protect and enhance cultural heritage	SA15. Support local economy	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel
E1	Land at Millfield Lane	Haydock	Allocate (EA7)										
E2	Land off Florida Farm, Slag Lane	Haydock	Allocate (EA2)										
E3	Haydock Point North	Haydock	Allocate (EA4)										
E4	Haydock Point South	Haydock	Discard										
E5	Land to the West of Haydock Industrial Estate	Haydock	Allocate (EA6)										
E6	Haydock Green North	Haydock	Allocate (EA3)										
E7	Land South of Penny Lane	Haydock	Allocate (EA5)										
E8	Land to the West of Eurolink and St Helens Linkway	Bold	Discard										
E9	Omega Extension, Land to the north of M62	Bold	Safeguard (ES-01)										
E10	Omega South Western	Bold	Allocate (EA1)										
E11	Parkside East	Newton-le-Willows	Allocate (EA8)										
E12	Parkside West	Newton-le-Willows	Allocate (EA9)										
E13	Land to the West of Sandwash Close	Discard	Allocate (EA10)										
E14	Land at Lea Green Farm West	Discard	Allocate (EA11)										
E15	Gerards Park Phases 2 and 3	Discard	Allocate (EA12)										
E16	Omega South Eastern Booths Wood	Bold	Safeguard (ES-02)										
LE1	Former United Glass Site, Salisbury Site	Central area	Discard									/	

**Table 5.2: Housing site options**

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H1	Sutton Moss Road	Parr	Discard																					
H2	Land at Florida Farm, Slag Lane	Haydock	Allocate (HA3)																					
H3	Land at Junction Road/ Stanley Avenue	Rainford	Discard																					
H4	Bold Forest Garden Suburb: land south of Reginald Road / Bold Road / Traver's Entry, west of Neil's Road, north of Gorse Lane and east of Crawford Street, Bold	Bold	Allocate (HA6) and safeguard (HS03)																					
H5	Haydock Green, Land south west of Junc 23- M6	Haydock	Allocate (HA10)																					
H6	Land off Clock Face Road	Bold	Safeguard (HS05)																					
H7	Land off Mere Road	Newton	Discard																					
H8	Land at Castle Hill and East of Rob Lane	Newton	Safeguard (HS15)																					
H9	Land at Elms Farm, West of Rob Lane	Newton	Safeguard (HS16)																					
H10	Land at Vista Road	Earlestown	Safeguard (HS07)																					
H11	Land at Vista Road (2)	Earlestown	Allocate (HA7)																					
H12	Land to the South of Elton Head Road	Thatto Heath	Safeguard (HS24)																					
H13	Prescot Reservoir	Eccleston	Discard																					

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H14	Rainford Wastewater Treatment Works	Rainford	Discard																					
H15	Eccleston Park Golf Club, Rainhill Road	Eccleston	Allocate (HA8)																					
H16	Bell Lane (Various Plots)	Bold	Safeguard (HS04)																					
H17	Land at Gartons Lane	Bold	Allocate (HA5)																					
H18	Land at Hydes Brow	Rainford	Discard																					
H19	Land east of Higher Lane / South of Muncaster Drive / at White House Lane, Rainford	Rainford	Safeguard (HS18)																					
H20	Land rear of Deepdale Drive	Rainhill	Discard																					
H21	Land at Scott Clinic, Rainhill Road	Thatto Heath	Discard																					
H22	Land South of Station Road	Haydock	Safeguard (HS11)																					
H23	Land to East of Newlands Grange	Newton	Safeguard (HS14)																					
H24	Lords Fold	Rainford	Allocate (HA14)																					
H25	Land at Rookery Lane	Rainford	Discard																					
H26	Land at Elton Head Farm	Thatto Heath	Safeguard (HS24)																					
H27	Land north of Muncaster Drive	Rainford	Discard																					
H28	Land between Ormskirk Road and Junction Road	Rainford	Discard																					
H29	Muncaster Drive	Rainford	Discard																					
H30	Land North of MossBorough Road	Rainford	Discard																					
H31	Land South of Higher Lane	Rainford	Allocate (HA15)																					

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H32	Rookery Lane	Rainford	Safeguard (HS21)																					
H33	Bushey Lane South	Rainford	Safeguard (HS19)																					
H34	Red Delph Farm	Rainford	Safeguard (HS19)																					
H35	Land adjoining Ash Grove Farm, Beacon Road	Billinge	Allocate (HA1)																					
H36	Land at Martindale Road, Carr Mill	Moss Bank	Safeguard (HS12)																					
H37	Land at Weathercock Hill Farm, Garswood Road	Billinge	Allocate (HA2)																					
H38	Land at Leyland Green Farm	Billinge	Safeguard (HS02)																					
H39	Land at Moss Bank Farm	Moss Bank	Allocate (HA11)																					
H40	Eccleston Vale- Land south of East Lancs	Windle	Allocate (HA16)																					
H41	Land at Elton Head Road	Thatto Heath	Safeguard (HS24)																					
H42	Houghton Lane Plots	Parr	Discard																					
H43	Land off Common Road/ Swan Road, Newton-le-Willows	Earlestown	Safeguard (HS06)																					
H44	Land to the South of former Central Works, Ballerpon Way	Haydock	Safeguard (HS10)																					
H45	Land at Old Hey Farm	Newton	Safeguard (HS13)																					
H46	NHS Sims Ward, Bradlegh Road	Newton	Allocate (HA12)																					
H47	Land at Manor Farm, Mill Lane/ Land to the east of Hall Lane	Rainhill	Safeguard (HS23)																					
H49	Red Bank Community Home, Winwick Road,	Newton	Allocate (HA13)																					
H50	Land off Winwick Road, Newton-le-Willows	Newton	Safeguard (HS17)																					

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H51	Land off Strange Road, Garswood	Haydock	Safeguard HS01																					
H52	Land to the west of Omega South (HCA)	Bold	Discard																					
H53	Rainhill High School	Rainhill	Discard																					
H54	Land at Mill Lane	Rainford	Safeguard (HS20)																					
H55	Land West of Beech Road	Rainford	Discard																					
H56	Land to the West of Haydock Park Racecourses	Haydock	Discard																					
H57	Loyola Hall	Rainhill	Discard																					
H58	Land east of Chapel Lane and south of Walkers Lane		Allocate (HA40)																					
H59	Higher Barrowfield Farm, Houghtons Lane		Allocate (HA9)																					
H60	Land south of Burows Lane		Safeguard (HS08)																					
H61	Land south of Howards Lane East of Gillars Lane		Safeguard (HS09)																					
H62	Land at Hanging Bridge Farm, Elton Head Road		Safeguard (HS22)																					
GT1	Land north of Sherdley Road		Allocate (GTA01)																					
GT2	Land east of Sherdley Road Caravan Park		Allocate (GTA02)																					







#### Rationale for site selection

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

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# **Appraisal of the draft Plan**

**06**

## 5 APPRAISAL OF THE DRAFT PLAN

### 5.1 Methodology

- 5.2.1 This section presents an appraisal of the draft Plan against the SA Framework. Effects have been identified taking into account a range of characteristics including: *magnitude, duration, frequency, and likelihood*. Combined, these factors have helped to identify the significance of effects, whether these are positive or negative.
- 5.2.2 The effect of the Plan 'as a whole' is identified, which considers cumulative effects, synergistic effects and how the different plan policies interact with one another. This is important as Plan policies should be read in the context of the whole plan, not just on their own.
- 5.2.3 A score is given to reflect the significance of effects as follows:

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

### 5.3 Appraisal findings

- 5.3.1 Tables 5.1 and 5.2 below present a summary of the SA findings for the draft Plan considered 'as a whole'.

**Table 5.1** – Summary of cumulative effects of the Local Plan on the SA Topics

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

**Table 5.2** – Summary of the appraisal findings

1. Biodiversity and geodiversity
<p>The Plan will lead to the development of a variety of sites within the Green Belt and also some which have environmental constraints such as being close to wildlife sites and ancient woodland. However, the effects associated with strategic site development ought to be mitigated by site specific policies and core policies throughout the plan.</p> <p>There is particularly strong protection for ancient woodland, and any loss of habitat should be compensated with a greater quantity of species / habitat. The Green Infrastructure network ought to be protected and enhanced, with particular benefits relating to the creation of new local wildlife sites at Billinge Hill and the Bold Forest Area Action Plan.</p> <p>Overall, despite the planned growth, the plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a <b>significant positive effect</b> predicted.</p>
2. Land quality
<p>The Plan will lead to substantial development on land of agricultural value; some of which is categorized as 'best and most versatile'. Once developed, this resource cannot be recovered, and so this represents a <b>significant negative effect</b> on soil resources. As a form of compensation, soil resources could be retained in part through the provision of allotments (Either on or off site). This recommendation would help to mitigate the effects somewhat.</p> <p>Conversely, the Plan seeks to make efficient use of land and infrastructure, and promotes the regeneration of land, particularly brownfield land in the urban area. This would generate <b>positive effects</b> with regard to land quality.</p>
3. Traffic, congestion and air quality
<p>The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Newton-le-Willows and Earlestown. Increased traffic in these areas could have <b>negative effects</b> upon levels of congestion with knock-on adverse effects upon air quality.</p> <p>Not all new trips would be car based though, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This will help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made. These elements of the Plan ought to reduce the significance of potential negative effects.</p> <p>In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have <b>positive effects</b> for the wider region with regards to a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed. An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.</p>

#### 4. Natural resources

The Plan is driven by economic growth, and seeks to deliver higher levels of housing than projected population statistics suggest is needed. This is likely to lead to increased generation of wastes, and the use of natural resources. However, growth would still occur in the absence of a local plan, though perhaps not at the same rate.

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

Given that much of the boroughs watercourses are vulnerable to nitrates within surface water run-off, changes in land use could actually help to reduce this problem in the longer term.

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

#### 5. Climate change and energy

Overall, the Plan should help to tackle climate change and facilitate adaption to climate change. Whilst increased growth is likely to lead to greater greenhouse gas emissions, the plan seeks to improve energy efficiency and the generation of energy from low carbon sources. In particular, development is encouraged to secure a 10% improvement in efficiency, and plans positively for wind energy. Over time a **significant positive effect** is predicted reflecting these factors.

#### 6. Flooding

Overall, the plan seeks to ensure that flood risk is minimised during the plan period, setting out a number of policies to help achieve this objective. Though the plan involves housing and employment land development on greenfield land; much of this is in areas that are not at significant risk of flooding and could be enhanced through the implementation of sustainable natural drainage systems. The effects of the Plan are therefore predicted to be positive, with **significant positive effects** accruing in the longer term as a result of blue and green infrastructure enhancement, linked to the Sankey Catchment Management Plan.

Beyond the plan period, the need for additional housing (as suggested by the safeguarding of land) could lead to increased development in areas at risk of flooding, which would need to be carefully examined.

## 7. Landscape

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

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

Some sites fall within areas of medium-high sensitivity, and therefore present the potential for significant negative effects. This is the case for Rainford, Billinge and Garswood. In combination, the development around these settlements is predicted to have a significant effect (though measures recommended in this SA Report would reduce the likelihood of effects occurring and thus reduce their significance).

The spatial strategy also focuses on the regeneration of the town centre and seeks to protect the vitality of key centres such as St. Helens and Earlstown. Several policies offer protection for Green Infrastructure, ecological networks and design policies ought to ensure that high quality developments are secured, particularly at gateway locations.

These policies in combination are likely to contribute to a general improvement of the townscape and settlement edges, which will help to offset the loss of character associated with Green Belt loss.

Therefore, overall, the effects upon landscape and townscape are predicted to be mixed. **Significant positive effects** are predicted in the main, reflecting the proactive approach to the management of the built and natural environment, and explicit commitment to individual improvement schemes such as the Bold Forest initiative and Billinge Hill Nature Reserve. Some strategic sites offer the opportunity for enhancement, but it should be acknowledged that negative effects are predicted for the majority of Green Belt allocations. With suitable mitigation and enhancement though, these effects could be prevented from becoming significant.

## 8. Built and natural environment

Overall, the strategy is predicted to have **mixed effects** on heritage. Some of the allocated strategic sites present the possibility of negative effects, whilst others are predicted to be neutral. The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are **positive effects**. The **negative effects** are generally predicted to be not significant across the Borough. However, there are particular locations where **significant negative effects** could be generated in the absence of mitigation measures.

Given that the Plan sets out specific measures that could help to protect and enhance the historic environment (i.e. *Particularly LPC11, site specific policies and design policies*), it is likely that the significant effects of housing, employment and infrastructure development could be mitigated effectively.

The Plan policies help to deliver the strategy and ought to reduce the significance of negative effects where they could arise, and to secure enhancements when possible, corresponding to a possible (?) **significant positive effect**.

## 9. Health and wellbeing

The Plan is predicted to have a **positive effect** on health and wellbeing, primarily through the delivery of housing to meet the needs of a range of groups, as well as the aspiration to provide increased job opportunities. The distribution of growth ought to ensure that jobs, services and leisure are accessible to new and existing communities and can help to reduce levels of deprivation in areas of need. Of particular important is the continued commitment to urban regeneration and the need to secure enhancements to infrastructure as part of new development.

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

In combination, the plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the district. However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people. Congestion, may also increase in the short term / before infrastructure improvements are secured, which could lead to a poorer quality environment in parts of the Borough where development is greatest (for example St Helens urban area, Haydock, Bold).

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

## 10. Economy and employment

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

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

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

## 11. Housing

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

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

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

Land has also been safeguarded to ensure that sufficient land exists beyond the Plan period for longer term development needs. This is positive, though the effects would need to be identified and attributed to the next Plan that sets out the delivery of housing and employment land more explicitly.





# **Mitigation and enhancement**

**07**

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## 6 MITIGATION AND ENHANCEMENT

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### 6.1 Introduction

- 6.1.1 The policies for the Plan were appraised in the SA before they were ‘finalised’ in the draft Plan for public consultation. This allowed for mitigation and enhancement measures to be identified and changes made to the policies as the Council considered appropriate at this stage.
- 6.1.2 Table 6.1 below sets out the recommendations that have been made at this stage. In some instances, the Council was able to make amendments to the relevant policies.
- 6.1.3 However, as the plan-making and SA processes have been undertaken in parallel, there was insufficient time to give full consideration to all the recommendations before finalising the draft Plan. The Council will consider recommendations though as the plan moves towards Publication stage.

**Table 6.1** *Mitigation and enhancement measures*

SA Recommendations	St Helens Response
<p><i>Further benefits could be generated by acknowledging the role that ecological networks (LPC08) and greenways (LPC07) should play in securing resilient habitats and a greater range of habitat for species. For example, the following text could be added to LPC07:</i></p> <p><i><u>“They do not impair the integrity of the Greenway as a wildlife corridor”.... or its resilience to development pressures and climate change.</u></i></p>	<p>Incorporated recommended wording into Policy LPC07.</p>
<p>The allocation HA1 at Billinge could have some adverse effects on the setting of heritage assets, as there are a number of listed buildings within proximity (Crookhurst Farm and the Old Barn).</p> <p>Though plan policies that deal with heritage and design ought to cover such an issue, it is considered beneficial to include a site specific policy clause that requires the development to incorporate sufficient screening so that views from Billinge Hill are not significantly intruded upon/altered. This would help to ensure that new homes are well integrated into the existing settlement and maintain the ‘rural’ feel of the area.</p>	<p>Comments recognised. It is felt that the implementation of other Plan policies that deal with design and heritage will enable these concerns to be addressed. However consideration will be given to a site specific policy clause when more detailed policies are developed at the Publication stage.</p>

## SA Recommendations

## St Helens Response

Housing land at HA15 is adjacent to a listed building (Dial Wood House). The setting of this asset is likely to be affected by development, as its character is enhanced by the open fields and wooded areas that the building overlooks. It is likely that negative effects upon this asset will occur as a result of substantial development here. It may therefore be beneficial to include a clause within a site specific policy for HA15. This could seek to achieve a relatively open design and/or a buffer of green space adjacent to Higher Lane.

Comments recognised. It is felt that the implementation of other Plan policies that deal with design and heritage will enable these concerns to be addressed. However consideration will be given to a site specific policy clause when more detailed policies are developed at the Publication stage

As a form of compensation for the loss of best and most versatile agricultural land, soil resources could be retained in part through the provision of allotments (Either on or off site). This recommendation would help to mitigate the effects somewhat.

To be considered for the Publication Draft of the Local Plan.

The protection of trees and woodland (LPC10) ought to have beneficial effects in terms of helping to manage flood risk. This link could be made more explicit by identifying flood and water management as a form of green infrastructure (under point 6).

To be considered for the Publication Draft of the Local Plan

- 6.1.4 Generally, the Plan has been positively prepared, and there was little scope for suggesting mitigation measures, as few negative effects were identified. However, as the plan was being developed, the draft policies were subjected to SA, and a small number of mitigation and enhancement measures were suggested through the SA. This led to positive changes to Policy LPC07. Further consideration will be given to mitigation measures as the plan progresses.

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