The Planning Inspectorate

Report to St Helens Borough Council

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Section 20

Report on the examination of the St Helens Borough Local Plan

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Abbreviations used in this report

BFAAP	Bold Forest Area Action Plan
Council	St Helens Borough Council
CS	St Helens Local Plan Core Strategy 2012
DtC	Duty to Cooperate
dpa	Dwellings Per Annum
dph	Dwellings Per Hectare
ECF	English Cities Fund
ELNS	Employment Land Needs Study
EVA	Economic Viability Assessment
Framework	National Planning Policy Framework
GBR	Green Belt Review
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
Ha	Hectares
HMA	Housing Market Area
HRA	Habitats Regulation Assessment
IDP	Infrastructure Delivery Plan
LCR	Liverpool City Region
LDS	Local Development Scheme
LHN	Local Housing Need
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
MSA	Mineral Safeguarding Area
NH	National Highways (formerly Highways England)
OAN	Objectively Assessed Needs
Plan	St Helens Borough Local Plan
PPG	Planning Practice Guidance
RIS	Road Investment Strategy
RMS	Recreation Mitigation Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SDS	Spatial Development Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHELMA	Strategic Housing and Employment Land Market Assessment
SHMA	Strategic Housing Market Assessment
SOCG	Statement of Common Ground
SRFI	Strategic Rail Freight Interchange
UDP	Unitary Development Plan

Non-Technical Summary

This report concludes that the St Helens Borough Local Plan [the Plan] provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. St Helens Borough Council [the Council] has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared a schedule of the proposed modifications and carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over an eight-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- Extending the timeframe of the Plan to ensure a 15 year period post-adoption;
- Taking into account the Council's climate change emergency declaration;
- Ensuring that Green Belt policy relating to safeguarded land and compensatory improvements is positively prepared and consistent with national policy;
- Clearly articulating the exceptional circumstances for Green Belt release at strategic and site levels;
- Modifying Policies LPA02 and LPA05 so that the Plan promotes the effective use of land;
- Ensuring that the Site Profiles for allocated and safeguarded sites are site-specific and not generic;
- The inclusion of bespoke policies for the Bold Forest Garden Suburb and Parkside West;
- Revising the boundaries for allocated Sites 7HA and 9EA and safeguarded Site 4HS so that they are positively prepared, justified, and effective;
- Modifying housing mix, affordable housing, and housing standards policies so that they are effective and consistent with national policy;
- Ensuring that the housing and employment land supply position is up-to-date so that the Plan is effective;
- Amending the Monitoring Framework to make sure that it is effective;
- A number of other modifications to ensure that the plan is positively prepared, justified, effective, and consistent with national policy.

Introduction

1. This report contains our assessment of the St Helens Council Local Plan [the Plan] in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to cooperate [DtC]. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework 2021 [the Framework] makes it clear that in order to be sound, a local plan [LP] should be positively prepared, justified, effective, and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority [LPA] has submitted what it considers to be a sound plan. The St Helens Borough Council Local Plan Submission Draft Written Statement (SD001), submitted in October 2020, is the basis for our examination. It is the same document that was published for consultation in January 2019.

3. A Draft Schedule of Changes (SD003) was also provided alongside the Submission Draft but, as this was not subject to consultation, we are not treating it as a formal addendum to the Plan. We have included some of the modifications as Main Modifications [MMs] as appropriate. The remainder are to be included by the Council as Additional Modifications. We have been provided with the representations on the Submission Draft and have taken them into account in our examination of the Plan, and in this report.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any MMs necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM001**, **MM002** etc, and are set out in full in the Appendix.

5. Following the examination hearings, St Helens Borough Council [the Council] prepared a schedule of proposed MMs (SHBC036) and carried out sustainability appraisal [SA] and habitats regulations assessment [HRA] of them. The MM schedule was subject to public consultation between 18 November 2021 and 13 January 2022. We have taken into account the consultation responses in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary we have highlighted these amendments in the report.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a LP for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted LP. In this case, the submission policies map comprises the set of plans identified as the St Helens Local Plan Policies Map (SD002).

7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.

8. These further changes to the policies map were published for consultation alongside the MMs (Annex 7 to SHBC036).

9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in SD002 and the further changes published alongside the MMs.

Context of the Plan

10. St Helens Borough is situated in the north-west of England, positioned geographically between the cities of Liverpool and Manchester, and close to the transport corridors of the M6, M62, and main west coast railway line. For administrative purposes St Helens is one of six authorities that together form the Liverpool City Region [LCR][1].There is a strong history of coal mining and manufacturing within St Helens, with a particular link to the glass making industry. Outside of the towns of St Helens, Newton-le-Willows and Earlestown, and the wider urban area, over half of the Borough is rural or semi-rural in nature most of which is designated as Green Belt.

11. The St Helens Borough Local Plan proposes to replace all of the policies in the St Helens Local Plan Core Strategy 2012 [CS] and the previously 'saved' policies of the St Helens Unitary Development Plan 1998 [UDP]. This is made clear by paragraph 1.3.5 of the Plan. Other development plan documents are the Joint Merseyside and Halton Waste Local Plan 2013 and the Bold Forest

[1] Liverpool, Wirral, Sefton, Knowsley, Halton, and St Helens

Park Area Action Plan 2017 [BFAAP]. These two documents will remain extant and will not be replaced by this Plan.

12. The submitted Plan includes the period 2020-2035 in its title. However, as explained later in the report, this period does not reflect the base date of the Plan and is not an appropriate Plan period. For clarity we have removed the references to 2020-2035 from the report when referring to the Plan's title.

13. During the examination the Government published a revised Framework and changes to Planning Practice Guidance [PPG]. These changes to Government policy and guidance have been taken into account in the schedule of MMs.

Public Sector Equality Duty

14. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination, including the provision of traveller sites to meet need, and accessible and adaptable housing for older people and those with disabilities. These matters are discussed in more detail under our assessment of soundness that follows.

Assessment of Duty to Cooperate

15. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan's preparation.

16. We have had regard to the DtC Statement (SD009) and representations in considering whether the DtC has been met. The Statement describes regional working with other local planning authorities, cross-boundary co-operation on strategic priorities, and the consultation that has taken place with prescribed bodies.

17. Our assessment of whether the DtC has been met focuses on the relationship of St Helens with authorities and prescribed bodies within the LCR and with the other adjoining LPAs of Warrington, Wigan, and West Lancashire.

18. The LCR authorities together with West Lancashire form a single functional economic area. St Helens, along with Warrington and Halton, forms a strategic housing market area [HMA] known as mid-Mersey.

19. There is a history of joint working on planning matters within the LCR such as the preparation of joint evidence-based studies on housing and employment needs and supply. Joint working within the LCR was formalised in 2014 through

the establishment of the LCR Combined Authority which deals with a range of functions including strategic planning. To this end the Combined Authority is preparing a Spatial Development Strategy [SDS] for the LCR. The SDS is at an early stage, focusing on a proposed vision, policy topic areas and suggested policy approaches. However, there is alignment between the Plan and the SDS thus far. There is nothing to suggest that the position will change as the SDS progresses.

20. A Statement of Common Ground [SOCG] dated October 2019 between the LCR authorities and West Lancashire Borough Council[2] (SD010) sets out the housing needed for each LPA at that time, based on adopted and emerging LPs. The SOCG noted that there was no current unmet need to be distributed among or beyond the seven LPAs. That position remains the same in that each LPA, including St Helens, currently plans to meet its own housing need. This includes Liverpool where the LP was adopted in January 2022 but examined under the transitional arrangements, so subject to the 2012 Framework. The increase in the housing figures for Liverpool as a result of the transition to the standard method, including the cities uplift, is a matter to be addressed by the SDS, any update of the Liverpool LP and other LP reviews in the LCR. In any event St Helens lies in a different HMA.

21. No spare capacity has been identified in any of the LPAs to meet St Helens housing needs. This is in the context that all of the seven LPAs are constrained by Green Belt (see SD030).

22. Warrington, immediately to the south-east of St Helens, has strong economic, housing and infrastructure links with St Helens, but is also constrained by Green Belt. The two authorities have worked together, particularly on a housing needs evidence base and on the provision of employment land. In relation to the latter, the major employment site at Omega on the boundary between the two Boroughs and straddling the M62, has been identified by the Plan for expansion. This has resulted in the proposed allocation of Site 1EA for employment to meet Warrington's employment land needs.

23. The Warrington LP was submitted for examination in April 2022. A SOCG between St Helens and Warrington was provided in support of the Warrington LP. The submitted LP indicates that the Omega site would contribute to Warrington's employment land needs. The SOCG also records the position on housing needs, confirming that Warrington is to meet its own housing needs but cannot accommodate any housing needs from St Helens. Again, this is reflected in the submitted Warrington LP. Although at different stages, the respective LPs and the SOCG demonstrate constructive working between the two LPAs.

[2] An associate member of the Combined Authority

24. Wigan, the other adjacent LPA, lies within the Greater Manchester conurbation and is also affected by Green Belt. There is no SOCG with Wigan. However, St Helens has engaged with the emerging strategic LP 'Places for Everyone' prepared by nine Greater Manchester Council's, including Wigan. No requirement to meet Wigan's or Greater Manchester's development needs has been identified by the emerging LP or indeed by Wigan alone.

25. A sub-regional need for the logistics and warehousing sector has been identified through the preparation of the LCR Strategic Housing and Employment Land Market Assessment [SHELMA] (SUB001). There is no agreed distribution of large-scale Use Class B8[3] development. But there is a commitment to addressing the need across the LCR through the plan-making process. St Helens has a role to play in this respect, particularly given its proximity to the strategic road and rail networks. No objections have been raised by other strategic policy making authorities, including the LCR Combined Authority and the LCR Local Enterprise Partnership, to the Plan's uplift in the employment land requirement to help meet this sub-regional need.

26. Connected to an extent to the logistics and warehousing sector, but also to wider employment provision in the region, is the longstanding aspiration to develop a strategic rail freight interchange [SRFI] at Parkside. The SRFI has support from the LCR and other agencies such as Transport for North and Warrington. This support is evidenced through funding by the LCR Strategic Investment Fund for the Parkside Link Road which is required to deliver the SRFI. The Plan's specific proposals for the SRFI and Parkside are dealt with later in this report.

27. The DtC Statement also evidences the co-operation with other prescribed bodies, including infrastructure providers and technical consultees. This has influenced the policies in the Plan and the preparation of key supporting documents such as the Infrastructure Delivery Plan [IDP] (SD013).

28. National Highways (formerly Highways England) [NH] has had ongoing involvement in ensuring that improvements to the strategic road network to accommodate development is programmed and included in the IDP and referenced in relevant Plan policies. A SOCG reflects this cooperation, particularly in respect of Junctions 22 and 23 on the M6 and Junctions 7 and 8 of the M62 (SD031). In relation to J23, Wigan has been involved, along with St Helens and NH, in a working group and feasibility study. The same partners, together with site promoters, will convene as a taskforce to drive forward design and funding for junction improvements.

29. Key bodies such as the Environment Agency and Natural England have also had an input into the need for additional evidence to support the policies and

[3] The B8 use class comprises 'use for storage or as a distribution centre'

proposals. The Council, Environment Agency and Halton and Warrington Councils have worked on the Sankey Catchment Action Plan to provide a long-term integrated water management approach to the catchment. Natural England and LCR authorities have been engaged in the preparation of a Recreation Mitigation Strategy [RMS] and an LCR Ecological Network. The latter identifies ecological assets and Nature Improvement Areas, two of which are in St Helens.

30. St Helens and other LCR authorities have produced the Joint Waste Local Plan. The Council works collaboratively on minerals as part of the North-West Aggregates Working Party which prepares annual aggregates assessments and monitoring reports. This joint working has informed the waste and minerals policies of the Plan.

31. We are satisfied that, where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to cooperate has therefore been met.

Assessment of Other Aspects of Legal Compliance

Local Development Scheme

32. The Plan has been prepared in accordance with the Council's Local Development Scheme [LDS] (SD014). The Regulation 19 consultation on the Submission Draft version of the Plan took place within the period identified in the LDS (between January and May 2019). Submission of the draft Plan was also made in line with the LDS (October 2020). Adoption of the Plan is likely to be some 6 months after the date anticipated by the LDS, but the difference is due to the length of the examination which could not have been predicted when the LDS was last updated.

Consultation

33. Consultation on the Plan and the MMs has been carried out in compliance with the Council's Statement of Community Involvement of November 2013 [SCI] (SD015). The SCI is over 8 years old. The Council considered updating the SCI during the Plan preparation process. However, it was felt that altering the approach during the evolution of the Plan could have led to inconsistencies. Moreover, the consultation and engagement methods which included drop-in sessions, appear to have been effective, notwithstanding criticisms of a lack of public meetings and workshops. Consultation has exceeded the requirements of the regulations. Given the above, we consider that the age of the SCI is not, in itself, an issue.

34. That said, during the examination process and in response to the challenges raised by the Covid-19 pandemic, the Council produced an SCI Addendum (SD015A). The addendum anticipates how consultation, particularly on the MMs, should take into account Government restrictions and guidance that have been in place from time to time during the pandemic. The addendum recognises that primary access will be via a digital format but that provision should be made to prevent digital exclusion. As it turned out the Council made hard copies of relevant documents available at the Borough's libraries during the MM consultation.

35. Some specific concerns about the extent of consultation in Billinge and Bold were raised at the hearings but the Council subsequently confirmed that the relevant parties had been consulted.

Sustainability Appraisal

36. The Council carried out a SA of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under Regulation 19. Two further SA Addendum reports were published in September 2020 and June 2021 (the latter following the close of the examination hearing sessions). These addendums updated some factual information and also corrected a small number of minor inaccuracies that had been identified. The SA was also updated to assess the MMs. This iteration of the SA identified that the MMs would lead to some positive effects for SA objectives compared to the submission version of the Plan[4].

37. The SA assessed a range of housing and economic growth options against 20 sustainability objectives. These options ranged from 451 to 712 dwellings per annum [dpa] for housing and around 109 hectares [ha] (low growth) to 306 ha (higher growth) of employment development. Whilst it is true that the quantum of growth assessed could have been higher, or indeed lower, it is essentially for the Council to define the content of the reasonable alternatives to be assessed. Whether or not an alternative is 'reasonable' is ultimately a matter of law but the determining factor is whether the process of identifying and assessing reasonable alternatives was followed. Whilst the growth ranges tested could have been different, it does not follow that the alternatives selected by the Council were unreasonable. The fact is that the options tested comprised a range that were sufficiently distinct so as to allow a meaningful comparison to be made between the different growth options. The options of not meeting housing and employment needs were not considered as reasonable alternatives by the Council.

[4] The suite of SA documents are referenced SD005 and SD005.1 to SD005.6

38. In assessing individual sites there was also some discussion regarding whether or not the SA (and also the Green Belt Review [GBR][5]) should have taken account of more detailed information where this was available. This might be the case where, for example, more detailed work has been undertaken in support of the proposed allocation or a planning application and could include detailed transport assessment work or ecological reports.

39. It may be that more detailed information at the site level might alter specific findings in the SA. However that detailed information was not available for all sites assessed in the SA. The methodology for the SA sought to ensure that all sites were assessed on an equal basis as that would help to ensure that the outcomes of the site assessment process were comparable. Furthermore, the information available for individual sites often evolves during the Plan making process, with additional information becoming available. If it were a requirement to constantly revisit strategic level site assessments, as additional detailed site information became available, then this would have its own practical difficulties as it would be unlikely that there would ever be a time when the evidence base ceased evolving.

40. The strategic assessment of sites is therefore necessarily a snap-shot in time and, providing there are no fundamental flaws in the process, it is not reasonable to expect reports to be constantly updated as new, more detailed information becomes available. The methodology adopted in assessing sites helped to ensure a consistent approach was taken to the assessment of sites.

41. Overall, the SA has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.

Habitat Regulations Assessment

42. The HRA of December 2018 (SD006), the subsequent HRA Addendum of September 2020 (SD006.1), and the HRA of the MMs (SD006.2) set out that a proportionate appropriate assessment has been undertaken of the Plan. The HRA concludes that the Plan contains an adequate policy framework to ensure that it would result in no adverse effects on the integrity of European sites. An example of this is the RMS which is being developed jointly by the LCR authorities to mitigate the cumulative effects of development across the area from recreational pressure on European sites such as those along the coast. The legal requirement to undertake an appropriate assessment has been met.

[5] Of December 2018 (SD020) read together with the further Stage 2B Assessments (SD021)

Strategic Priorities

43. The Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area. The Plan is explicit as to which policies are strategic.

Climate Change

44. The Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Policies on matters including flood risk, water management, renewable energy, and low carbon development, aim to achieve this. We consider these policies later in our report. Specifically, the Plan now refers to the Council's climate change emergency declaration and various MMs (**MM003**, **MM006**, **MM012**, **MM014**, **MM025**, **MM027**, **MM029**, **MM032**, **MM034** and **MM039**) ensure that this is a cross cutting theme throughout the policies of the Plan. These changes are required so that the Plan is positively prepared.

Conclusions on legal compliance

45. In summary, the Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

46. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified ten main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy or policy criterion in the Plan.

Issue 1 – Whether the Plan period and the housing and employment requirements in the LP are justified taking into account national policy and the needs and constraints of the area. In particular whether exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries

Plan period

47. The Framework indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The Plan has a stated timeframe of

2020 to 2035. However, the LP has had a long gestation period and, if it is adopted in 2022, it would only have about a 13-year period post adoption.

48. Extending the Plan period to 2037 would ensure a 15-year period post adoption so that it can respond to long-term requirements and opportunities, including those arising from improvements to infrastructure. The longer period would increase employment and housing land requirements but the Plan is able to accommodate these changes as demonstrated later in the report. Retail floorspace requirements would not need to change as they would be reviewed well before 2037 when changes in shopping behaviours, including the effects of the pandemic, would be taken into account.

49. A Plan period up to 2037 is required so that the Plan is positively prepared, justified, and consistent with national policy. **MM001** would secure the relevant changes. There are other consequential changes throughout the Plan which are dealt with below.

Housing Objectively Assessed Needs [OAN]

50. The Framework indicates that, to determine the minimum number of homes needed, strategic policies should be informed by a local housing need [LHN] assessment, conducted using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. PPG advises that if an alternative approach identifies a need higher than the standard method, it should be considered sound as it will have exceeded the minimum starting point. When taken together, national policy and guidance implies that, in most cases[6], the housing OAN should not be lower than the LHN figure but there may be justification for it to be higher.

51. At the time of submission of the LP, the LHN was 434 dpa. At the time of the hearings the latest LHN assessment based on the standard method showed a housing need of 424 dpa (see SHBC013). Figures published in April 2022, taking into account 2021 affordability ratios, show a housing need of 399 dpa. The household growth figure contained in the Council's recently published draft Housing Strategy (407 dpa) is based on the 2018 household projections, is not a LHN assessment and has not been tested. The Plan proposes a housing requirement of 486 dpa which represents an uplift of about 12%, 15% or 22% on these minimum figures.

52. The standard method takes into account affordability ratios which in St Helens are low compared to national figures. Moreover, ratios in the Borough have

[6] Paragraph 11 b) i. of the Framework provides an exception

been fairly level for the last 10 years, whereas nationally they have generally been rising.

53. That said, PPG gives examples of where a housing need higher than LHN can be considered. One of these relates to growth strategies for an area that are likely to be deliverable. In this respect the LCR has a growth strategy and St Helens has been awarded £25m as part of the Government's Towns Fund. The other examples cited, strategic infrastructure improvements driving an increase in homes needed and unmet needs from a neighbouring authority, do not apply in St Helens.

54. The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand. The link between economic and housing growth is evidenced by the Strategic Housing Market Assessment [SHMA] Update 2019 (HOU001) and the relevant Background Paper (SD025). The jobs growth forecasts which underpin the housing need figure reflects a number of local factors. These include the Employment Land Needs Study of 2015 [ELNS] (EMP002) which states that St Helens has a net outflow of commuters, particularly to the neighbouring areas of Warrington, Knowsley, and Liverpool. There are, therefore, likely to be opportunities to improve the commuting imbalance and improve employment opportunities for local residents. There is also the opportunity for St Helens, because of its geographic location and proximity to a number of major strategic transport routes, to take advantage of demand for the logistics sector. In addition, there is the job growth experienced on existing sites within St Helens.

55. Affordable housing need has been assessed in the SHMA Update as being around 117 dpa which is slightly less than identified in the Mid-Mersey SHMA of 2016. Provision has been meeting this level since 2012. The level of affordable housing contributions set in this Plan are lower overall than the CS, taking into account viability issues in some areas and on brownfield land in particular. But, combined with Council interventions, the requirement is likely to lead to affordable housing being delivered at levels corresponding to the need.

56. In terms of losses to Right to Buy, there is no explicit reference in national policy or guidance as to whether these should be taken into account in calculating affordable housing needs. Although the PPG refers to 'net additional affordable dwellings' and 'total net need' this is in the context of taking into account available affordable housing stock/supply in calculating the need going forward. Moreover, whether purchase of a home by a tenant creates more housing need is difficult to quantify.

57. Therefore, there is no need to further increase the housing OAN to deliver more affordable homes.

58. There is no need to deal with any backlog from the CS as the standard method, which uses the 2014-based household projections, addresses any historic under-delivery through the affordability adjustment.

59. The Council put forward a higher housing figure of 570 dpa at preferred options stage which reflected the CS requirement, and evidence and national policy at the time. The Council has been delivering an average of over 600 dpa in the last few years. However, the standard method which results in a much lower housing need figure is appropriate as a minimum starting point. Taking into account the LHN and the economic and other factors referred to above, the uplift and 486 dpa as a minimum housing need figure is justified.

Employment OAN

60. The ELNS and the ELNS Addendum Report of January 2019 (EMP001) assessed demand for employment land provision in St Helens, following the methodology set out in the PPG. The ELNS forms the evidence base for the employment land OAN of 227 ha proposed in the submitted Plan. The OAN figure is at the high end of the growth ranges considered and includes a 5-year buffer along with an allowance for Parkside SRFI and the LCR SuperPort, the latter being the cluster of assets and investment across the region needed to develop a multimodal freight hub.

61. The ELNS used a historic take-up methodology to calculate the OAN with a base date of 2012. The decade from 1998 to 2008 was identified as a particularly strong period of growth for the area, with an annual average of 7.5 ha. However, if the period of analysis is extended from 1997 to 2015 the annual average growth rate fell to 4.86 ha. This was because the evidence showed a decline in employment land take-up in St Helens beyond 2012.

62. The take-up of employment land in St Helens during this period contrasts with take-up rates in neighbouring authorities (such as Warrington) that have similar geographical and locational characteristics to St Helens. Where sites, such as Omega in Warrington, have been made available, take-up rates have been considerably higher during the same period.

63. Since more employment land has been made available in St Helens through the grant of planning permissions in 2018/19 and 2019/20 there has been an increase in take-up. Several planning applications for large scale logistics development have also been received since 2017, notably the Omega extension site, Parkside, and Haydock Point North.

64. The response from stakeholders during the preparation of the ELNS also supports the view that there is demand for employment land in the area, particularly for large scale logistics development.

65. The St Helens Allocations Local Plan Economic Evidence Base Paper of 2015 (EMP003) identified a number of key locational and specific criteria required by large scale logistic uses (300,000 square feet). These include a minimum site size of 5 ha and a drive time to the motorway of less than 10 minutes. On that basis, the paper concluded that none of the sites identified in the CS met those requirements and were therefore not suitable, hence why in recent years these type of occupiers have located elsewhere, outside of the Borough.

66. These factors together do point to a picture of pent-up demand for employment land that has been constrained since 2012 due to a lack of available sites suitably attractive to the market. For these reasons, the inclusion of post 2012 data is likely to distort the historic baseline for predicting needs as this is reflective of a period where demand was supressed due to limited land supply.

67. On the other hand, more recent data for 2019/20 show that this was a particularly strong year for employment land take up, and if this were to be included (along with post 2012 data) this would increase the average annual take-up by approximately 9%. However, there could be a danger that the inclusion of a significant recent peak in the statistics for one year may distort the overall picture.

68. Clearly in any assessment of long-term employment needs it is desirable to take a longer-term view that captures the natural peaks and troughs of the economic cycle. Additionally, whilst it is likely that there will be an acceleration in take-up once suitable sites are made available, the evidence suggests that this would moderate in the medium term as the market returns to more typical levels and reaches a new natural equilibrium. Therefore, the take-up scenario used in the ELNS which is based on the period 1997-2012 is likely to represent a more complete picture of a sustained period of growth, when a suitable supply of employment land was available, but differences in the level of demand have also been factored in.

69. The average annual growth rate identified for this period (1997-2012) is at the higher end of the growth scenarios identified. It is therefore an aspirational figure that should support economic growth through ensuring that employment needs are met during the Plan period. This leads to a residual baseline requirement of about 174 ha for St Helens. This figure includes the five year buffer referred to above. The buffer is included because each parcel of employment land does not necessarily meet the needs of the business looking for a site. Therefore, there needs to be a margin included within the modelling to

enable choice of land. This margin was approximated using a five-year buffer on top of the original forecasts to provide this flexibility.

70. There are several references in the PPG which refer to the need to allocate space for logistics, and the specific needs of the logistics sector, such as the requirement for a significant amount of land and a suitably accessible location. Demand for employment land based on major projects and large-scale logistics has, therefore, been added to the OAN. This is over and above the demand calculated based on past trends and reflects the anticipated role that St Helens could play in accommodating demand as a result of increased capacity at SuperPort and also the SRFI at Parkside. This additional demand was estimated to be between 30-40 ha over and above the baseline growth. However, the existing and anticipated demand for large scale logistics warehousing in the area led to this being revised upwards to 55-65 ha. When this figure is added to the requirement figure referred to earlier, the OAN figure of about 239 ha is reached (this has been amended from 227 ha to take into account an adjusted Plan period).

71. The evidence base highlighted the logistics sector as having strong demand in the area. The ELNS Addendum states that it is the sector most likely to drive growth and it is anticipated to be a dominant market sector in the area. This assumption is supported by other studies, such as the B8 land-use forecasts for the LCR of May 2016 which was used to inform the LCR's SHELMA. In the LCR report, two transport scenarios were modelled which looked at a 'do nothing' or 'do something' option. Under the 'do something' scenario, the land requirement for large B8 floorspace is anticipated to be 321ha by 2033 and 512ha by 2043.

72. Historically, St Helens has been shown to accommodate around a 16% share of the city region's large scale logistics market. Whilst the report did not disaggregate the land requirement to individual LPAs, if a 16% share were applied this would give a land requirement of 51 ha by 2033 and 82 ha by 2043. On this basis, adding 55 ha to the OAN is justified.

73. Continued interest from developers for large scale sites suitable for logistics warehousing near the M6 and M62 motorway intersection, is anticipated to sustain this demand, with further growth in the sector during the Plan period. The two planning applications at Haydock that have been granted, along with the two applications at Omega and Parkside recently granted by the Secretary of State, all reinforce the picture of strong developer interest for large scale sites suitable for logistic warehousing in St Helens that are close to the strategic motorway network. This is anticipated to fuel a period of further growth in demand.

74. As to whether the demand for large scale logistics development is likely to be sustained during the Plan period, the evidence shows that there is likely to be

substantial demand for this type of development over the coming years. Over time, consumer behaviour has changed and there has been a steady growth in online shopping. It is likely that this long-term trend has been accelerated during the Covid pandemic as a consequence of national lockdowns and other restrictions. This change in behaviour has in turn increased demand for large scale logistics warehousing to store and deliver the consumer goods ordered, particularly close to urban centres. Consumers also want more choice, such as click and collect delivery, and this all has an effect on the amount of warehousing space required. Forecasts show that this demand is set to continue into the future.

75. Given that parts of the strategic motorway and rail network pass through St Helens, the area is well placed to meet this demand. However, in the event that large scale B8 uses do not come forward on the allocated sites as envisaged, the sites are also allocated for B2 uses which should ensure some flexibility in accommodating the needs of end users.

76. It is therefore considered that the major projects allowance within the employment OAN is justified and consistent with national policy and guidance.

77. **MM001** extends the Plan period to 2037. This has the effect of increasing the employment OAN from 227 ha to 239 ha. This figure has been calculated by projecting forwards the historic 5.8 ha per annum growth for the 1997 – 2012 period. The additional two years therefore equates to a further 11.6 ha of employment land, which has been added to the previous OAN figure, and is justified (**MM007**).

78. Taking account of the above, the employment land OAN figure is justified to meet the specific needs of the area and the wider sub-region.

Exceptional circumstances

79. The Framework requires that LPs should provide for objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework, such as those relating to Green Belt, indicate that development should be restricted.

80. Given the importance placed on preserving the Green Belt in national planning policy, exceptional circumstances must be demonstrated to justify Green Belt release through the preparation of a local plan.

81. St. Helens is constrained by Green Belt, in that approximately 65% of the Borough is so designated. The remainder of the Borough is urban land. In most

areas the Green Belt boundary is tight to the edge of the existing built-up areas of the main towns and villages. The boundaries of the St. Helens Green Belt were drawn up in 1983 and have remained largely unchanged since.

82. Both the UDP and the CS aimed to focus most new development on brownfield land in urban areas. Indeed, the CS set a target for 80% of all new housing development to be delivered on such land between 2003 and 2027. However, the CS also identified a potential need for Green Belt release to meet housing needs from 2022.

83. The 2017 Strategic Housing Land Availability Assessment [SHLAA] shows that there remains substantial capacity for housing on urban sites during the Plan period. As such, a large proportion of the identified housing need can continue to be met on sites in the urban area. Provision will be through a combination of allocations, other sites within the built-up areas of the Borough, and a windfall allowance. However, the evidence base also shows insufficient capacity to meet housing needs in full, because of the quantity, quality, and range of sites. In particular viability issues affect many sites, including brownfield sites subject to contamination.

84. Some sites close to the town centres would be more suited to high-density apartment type developments, but in such cases viability is also challenging. Furthermore, the provision of flats would be at odds with the appropriate type and mix of properties identified as being needed. The SHMA identifies that 2- and 3-bedroom properties should be the focus for new housing development, with demand for family housing and medium sized properties expected to continue during the Plan period.

85. Policy LPA05 encourages high densities (40 dwellings per hectare [dph]) in appropriate locations, such as sites within or adjacent to St. Helens and Earlestown Town Centres. Increasing densities above this could give rise to 'town cramming'. Using greenfield urban spaces and recreation sites would lead to a change in the character of the existing built environment that would be contrary to the Council's aim of delivering high quality development. It is too early to ascertain whether changing shopping patterns will increase opportunities for housing in the Borough's town centres. For these reasons suitable non-Green Belt sites cannot be found to meet all the need. There is a shortfall of over 2000 dwellings in the submitted Plan.

86. As a result the Plan makes allocations on Green Belt land to deliver over 2000 homes during the Plan period, equating to about 27% of the residual requirement for the period 2021 and 2037.

87. In terms of employment there has been a slow take up of land since the adoption of the CS, the evidence base suggesting that this is due to a lack of

available sites suitably attractive to the market rather than a lack of demand, as discussed above. To meet the submitted OAN figure, Policy LPA04 allocates 234 ha of land across ten sites, the majority of which, some 95% of land take, comprise Green Belt release. These figures do not take account of the 31 ha allocated for the Omega site (1EA) as this is to meet the needs of Warrington Council.

88. As pointed out earlier neighbouring authorities also have large areas of Green Belt and have similar constraints. The other authorities in the HMA, Halton, and Warrington, have identified a shortfall of urban land supply to meet their own needs. Similarly, none of the authorities in the functional economic area have identified spare urban capacity in order to meet the employment needs of St. Helens. Indeed, many neighbouring authorities have undertaken their own Green Belt reviews to identify land to release from the Green Belt in order to meet their own housing and employment needs. For these reasons, meeting any unmet need within neighbouring authorities is not a feasible option.

89. The Plan's strategy is dependent on meeting the needs of the Borough close to home. Providing housing and employment on the doorstep would prevent out-migration from the Borough, the loss of economically active residents, and out-commuting. The delivery of affordable and special needs housing would be prejudiced if housing need was not met or met elsewhere. Most importantly the Plan would not meet the key objectives of tackling low levels of economic activity and high deprivation.

90. The Plan has sought to strike the right balance between providing homes and jobs and protecting the Green Belt. There is a strong case for meeting the Borough's housing and employment needs in full. Exceptional circumstances exist at a strategic level to justify the Plan's proposals for some Green Belt release. The quantum of housing and employment land proposed for release has been justified. However, the exceptional circumstances have not been fully articulated in the submitted Plan. **MM006** provides the justification for the strategy of Green Belt release contained within Policy LPA02 and ensures consistency with national policy. We deal with the particular Green Belt impacts of the allocations later in the report.

Housing and employment requirements

91. As exceptional circumstances have been demonstrated at a strategic level, the Plan makes provision for all of the housing and employment need identified. The needs are reflected in the requirements.

92. The base date for the housing requirement is 1 April 2016, as the SHMA Update projected housing needs forward using population and household projections from 2016. Taking into account the extended Plan period up to

2037, this results in a minimum housing requirement of 10,206 dwellings (21 x 486 dpa). **MM009** and **MM021** amend Policy LPA05 (Housing Needs), Table 4.6 (Housing requirements) and the explanation to Policy LPC01 (Housing Mix) to reflect the extended Plan period and to ensure that the Plan is positively prepared, justified, and consistent with national policy. The requirement is a net figure so will have regard to demolitions. We have amended MM009 following MM consultation to ensure the figures for the LHN, Plan period and dpa are up-to-date and accurate for clarity.

93. The whole of the employment OAN, taking into account the extended Plan period, is now 239 ha of employment land. **MM007** updates table 4.4 (Residual Employment Land Requirements) to ensure that the requirement reflects the extension of the Plan period to 2037. This ensures that the Plan is positively prepared, justified, and consistent with national policy.

Conclusion

94. We conclude that, subject to the MMs proposed, the Plan period and the housing and employment requirements in the Plan are justified taking into account national policy and the needs and constraints of the area. In particular exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries.

Issue 2 – Whether the spatial strategy for the distribution of development is justified and other strategic policies, including those relating to the Green Belt, are positively prepared, effective, and consistent with national policy

Spatial strategy

95. St Helens is a fairly compact Borough. St Helens itself and the surrounding urban area (collectively known hereafter as the Core Area) is by far the largest settlement in the Borough. Physically linked to the Core Area by built development are the settlement of Rainhill and the urban area of Haydock/Blackbrook. Indeed, Rainhill is also contiguous with Whiston in Knowsley Borough.

96. Newton-le-Willows/Earlestown, a few miles to the east of the Core Area, is the largest settlement after the Core Area. The villages of Rainford, Billinge and Garswood lie to the north of the Borough but, again, are not far from the Core Area.

97. All the aforementioned settlements (referred to as Key Settlements) provide some employment opportunities as well as services such as schools, health provision and shops. Public transport links by either bus or train are available to

larger centres within and beyond the Borough boundaries, including the Core Area. Other significant employment opportunities are provided at Omega and elsewhere in Warrington Borough, in the Liverpool conurbation to the west, and in Wigan Borough to the north-east. Shopping and other services are likewise close at hand in neighbouring towns and Liverpool.

98. Because of the proximity of, and accessibility to, settlements and services, the level of service provision, and for other reasons set out below, it is not necessary to provide new housing and employment opportunities in each key settlement. Nor is it necessary to apportion housing and employment provision broadly equivalent to population levels.

99. That said a good proportion of housing growth is proposed in most key settlements[7]. Some 12% of housing development will take place in Newton-le-Willows/Earlestown, and between 12% and 13% in Haydock/Blackbrook and the northern villages. But a sizeable proportion of housing is to be focused on the Core Area (some 75%) to make use of brownfield land, improve the housing offer, sustain the town centre and services, and tackle high levels of deprivation. Some of the new housing will be on Green Belt land on the edge of the Core Area and other key settlements due to the shortage of developable sites within built-up areas, as explained earlier. But such sites have been selected on the basis of them being the most suitable, including in accessible locations. The location of a good proportion of development in the southern part of the Core Area will align well with the most deprived parts of the Borough.

100. Employment is to be primarily focused on or close to the main transport corridors of the M6, the M62 and the railway network, at Haydock, Omega, and Parkside. These areas are currently in the Green Belt but meet the market's requirements. Accessibility from existing urban areas is reasonable. Moreover, improvements to links, particularly those involving active travel and public transport, will be supported by the Plan.

101. There are also a number of smaller settlements in the Borough that are either washed over or surrounded by Green Belt. These small villages and hamlets have limited services and, in some cases, poor transport links. The Plan does not propose any new development in these less sustainable locations. Elsewhere open countryside between the key and smaller settlements is to be retained as Green Belt.

102. The above, given affect by Policy LPA02, is an appropriate strategy which is, positively prepared, justified, effective and consistent with national policy.

[7] See Appendix 1 to SHBC011

Green Belt

103. We deal with the exceptional circumstances for Green Belt release at a strategic level to meet the Plan's housing and employment needs and in relation to specific allocations under Issues 1 and 3 respectively. Here we consider some other aspects of Green Belt policy.

Safeguarded land

104. The Framework advises that, when defining Green Belt boundaries, plans should, where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Plan identifies safeguarded land to meet longer-term housing and employment land needs through Policy LPA06.

105. The safeguarded employment land at Omega and Haydock is adjacent to the strategic road network and existing well-established employment sites. The eight safeguarded sites for housing achieve a reasonable geographic spread around the Borough, including land adjacent to the St Helens Core Area and Newton-le-Willows/Earlestown.

106. National policy does not quantify how much safeguarded land should be identified. The safeguarded employment land amounts to some 85 ha, or some 9 years supply based on the current OAN, whereas the housing land would provide for around 2700 dwellings or some 6 years supply based on the current OAN. However, it should also be noted that some of the allocated strategic housing sites are projected to deliver a significant proportion of development beyond the Plan period such that over 3200 homes would be likely to be built on these allocations post 2037.

107. The Plan needs to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the Plan period. Moreover, there are uncertainties about what future needs will be or what non-Green Belt opportunities may arise. The Plan achieves an appropriate quantum of safeguarded land and demonstrates exceptional circumstances in this respect. We come on to the particular Green Belt impacts of the safeguarded land later in the report under Issue 3.

108. Policy LPA06 is broadly consistent with the Framework in requiring that planning permission for the permanent development of safeguarded land should only be granted following an update to a plan. Alternative approaches, such as allowing a phased release of safeguarded land through this Plan, would not be consistent with national policy.

109. However, in order to ensure that Policy LPA06 is positively prepared, it should recognise that it may be necessary to update the Plan partially or fully during the current Plan period, to respond to new evidence. Such a change would also reflect the advice within paragraph 33 of the Framework about reviewing plans. The changes to Policy LPA06 and its explanation would be achieved by **MM011**. We have amended MM011 following consultation to make reference to issues of both need and supply so that it is positively prepared.

Compensatory improvements

110. The Framework requires that, when releasing Green Belt land, plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The submitted Plan does not specifically refer to compensatory improvements, albeit that it is acknowledged that areas such as the Bold Forest Park have the potential to be enhanced through improved access and infrastructure.

111. **MM006** ensures that Policy LPA02 and its explanation recognise that compensatory improvements will be needed when planning permission is sought for areas to be released from the Green Belt. This change is required so that the Plan is consistent with national policy.

112. Remaining areas of Green Belt will be protected by national policy as set out in Policy LPA02.

Other strategic policies

113. Policy LPA02 sets out that the re-use of brownfield land will be a key priority. This approach is broadly consistent with Chapter 11 of the Framework and making effective use of land. However, the Framework also recognises that not all previously developed land is suitable for redevelopment. **MM006** ensures that Policy LPA02 makes reference to suitability so that the policy is consistent with national policy and is effective.

114. Effective use of land also involves achieving appropriate densities. The Framework refers to the inclusion of minimum density standards in Plans. Policy LPA05 seeks higher density housing development on sites within or close to St Helens and Earlestown Town Centres (40 dph). However, the policy is not clear as to what densities should be achieved elsewhere. As a result the Plan's objective of optimising the use of land would be undermined. **MM009** ensures that a minimum density of 30 dph is sought elsewhere unless a lower density would achieve a clear planning objective. The MM is needed so that the Plan is effective and consistent with national policy.

115. The Plan recognises that viability is likely to be challenging on many brownfield sites and that lower thresholds for contributions will be necessary. Policy LPA08 (Infrastructure Delivery and Funding) and Policy LPC02 (Affordable Housing) provide further policy support for a finer grained approach to contributions. **MM006** makes it clear the circumstances where lower thresholds are likely to be supported and appropriate so that Policy LPA02 is effective.

116. In promoting health and wellbeing and seeking to reduce health inequalities, Policy LPA11 acknowledges that working with partners will be crucial to improving outcomes. This applies in particular to matters such as achieving affordable warmth where planning will only be one of a range of possible public, voluntary, and private sector interventions. The policy is broadly consistent with national policy and in particular Section 8 of the Framework. However, the policy refers to 'planning processes' being used to encourage and guide development which lacks clarity. The policy should also acknowledge that opportunities for anti-social behaviour as well as crime should be minimised. **MM016** would secure these changes so that Policy LPA11 is effective.

117. There is no need for the Plan to reiterate policies that are already set out in the Framework. Policy LPA01 recites the presumption in favour of sustainable development at paragraph 11 of the Framework. This would give the Framework presumption development plan weight which would potentially weaken other policies within the Plan. Moreover, the wording of national policy in relation to the presumption has changed with the revised Framework so Policy LPA01 would be inconsistent upon adoption. Therefore, the policy is not necessary and should be deleted by **MM005** so that the Plan is consistent with national policy.

Conclusion

118. We conclude that, subject to the MMs proposed, the spatial strategy for the distribution of development is justified and other strategic policies, including those relating to the Green Belt, are positively prepared, effective, and consistent with national policy.

Issue 3 – Whether the allocations and safeguarded land identified for development within St Helens, and Green Belt boundaries, are consistent with the Plan's strategy and national policy, including protecting Green Belt land, and whether the housing and employment land identified will be delivered

Generally

119. We have already found that, in order to meet the Plan's housing and employment requirements and to provide land for longer-term needs,

exceptional circumstances exist at a strategic level to justify the release of land from the Green Belt in the Borough. We have also reasoned earlier that the overall quantum of land required and its general spatial distribution have been justified. We consider below site specific issues for the allocations and safeguarded land, including the effect on Green Belt purposes, in order to determine whether exceptional circumstances exist for the specific Green Belt releases.

120. The identification of potential housing sites derives from the SHLAA and 'call for sites' exercises. The former, together with the brownfield register, focuses on the urban area land supply, the latter has been more widespread. The Site Selection Paper (SHBC012), provided at our request, summarises the approach.

121. The SHLAA has been undertaken in accordance with guidance in the PPG. Section 3 of the SHLAA sets out the methodology for identifying sites and then appraising them to see whether they are deliverable, developable, or non-developable against a range of factors, including their suitability for housing development. Those sites considered deliverable or developable have been included in the Plan's housing supply. The SHLAA supply also includes sites that are under-construction or have planning permission. SHLAA sites with a capacity of over 300 units which had not commenced at the time of publication of the Plan have been allocated (Sites 3HA, 6HA, 9HA and 10HA).

122. The SHLAA is generally robust and seeks to make the best use of the urban land supply in accordance with the spatial strategy of the Plan, particularly Policy LPA02, and Sections 5 and 10 of the Framework. Under Issue 5 we consider non-allocated SHLAA sites in more detail and advise that some SHLAA sites should be discounted from the supply because they are not developable.

123. In terms of potential employment land, a review was undertaken of sites identified in the CS to see whether any of these could reasonably contribute to supply during the Plan period. Many sites were no longer available due to their loss to higher value uses, would not be viable or developable for speculative employment without gap funding, or were of poor quality in terms of market attractiveness for various other reasons (e.g. contamination, infrastructure issues). Moreover, none of the sites identified as part of the evidence base for the CS would meet the need for large scale warehousing and logistics. Therefore, the pool of sites to meet employment needs is limited. However, three sites included in the CS were identified as deliverable over the Plan period, and able to contribute to meeting identified employment needs, and, therefore, have been allocated (9EA, 10EA and 11EA).

124. Due to the supply of urban land being insufficient to meet identified needs, the Council undertook a review of the Green Belt across the Borough. The GBR had the objective of 'topping up' the supply of sites so that the overall requirement and longer-term needs could be met. The GBR considered parcels and sub-parcels of land across the entire extent of the Green Belt against the Green Belt purposes set out in the Framework. These assessments also discounted parcels or sub-parcels which did not have a realistic prospect of being developed due to the presence of a prohibitive constraint.

125. The SA has assessed the allocations and proposals for safeguarded land and reasonable alternatives against eighteen key sustainability issues.

126. In the light of the above evidence and in response to the quantum of land needed to 'top up' supply, the Plan proposes the alteration of Green Belt boundaries through the allocation of six sites and eight areas of safeguarded land for housing and eight sites and two areas of safeguarded land for employment.

127. The combination of the GBR and SA has been, in our view, a generally robust iterative process for identifying sites beyond the urban area. The detailed critiques of the scoring put forward in representations, statements and at the hearings have revealed some minor inconsistencies but have not significantly undermined the site selection process. The different approach to housing and employment sites has been justified, particularly in respect of some employment sites being progressed beyond the Stage 1B assessment in the GBR, despite identified Green Belt harms. Therefore, Sites 7EA and 2ES were taken forward considering the evidence in the round, including the specific requirements to meet B8 needs.

128. The Green Belt sites will all affect Green Belt openness and purposes to an extent by leading to encroachment into the countryside. However, the effects on other Green Belt purposes vary depending on the particular characteristics of the parcels. In addition, the sites are predominantly on the best and most versatile agricultural land. However, that would be the case for the vast majority of greenfield sites on the edge of the Borough's settlements. That said, the highest quality of agricultural land is in the north-west of the Borough, near Rainford. Limited development is directed to that area.

129. The Council, although accepting that both allocated and safeguarded sites can be released from the Green Belt, have made judgements as to which sites should contribute to needs during the Plan period and those that are likely to be required for longer-term needs. The judgements are based on assessing relative Green Belt and other impacts, any constraints that might affect when sites might come forward, supporting sustainable patterns of development, and

ensuring that the right quantum of development comes forward, in the right places, and at the right time.

130. In some cases the differences between some of the sites that have been allocated and others that have been either safeguarded or remain within the Green Belt are not significant. However, the judgement calls are justified and result in a sustainable pattern of development and an appropriate strategy. It is also argued that some of the safeguarded sites should be allocated. However, bringing forward too much greenfield land would be likely to undermine the ability to maximise the development of previously developed land, and other sites in the urban area which are in the most sustainable locations, as set out in Policy LPA02.

131. As explained earlier, exceptional circumstances exist to justify the alteration of Green Belt boundaries at a strategic level. In terms of releasing particular sites from the Green Belt, we set out below our reasoning. However, the Plan itself does not clearly and concisely justify each allocation that will alter Green Belt boundaries. **MM007**, **MM009** and **MM011** would secure changes to the justification for Policies LPA04 (employment allocations), LPA05 (housing allocations) and LPA06 (safeguarded land). As a result, a concise explanation is included to explain the reasoning and exceptional circumstances for the removal of sites from the Green Belt, including by reference to the GBR, Green Belt purposes and other site characteristics. These changes are needed so that the Plan is positively prepared, justified, and consistent with national policy.

132. Most of the allocated housing sites to be removed from the Green Belt make some contribution to the five-year supply but are projected to commence some 2 years after Plan adoption at the earliest i.e., by 2024/25. The majority of sites are shown as delivering at around 40-45 dpa, apart from the commencement year when delivery would be 50%, i.e., between 20 and 22 dpa. The rate of delivery in most cases is based on the assumption that there would be a single housebuilder outlet on an allocated site. Some developers have indicated the potential for shorter lead-in times and higher build-out rates. However, the Council's assumptions about lead-in times and build-out rates are realistic. We will come onto those sites which have projected longer lead-in times and different build-out rates later in this section.

133. Appendices 5 and 7 of the Plan sets out profiles for each allocated or safeguarded site. The profiles include key requirements that would need to be addressed when the sites are brought forward. However, some of the requirements are generic and would apply to any site because of policies of the Plan. The Site Profiles should only include requirements which are site specific such as those relating to access, sustainable travel routes, heritage assets, and landscaping. **MM044** and **MM045** would ensure that Appendices 5 and 7 are effective in this respect.

134. The Site Profiles together with LP policies such as LPA07, LPA08 and LPC05 seek to ensure that necessary infrastructure or contributions are sought from allocations for off-site highway works, sustainable travel, school places, health facilities and open space/recreation provision.

135. Appendix I of the GBR sets out details of where the Green Belt boundary should be amended so that it follows readily identifiable features on the ground or excludes areas of built development on the edge of settlements from the Green Belt. These changes are reflected on the submitted Policies Map.

136. We now deal with the specific allocations, safeguarded land, and Green Belt boundaries by area having regard to the evidence base, representations and our assessment which includes visits to the sites.

Bold, Eccleston, Sutton Manor, Thatto Heath and St. Helens Core Area

Allocations and Safeguarded Land

137. The largest urban area in the Borough is the St Helens Core Area which includes those parts of Bold, Eccleston, Moss Bank, Parr, Sutton, Thatto Heath, West Park and Windle which are built-up, as well as the town centre ward. In addition, the large village of Rainhill is physically linked to the Core Area to the north.

138. **Omega South-Western Extension (Site 1EA)** comprises 31 ha of Green Belt land, allocated for B2 and B8 uses.

139. The GBR found that the site scored medium in terms of its contribution to the Green Belt purposes of checking the unrestricted sprawl of large urban areas, preventing neighbouring towns merging into one another, and safeguarding the countryside from encroachment. In relation to the first and third Green Belt purposes, the site is currently largely free from development and there are open views across the site. However, the site is bordered by the M62 motorway to the north from which large scale built development is visible, including the existing Omega site to the east. Due to the proximity of existing development, the GBR assessed the site as having a moderate countryside character. As 1EA is next to the existing Omega strategic employment site, it would form a natural extension to it. The site is well contained to the north and west and, in part, to the south and east.

140. As to the second Green Belt purpose, the site is within a strategic gap between the towns of St Helens and Warrington. Whilst the gap would be reduced as a consequence of development taking place on the site, a sufficient gap would be maintained to ensure that the towns did not merge into one another.

141. In terms of constraints other than Green Belt, there is a protected woodland within the site. However, this could be retained and the issue would be capable of being resolved at the detailed application stage. As with most of the Green Belt allocations there is the best and most versatile agricultural land present.

142. With regard to benefits, Omega is the premier strategic employment site within Warrington, with approximately 277 ha originally intended to be delivered between 2006-2027. However, the current Omega site is at capacity and further land is therefore required to maintain continuity of supply. As referred to earlier, there is agreement between St Helens and Warrington Councils that the allocation of the site would contribute towards meeting the needs of Warrington.

143. The site is also within 1km of an area that has one of the top 20% most deprived populations in the UK. The development of the site would bring with it opportunities to improve access to potential jobs for deprived communities nearby at both the existing Omega site as well as at Site 1EA. To help secure these benefits, **MM044** amends the Site Profile to include the requirement to improve access to the site from areas nearby via walking, cycling and public transport.

144. Given the size of the allocation and its proximity to the M62, it is suitable for large-scale logistics warehousing development. Indeed, a recent planning application for logistics development at the site (along with offices and B2 and B8) has been granted planning permission after having been 'called-in' by the Secretary of State[8]. This is evidence of the site's suitability for this type of development which has been identified as strategically important for the growth of the economy in St Helens and the wider LCR.

145. The planning permission that has been granted is for a significantly larger development and on a larger site than that allocated in the LP. The permitted scheme has also been designed to meet the specific requirements of an identified end user. For these reasons, the development will be different to that envisaged in the LP. However, that does not render the original allocation unsound. Moreover, the permission post-dates the LP's supply baseline of 31 March 2021. A MM to amend the allocation (and associated policies) to reflect the planning application is not therefore necessary or justified. However, a reference has been made in **MM044** to the recent planning permission for effectiveness and as a factual update.

146. The IDP identifies the potential requirement for mitigation to be provided in relation to Junction 8 [J8] of the M62. J8 is situated wholly within Warrington Council and capacity issues have been identified. Neither NH nor Warrington Council have objected to the allocation on the basis of highway impacts. NH commissioned a report in 2019 looking at options for junction improvements.

[8] See SHBC037

However, further work is needed to identify costs and the impacts of potential interventions. The Council have entered into a SOCG along with Warrington Council to work together and liaise with NH to address the cumulative impact of LP allocations and the Omega site on J8.

147. The Site Profile requires the implementation of any measures required to mitigate impacts on the M62 (J8) or other parts of the highway network (including potentially J7 of the M62). The phasing of development at the site will also be an important consideration in mitigating any impacts.

148. **Omega North-Western Extension (Site 1ES)** is close to the M62 motorway and existing large-scale development at Omega North. It is therefore well contained to the east and south. The western boundary is marked by a hedgerow, and trees (some of which are subject to a Tree Preservation Order) and there is a lane along part of the northern boundary. However, the site itself is open and there is agricultural land to the north and west.

149. The GBR scored this site as making a medium contribution to the Green Belt in terms of its role in checking the unrestricted sprawl of a built-up area, preventing neighbouring towns from merging, and protecting the countryside from encroachment. However, the GBR also noted that, whilst the site falls into the strategic gap between the towns of St Helens and Warrington, a significant gap could still be maintained even if this parcel of land were developed. The proximity of the motorway and large-scale development influences the perception of the site and it has only a moderate countryside character. Once development at the adjacent Site 1EA commences this will also inevitably further influence the character of Site 1ES.

150. The site's location would form a natural extension to the Omega site. However, access would need to be achieved through land in the ownership of a third party. Whilst it is possible that agreement could be reached with the third party soon, it indicates that the site may not be immediately available for development. Given that the sites allocated in the LP will be sufficient to meet the residual employment need during the Plan period, it is logical that the LP safeguards the site for longer term employment needs of the area as this will allow more time for access options to be explored. Potential impacts on J8 of the M62, which experiences capacity and congestion issues, would also need to be addressed. The Site Profile refers to these issues, along with others, that any future development would need to address. **MM044** is necessary for effectiveness as it inserts additional wording to the Site Profile to ensure that a full range of sustainable modes of transport will be secured, enhancing connections to the St Helens Core Area.

151. Exceptional circumstances have been demonstrated for the release of Sites 1EA and 1ES from the Green Belt.

152. **Bold Forest Garden Suburb (4HA)** is the largest housing allocation in the Plan comprising some 132 ha of Green Belt land to the south of the St Helens Core Area. Whilst very open in places with expansive views across the site from the surroundings, the overall site has clear physical boundaries. Moreover, much of the site comprises a notable indent into the alignment of the southern edge of the built-up area around Clock Face. Development of the site would not bring the eastern extremity of St Helens any closer to Burtonwood. Therefore, the site makes a medium to low contribution to Green Belt purposes.

153. The site comprises predominantly large level arable fields interspersed with some boundary hedgerows and small copses, some of which have biodiversity value. The landscape is pleasant but not remarkable. It can be enjoyed by those using the various public rights of way that cross the site. The allocation would have adverse landscape and visual impacts, result in a significant loss of higher-grade agricultural land, and also would affect local businesses, such as equestrian centres.

154. The site has good accessibility to local industrial areas and transport, including St Helens Junction Railway Station. Highway and biodiversity impacts can be mitigated.

155. The Garden Suburb is at a scale where it is anticipated that it would need to deliver social infrastructure in the form of school places, a local centre, and possible health facilities. The site would also make a significant contribution to Green Infrastructure [GI], visitor facilities and recreation hubs within, and close to, the Forest Park and provide considerable on-site open space and recreation opportunities, including the enhancement of the Greenway and bridleway networks. The site has the potential to achieve biodiversity net gain. Tunstall's Farm Local Wildlife Site has been excluded from the allocation.

156. In view of the scale, the various requirements, and to ensure appropriate masterplanning and phasing, a bespoke policy for the Bold Forest Garden Suburb should be included in the Plan. This would be achieved by **MM018** which would insert Policy LPA13 into the Plan for effectiveness and so that it is positively prepared. We have amended the wording of the policy and the reasoned justification following the MM consultation to make it clear that a comprehensive masterplan should be in place in advance of any planning applications but that a Supplementary Planning Document may not also be necessary. Consequential changes would be required to Policy LPA05.1 and Appendix 5 to the Plan (Site Profiles) to cross reference masterplanning and other requirements with Policy LPA13 (**MM010** and **MM044**).

157. The site is in a number of ownerships but most of the land making up 4HA is being actively promoted. There will be a need for significant masterplanning as a forerunner to any planning applications. In this respect the site is not shown

as delivering housing until later in the Plan period (from 2028/29), with only some 500 homes built by 2037, out of a total capacity of around 3000 homes. However, when it does commence, it is anticipated that two housebuilder outlets would be likely to be in place delivering in total around 60 dpa. These delivery assumptions are realistic. If more homes are delivered during the Plan period, all well and good.

158. **Land south of Gartons Lane (5HA)** has an area of about 22 ha. It has a strong element of visual containment within the clearly defined boundaries of Gartons Lane and the urban area to the north, Sutton Manor Nature Reserve to the south, the B5419 to the west, and a dismantled railway line and housing to the east. Therefore, the site makes a low contribution to Green Belt purposes. The site is located close to local shops, a primary school, and open space.

159. The site can make a contribution to the planned Sutton Manor Recreation Hub, by providing links to the car park, utility connections, and sustainable routes from the north. These requirements are included within the relevant Site Profile.

160. Gartons Lane has areas of higher density housing nearby and is close to sustainable transport routes. A higher indicative minimum density of 35 dph is achievable. The site is being promoted by a major housebuilder. There are no barriers to the site coming forward as anticipated by the trajectory. The small brownfield sites on Gartons Lane occupied by a church and farm buildings could be incorporated into the site. However, a change to the Policies Map to include them as part of the allocation is not necessary as these sites are excluded from the Green Belt. Therefore, there is no objection in principle to their redevelopment. They could be included through the development management process.

161. Both 4HA and 5HA are close to the most deprived parts of the Borough where housing and, in the case of 4HA in particular, new social infrastructure, would deliver social and economic benefits. The allocations would accord with the objectives of the BFAAP which through Policy BFP1 seeks to ensure that the Bold Forest Park area contributes to meeting the Borough's needs for, amongst other things, housing. Site 4HA would only comprise about 7% of the Bold Forest Park area.

162. The LP Transport Impact Assessment (TRA003) and the Bold Forest Garden Suburb Transport Review (TRA005), when read together, indicate that, through a combination of changes to existing junctions, the creation of new routes through the sites, and a modal shift towards sustainable travel, cumulative residual impacts on the road network would not be severe. Sustainable travel to both sites will be assisted by improved cycle and walking routes, including towards Lea Green Station, for which funding has been secured (see SHBC020). **MM044** amends the Site Profile for Site 5HA to include reference to

the potential for contributions to the improvements to local railway stations so that the Plan is positively prepared and effective.

163. For the above reasons and having regard to the social and economic benefits of providing housing and related infrastructure, both during the Plan period and beyond, the allocations are justified. Exceptional circumstances for the removal of the sites from the Green Belt have been demonstrated.

164. The **Former Penlake Industrial Estate (3HA)** was predominantly built-out by March 2021 and therefore should be removed as an allocation and included in the housing supply as a combination of completions and commitments. **MM009**, **MM010** and **MM044** would remove the site from Table 4.5, Policy LPA05.1 and its reasoned justification, Footnote 35, and the Site Profiles, for effectiveness.

165. The employment allocations at **Lea Green Farm, Thatto Heath (10EA)** and **Gerards Park, College Street (11EA)** have now been respectively built-out and commenced. The Plan should, therefore, reflect their status at 31 March 2021 and that they no longer need to be allocated. Tables 4.1 and 4.4 and the Site Profiles are amended accordingly in the interests of the Plan's effectiveness (**MM007** and **MM044**).

166. Table 4.5, the reasoned justification to Policy LPA05, the housing supply tables and the Site Profiles need to be updated to reflect the planning status at 31 March 2021 of the non-Green Belt sites of the **former Linkway Distribution Park, Thatto Heath (9HA)**, **land east of City Road, Cowley Hill (6HA)**, and **Moss Nook Urban Village (10HA)** for effectiveness (**MM009** and **MM044**). By that date, 9HA had an outline planning permission, 6HA had a resolution to grant outline planning permission, and for 10HA there was permission for, and commencement of, supporting infrastructure and a reserved matters application pending for the first phase.

167. The housing trajectory shows the above allocations commencing by 2023/24 which is reasonable given their planning status. Although 9HA, 6HA and 10HA are large allocations with projected capacities of 350, 1100 and 800 homes respectively, suggesting the potential for more than one outlet, delivery of 45 dpa is realistic given their urban location.

168. The Plan safeguards four sites around St Helens Core Area for housing beyond the Plan period. The four sites would ensure a reasonable geographical spread of opportunities to meet longer-term needs around the urban fringe.

169. The **former Eccleston Park Golf Club (3HS)** has housing development on three sides. Development to the north at Eccleston Park and Grange Park is contiguous such that the urban areas of St Helens and Prescot already merge. Therefore, the site is not an important strategic gap. The site is reasonably well-

contained with strong boundaries such that it is not perceived as contributing significantly to Green Belt openness or purposes. The site is well-related to services and jobs, including those at the nearby Whiston Hospital. Public transport connections are also good, with Eccleston Park Railway Station adjacent.

170. The golf course use has ceased and there is no evidence that it is essential that the site should be retained for sports use. Indeed, the Sports Facilities Needs Assessment – Golf Addendum (OPE002) indicated capacity for additional participants at all golf courses within St Helens. Although the report was produced in 2016, there is no evidence that the position has materially changed. Sport England has not objected to the safeguarding of the site.

171. The site has some constraints, including those related to highway network impacts and utilities that need to be overcome. The refusal of planning permission for up to 962 dwellings in January 2022 is a reflection of the current development plan and its Green Belt status and some of the technical constraints but does not alter the Council's position that the site should be safeguarded. Given the need to assess and mitigate the constraints, which may affect the developable area and capacity, safeguarding rather than allocating the site is appropriate.

172. **Land east of Chapel Lane, Sutton Manor (6HS)** has a reasonable degree of self-containment due to the presence of woodland to its southern edge. The site does not contribute significantly to the strategic gap between Sutton Manor and Rainhill. That said, it projects out from the urban edge into the countryside. The constraints of a local wildlife site and protected woodland will need to be assessed. Overall, the site would be suitable for longer-term needs.

173. The promoters of the site have suggested that it can provide 100% affordable housing and this, along with other reasons, supports its allocation rather than safeguarding. However, allocations are to meet housing needs overall. There would be no certainty that the site would come forward entirely for affordable housing. Moreover, as explained under Issue 1, the Plan is likely to make provision for affordable housing to meet the identified needs, and the Plan will meet its housing needs overall, so there is no soundness reason for bringing the site forward during the Plan period.

174. **Land south of Elton Head Road, Thatto Heath (7HS)** makes a limited contribution to Green Belt purposes with reasonable self-containment due to the presence of a school and housing to the east, residential areas on the opposite side of the B5204 to the north, woodland, and the new Waterside Village to the south, and a hedgerow and higher ground to the west. The site is close to a primary school and local convenience store, and on a bus route.

175. **Land south of A580, Windle (8HS)** is a large (52 ha) triangle of predominantly agricultural land on the north-west edge of the St Helens urban area. The site has well-defined boundaries formed by the East Lancashire Road, Houghton's Lane, and the existing built-up area. The site makes a limited contribution to Green Belt purposes.

176. The site comprises large arable fields interspersed with some boundary hedgerows and small copses, with the land rising up towards the eastern corner. The landscape is pleasant but not remarkable. It can be enjoyed by those using the various public rights of way that cross the site. Housing development would have adverse landscape and visual impacts and result in a significant loss of higher-grade agricultural land.

177. The site is located relatively close to local primary schools and a secondary school. However, given the scale of the site, some additional social infrastructure may be required. In addition, off-site highway and transport improvements are likely to be needed.

178. Notwithstanding the adverse effects, the site is well-placed to meet longer-term housing needs. This would fit in with the need to undertake significant technical work and masterplanning to bring the site forward. Taking into account the above, safeguarding is appropriate.

179. Exceptional circumstances exist for the release of safeguarded Sites 3HS, 6HS, 7HS and 8HS from the Green Belt. The Site Profiles require amending (**MM045**) to reflect opportunities for sustainable modes of access so that the Plan is positively prepared and effective.

180. There has been significant development in the St Helens urban area since 2016. At 31 March 2021 some 2400 homes had been completed or were under-construction. Opportunities exist in the St Helens Core Area to bring forward further previously developed land, including the allocated sites 6HA, 9HA and 10HA, and other urban sites. The Green Belt allocations 4HA and 5HA will add to the range of sites. Therefore, making Sites 3HS, 6HS, 7HS and 8HS available to meet longer-term needs would be appropriate.

Green Belt boundaries

181. In terms of the submitted Policies Map, there remains one anomaly in this part of the Borough. The Policies Map shows some of the land to the south of the A580 in the vicinity of Carr Mill Road as Green Belt. In order to ensure that the Green Belt boundary follows recognisable and permanent physical features and Green Belt policies are justified and effective, it should follow the line of the road. The change to the extent of the Green Belt would require changes to the submitted Policies Map. The other modest changes to the Green Belt

boundaries set out in Appendix I of the GBR are justified. Exceptional circumstances have been demonstrated for these clearly defined boundaries.

Rainford, Billinge, Garswood and Haydock

Allocations and Safeguarded Land

182. Garswood and Rainford are large villages near the northern edge of the Borough. Garswood has primary schools, a medical centre, local shops, and a railway station. Rainford has a secondary school, primary schools, a medical centre, and a vibrant village centre. The railway station at Rainford Junction is some distance to the north of the village so would be too far to access on foot. That said there is a linear path which would allow cycle access from the village to the station.

183. The Plan allocates **land to south of Billinge Road, Garswood (1HA)** and safeguards **land to south of Leyland Green, Garswood (1HS)**, both for housing.

184. Site 1HA is a triangle of fairly level pastureland contained by the B5207, Garswood Road and Smock Lane. These strong boundaries and its siting between the main village and Simm's Lane End result in the land making only a limited contribution to Green Belt purposes whilst representing a logical expansion of the village. In particular, development of the site would not lead to any material closing of the strategic gap between Garswood and Billinge.

185. The site is within walking distance of local services and the railway station. The allocation is unlikely to materially exacerbate parking issues at the railway station and nearest primary school given its relatively close proximity to these facilities. There are no significant technical constraints in that a safe access can be obtained and mitigation can be put in place to resolve on-site and off-site drainage issues.

186. Site 1HS is immediately to the north of 1HA. It can be distinguished from 1HA in that 1HS projects more into the countryside and is more open in character. As such it makes a greater contribution to the Green Belt purpose of safeguarding the countryside from encroachment and is a less logical extension to the village. The effects on other Green Belt purposes are comparable to Site 1HA.

187. Although Site 1HS is also equidistant to some local services such as the medical centre and primary school, it is further away from others such as the main convenience store/post office and railway station.

188. Neither site has significant technical constraints. But there is no need to allocate both sites now and to do so would have the potential to undermine the Plan's

priority of bringing forward land within the existing urban areas of the Borough. Phasing the sites so that one provides housing during the Plan period and the other meets longer-term needs would achieve a sustainable expansion of the village and is justified by the different characteristics of the sites. Exceptional circumstances exist for the release of Site 1HA and Site 1HS from the Green Belt.

189. The Site Profiles require updating to ensure that, when the sites come forward, measures to enhance sustainable modes of travel are incorporated to ensure a positively prepared and effective Plan (**MM044** and **MM045**). In the case of Site 1HA this would include the potential for enhancing bus stop provision and upgrading the railway station, albeit it is acknowledged that measures relating to accessibility would require significant funding.

190. **Land to west of Sandwash Close, Rainford (9EA)**, lies adjacent to an existing industrial estate. It is an employment allocation carried over from the UDP and has an extant planning permission. Its deliverability has been assessed taking into account the acquisition of additional land adjacent to Sandwash Close by the owner which opens up access to the site. This change should be reflected in the site area set out in Table 4.1 and the Site Profile so that the Plan is effective (**MM007** and **MM044**). The Policies Map will also need to be updated to reflect the revised site area.

191. The site has the potential to serve a range of local employment needs. In this respect the appropriate uses set out in Table 4.1 should include light industrial as well as general industrial and warehousing/storage so that the Plan is positively prepared. **MM007** would secure this change.

192. The extant planning permission has a number of key conditions relating to the protection of existing trees and the landscape, highways and access and drainage. The relevant Site Profile has therefore been amended to include reference to these matters to ensure that the Plan is effective (**MM044**).

193. **Land south of Higher Lane, Rainford (8HA)**, allocated for housing, makes a limited contribution to Green Belt purposes and benefits from strong boundaries and a high degree of visual containment. The site would not extend the village any closer to Billinge given the linear nature of the Rainford Industrial Estate.

194. The site slopes away from Higher Lane and is conspicuous in views from the road and from properties in Rookery Lane. Development of the site would have some adverse landscape and visual effects and lead to the loss of good quality agricultural land. However, the site represents a logical extension of Rainford. Local facilities in the village centre, a primary school and the health centre would be reasonably close and capable of being accessed by foot and cycle via the Rainford Linear Park. There are no significant technical constraints.

Exceptional circumstances exist for the release of Site 8HA from the Green Belt.

195. The Site Profile requires updating so that measures to enhance sustainable modes of travel are incorporated to ensure a positively prepared and effective Plan (**MM044**). In particular, links should be facilitated to the linear way and bus stops provided. The reference in the site requirements to a minimum 25m wide linear flood attenuation and habitat creation feature is prescriptive but may be adjusted upon the receipt of more technical information.

196. The sites allocated for housing in Garswood and Rainford are attractive to the market. The sites are being promoted by major housebuilders. There are no barriers to the sites coming forward as anticipated by the housing trajectory.

197. Haydock and Blackbrook comprise a single urban area between St Helens and Ashton-in-Makerfield. The latter lies within Wigan Borough. There are large employment sites north of the A580 at Haydock. In addition to jobs, the settlement has schools, a health centre and good bus links to St Helens.

198. There is a grouping of employment allocations to the north of the A580 which are well-placed to serve the needs of the logistics and warehousing sector and will enhance the existing jobs offer. They would also contribute to reducing poverty and social exclusion given their proximity to areas of high deprivation.

199. Most of the land at **Florida Farm North (2EA)** and **Land North of Penny Lane (3EA)** has been developed. As a result, these sites no longer need to be allocated but would constitute part of the take up of land in the employment supply figures. **MM007, MM008,** and **MM044** would remove the sites from Table 4.1, delete references to Site 2EA from Policy LPA04.1 and its explanation (Strategic Employment Sites), and remove the Site Profiles.

200. However, it would be appropriate to remove both sites from the Green Belt and show them as white land. Otherwise, if they remained as Green Belt, any proposals for residual land or ancillary development within the site boundaries would need to demonstrate very special circumstances. Exceptional circumstances have been demonstrated. The change from allocations to white land would necessitate changes to the Policies Map. The above changes are needed to ensure a positively prepared and effective Plan.

201. **Land south of Penny Lane (4EA)** at 2.16 ha is a small, triangular shaped site currently situated in the Green Belt. The LP allocates the site for B2 and B8 uses. The site is next to Site 3EA which has been largely built-out since the GBR was undertaken. Consequently, 4EA is now bordered by development on two sides (Site 3EA, a hotel, and the A559 Penny Lane), with the M6 running

along the third side. As such, the site is very well contained by development and would also form a natural extension to the existing Haydock Industrial Estate.

202. The site was assessed in the GBR as making a medium contribution to Green Belt purposes. However, that was in combination with Site 3EA. On its own the site makes a very limited contribution to Green Belt purposes. Its development for employment uses would be entirely logical and exceptional circumstances have been demonstrated.

203. In terms of highways, the site will need to take into account any impacts on J23, along with Sites 5EA and 6EA. However, NH have confirmed that there is nothing to prevent a relatively small site such as 4EA coming forward on an incremental basis in advance of the M6 improvements to J23 providing that any proposed scheme can demonstrate that impacts will be acceptable.

204. **MM044** is necessary to the Site Profile to secure suitable access to the site via walking, cycling, and public transport, in the interests of a positively prepared and effective LP.

205. Site 4EA is expected to be delivered well before the end of the Plan period. Based on the available evidence, this is a reasonable assumption.

206. The GBR assessed **Land West of Haydock Industrial Estate (5EA),** and **Land West of Millfield Lane, Haydock (6EA)** as part of the same parcel of land. It found that overall the parcel made a moderate contribution to the purposes of the Green Belt. The GBR acknowledged the role of 6EA in preventing ribbon development along Liverpool Road and in broadly contributing to the physical and visual separation of Haydock and Ashton-in-Makerfield. However, the sites would form a natural extension to the existing Haydock Industrial Park and are bounded by the triangle of existing roads. They are therefore relatively self-contained with well-defined boundaries. The sites do not encroach onto the attractive rolling countryside to the north of the A58.

207. The allocation of both sites for B2 and B8 employment uses is therefore logical. The removal of the sites from the Green Belt will also help to ensure permanence in the boundaries of the Green Belt for the long-term in this location. Exceptional circumstances have been demonstrated. However, in recognition of the potential landscape and visual impacts, **MM044** adds a requirement to the Site Profile for 6EA relating to the layout and landscaping of the site, particularly in terms of treatment along Liverpool Road.

208. Access to 5EA will be achieved through the adjacent employment sites 2EA and/ or 6EA. **MM044** therefore amends the Site Profiles for both 5EA and 6EA to refer to this to ensure that this requirement is taken into account when Site

6EA is developed. The MM also includes measures to secure suitable access to the site via walking, cycling and public transport.

209. **MM044** also adds a requirement to the Site Profile for 5EA to ensure that effective flood management measures for Clipsley Brook are provided. This is necessary to ensure the risk of flooding downstream is reduced, as well as enhancing biodiversity. The MM also adds wording to the Site Profile for 6EA to provide a green space buffer alongside Millfield Lane. This is necessary to ensure that any effects on the setting of the listed building, 'Le Chateau', are minimised.

210. The above changes through **MM044** are required to ensure that the Plan is positively prepared, effective, and consistent with national policy.

211. The employment land delivery trajectory set out in the Employment Land Background Paper (SD022) envisages a staggered approach to the development of Sites 4EA, 5EA and 6EA to take account of impacts on, and the need for a significant upgrade to, J23 of the M6. Reference is also made to this issue in the Site Profiles for 5EA and 6EA to ensure that it is addressed by any planning application. 5EA is expected to be operational by 2030. As 6EA is the larger of the two sites, it is anticipated that the later start date will allow for the improvement works at J23 to take place but that the site will be operational by the end of the Plan period. Based on the available evidence, the delivery assumptions for both sites are reasonable.

212. **Land north-east of J23 (M6), Haydock (2ES)** is a generally open area of agricultural land of around 43 hectares in size. It is next to J23 of the M6 Motorway and the A580 East Lancashire Road, south of Haydock Racecourse, and the A49 runs along its western boundary. An area of woodland borders the site's eastern boundary.

213. The GBR found that the site made a strong contribution to the purposes of the Green Belt. Specifically, it contributes to the strategic gap between settlements (Haydock and Golborne and also Haydock and Ashton-in-Makerfield) and has an important role in checking the outward expansion of the large built-up areas of Haydock and Ashton-in-Makerfield into the countryside. As such, the GBR acknowledged that the development of this site would have a high impact on the Green Belt.

214. On the other hand, the GBR also acknowledged that the site, because of its size and location (being close to the strategic road network), has the potential to help meet the long-term need for logistics development within the area and wider sub-region.

215. The decision was taken by the Council to safeguard this site rather than allocate it based on the ranking given to the employment sites during Stage 3 of the GBR. Seven sites scored more highly than 2ES and these higher scoring sites have been allocated in the LP.

216. A planning application for development on part of the allocated site was made in 2020 for 167,000 sqm of B8 storage and distribution and B2 business use (with an 80/20% split of floorspace respectively). Permission for the scheme was dismissed on appeal in November 2021[9] on the basis of conflict with Green Belt policies and landscape and visual impact harm. Loss of agricultural land and heritage concerns were also identified.

217. In terms of landscape and visual impact, it is the case that development of the site for large scale logistics would detract from its current open and rural character. However, this is an issue that will need to be weighed in the balance when considering the need to meet employment needs beyond the Plan period and the sites suitability in meeting them.

218. Development of the site would involve the loss of agricultural land but that is the case for most sites in St Helens on the edge of the urban area. The site would also cover a large part of the former Haydock Park medieval hunting ground which is a non-designated heritage asset. However, much of this has been eroded by modern development and only remains to a limited extent.

219. The appeal scheme included proposed works to the A49 Lodge Lane. The Council has acknowledged that this is likely to form part of any future improvement works to J23 of the M6. Whilst that might be the case and any private sector contributions as a result of development at the site would no doubt make a positive contribution towards the funding of J23 improvement works, the fact remains that this would only be a partial solution. NH have made it clear that their preference would be for a comprehensive scheme to come forward as that would enable a complete design solution to be delivered and would also minimise disruption to users of the existing road network during construction works.

220. An initial feasibility study was undertaken in 2019 between St Helens, LCR, NH (then Highways England) and Wigan Council to look at options for improvement works at J23. A number of options were identified. However, the design option recommended is outside of current national standards. Therefore, further work is needed to identify a preferred solution and options for funding are being investigated.

[9] See SHBC039

221. In summary and despite its Green Belt and landscape impacts, Site 2ES is of a suitable size and in the right location to meet the need for large scale logistics development that would bring substantial economic benefits to the area and wider sub-region. The economic benefits of the site were also acknowledged as substantial in the recently dismissed appeal. Nevertheless, the decision was taken by the Council to safeguard this site rather than allocate it based on the ranking referred to above. Deciding which sites to allocate is a matter for the Council. Given that the employment requirement during the LP period can be met in full through the allocated sites, the decision to safeguard Site 2ES to meet long term employment requirements beyond the Plan period is justified. Exceptional circumstances for safeguarding Site 2ES have been demonstrated.

222. **MM044** is necessary to add wording to the Site Profile to ensure that any future development on the site addresses the landscape and visual impacts through a suitably designed scheme. The MM would also ensure that measures to secure suitable access to the site via walking, cycling and public transport are included. These changes are necessary for a positively prepared and effective Plan.

223. **Land at Florida Farm, Haydock (2HA)** has residential areas to the south and the East Lancashire Road and large new warehousing to the north. It would involve a logical extension of Haydock up to the A580 and the A58. The site makes a limited contribution to Green Belt purposes.

224. The site is in a sustainable location with good access to services and jobs. Aside from some limitations imposed by the capacity of J23 of the M6, there are no significant technical constraints. Flood risk, noise, and historic mineshafts can be mitigated. Exceptional circumstances have been demonstrated. **MM044** would modify the Site Profile to recognise the opportunities for sustainable means of access in the interests of a positively prepared and effective Plan.

225. The housing trajectory anticipates that development at Florida Farm would not commence until 2027/28. The site is one of several allocations that might add to capacity issues at J23 and, therefore, may need off-site highway improvements before it can be brought forward. That said, further assessment might indicate that some of the site can be developed in advance of works. But a cautious approach by the Council to delivery is reasonable in the circumstances.

226. Additional housing allocations or the provision of safeguarded land for housing around Haydock/Blackbrook are not necessary to make the Plan sound. Although there is limited identified supply, apart from Site 2HA, the settlement is close to St Helens, Garswood and Newton-le-Willows/Earlestown which, in combination, have a plentiful supply of sites. In addition, there may be opportunities to develop other land which is now excluded from the Green Belt, for example land to the west of Haydock Park Racecourse. The development of land to the south of Haydock/Blackbrook, particularly south-west of J23, would

erode the gap between the settlement and the nearby built-up area of Newton-le-Willows/Earlestown, leading to a perception of merger.

Green Belt boundaries

227. The change to the boundary in the vicinity of Barrows Farm, Billinge, shown in Appendix I of the GBR is justified in that the frontage development on Carr Mill Road and the more tightly knit development behind would be removed from the Green Belt, whereas the more open areas of the complex further east would remain within the Green Belt. The other modest changes to the Green Belt boundary set out in Appendix I are justified. Exceptional circumstances have been demonstrated for these clearly defined Green Belt boundaries.

Parkside, Newton-le-Willows and Earlestown

Allocations and Safeguarded Land

228. Newton-le-Willows/Earlestown comprises a single urban area to the east of the Borough. Apart from St Helens it is the largest distinct settlement. The area is served by Earlestown Town Centre and Newton-le-Willows Local Centre, schools, health facilities, and good transport links, including two railway stations. The former Parkside Colliery lies adjacent to Newton-le-Willows, between the West Coast mainline and the A49, and the M6.

229. **Parkside East (7EA)**, allocated for a SRFI, is situated mostly to the east of the M6 motorway close to J22, with a thin strip of land crossing over the M6 to include a small area on the west of the motorway to allow for rail enabled development. It is a large open Green Belt site of around 125 hectares consisting of agricultural land with some agricultural buildings on it. The A579 Winwick Road is situated to the south, and the Chat Moss railway line along with an area of woodland to the north. The A573 Parkside Road and Barrow Lane cross the site. The site is therefore well-contained apart from along its eastern boundary which is open.

230. The GBR assessed the site as making a high + contribution to the Green Belt. This was specifically in relation two Green Belt purposes: checking the unrestricted sprawl of built-up areas and assisting the safeguarding of the countryside from encroachment. It is acknowledged that developing the site would be harmful to the Green Belt due to the size of the site, the lack of enclosure to the east, its strong countryside character, and the absence of existing development.

231. **Parkside West (8EA)**, allocated for B2 and B8 uses, includes the site of the former Parkside Colliery and is about 80 hectares in size. The site is a mixture

of brownfield land, farm buildings, trees, and grassland. It is bounded by the Chat Moss railway line to the north, the M6 and agricultural land to the east, Hermitage Lane and woodland to the south, and the West Coast railway line and A49 Mill Lane to the west. To the west it adjoins Newton-le-Willows. The site is therefore well contained by its boundaries to the north and west and to a lesser extent to the south and east.

232. The GBR assessed the site as making an overall medium contribution to Green Belt purposes. The review noted the sites high degree of enclosure, that part of the site is brownfield and that it did not have a strong sense of openness or countryside character.

233. The Framework promotes economic growth and sustainable transport. The Department for Transport's National Policy Statement identifies SRFIs as key to facilitating the transfer of freight from road to rail. The Government has concluded that there is a compelling case for an expanded network of SRFIs. However, there is also acknowledgement that due to the requirements for road and rail access, the number of locations where SRFIs can be developed will be limited.

234. SRFI's are an important tool in promoting a modal shift to more sustainable modes of transport, by encouraging the transportation of goods via the national rail network rather than by road, thereby reducing carbon emissions and congestion. They therefore have significant environmental benefits.

235. Both 7EA and 8EA together form the wider Parkside site which has been the subject of planning applications for a SRFI. It was identified in the CS as a strategic location for a SRFI. Evidence demonstrates the site to be of national and regional significance in relation to policy, market demand, and the need to deliver new SRFIs.

236. The development of an SRFI would contribute towards the Plan's strategic aims of regeneration and tackling the issues of multiple deprivation that exist in the area. The proposed SRFI would lead to the creation of jobs and training opportunities that would benefit nearby deprived communities that suffer from unemployment, low skills and educational attainment, and low incomes.

237. As noted, the locations where a SRFI could be developed are limited due to the locational requirements. Given Parkside's proximity to the strategic road and rail network with links to routes connecting the north, south, east, and west of the country, the site is placed in a somewhat unique location to provide a SRFI.

238. In terms of the scale of the SRFI proposed, Policy CAS 3.2 of the CS identified the former Parkside Colliery and part of the adjacent land as being a strategic location which had the potential to facilitate the transfer of freight between road

and rail. At the time of the CS, the Council had considered the proposal on the basis of a small-scale facility which used the minimum amount of land necessary to develop such a facility. The evidence at the time showed that it was viable to develop a SRFI on Parkside West, with some land possibly being required within what is now Parkside East for operational reasons.

239. Since the adoption of the CS in 2012, a number of studies and reports have been commissioned to better understand the operating requirements of an SRFI on the site. The 2016 AECOM study looked at four options for developing SRFIs of different scales. The study found that either a medium (defined as handling between 4-8 trains per day) or large (over 9 trains per day) scale SRFI would be economically viable on the site. The assessment took into account matters such as infrastructure costs, flexibility of rail access, and road access. Both options require land on the east of the M6 to be utilised. Additionally, evidence indicates that a rail facility capable of accommodating trains 775m in length could not be accommodated on Parkside West (Site 8EA) alone. Being able to handle trains of this length is essential as it would meet the operational requirements of the logistics sector, and additionally, helps ensure that the full environmental benefits are realised in that longer trains are able to transport more goods which equates to fewer journeys and less emissions.

240. Additionally, if a rail facility were developed solely on Parkside West there would be insufficient space to accommodate the necessary reception sidings for trains from the west/south prior to arriving at the terminal. This would result in the west side loop being blocked, making rail access from the west less suitable for a SRFI. It is clear, therefore, that if an SRFI is to be built at Parkside then incorporating land on the east of the M6 will be necessary to realise its full benefits and to ensure the facility is viable.

241. Developing an SRFI has a high initial capital investment in terms of ensuring the necessary infrastructure is in place. Viability is therefore a very important consideration. Of the options looked at, the large scale SRFI (handling up to 12 trains per day) is the one that would be capable of accommodating trains 775m in length. Rail access would also be the most flexible with a facility being capable of accepting trains from both the south and west. Additionally, the size of the core handling area would mean that trains would not need to be split for handling which would save time and provide an operational benefit. The 2016 AECOM study also noted that the higher throughput of trains that would be capable of being handled by a facility of this size would make better use of the infrastructure and equipment provided on the site and would result in the initial capital costs being paid back more quickly than other options. The large scale SRFI was therefore considered to be the best option available by the study as it would make optimal use of the site's strategic location.

242. The employment land allocations trajectory assumes that a rail terminal at Parkside would open in 2026-2028 and that the site would be operational by

2030, with development ongoing at the end of the Plan period. Given the scale of the facility envisaged, this is an ambitious project timetable. However, a planning application for the development of Parkside Phase 1 for primarily road-based logistics on about 60% of Site 8EA was approved by the Secretary of State in November 2021[10]. An application for the Parkside Link Road was also approved at the same time[11]. There is also a developer who is promoting the Parkside East Site who has a track record in delivering strategic logistics-based developments. They are in advanced discussions with a rail freight operator in relation to the site. Their plans for the site at this stage are to develop a SRFI with a major manufacturing and logistics 'Super Hub'. The evidence therefore suggests that there is strong interest in developing Parkside as a SRFI from the logistics industry. The delivery assumptions for both sites, whilst being challenging, are nevertheless realistic.

243. The Parkside Strategic Rail Freight Interchange Capacity Study (EMP012) found that the existing rail infrastructure could support 4 trains per day at Parkside and this is the minimum number necessary to meet the definition of a rail freight Nationally Significant Infrastructure Project under the relevant legislation. However, in total, 19 paths were identified which means that it is likely that more trains could be accommodated at Parkside. Furthermore, as the facility grows over time and given the strong demand in the logistics market, it is likely that the facility would be able to accommodate more trains allowing for path capacity improvements through timetabling changes and infrastructure improvements. Against a national policy background that promotes growth in the transportation of freight via the rail network, it is reasonable to anticipate that future growth at the facility could be accommodated.

244. In summary, the provision of a SRFI requires a critical mass to justify the capital cost investment in infrastructure and this is informed by the scale of the proposal which in turn affects its viability. On the basis that the development of an SRFI at Parkside is supported, then a large-scale facility is therefore justified, otherwise the full economic, social, and environmental benefits would not be realised as a smaller scheme would be unviable. Although it is acknowledged that significant harm to the Green Belt would occur as a consequence of developing Site 7EA in particular, exceptional circumstances have been successfully demonstrated to support the release of both 7EA and 8EA from the Green Belt. These exceptional circumstances are summarised in **MM007** which is necessary so that the Plan is positively prepared, justified, and consistent with national policy. We have added some additional wording following MM consultation to include reference to warehousing and industrial development linked to the SRFI.

245. As the justification for releasing 7EA rests on the development of the site as a SRFI, **MM015** is necessary to ensure that this is delivered. The additional

[10] See SHBC040
[11] See SHBC038

wording to Policy LPA10 requires any masterplan for the site to set out phasing for the whole site which should include a clear floorspace trigger for the delivery of the rail terminal infrastructure.

246. There is an existing access from the A49 to Parkside West. The 2016 AECOM study found that traffic impacts on the A49 would be acceptable if a small-scale facility (up to three trains per day) were developed at the site, providing some junction improvements were implemented. However, the study found that access from the A49 alone would not be feasible if a medium to large scale facility were developed at the site. To mitigate the impacts of developing both 7EA and 8EA, the Council has developed a scheme to provide a link road between the A49 to M6 J22. The link road will provide access from both Parkside East and Parkside West to J22. Funding for the scheme has been secured from the LCR Combined Authority and the Council, with additional funding to be provided by the private sector. Construction work on the link road commenced in January 2022. Policy LPA10 makes the provision for a safe and convenient access to J22 a requirement for the delivery of the site. There is also the ongoing work between NH, St Helens, and Wigan, to identify funding for delivery of improvement works to J22 itself. NH's Road Investment Strategy [RIS] 2 includes the junction as a pipeline scheme for potential future development in the next plan period (RIS3, 2025-2030).

247. Given the large scale of 8EA and its relationship to site 7EA, **MM017** introduces a site specific policy into the Plan for effectiveness. Site 7EA already has a site specific policy (LPA10). As a consequence **MM044** deletes the text in the Site Profile for 8EA and refers instead to new Policy LPA12. A number of consequential changes are also made throughout the Plan to update references to the new policy where necessary (**MM006**, **MM008**). Additionally, for effectiveness and following the MM consultation, we have amended MM017 so that the explanation to the new policy now includes a reference to the planning permissions recently granted by the Secretary of State for Site 8EA and the link road.

248. New Policy LPA12 confirms that the site is suitable for B2 and B8 development. It also sets out a number of detailed considerations that a planning application on the site will be required to address, including access to and from the M6 for HGVs and other vehicles (including a specific reference to the link road recently granted permission), and the need to mitigate any adverse impacts on J22 of the M6. Other matters are also referred to in order to address specific issues identified in the SA and evidence base including the presence of a designated historical battlefield, the amenity of nearby residents, provide access via walking, cycling and improved bus provision, and training schemes to increase opportunities for the local population. These modifications are needed so that the allocation is positively prepared and effective.

249. The Plan allocates **land to the west of the A49, Newton (7HA)** and safeguards **land between Vista Road and Belvedere Road, Earlestown (2HS)**, **land east of Newlands Grange, Newton (4HS)** and **land west of Winwick Road, Newton (5HS)** for housing.

250. **Site 7HA** is occupied by vacant school buildings and associated grounds. The school complex provides strong boundaries and enclosures which together with its partly brownfield condition, results in a low contribution to Green Belt purposes. The site is within walking and cycling distance of Newton Railway Station, on a bus route, close to local facilities, and opposite Parkside West. Exceptional circumstances have been demonstrated.

251. Since the commencement of the examination, permission has been granted for redevelopment of the site to accommodate the relocation of Penkford School from its existing site on the edge of Earlestown. This will lead to a reduction in the capacity of Site 7HA to reflect that part of the site is to be taken up by the new school and its associated parking and playing field. The revised yield from the site is estimated to be some 140 dwellings compared to around 180 units in the submitted Plan. The revised figure is justified[12]. The revisions would take into account a modification to increase the minimum density from 30 to 35 dph which would be consistent with densities to be achieved on other urban edge sites and would reflect the modern housing to the north.

252. Land to the south at Red Bank Farm is not included in the allocation but potentially could be developed as it now lies beyond the Green Belt, providing flood risk issues in relation to Newton Brook are resolved.

253. The revisions to capacity at Site 7HA are reflected in changes to the reasoned justification to Policy LPA05, Tables 4.5, 4.6 and 4.7 and Figure 4.3 (**MM009**), and the Site Profile (**MM044**). **MM044** also introduces requirements in the Site Profile relating to walking and cycling links and bus stop improvements. These modifications are needed so that the allocation is positively prepared and effective. Changes to the Policies Map will also be required.

254. **Site 2HS** is on the northern edge of the settlement but is set back from existing housing to the north-east. Therefore, although adjudged to have a medium contribution to Green Belt purposes, it would not bring the settlement any nearer to Haydock. The northern boundary is clearly defined by a strong hedge line with trees. The site is reasonably close to schools, health facilities and Earlestown Town Centre.

255. **Site 4HS** is sandwiched between the main west coast railway line, recently built housing estates and Vulcan Village. It makes a low contribution to Green Belt

[12] see SHBC023

purposes. The site is close to a modern foodstore, with a primary school, health and recreation facilities, and the railway stations also within walking distance.

256. The area of safeguarded land should be extended to the south-west up to the northern boundary of the recreation ground so that it includes land to the east of the Vulcan Village Conservation Area. The Site Profile already includes a requirement for a landscaping buffer to the Conservation Area. In addition, there is a well-wooded bank immediately to the east of the Conservation Area. Together these existing and proposed buffers would provide sufficient protection to the setting of the Conservation Area. Moreover, the built development within the Conservation Area is inward looking and urban in form. There would not be any significant impact on Green Belt purposes taking into account the findings of the GBR and our site visits. This change is required to ensure a positively prepared and justified area of safeguarded land. Table 4.8 requires modifying accordingly to reflect increased site area and indicative capacity (**MM011**) and there are consequential changes to the Policies Map.

257. **Site 5HS** is also between the main west coast railway line and housing. It makes a low contribution to Green Belt purposes. The site has a primary school, health and recreation facilities and Newton Railway Station within walking distance.

258. The site makes some contribution, alongside the cemetery and the local wildlife site flanking Newton Brook, to the relatively tranquil green lung permeating through the urban area. There are also constraints that would need to be mitigated relating to the wildlife site, flood risk and nearby landfill. These factors have led to Site 5HS being safeguarded rather than allocated, a position which is justified.

259. Exceptional circumstances exist for the release of Sites 2HS, 4HS in its modified form and 5HS from the Green Belt.

260. **MM045** introduces requirements within the Site Profiles for 2HS, 4HS and 5HS relating to sustainable transport measures to ensure a positively prepared and effective Plan.

261. There has been significant development in the Newton-le-Willows and Earlestown urban area since 2016. At 31 March 2021 over 1000 homes had been completed or were under-construction. Opportunities exist in the built-up area to bring forward further previously developed land. The allocation 7HA will add to the range of sites. Therefore, making Sites 2HS, 4HS and 5HS available to meet longer-term needs would be appropriate.

Green Belt boundaries

262. The modest changes to the Green Belt boundary in Appendix I of the Green Belt Review, so far as they affect Newton-le-Willows and Earlestown, are justified. Exceptional circumstances have been demonstrated for these clearly defined boundaries.

Conclusion

263. We conclude that, subject to MMs proposed, the allocations and safeguarded land identified for development within St Helens, and Green Belt boundaries, are consistent with the Plan's strategy and national policy, including protecting Green Belt land, and whether the housing and employment land identified will be delivered. The MMs which affect the allocations and safeguarded sites will require consequential adjustments to Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram). We have amended **MM**

Issue 4 – Whether the Plan meets the development needs of business through its policies

Employment Land Supply

264. Policy LPA04 and accompanying Table 4.1 in the submitted Plan allocates approximately 234 ha of employment land across ten sites to meet the employment needs of St Helens. The Omega site (1EA) of around 31 ha is excluded from the supply calculations as it has been allocated in the LP to meet the employment needs of Warrington.

265. Take up of employment land between 1 April 2012 and 31 March 2021 has been around 61 ha (this includes the allocated sites 2EA, 3EA and 10EA which have now been substantially built out). The vast proportion of this land (approximately 58 ha) has been delivered in recent years (post 2018). The existing supply of deliverable sites is about 5 ha. This leaves a residual requirement of about 173 ha.

266. To reflect the above position, **MM007, MM008** and **MM044** update Tables 4.1 and 4.4 of the Plan, Policy LPA04.1 (Strategic Employment Sites) and the Site Profiles. This is necessary to reflect (1) the employment land supply figures for the extension of the Plan period to 2037, (2) the latest available data (up to 31 March 2021) and (3) the four sites - 2EA, 3EA,10EA and 11EA – that are now substantially completed or are under-construction and, therefore, do not need to be allocated. These changes ensure that the Plan is effective.

267. As the land that remains allocated for employment in the Plan amounts to about 182 ha, this will exceed the residual requirement. We therefore conclude that, subject to the MMs proposed, the amount of employment land allocated in the Plan is appropriate and will be sufficient to meet the employment needs of the area and that sufficient supply exists to meet the OAN in full.

Protection of Employment Land and New Employment Development

268. Policy LPA04 seeks to protect allocated employment land from being developed for alternative uses by, amongst other things, requiring an 18-month marketing period. However, there are other sites that are also meeting the employment need identified in the Plan but are not now allocations (such as the deleted allocations 2EA, 3EA, 10EA and 11EA). **MM007** amends the reasoned justification to the policy to make it clear that the 18-month marketing period also applies to these sites as well. This MM is justified and necessary to ensure that the policy is effective in ensuring that identified employment land is protected.

269. Policy LPA04 also sets the approach to protecting existing employment sites unless other uses can be justified. The policy seeks to explain how applications for non-employment uses will be dealt with on existing employment sites. However, much of the detail on how the policy will be applied is contained in the Local Economy Supplementary Planning Document. To ensure that the policy is effective and readily understood, **MM007** inserts a reference into the reasoned justification for the policy to a 12-month marketing period being required in order to demonstrate that a site is no longer viable for employment uses.

270. As Policy LPA04 does not prevent employment sites from being developed for alternative uses, provided specific requirements are met, it is consistent with paragraph 123 of the Framework.

271. Since the submission version of the Plan was published, changes to the Use Classes Order have come into effect. These include introducing a new Class E which incorporates the previous B1 Use Class. **MM006**, and **MM007** are therefore necessary to update references throughout the relevant policies and reasoned justification to provide a full description of the uses that are being referred to. For the most part, the wording refers to 'light industrial, offices and research and development uses'. MM007 also introduces safeguards into Policy LPA04, such that new employment uses now falling within Class E would be subject to a condition preventing a change to town centre uses. These MMs are necessary to ensure that the Plan is effective in retaining employment uses and consistent with national policy.

272. Given the widespread effect that the Covid-19 Pandemic has had on many aspects of our lives, **MM007** inserts a reference to it in Policy LPA04. This is to

ensure that planning decisions support businesses and the economic recovery of the Borough and ensures that the Plan is effective.

Main Town Centre Uses

273. Policy LPC04 sets out the retail hierarchy. St Helens is identified as the principal town centre, followed by Earlestown Town Centre. There are then two district centres identified (Rainhill and Thatto Heath) and a number of local centres. The hierarchy reflects that established in the CS (except for the omission of the Local Centre Chancery Lane) and is supported by the evidence base. In particular, the Retail and Leisure Study (EMP004) reviewed the hierarchy to take account of any changes in circumstances since the CS was adopted. The hierarchy is, therefore, appropriate and justified.

274. The retail strategy of supporting existing centres and directing new development towards the principal town of St Helens (set out in Policy LPC04 and paragraph 4.6.16) will help support the regeneration of the area which in turn reflects one of the central themes of the Plan. This also reflects national policy. As referred to above, **MM007** proposes the use of conditions to restrict changes within Class E on employment sites. The MM is necessary to ensure that the Plan is effective in protecting town centres in accordance with national policy (Section 7 of the Framework).

275. **MM024** inserts a reference within Policy LPC04 to make it clear that the development of main town centre uses within defined centres will be supported and that permission will be granted for development that is appropriate in terms of scale and nature. This MM is necessary to ensure that the policy is positively prepared and effective.

276. The English Cities Fund [ECF] and Town Deal are two initiatives that will be integral to ensuring the delivery of the Plan's aim to regenerate centres in the area. This will be achieved through partnership working and additional funding. **MM006**, **MM019**, and **MM020** insert references to these initiatives into the relevant policies. The changes are necessary to ensure that the policies are effective in explaining how these initiatives will contribute towards the delivery of the Plan's policies and objectives.

277. National policy no longer refers to the need to identify primary and secondary shopping areas. **MM019** deletes references to these terms in Policy LPB01, Appendix 11, and the glossary, and uses the term 'Primary Shopping Area' in relation to St Helens Town Centre. This MM is necessary to ensure that the Plan is consistent with national policy. Consequential changes to the Policies Map will also be required.

278. Policy LPB01 refers to the St Helens Town Centre and Central Spatial Area. To ensure that the policy is clear on how the 'Central Spatial Area' is defined, **MM046** inserts a map into Appendix 11 of the Plan along with a reference to the map in the reasoned justification. This MM is necessary to ensure that the policy is effective and readily understood.

279. The Retail and Leisure Study provides the evidence base for a locally set threshold where an impact assessment will be required. Policy LPC04 (Part 6) sets the threshold for retail development at different centres. The thresholds have been informed by the size of existing units within the centre, the vacancy rate of units, and whether there are existing out of centre retail destinations nearby. The thresholds set out in the policy are appropriate and supported by the evidence.

Conclusion

280. We conclude that, subject to the MMs proposed, the Plan meets the development needs of business through its policies.

Issue 5 – Whether the housing requirement will be met; whether the means of meeting the requirement have been justified and will be effective; and whether the Plan will have a five-year housing land supply upon adoption and be able to maintain it through the Plan period

Generally

281. Earlier in this report we concluded that the Plan's requirement for 10,206 homes between 2016 and 2037 is justified. Under Issue 3 we considered whether the allocated sites were suitable and would be delivered. We now go onto consider the totality of the likely housing supply against the Plan's requirements and whether there will be a five-year housing land supply.

Components of Supply

282. Policy LPA05 and its justification explain how the housing requirement will be met. Table 4.6 sets out components of the land supply. It includes contributions from completions, non-Green Belt sites identified in the SHLAA (including some allocations), a small sites allowance, and Plan allocations within the Green Belt. Table 4.6 needs to be updated to reflect the extended Plan period until 2037. The revised table should also set out the most up-to-date position at 31 March 2021. The revisions to the table (now included in separate Tables 5.2 – 5.5) would be secured by **MM009** which is required for an effective Plan.

283. The completion of 3,074 units shown in the modified tables are for the period 1 April 2016 to 31 March 2021. There is no dispute about the figures for completions. Completions show an over-supply of housing against the requirement of 486 dpa since the base date of the Plan. This leaves a minimum residual requirement for the remainder of the plan period (1 April 2021 to 31 March 2037) of 7,132 dwellings (or around 446 dpa).

284. PPG is silent on whether or not over-delivery since the base date of a plan can be used to proportionately reduce the subsequent housing requirement over the rest of the plan period. That said, there is nothing in national policy or guidance which prevents an over-supply of housing in the early years of a Plan being taken into account. Indeed, it would be equitable to do so taking into account that Plans need to address any under-delivery. In the circumstances it is reasonable to use a residual requirement of around 446 dpa for calculating both the five-year requirement and the residual requirement for the rest of the Plan period. This is reflected in the tables associated with **MM009**, to ensure an effective Plan.

285. The small sites allowance relates to sites below 0.25 hectares or 5 dwellings. The figure of 93 dpa is based on historic data which shows delivery of an average of 103 dpa from this source over the last 10 years. The SHLAA does not include such small sites. The SHLAA sites within the five-year supply calculation also exclude units on developments of 4 or less. Therefore, there is no double counting. The small sites windfall allowance is justified by compelling evidence. An allowance for larger windfall sites would not be warranted as such sites are captured by the SHLAA.

286. No allowance is included for demolitions. There are no plans to carry out major clearance. Demolitions from SHLAA sites and allocations are largely known and therefore have been accounted for in the net figures for sites. A demolition allowance is not required.

287. The SHLAA sites include those under-construction, with planning permission and other sites identified as likely to come forward during the Plan period, including allocations within the urban area (6HA, 9HA and 10HA). The capacity of SHLAA sites shown to come forward beyond the next 5 years is reduced by 15% to reflect the potential non-delivery of some sites, including some with planning permission. No lapse rate has been applied to SHLAA sites with planning permission which are included within the 5 year supply for the very reason that they have been assessed as being deliverable.

288. Many of the SHLAA sites are no larger than 1 ha. Added to this will be windfall sites that come forward and which are accounted for by the small sites allowance. At least 10% of the housing requirement will come forward on small to medium-sized sites in accordance with paragraph 69 of the Framework.

289. Taking into account completions, the small sites allowance, and SHLAA sites, the residual requirement to be met from Green Belt sites is some 1,462 dwellings. However, to increase the robustness of overall Plan supply, a 20% increase on what is required from the Green Belt allocations in the Plan period has been added. This is justified by potential for lead-in times to be longer than anticipated due to the possibility of greater infrastructure requirements. The requirement is, therefore, some 1,754 homes. The sites are shown as being able to deliver 2,114 dwellings during the Plan period.

290. The updated tables setting out components of the supply, including the capacity reductions/allowances referred to above, show some 10,858 dwellings are capable of being delivered in the Plan period. Even with these reductions/allowances, potential supply exceeds the requirement by around 6%. Therefore, there is some flexibility built into the supply. Additional flexibility would require more Green Belt release which would not be justified by exceptional circumstances.

Housing Trajectory and Five-year Housing Land Supply

291. Paragraph 74 of the Framework indicates that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Table 4.7 and Figure 4.3 show the trajectory in tabular and graph form. The table and figure need to be updated to take into account the extended Plan period, the housing land supply position at 31 March 2021, and the removal of some SHLAA sites from the supply. The information should also be presented to clearly distinguish between different sources of supply. **MM009** secures these changes so that the Plan is effective. The trajectory within the Plan is supported by a more detailed site by site trajectory, the most up-to-date version of which is contained within SHBC031.

292. The contribution of SHLAA sites to the Plan's supply takes into account those that we have recommended be removed due to them not being deliverable or developable, or where delivery has been adjusted. The reasons for these sites being removed or adjusted were discussed at the hearings and are set out in our letter dated 30 July 2021 (INSP014). In terms of the former Pilkington HQ, Alexandra Park, we recognise the constraint of the heritage assets but are satisfied with the Council's assessment that the site is developable with a projected capacity of 162 dwellings, taking into account a site visit and the information in SHBC021 and SHBC030.

293. In terms of other disputed SHLAA sites which remain as part of the supply, there are a number of factors which give us comfort that overall delivery will be broadly as anticipated. The Council has a strong track record in bringing forward sites in the urban area. In the last 5 years, completions on previously developed land have been upwards of 75% of total completions. The Council

works with partners to bring forward sites and seek funding opportunities. For example, a £2 million grant was obtained from the LCR Strategic Investment Fund to accelerate development on the Moss Nook site (allocation 10HA). Further funding is being obtained from the ECF to deliver brownfield land in St Helens and Earlestown Town Centres. In addition, we emphasise the 15% reduction in capacity of developable SHLAA sites referred to above.

294. Some sites may deliver slower than anticipated or not at all, others may come forward quicker than expected. Sites which have not been identified and which are above the small site threshold may become available. However, overall, and having regard to the above, the data that supports the housing trajectory and which derives from the SHLAA is based on realistic assumptions about when those sites left in the supply will come forward, lead-in times and build-out rates. We have confidence that supply from SHLAA sites will be delivered broadly as anticipated.

295. The overall assumptions relating to the delivery of allocations have not been subject to significant challenge during the examination. Indeed, some developers felt that their sites would come forward sooner than anticipated. As indicated under Issue 3, the lead-in times and build-out rates for the allocations are realistic.

296. In identifying a five-year supply of deliverable housing sites, the Framework requires an additional buffer of 5%, 10% or 20% to be added, the latter to be applied where there has been significant under delivery of housing over the previous three years. The five-year supply position set out in the supporting evidence is based on a 5% buffer. Figures since the base date of the Plan show that delivery has been above the 486 dpa requirement for all but one of the 5 years. In the last 3 years completions have been considerably above the requirement, ranging from about 650 to over 800 homes. There has not been under delivery.

297. Five-year supply is a matter that we are considering in judging the soundness of the Plan. However, the situation is not one where the 10% buffer would apply as the Council did not make it clear as part of the plan-making process that it would be seeking confirmation of the existence of a five-year supply. A 5% buffer is justified.

298. The LP should clearly express the key assumptions and parameters which will be relied upon to calculate the five-year housing land supply. **MM009**, which includes tables to be inserted into the Plan, would ensure that the current housing land supply position is set out, including reference to the residual requirement, the 5% buffer and the components of the five-year supply. These changes are required so that the Plan is effective and consistent with national policy.

299. The tables indicate that supply would be just above five years on adoption of the LP using the base date of 31 March 2021. However, these figures take into account a cautious approach to the delivery of some Green Belt sites, including 2HA. The Council's track record in robustly monitoring supply and the flexibility in the overall supply give us comfort that a five-year supply can be maintained over the Plan period. This is reflected in the housing trajectory.

300. Section 4 of Policy LPA05 refers to monitoring of housing supply. The policy is not clear on what would demonstrate that delivery had fallen significantly below the required level. **MM009** links monitoring to the housing delivery test so that the policy is effective and consistent with national policy.

Conclusion

301. We conclude that, subject to the MMs proposed, the housing requirement will be met; the means of meeting the requirement have been justified and will be effective; and the Plan will have a five-year housing land supply upon adoption and be able to maintain it through the Plan period.

Issue 6 – Whether the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers

Generally

302. The Economic Viability Assessment [EVA] of December 2018 (VIA001) considers the implications of the Plan's housing mix, affordable housing, and housing standards policies, along with other policies of, and contributions sought by, the Plan. The assessment concludes that the overall scale of obligations, standards and policy burdens contained in the Plan are not of such a scale that cumulatively threaten the ability of the sites and scale of development identified in the Plan to be developed viably. The assessment also notes that policies such as LPC01 and LPC02 include clauses that allow some flexibility where there are viability issues, albeit that such instances would be the exception, not the rule.

303. The EVA is considered to be, overall, realistic, robust, and proportionate, applying existing use values, sales values, interest rates, construction costs and developer profits, in accordance with PPG and local evidence. Developer profit of 20% for larger developments is particularly robust given that the PPG suggests between 15-20% should be considered a suitable return. The EVA Update Note (SHBC027), provided after the hearings, included a proportionate response to some of the viability evidence, as well as testing of different scenarios.

Housing Mix and Types

304. The Framework requires that LPAs assess the housing needed for different groups in the community and these needs should be reflected in planning policies.

305. Policy LPC01 requires that housing is well designed to address local housing need informed by the relevant evidence including the latest SHMA. However, the policy should emphasise that evidence should be up-to-date and the wording should not be too inflexible (use of the term 'should' rather than 'must). **MM021** would secure these changes so that Policy LPC01 is justified and effective.

306. Detached houses make up a relatively small proportion of the existing housing stock. However, although the SHMA indicates a need for 3-bed and 4+- bed homes, there is insufficient evidence to translate that need into a specific policy requirement for detached houses. That said, the need for larger dwellings will be a factor in considering compliance with Policy LPC01.

307. Policy LPC01 includes a provision that 5% of new homes on larger greenfield sites should be bungalows. However, although the SHMA makes reference for a demand for bungalows, the document acknowledges that it is difficult to quantify the need/demand. Moreover, the inclusion of bungalows is likely to make the minimum densities required by Policy LPA05 more difficult to achieve, which could result in the ineffective use of land. Whilst the viability assessment considered the implications of the policy, we do not consider that the requirement has been fully justified. For these reasons **MM021** removes Section 3 of Policy LPC01.

308. However, bungalows will still have a part to play, along with other forms of accommodation such as sheltered and extra care housing, in meeting the needs of older people. **MM021** recognises this by including reference to bungalows within Section 5 of Policy LPC01 so that the Plan is positively prepared.

309. Policy LPC01 also supports the delivery of self-build and custom-build homes but is not prescriptive about what is required. That said there are only a dozen or so people on the relevant register. In many cases those wanting to build their homes will seek out individual plots. These are most likely to come forward within existing urban areas as windfalls. Policy LPC01 is consistent with national policy in this regard.

Affordable Housing

310. Policy LPC02 supports the delivery of affordable housing. The policy includes a zonal approach to the provision of affordable homes on larger housing developments. In Zone 1 (St Helens Town Centre and Parr Wards) no affordable housing would be required. In Zone 2 (wards covering Newton-le-Willows, Earlestown, Haydock, Garswood, and the wider St Helens Core Area) brownfield sites would not be expected to deliver any affordable housing but 30% of homes on greenfield sites would be required to be affordable. In Zone 3 (Rainford, Eccleston and Rainhill), brownfield sites would be expected to provide 10% affordable housing, greenfield sites 30%.

311. The above approach would depart from the Framework's expectation that at least 10% of homes on major developments are to be available for affordable home ownership. Concerns have also been raised that the Plan will not be able to deliver the number of affordable homes required to meet the need. In this respect it is argued that more greenfield sites should be allocated where 30% affordable housing is deliverable.

312. However, the Framework does not impose the 10% as a mandatory requirement. The viability assessment concludes that housing development within Zone 1 and on brownfield sites within Zone 2 would not be viable with affordable housing. But it is important that new housing is brought forward in the most deprived wards of the Borough, coinciding with Zone 1. Moreover, development of sites in the existing urban areas has advantages in terms of providing homes in the most accessible locations, improving the townscape by removing derelict and untidy sites, remediating contaminated sites, contributing to the supply of small and medium sized sites, and protecting the Green Belt. Furthermore, registered providers, such as the Council's partner Torus, are proactive in the urban areas and often deliver schemes with 100% affordable housing. Based on the evidence, the policy approach is likely to deliver sufficient affordable homes in a sustainable manner.

313. In Zone 2, the EVA shows that greenfield sites providing 30% affordable housing at 30 dph are not viable, albeit that the deficit is marginal. However, at a higher density of 35 dph most greenfield development would be viable. Although Policy LPA05, as modified by MM009, sets a minimum density of 30 dph and this is reflected for some allocations (Table 4.5), sites are likely to achieve higher densities and therefore be able to deliver 30% affordable housing. Moreover, Section 4 of Policy LPC02 does allow a lower level of provision on a site-by-site basis were justified by the evidence.

314. In referring to developments of 11 dwellings or more contributing to affordable housing, Policy LPC02 aligns with earlier versions of the PPG which set a threshold of 11. However, the Framework now states that affordable housing

should not be sought for residential developments that are not major developments. Therefore, the policy should align with the Framework in referring to developments of 10 or more dwellings. **MM022** secures this change so that Policy LPC02 is consistent with national policy.

315. During the examination the Government introduced, through its Written Ministerial Statement of May 2021 and revisions to the PPG, a requirement that 25% of affordable housing should be First Homes, a specific kind of discounted market housing. However, the PPG includes a transition period for plan-making. Thus, this Plan does not need to reflect the First Homes policy requirement. That said, the Plan should recognise that First Homes would need to be addressed by an update of the Plan. This would be achieved by **MM022** so that the Plan is consistent with national policy.

Housing Standards

316. Policy LPC01 requires a proportion of adaptable and accessible homes on larger housing developments. However, the policy is not clear as to whether it is seeking wheelchair adaptable or wheelchair user dwellings under Part M4(3) of the Building Regulations. In addition, in applying the requirements for adaptable homes under Parts M4(2) and M4(3), it is reasonable for a transition period to be included so that developers can factor in the cost of such standards. **MM021** clarifies both these matters so that Policy LPC01 is effective. Following the MM consultation, we have reverted to the original wording of Part 2. a) of the policy in relation to 'accessible and adaptable' dwellings under Part M4(2) and amended the wording of Part 2. b) and the reasoned justification so that it refers specifically to 'adaptable dwellings' under Part M4(3)(2)(a) for clarity.

317. Policy LPC13 promotes the sustainable design of new homes but does not include any specific provisions linked to particular standards. The Written Ministerial Statement of 2015 remains extant Government policy in setting energy standards for new homes. **MM032** would ensure that the requirements for a standard equivalent to the Code for Sustainable Homes Level 4 is incorporated within Policy LPC13 so that it is effective and consistent with national policy. Such standards are likely to be replaced by the Future Homes Standards by 2025.

Gypsies, Travellers and Travelling Showpeople

318. The needs of gypsies, travellers and travelling showpeople were assessed in the Merseyside and West Lancashire Gypsy and Traveller Accommodation Assessment [GTAA] of 2015 (GYP001). The GTAA identified a need for 8 residential pitches and 3 transit pitches up to 2032/33, but no need for plots for travelling showpeople. However, the Plan recognises that the need for residential pitches has increased since 2015 due to household growth and

evidence such as a rise in unauthorised sites. As a result, the need for the Plan period now stands at around 18 residential pitches.

319. There is planning permission for 12 pitches on land east of Sherdley Road Caravan Park, Thatto Heath. In addition, Policy LPC03 allocates a further site for 8 pitches as well as a site for 3 transit pitches, both in Sherdley Road. In combination, the permission and allocations would meet currently identified traveller needs for the Plan period.

320. Policy LPC03 does not set pitch targets for gypsies and travellers to address the above permanent and transit accommodation needs. **MM023** would ensure that the policy makes reference to the target and the reasoned justification explains how the 18-pitch need is made up so that the Plan is positively prepared, effective, and consistent with national policy, particularly the provisions of Policy B of Planning Policy for Traveller Sites.

321. Policy LPC03 includes criteria for assessing applications that come forward for traveller and travelling showpeople sites in accordance with the aforementioned Policy B. However, Section 5 of the policy should recognise that sites for travelling showpeople need to be able to provide space for storage of rides and associated equipment. This would be secured by **MM023** so that the policy is positively prepared.

Conclusion

322. We conclude that, subject to the MMs proposed, the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers.

Issue 7 – Whether the policies of the Plan relating to green infrastructure, open space and recreation are positively prepared, justified, effective and consistent with national policy

323. Policy LPA09 sets out that the Plan will enhance the GI assets of the Borough by working with relevant organisations; ensuring the provision and management of GI alongside developments; supporting development that would contribute to the function of existing GI; and resisting the loss or fragmentation of GI. Specific components of GI are dealt with by Policy LPC07 (Greenways) and Policies LPC05 and LPD03 (open space). Taken together these policies recognise the multiple benefits that GI can bring to the population of the Borough and its natural assets, in accord with national policy.

324. The justification to Policy LPA09 at paragraph 4.33.2 refers to countryside around the Borough's towns forming part of the GI network. It also states that this countryside accounts for 50% of the Borough's land area. The definition of

GI in the Glossary to the Plan (Appendix 1) also makes reference to 'open countryside'. However, including all countryside as GI, much of which is farmland, goes beyond the description of GI in Section 1 of the policy and the definition of GI in the Glossary to the Framework. Policy LPA09 also lacks clarity as to when loss of GI might be justified and what mitigation would be required.

325. **MM014** and **MM041** would remove the wide-ranging definition of GI within the policy explanation and Glossary, and clarify the exceptions and mitigation required where the loss of GI might be contemplated, so that the Plan is effective and consistent with national policy.

326. There is a network of well-established Greenways within the Borough which Policy LPC07 aims to protect and enhance. Figure 7.2 shows potential new Greenway routes, one of which runs through the allocation at Bold Forest (4HA). However, the policy itself is not explicit in supporting the expansion of the network in connection with new developments. **MM027** would ensure that such a provision is included within the policy so that it is positively prepared and effective. Policy LPA05.1 (Strategic Housing Sites) should also be modified for the same reasons (**MM010**) and the new policy for Bold Forest (Policy LPA13) should contain reference to the Greenway network (**MM018**).

327. Open space for sport and recreation forms an important component of GI. Indoor facilities also make a significant contribution to people's health and well-being. There are deficiencies in certain typologies of open space and in some sports which are predominantly played indoors, as set out in the Background Paper on Open Space (SHBC003).

328. The explanation to Policy LPA08 recognises that open space, including playing fields, and indoor sports facilities, are part of the infrastructure that needs to be protected and may need to be enhanced alongside new development, either by including such provision within the development or through contributing to facilities off-site. The explanations to Policies LPC05 (Open Space) and LPD03 (Open Space and Residential Development) also acknowledge the role of provision and contributions, particularly to address any deficiencies which would be exacerbated by new housing development.

329. Although not explicit in what provision is needed, the Plan supported by the evidence base, would allow opportunities for new provision and contributions to enhance existing provision to meet needs. However, the Plan would be effective if Policy LPD03 in particular makes it clear how new development would contribute to outdoor sports facilities. Moreover, reference should be made to the relevant evidence base (the Council's Playing Pitch Strategy and Action Plan) that would inform the type of contribution that would be necessary. **MM036** is required in these respects.

330. Policy LPD03 and the explanation to Policy LPC05 indicate that, where there is no deficiency in open space or recreation facilities in the locality, residential development may not need to make any provision. However, even if there is sufficient open space in the area, larger residential developments would need to provide certain types of open space. For example, children's play areas should be provided close to home. Informal open space would provide visual relief and areas for quiet recreation. **MM036** and **MM025** would ensure that Policies LPD03 and LPC05 support provision of certain typologies of open space, even where there may not be any deficiencies in a locality, so that the Plan is positively prepared and effective.

331. The Policies Map designates open space and also shows the typologies. These designations are, in the main, justified. However, land at Sankey Valley Industrial Estate is shown as falling within the playing field typology, whereas it is evident that the site has not been in sports use for some time. The site now has the character of natural green space and is accessible from the adjacent local wildlife site (see SHBC035A). The Policies Map should be amended accordingly so that Policy LPC05 is justified.

Conclusion on Issue 7

332. We conclude that, subject to the MMs proposed, the policies of the Plan relating to green infrastructure, open space and recreation are positively prepared, justified, effective and consistent with national policy.

Issue 8 – Whether other policies of the Plan are positively prepared, justified, effective, consistent with national policy and clear to the decision-maker

Natural environment

333. Policy LPC06 (Biodiversity and Geological Conservation) deals with the hierarchy of designated sites. It seeks to translate statutory obligations and national policy as set out in Circular 06/2005 and the Framework into the Plan. However, there are some inconsistencies with national policy. In addition, the policy needs to make clear that a sequential approach and a preference for on-site measures, should be applied to, not only mitigation, but also biodiversity net gain. Furthermore, the explanation to the policy should acknowledge that the mitigation strategy for European sites is being developed at a LCR level, albeit that in St Helens, strategic greenspace enhancements are likely to be focused on Bold Forest Park. **MM026** would ensure that Policy LPC06 is effective and consistent with national policy in the above respects. It is not necessary for the policy to prioritise replacement habitats on a like for like basis as this may not always be the most desirable solution.

334. The effects of traffic flows on the Manchester Mosses Special Area of Conservation [SAC] is referred to in Policy LPD09 (Air Quality), specifically in relation to developments that would generate significant traffic flows along the adjacent section of the M62. However, the justification to the policy should explain the sort of measures that could mitigate the effects, such as promoting sustainable modes of travel. Moreover, the in-combination effects of smaller developments should also be taken into account, as referenced by Policy LPC06. **MM039** refers to mitigation measures and sets out that smaller developments, normally above a certain threshold, would require evidence relating to the effects on the SAC. These changes are required so that Policy LPD09 (alongside Policy LPC06) is positively prepared, effective, and consistent with national policy.

335. The reasoned justification to Policy LPC09 (Landscape Protection and Enhancement) refers to valued landscapes (paragraph 7.15.1). However, the Framework at paragraph 174 distinguishes between valued landscapes and the countryside generally. Valued landscapes are to be protected and enhanced whereas the intrinsic character and beauty of the countryside is to be recognised. The Landscape Character Assessment (NAT001) is some 15 years old and does not grapple with whether any of the landscape within St Helens could be considered to be 'valued'. No other evidence has been put before the examination to support the identification of valued landscapes within the Borough. Therefore, **MM028** removes the reference to valued landscapes so that the Plan is justified and consistent with national policy.

336. Policy LPC10 (Trees and Woodland) refers in Section 6 to development not damaging or destroying trees. Reference to 'retain' rather than 'damage or destroy' would be reflective of a positively prepared Plan and would be achieved by **MM029**.

337. Section 6 of Policy LPC10 also includes the requirement to replace any tree lost at the minimum of a 2 for 1 ratio. Whilst such a requirement is fairly prescriptive, it is a clear quantifiable method, along with other enhancements, by which developments can contribute to biodiversity net gain. Moreover, the requirement is not mandatory and it may be that it can be demonstrated that other means would be more effective on a particular site as part of the development management process.

Historic environment

338. Policy LPC11 (Historic Environment), in dealing with heritage assets, seeks to translate national policy as set out in the Framework into the Plan. However, there is no need for the Plan policies to repeat national policy (or statutory duties), so it would be effective for Policy LPC11 to reference national policy in terms of heritage assets and include only the implications of national policy at the Borough level.

339. For example, in the case of Section 4 of the policy, this repeats paragraph 202 of the Framework. However, Section 5 of the policy does not replicate paragraph 203 of the Framework and gives development proposals a higher test to pass in relation to the effect on the significance of non-designated heritage assets than designated heritage assets. **MM030** would ensure that Policy LPC11 is effective and consistent with national policy.

Climate change and flood risk

340. Policy LPC12 (Flood Risk and Water Management) is another policy that, to a large extent, repeats national policy and guidance. The policy would be effective if it were to reference national policy in terms of flood risk but then only include the implications of national policy at the Borough level. **MM031** would achieve these changes so that Policy LPC12 is effective and consistent with national policy. Following the MM consultation we have included additional wording where multiple developers are involved to make Section 10 of the policy effective.

341. The reasoned justification to Policy LPC13 (Renewable and Low Carbon Energy Development) refers to national policy on wind energy development (including what is now Footnote 54 of the Framework). But then paragraph 7.27.5 of the Plan contradicts national policy by suggesting that wind energy development may be acceptable in the Borough despite what is said in Footnote 54. **MM032** deletes the relevant section of the paragraph so that the approach aligns with national policy.

Minerals and waste

342. Policy LPC14 sets out a number of provisions relating to minerals. The policy prioritises the use of secondary and recycled materials, to reduce the need for the production of new primary aggregates and disposal to landfill. This approach is consistent with national policy. Section 1 of the policy refers to ensuring that St Helens provides a steady and adequate supply of minerals to contribute towards regional and national needs. **MM033** amends the policy to add in a reference to 'local' needs. This is necessary to ensure consistency with national policy (paragraph 210 of the Framework).

343. **MM033** deletes the word 'only' from the opening sentence of section 4 of Policy LPC14. This is necessary to ensure that the policy is positively worded and is permissive of proposals for the extraction, storage, processing and/or distribution of minerals that are consistent with policy requirements.

344. A Minerals Safeguarding Area [MSA] is shown on the Proposals Map. Appendix 10 of the Plan shows the extent of each resource, namely shallow coal, clay, and sandstone. The purpose of the MSA is to inform developers of the

presence of these mineral resources. Policy LPC14 ensures that the potential for the sterilisation of mineral resources is considered during the planning process, without being unduly onerous on small scale developments.

345. Policy LPC15 acknowledges the role of the Joint Waste Local Plan in promoting the sustainable management of waste in accordance with the waste hierarchy. The policy is consistent with the National Planning Policy for Waste (2014) and the Joint Waste Local Plan.

Well-designed places

346. Policy LPD01 (Ensuring Quality Development) has a range of provisions. In terms of criterion 1. a), and having regard to the reasoned justification, it should refer to the importance of local distinctiveness and the role of good design in improving the quality of run-down areas.

347. In terms of criterion 1. b), avoiding causing any 'harm to the amenities of the local area' would be a high bar to pass in some cases. The inclusion of 'unacceptable' would make the policy effective.

348. With regard to criterion 1. c), the Framework refers to a 'high standard of amenity' rather than 'an appropriate standard of amenity'. The policy should be modified so that it is consistent with the Framework. 'Adversely affected' is a high test to pass and 'unacceptably' affected would result in a more effective policy.

349. Criterion 1. g) should make reference to tree-lined streets to accord with paragraph 131 of the Framework.

350. In relation to public art (Criterion h), it is accepted that it can enhance the quality of public spaces. However, the effects of requiring contributions on viability have not been assessed. The policy should be amended to refer to encouragement of public art within appropriate schemes, for example, those that are at a prominent gateway.

351. Finally, it is assumed that for criterion i), Policy LPC01 provides the specific requirements for the needs of special groups and would be usefully cross referenced. Collectively these changes to Policy LPD01 would be achieved by **MM034** and are necessary so that the Plan is effective and consistent with national policy.

352. Policy LPD02 (Design and Layout of New Housing) includes criteria relating to heritage assets and natural habitats (6. and 7.). However, the way that the criteria are written is not entirely consistent with the provisions of Policies

LPC06, LPC08, LPC09, LPC10 and LPC11. In this respect the criteria should simply cross-reference with these policies so that the Plan is effective. Section 3 of the policy should refer to tree-lined streets. **MM035** is necessary so that the Plan is effective and consistent with national policy.

353. Policy LPD04 (Householder Developments), in referring to extensions, sets a high bar in requiring them to have 'no adverse impact' on neighbouring occupiers. The policy also refers to harm to the free flow of traffic. Free flowing traffic is not always desirable, particularly on residential streets. **MM037** inserts 'no significant impact' and deletes 'free flow of traffic' to ensure that the policy is positively prepared.

Communications

354. Policy LPD07 (Digital Communications) supports the provision of digital communication networks within developments. However, the policy also suggests that contributions may be sought for off-site fast broadband infrastructure. However, the viability assessment does not address off-site digital infrastructure. **MM038** deletes reference to off-site infrastructure and is required so that the policy is justified.

Healthy communities

355. Policy LPD10 (Food and Drink) proposes, amongst other things, an exclusion zone of 400m for hot food takeaways around primary schools, secondary schools and sixth form colleges. The justification for these restrictions is that the number of primary school children in St Helens classed as overweight is significantly more than the national average. High levels of obesity continue into teenage and adult life in St Helens. There are strong linkages between obesity, health, and deprivation indicators.

356. Although some hot food takeaways may sell healthy meals, many contain a high calorie count and significant proportions of fat, saturated fat, sugar, and salt. NHS guidance refers to obesity being related to, in part, poor diet. It is difficult to prove a direct causal link between the number of takeaways and child obesity, but analysis shows sufficient correlation. The Framework refers to planning policies supporting healthy lifestyles by, for example, enabling access to healthier foods. Reducing access to hot food takeaways is one component of an overall approach that can help to combat poor health, and childhood obesity in particular. But it is an important one. Sections 3 and 4 of Policy LPD10 are justified.

357. The changes to the Use Classes Order with the creation of the new Class E and the consequent classification of hot food takeaways as sui generis have an

impact on the effectiveness of Policy LPD10. **MM040** is, therefore, required to update the policy with references to Class E and sui generis uses.

Conclusion

358. We conclude that, subject to the MMs proposed, other policies of the Plan not dealt with elsewhere are positively prepared, justified, effective, consistent with national policy and clear to the decision-maker.

Issue 9 – Whether necessary infrastructure is likely to be delivered alongside development

359. The IDP sets out what new or improved infrastructure will be required to deliver the growth identified in the Plan. It aims to identify the cost, delivery agents, funding sources, timescale, and level of priority. The preparation of the document was informed by a range of stakeholders and key service providers.

360. Due to the nature of infrastructure provision, the IDP is intended to be a living document. It has evolved alongside the Plan and has been informed by the infrastructure requirements for the allocated sites. It will be monitored by the Annual Monitoring Report and the Council's intention is to update it as appropriate.

361. Policy LPA08 sets out how new development will be supported by infrastructure and delivery funding. The approach that will be taken to developer contributions is also explained. However, the policy goes beyond the legal and policy tests for planning obligations by referring to 'the needs of the wider area'. **MM013** would remove this part of LPA08 so that it is consistent with national policy.

362. Reference is made to how economic viability will be considered including any site-specific appraisal when deciding on the extent and level of any developer contribution. A hierarchy for different types of developer contributions is also listed to aid decision makers in prioritising funding for different types of infrastructure.

363. Whilst the policy seeks to take a flexible approach in taking account of viability where this can be shown to be an issue, the EVA Update Note acknowledges particular viability issues for both brownfield and greenfield typologies in Zone 1. This is where all Plan policy requirements have been taken into account and where the affordable housing requirement has been set at 0%. **MM013** adds additional wording to Part 5 of Policy LPA08 to acknowledge the lack of viability in Zone 1 and that a more pragmatic approach will be taken when negotiating developer contributions. This will ensure that the policy is effective and positively prepared.

364. The reasoned justification accompanying Policy LPA08 refers to Appendix 2 which defines the term 'infrastructure' for the purposes of the policy through a list. The list includes categories that are not infrastructure and therefore would not be expected to be supported by developer contributions as required by the policy. **MM042** and **MM013** delete Appendix 2, and references to it, as it is not justified.

365. Subject to the MMs proposed, Policy LPA08 will provide the necessary support for the delivery of essential new or improved infrastructure.

366. Policy LPA07 sets out how the strategic priorities for the transport network will be achieved and the criteria to be assessed in considering the impact of development on the network. **MM012** amends Policy LPA07 1 (a) by adding a reference to rail improvements. This will make it clear that rail forms part of the infrastructure necessary to achieve the Council's strategic priorities, for example, the new station at Carr Mill and Parkside SRFI. This MM will ensure that the policy is effective and consistent with national policy which seeks to promote sustainable transport.

367. Other changes are required to Policy LPA07 relating to travel plans, access to the strategic road network, and funding for the Government's Major Road Network, so that the policy will be effective (**MM012**).

368. We have referred to the SOCG between NH and the Council in the DtC section of our report. This confirms that the main motorway junctions likely to be impacted by the site allocations are Junctions 7, 8 and 9 of the M62 and Junctions 22, 23 and 24 of the M6. The evidence base demonstrates that impacts on most of these junctions can be addressed via the policies in the Plan and small-scale mitigation measures at sensitive junctions on the local network. The exception being the need for three larger scale interventions - Parkside Link Road, M62 J7 improvements and M6 J23 improvements. The Transport Impact Assessment also recommends further modelling for J8 of the M62 in relation to the combined effect of growth planned within Warrington Borough.

369. The Parkside Link Road has been discussed under Issue 3 of the report in the sections covering the Parkside employment allocations (7EA and 8EA). The scheme is necessary to mitigate the effects of the allocations on J22 of the M6 and the local road network and, as discussed in Issue 3, the evidence shows that this scheme has planning permissions, is deliverable and is fully funded. Improvements required at J22 itself have been identified by NH. The Council, NH and Wigan are working together to identify funding for these improvement works.

370. Impacts on J23 of the M6 have been identified in relation to a number of site allocations, notably 4EA, 5EA, 6EA, 1HA and 2HA. Junction improvements are

currently not identified as a priority or pipeline scheme in NH's RIS2. The improvement works needed at J23 are discussed in detail in Issue 3 in relation to safeguarded site 2ES. In summary, there is currently no agreed design option for the scheme, no funding has been identified and further work is needed on the business case for the scheme. NH and St Helens, along with other partners, intend to convene a working party to resolve these issues.

371. Impacts on J8 of the M62 have been identified in relation to 1EA and 4HA. Growth around the Warrington area will also be likely to have an impact. Improvement works at this junction have not been identified by NH in their RIS2 as either a potential or pipeline scheme. A preferred option for the works has been identified and a source of potential funding identified (LCR's Single Infrastructure Fund). Impacts on J8 will be assessed by NH, St Helens and Warrington as development comes forward.

372. Potential impacts on J7 of the M62 have been identified in relation to a number of site allocations, notably 4HA, 5HA, 9HA and 1EA. Growth around the Widnes and Warrington areas will also be likely to have an impact. However, assessments undertaken show that these impacts will not arise until towards the end of the Plan period (from 2035 onwards). It is therefore reasonable that St Helens, Halton, and Warrington Councils have agreed to work together on this issue, along with NH, to address any cumulative impacts arising.

373. A number of consequential factual changes have been made to the IDP to reflect the wording of the SOCG, for example the identification of lead delivery partners and sources of funding.

374. The IDP identifies the steps that the Council will take where the number of existing school places are shown not to be sufficient to accommodate additional places arising from new developments. The primary mechanism will be through developer contributions, normally via planning obligations.

375. The Bold Forest Garden Suburb (Site 4HA) may be required to provide a new primary school. The Council has undertaken to discuss the potential for this with developers as part of any planning application on the site. **MM018**, which introduces the bespoke policy for Site 4HA, includes reference to the possible need for a new primary school.

Conclusion

376. We conclude that, subject to the MMs proposed, necessary infrastructure is likely to be delivered alongside development.

Issue 10 – Whether the monitoring and implementation provisions of the Plan will be effective

377. The Plan includes a Monitoring Framework at Appendix 4. One of the indicators against Policy LPA05 is the five-year housing land supply. The trigger for action is having below a five-year supply and the potential for action is considering an early update of the Plan. However, there are other measures that the Council could take, other than an early update of the Plan, if supply falls below 5 years, including the type of measures that would be included in an action plan. An early update of the Plan would be a potential action where there is a longer-term underperformance against the five-year supply or if housing land supply falls significantly below the required level.

378. As indicated earlier in the report under Issue 5, **MM009** would introduce a link in Policy LPA05 between the housing delivery test in national policy and the need for actions, including an update of the Plan, if housing supply falls significantly below the required level. This MM, together with the changes to the Monitoring Framework referred to here, would, when considered in the round, provide the necessary triggers to tackle issues with 5 year supply.

379. In terms of Policy LPA06, the trigger for action is that 10% of safeguarded land has planning permission for built development. However, any loss of safeguarded land to development would indicate that the Plan requires updating as would the failure to deliver sufficient housing or employment land.

380. There are a number of other policies where the Monitoring Framework does not set targets, a trigger for action, or a potential action. Measurable targets, triggers and actions are required. The Monitoring Framework also needs to take into account policies that have been deleted, added, or significantly amended by other MMs.

381. Having regard to the above, a revised Monitoring Framework is proposed through **MM043** so that the Plan is effective. Following the MM consultation we have made some further changes to the Monitoring Framework for effectiveness, specifically in relation to 5 year supply, safeguarded land, Parkside East, the use of the words 'review' and 'update', bungalows and ensuring all policies have relevant indicators.

382. The intention is to review existing, and progress some new, supplementary planning documents to add further detail to the policies in the Plan and support its implementation. However, the Plan does not make clear the intentions. **MM004** would ensure an effective Plan in this respect.

383. Paragraph 33 of the Framework requires that Plans are reviewed to assess whether they need updating at least once every five years. However, the Plan

interprets review as meaning update which lacks clarity. **MM002** would ensure that the correct terminology is used so that the Plan is effective and consistent with national policy.

Conclusion

384. We conclude that, subject to the MMs proposed, the monitoring and implementation provisions of the Plan will be effective.

Overall Conclusion and Recommendation

385. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

386. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix, the St Helens Borough Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Mark Dakeyne and Victoria Lucas

INSPECTORS

This report is accompanied by an Appendix containing the Main Modifications.

APPENDIX TO INSPECTORS' REPORT

ST HELENS BOROUGH LOCAL PLAN SUBMISSION DRAFT

SCHEDULE OF PROPOSED MAIN MODIFICATIONS

May 2022

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Proposed Main Modifications to the Local Plan Submission Draft

The Main Modifications below are expressed either in the form of ~~strikethrough~~ for deletions and **underlined and bold** for additions of text, or by specifying the modification in words.

When reading the Main Modifications below, please note that the original Local Plan Submission Draft (2019) policy numbers have been retained for ease of use. These will be updated, along with all necessary policy number references throughout the document, in the final version of the Local Plan, to reflect the omission and addition of policies as a result of Main Modifications.

The Main Modifications are set out below and include 11 separate Annexes.

The Policies Map is not a development plan document and so the Inspectors do not have the power to recommend main modifications to it. However, a number of the published Main Modifications to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective. Therefore, whilst changes to the Policies Map do not comprise Main Modifications and are not included in this schedule, the Council will make changes to the Policies Map at the same time as Main Modifications are made.

Mod Ref No.	**Page number**	**Current policy/ paragraph**	**Change** (deleted text in ~~strikethrough~~; new text **underlined and bold**; changes to diagrams, tables, etc. described in *italic* text).
MM001	0	**Front Cover and references to 2035 throughout Plan**	"St Helens Borough Local Plan 2020-203**7**~~5~~" *Change all references to 2035 throughout the Plan to 2037 to reflect the extended Plan period and update any associated requirement figures and supply information (including for employment and housing), where necessary.*

MM002	4	**Introduction** Paragraph 1.9.1	"1.9.1. In accordance with national planning legislation, the Local Plan will be subject to regular monitoring and will be reviewed **at least once every** ~~no more than~~ 5 years after its ~~date of~~ adoption **to assess whether it needs updating, and action taken to update the Plan if considered necessary**. This will ensure that planning policies in St Helens Borough remain responsive to the development needs of the Borough."
MM003	10	**Context - Heritage Assets** Paragraph 2.9.2	"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. **In addition, open spaces provide opportunities to mitigate and adapt to the impacts of climate change. Therefore, this plan will support the Council's Climate Change Emergency declaration.**"
MM004	15	**3.3 Ensuring delivery of the aims and objectives**	*Insert new paragraphs 3.3.2 and 3.3.3 as follows:* "**3.3.2 The plan proposes to review the following Supplementary Planning Documents (SPDs) that are used by the Council:** • **Ensuring a Choice of Travel** • **Hot Food Takeaways** • **Affordable Housing** • **New Residential Development** • **Householder Development** • **Telecommunications** • **Nature Conservation**

			3.3.3 This Plan also proposes to produce new Supplementary Planning Documents to support the implementation of policies: • **Developer Contributions** • **Open space provision and enhancement** • **Houses in Multiple Occupation (HMOs)**"
MM005	16	**LPA01**	*Entire 'Policy LPA01: Presumption in Favour of Sustainable Development' to be deleted along with accompanying Reasoned Justification (and associated re-numbering of subsequent policies in the Plan)*
MM006	17	**LPA02**	3. The re-use of **suitable** 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 **through the use of Policies LPA08 and LPC02 to support the delivery of sites, particularly those on Previously Developed Land,** by**, for example,** 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**, where appropriate**.
	17		*Addition of new section 4 into policy:* **4. Comprehensive regeneration of the wider Borough will be delivered by the English Cities Fund Regeneration Partnership, through the provision of quality housing, new commercial activity, upgraded infrastructure and the overall improvement of the social and economic viability of the Borough on a phased basis.**
	17-18		*Re-number existing criteria 4-10 to 5-11.*

	17		"~~4.~~ **5.**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~~ **up to** 31 March 203**7**~~5~~, 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 203**7**~~5~~. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a**n update** ~~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. **Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual application basis.**"
	18		"~~6~~**7**. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough and beyond. Development that prejudices their development in accordance with Policies LPA04**,** ~~and~~ LPA10 **and LPA12** will not be allowed."
	22	Key Settlements Plan	Figure 4.1 (Key Settlements Plan) updated to reflect MMs to allocations and safeguarded land.
	22	Reasoned Justification	"4.6.9 …. This will ensure that the changes to the Green Belt endure well beyond 203**7**~~5~~, 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 Council's SHLAA indicates that there is capacity for substantial housing development on urban sites. However it also established that Green Belt release would be required to help meet identified housing needs over the Plan period. Likewise, there is a significant shortfall in the urban supply of employment land against the identified needs.** **4.6.11 In view of the NPPF advice that local authorities work jointly with neighbouring authorities to meet any development requirements that cannot be met within their own boundaries, it should be noted that whilst St Helens shares a housing market area with Halton and Warrington, both have identified shortages of urban land supply for housing. St Helens Borough shares a functional economic market area with Halton, Knowsley, Liverpool, Sefton, West Lancashire, and Wirral, none of which have identified spare capacity for employment development which could help meet the needs of St Helens. Such is the shortage of employment and housing development land in the surrounding areas as a whole that several authorities (Knowsley, Sefton, and West Lancashire Councils) have successfully undertaken local Green Belt Reviews to meet their own needs, with further authorities also undertaking them (collectively covering the whole of Greater Manchester, Halton, Warrington, and Wirral). None of these reviews have identified surplus capacity to help meet development needs arising in St Helens.** **4.6.12 In addition, there are other reasons why it is not desirable for housing or employment development needs arising in St Helens to be met in other authorities. If a neighbouring authority were able to meet such needs, this would (due to the shortage of urban land supply identified in those areas) be through the release of Green Belt, i.e. the prospective loss of Green Belt in St. Helens would simply be replaced by a similar loss of Green Belt elsewhere. This would also lead to a risk**

			that residents would need to move out of the Borough, potentially resulting in the loss of economically active residents within local communities. Such an approach would also be unlikely to guarantee delivery of affordable or special housing needs for residents of St Helens. If demand for new employment was required to be met outside the Borough, it would tend to exacerbate net out-commuting. This would prejudice the achievement of sustainable patterns of travel and make it more difficult for residents of St Helens, some of whom are likely to be reliant on public transport to access employment. **4.6.13 For all of these reasons, there are considered to be exceptional circumstances at the strategic level to justify the release of Green Belt land to meet identified development needs.**" *Renumber subsequent paragraph to account for the new paragraphs* "~~4.6.10~~ **4.6.14** The sites that have been removed from the Green Belt …."
	23	Reasoned Justification Paragraph 4.6.11	"~~4.6.11~~ **4.6.15** New employment development falling within use classes ~~B1,~~ B2 and B8 **and for light industrial, offices and research and development uses** will be primarily …."
		Reasoned Justification New Paragraph after current 4.6.15 (to be renumbered to 4.6.19 following on from modifications above)	"~~4.6.15~~ **4.6.19 …** 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. **4.6.20** *In* **addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the**

			environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land). **4.6.21 The delivery of compensatory improvements will be supported by a number of policies within this Plan. For example, policies LPA09, LPC05-10 and LPC12 all have an environmental focus, which will support the delivery of Green Belt compensatory measures. Additionally, development management focussed policies, including LPD01-03 and LPD09 will support this.** **4.6.22 Beyond the policy framework in this Plan to support the delivery of Green Belt compensatory measures, as well as other development plan documents, such as the Bold Forest Park AAP, the Council will continue to build on project improvements delivered to date. Improvements include those at the strategic level, such as at Bold Forest Park, for example the expansion of tree cover and the delivery of improved recreational facilities. A further strategic level project is the Sankey Valley Corridor Nature Improvement Area (NIA), which is focussed on enhancing the aquatic environment as well as the surrounding natural environment within the catchment, and improvements in environmental management practices. Improvements in this location have included accessibility enhancements, including walking, and cycling infrastructure and new signage, enabling increased access to the Green Belt for residents and visitors. It is expected that further improvements can be delivered at these two strategic projects as part of Green Belt compensatory measures.** **4.6.23 There are further sites around the Borough that could be**

			improved as part of Green Belt compensatory measures including those which form part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA), comprising three sites in the north of the Borough, near Rainford, one by Parr and one by Newton-le-Willows (see Appendix 9). In addition, there are many Local Wildlife Sites (LWS) in the Borough, which are identified on the Policies Map, and Appendix 8 of this Plan shows that there are several LWS in each ward of the Borough, with many of these wards having LWS in the Green Belt. There are also three Local Nature Reserves located within the Green Belt. Compensatory measures can also occur at non-designated sites within the Green Belt, for example, initiatives related to alleviating the effects of flooding events, such as those implemented previously in the settlement of King's Moss. Therefore, there are clear opportunities for localised Green Belt compensatory measures to be delivered on such designated and non-designated sites across the entire Borough through the delivery of environmental improvements, in addition to the two identified strategic sites referred to above."
	24	Paragraph 4.6.17 (to be renumbered 4.6.25)	"~~4.6.17~~ **4.6.25** … 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**, and therefore support the Council's Climate Change Emergency declaration**. Whilst public funding support to create and manage open spaces …"
	24	Paragraph 4.6.18 (to be renumbered 4.6.26)	"~~4.6.18~~ **4.6.26** … Enhancing linkages between areas of deprivation and employment areas particularly by public transport, walking and cycling is a key priority. **Such enhancement of sustainable transport modes further supports the Council's Climate Change Emergency declaration**

			through the promotion of active and low carbon travel opportunities. Further details of the Plan's approach …"
	24	Paragraph 4.6.19 (to be renumbered 4.6.27)	"~~4.6.19~~ **4.6.27** 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. The Council will prepare Supplementary Planning Documents covering specific areas where this is considered necessary to help implement their regeneration.~~"
	24	Reasoned Justification	*Insert new paragraphs 4.6.28 to 4.6.30 as follows:* "**4.6.28 The Council has entered into a formal partnership agreement with the English Cities Fund as the Council's preferred strategic partner to ensure the delivery of a Borough wide regeneration strategy, including economic regeneration and housing. The Council has recognised that a new approach to growing the economy of the Borough is required that seeks to work pro-actively with the private sector and establish a strategic partnership maximising the opportunities presented to deliver significant future growth in St. Helens and deliver key priorities including Town Centre regeneration, social wellbeing and providing appropriate infrastructure to support future development.** **4.6.29 Furthermore, as part of the 'Town Deal' initiative established by the Government in 2019, the Council has successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and**

			regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts, and culture for St. Helens Town Centre. **4.6.30 The Council will prepare Supplementary Planning Documents covering specific areas to help implement regeneration where this is considered necessary.**"
	25	Key Diagram	Figure 4.2 (Key Diagram) updated to reflect MMs to allocations and safeguarded land.
MM007	29	**LPA04** Section 1	"c) ensure the necessary infrastructure is provided to support business needs (see **Policy** LPA-08); ~~and~~ d) support the creation of and expansion of small businesses~~.~~**;** **and** **e) support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.**"
	29	Section 2	"2. The Council will aim to deliver a minimum of ~~215.4~~ **173.24** hectares of land for employment development between 1 April 20**21**~~18~~ and 31 March 203**7**~~5~~ to meet the needs of St Helens Borough."
	29	Section 5 a)	"a) the land or building (or any part of it) is no longer suitable and economically viable for **light industrial, offices and research and development**~~B1~~, B2 or B8 use**s** in accordance with the ..."
	30	Section 6	"Proposals for the re-use, re-configuration or re-development for ~~B1~~ **light industrial, offices and research and development**, B2 or B8 uses of land or buildings used for ~~B1~~ **light industrial, offices and research and development**, B2 or B8 uses (including where …"'

		New section 7 of policy	"**7. Proposals for Class E uses in locations outside a defined centre will be subject to a condition to prohibit town centre uses (as defined in the glossary of the NPPF) unless the requirements of Policy LPC04 are satisfied.** ~~7~~**8.** The Council will support proposals to …" *Subsequent criteria will be renumbered accordingly.*
	31	Table 4.1	*Remove sites 2EA, 3EA, 10EA and 11EA.* *Table 4.1 to be updated to reflect this. See Annex 8.*
	31	Table 4.1 'Appropriate Use(s)' column For allocation 9EA	For this site, appropriate uses will read: "**light industrial, offices and research and development**, B2, B8"
	31	Footnote 15	"~~15 Sites 2EA and 6EA are subject to existing planning permissions for employment development~~."
	31	Footnote 16	"16 The phrases ~~B1,~~ B2 and B8 in Policy LPA04 refer to use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended)."
	32	New Paragraphs 4.12.2 and 4.12.3 in the Reasoned Justification	"**4.12.2 The Local Plan's vision still stands true as we plan for recovery from the COVID-19 pandemic: By 2037, 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. Key to this is a continued focus on the economy, so that St. Helens residents are able to access good quality jobs that raise their living standards, whilst also improving physical and mental health.**

			4.12.3 It is anticipated that the English Cities Fund Regeneration Partnership and the Council's successful Town Deal funding bid will also assist in the post COVID-19 economic recovery." "4.12.**4**~~2~~ The provision of new well-located …" *Subsequent re-numbering of Reasoned Justification paragraphs required.*
	32	Reasoned Justification Paragraph 4.12.2 (to be renumbered 4.12.4)	"4.12.**4**~~2~~ …. development needs within the ~~B1 (business)~~ **light industrial, offices and research and development uses**, B2 (general industrial) and B8 (storage and distribution) use classes during the Plan period …"
	33	Table 4.2 '*Employment Type'* Column	"~~B1 (a)~~ Office" "~~B1 (b)~~ Research and ~~d~~**D**evelopment" "~~B1 (c)~~ Light Industry"
	33	Reasoned Justification Paragraph 4.12.7 (to be renumbered 4.12.9)	"4.12.**9**~~7~~ Based on the ~~OAN identified in the~~ ELNS Addendum Report ~~up to 2037~~, the OAN requirement for 2012-203**7**~~5~~ has been calculated as a minimum of ~~227.4~~ **239ha** 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 (203**7**~~5~~), 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."

	33	Table 4.3	*Update Table 4.3 in the Plan as follows:* **Table 4.3 Objectively Assessed Need for new employment land 2012-2037~~5~~**

Local Plan Objectively Assessed Needs Requirement 2012-2037~~5~~	**Hectares**
Baseline OAN 2012 to 2037~~5~~ (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)	~~133.4~~ **145**
5 year Flexibility Buffer	29
Allowance for SuperPort and Parkside SRFI	65
Total	**~~227.4~~ 239**

	33	Reasoned Justification Paragraph 4.12.8 (to be renumbered 4.12.10)	"… allowing for take-up of employment land since 2012 against the OAN (~~227.4~~ **239**ha) and the existing supply of developable employment land in the Borough as shown in Table 4.4. Once an allowance of ~~2.7~~**60.77**ha for take up and ~~9.34~~ **4.99**ha for the existing developable employment land supply in the Borough has been applied the residual requirement is ~~215.4~~ **173.24**ha."

	34	Table 4.4	*Replace Table 4.4 in the LPSD with an updated version to show the latest position, as provided in Annex 5. Add a row to end of the table to show the supply from the remaining site allocations.*
	34	Reasoned Justification Paragraph 4.12.9 (to be renumbered 4.12.11)	"4.12.**11**~~9~~ The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 203**7**~~5~~. This …"
	34	Reasoned Justification Paragraph 4.12.11	" 4.12.~~11~~**13**… The draft SHELMA also assesses the need for ~~B1~~**light industrial, offices and research and development**, B2 and for smaller scale B8 development (of less than 9,000m^2). Unlike those …"
	34	Reasoned Justification Para 4.12.12	"4.12.~~12~~**14** … Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling ~~215.4~~**173.24**ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough's needs for ~~B1~~ **light industrial, offices and research and development**, B2 and small scale B8 uses and a substantial …"
	35	Reasoned Justification Paragraph 4.12.14 (to be renumbered 4.12.16)	"4.12.~~14~~**16** The total supply of allocated employment sites will (at ~~234.08~~**182.31**ha – excluding site 1EA) slightly exceed the residual employment land requirement identified in Table 4.4. …"

	35	Reasoned Justification – new paragraph after 4.12.13 (to be renumbered 4.12.15)	"**4.12.16 To ensure the development of the proposed employment allocations for the identified employment uses, the Council will require any applications for alternative uses to demonstrate that the site has been marketed for employment use on the open market for a minimum period of 18 months. Only after this period, and subject to no interest being received for the identified employment uses, will an application for an alternative use be considered further. This applies to site allocations within the Plan, as well as those sites contributing to meeting identified employment needs over the Plan Period, including but not limited to land at Florida Farm North, Land north of Penny Lane, Land at Lea Green Farm West and Gerards Park, College Street.**" *Subsequent paragraphs to be re-numbered accordingly.*
		Reasoned Justification, Paragraph 4.12.17 (to be renumbered 4.12.20)	"4.12.~~17~~**20** 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. **This outlines the requirement for existing employment sites to carry out a minimum of 12 months marketing for employment uses in order to identify that the site is not viable in the long-term.**"
		Reasoned Justification, new paragraph after the end of existing para 4.12.18 (to be renumbered 4.12.21)	*Following on from end of the Reasoned Justification para 4.12.18 (to be renumbered 4.12.21), add the following text as a continuation ….* "**Green Belt Exceptional circumstances**

			4.12.22 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context. **1EA – Omega South Western Extension, Land north of Finches Plantation, Bold** **4.12.23 The Green Belt Review (2018) found the sub-parcel reflecting this site to make a 'medium' contribution to the Green Belt purposes as whilst the site contains no inappropriate development and has open views across it, it is bordered by large scale built development at Omega South and the M62, and therefore only has a moderate countryside character. The Review also found the site to have 'medium' development potential.** **4.12.24 The site is adjacent to the Borough's boundary with Warrington Borough, and its development would form a natural extension of the adjacent Omega employment site. This is particularly important in relation to the exceptional circumstances in the context of this site being allocated to help meet Warrington's employment needs.** **4.12.25 The site is within 1km of an area within the 20% most deprived population in the UK, so its development for employment uses would help to reduce poverty and social exclusion. Further, the development of this site, provides the opportunity to improve sustainable transport links between St Helens and this site, as well as the wider Omega employment site, improving access to jobs in this location for residents of St Helens.** **4EA – Land south of Penny Lane, Haydock** **4.12.26 This site forms a relatively small part of a larger parcel of land that the Green Belt Review (2018) found to make a 'medium' contribution**

			to the purposes of the Green Belt, with 'good' development potential. It should be noted that the parcel of land assessed in the Green Belt Review included the land to both the north and south of Penny Lane. In this context, a significant part of the assessed Green Belt parcel (11.05ha) has an extant planning permission for employment development, of which the majority has now been developed. This is the land to the north of Penny Lane. The site forms a natural extension to the Haydock Industrial Estate. Indeed, given the development of land to the north of Penny Lane, this site is now surrounded by built development of the Haydock Industrial Estate to the north, east and south, and the M6 to the west. The site is also located in close proximity to an area that falls within the 20% most deprived population in the UK. Therefore, its development for employment use would help to reduce poverty and social exclusion. The development would also reduce the need to travel by making best use of existing transport infrastructure due to its location close to a high frequency bus service. **5EA – Land to the West of Haydock Industrial Estate, Haydock** **4.12.27 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a 'medium' contribution to the Green Belt purposes. The site adjoins the large built up area of Haydock but is relatively well contained and strategic gaps between Haydock and elsewhere could still be maintained following the release of this site from the Green Belt. The Review also found the site to have 'good' development potential. The removal of this site from the Green Belt in conjunction with site 6EA, and the now developed employment land at Florida Farm North presents the opportunity to provide a stronger, more robust boundary in this location. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion and help reduce the need to travel through making best use of**

			existing transport infrastructure due to its location close to a high frequency bus service. **6EA – Land West of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock** **4.12.28 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a 'medium' contribution to the Green Belt purposes. At the time the Green Belt Review was undertaken, this site did not adjoin a large built-up area, but was considered in part to prevent ribbon development along Liverpool Road. Since that time, employment development at Florida Farm North has taken place adjacent the southern boundary of the site. This site would form a natural extension to the Haydock Industrial Estate, and its development would provide a stronger, more robust Green Belt boundary. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion** **7EA – Parkside East, Newton-le-Willows** **4.12.29 The Green Belt Review (2018) found this site to make a 'high+' contribution to the Green Belt purposes due to its significant size, lack of enclosure to the east and strong countryside character with little inappropriate development. On this basis, the site would not ordinarily have progressed to further assessment. However, the Review acknowledged that the site forms part of the wider Parkside site, straddling the M6, for which there has been a long history of developer interest, including a planning application for a Strategic Rail Freight Interchange (SRFI), the area being highlighted as a potential location for an inter-modal freight terminal in the previous North West RSS and the Core Strategy (2012) identifying the site as a strategic location for a SRFI. Furthermore, the evidence in the Parkside Logistics and Rail Freight Interchange Study (August 2016) found the site to be of regional**

			and national significance in relation to regional and national policy, market demand and the need to deliver new and improved SRFIs, with the site's opportunity for rail access to be second to none in the North West. **4.12.30 This site has excellent locational advantages in relation to the delivery of an SRFI and major warehousing and industrial development, including accessibility by rail with north-south and east-west routes immediately adjacent, as well as proximity to the M6, Junction 22. The evidence also indicates that the site is of a sufficiently large scale and layout to provide the necessary operational requirements of a SRFI. The development of a SRFI on this site would support the Government's policy to move freight from road to rail.** **4.12.31 Therefore, whilst development of this site could have a high impact on the Green Belt, there are exceptional circumstances justifying its release from the Green Belt for development as a SRFI (as well as other forms of B2 and B8 employment use, in principle, provided it is rail served or is of a layout and scale that does not prejudice the ability to develop an effectively laid out SRFI on at least 60ha of the site), and the site is considered to have 'good' development potential. Additionally, Parkside has been included as one of three Tax Sites as part of the Liverpool City Region Freeport. Also, as part of the Secretary of State planning approvals made in respect of the Parkside Link Road in 2021, the Secretary of State acknowledged that development at Parkside will deliver significant economic, regeneration and sustainability benefits.** **8EA – Parkside West, Newton-le-Willows** **4.12.32 The Green Belt Review (2018) found the parcel of land reflecting this site boundary to make a 'medium' overall contribution to the Green Belt purposes, influenced by the relatively high degree of enclosure, brownfield status of part of the site (former colliery and associated uses) and because it does not have a strong sense of openness or countryside**

			character. It also found the site to have 'good' development potential. It's scale and location, particularly in relation to the transport network, makes it ideal for employment uses to meet the identified employment needs. It will also support the delivery of the SRFI on Parkside East (site 7EA). **4.12.33 The site is located within 1km of an area within the 20% most deprived population in the UK, so not only will development of the site bring wider economic benefits, but it will also help to reduce poverty and social exclusion, and due to its public transport links, would help to reduce the need to travel by car.** **4.12.34 The relevance of paragraph 138 of the NPPF should also be noted given the importance of giving "first consideration to land which has been previously developed and / or is well-served by public transport" when a conclusion has been reached that it is necessary to release Green Belt land for development. The exceptional circumstances for removing land from the Green Belt to meet identified development needs is set out in the Reasoned Justification to Policy LPA02 and given the brownfield nature of much of this site, and for the other reasons set out, there are exceptional circumstances justifying the removal of this site from the Green Belt.**"
MM008	37	**LPA04.1** Section 1	• "1EA: Omega South Western, Land north of Finches Plantation, Bold; • ~~2EA: Land at Florida Florida Farm North, Slag Lane, Haydock~~[22] • 6EA: Land west of …" *Delete footnote 22*

	38	Section 5	"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 5 (in the case of sites 1EA~~,~~ **and** 6EA~~, 2EA and 8EA~~) and Polic**ies**~~y~~ LPA10 **and LPA12** (in the case of site**s** 7EA **and 8EA**)."
MM009	40	**LPA05** Section 1	"1. In the period from 1 April 2016 to 31 March 203**7**~~5~~ a minimum of ~~9,234~~**10,206** net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum."
MM009	40	Section 3	"a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St. Helens or Earlestown Town Centres; **and** b) at least 30 dph on **all** sites **outside St. Helens and Earlestown town centres.** ~~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~~."
		Section 4b)	"b) …. If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, **taking into account the requirements in relation to housing delivery set out in national policy,** a partial or full plan ~~review~~ **update** will be considered to bring forward additional sites."
	41	Table 4.5	*Updated version of Table 4.5 provided in Annex 7 to replace Table 4.5 in the LPSD, to remove site 3HA as an allocation and update other sites to reflect the latest housing trajectory*

	41	Footnote 24	"24 The NDA (net developable area) for each site is an estimate of the area available to accommodate new housing once an allowance, typically ~~7~~**2**5%, has been made for features that are not included when calculating density e.g., areas performing a function for the wider area and not just the development~~,~~ such as significant new landscaping buffers, potential new schools, areas of strategic open space and roads to serve the wider area. **Therefore, most sites will have a NDA of 75%.**"
	42	Reasoned Justification Paragraph 4.18.1	"4.18.1 … The requirement of ~~9,234~~ **10,206 in total over the Plan period (equating to an average of 486** dwellings per annum**)** set out in Policy LPA05 is designed to meet the full Objectively Assessed …."
	42	Reasoned Justification Paragraph 4.18.4	"4.18.4 … Application of the national standard method using this approach would generate a housing need of ~~468~~ **399** new dwellings per annum[27].
	42	Footnote 27	"27 This figure is derived by applying the standard method to the average household growth indicated in the 2014 based household projections for the 10 years from 20**22**~~19~~ to 20**32**~~29~~ and the ~~latest~~ **2021** affordability ratios ~~data published in 2018~~, with the output extrapolated over the Plan period."
	43	Reasoned Justification Paragraph 4.18.10	"4.18.10 … The St. Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 **(as updated with the latest information as at 1 April 2021)** identifies that sites in the urban area ~~(as at 1 Apr 2017)~~ had a total capacity of ~~7,817~~**6,114** dwellings. This figure includes sites with planning permission, sites under construction, other sites identified as suitable for housing and an allowance of 93 units per annum from small windfall sites of less than 0.25ha (based upon past delivery rates). The largest SHLAA sites are allocated as sites ~~3HA,~~ 9HA and 10HA in Policy LPA05."

	44	Reasoned Justification Paragraph 4.18.12	"4.18.12 … In total, the allocated brownfield sites (~~3HA,~~ 6HA, 9HA and 10HA) have an estimated capacity of ~~2,029~~ **1,611** 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~~ **2,114** dwellings in the Plan period."
	44	Reasoned Justification	"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~~ **reflecting the minimum densities and anticipated net developable areas set out**. The actual capacity will also be determined having regard to the acceptability of specific proposals in relation to relevant national and local policies."
	45	Table 4.6 Housing Land Supply	*Replace LPSD Table 4.6 with Tables 5.2 - 5.5 provided in Annex 3.*
	45	Footnotes 29-33	*Remove Footnotes 29-33 in their entirety*
	46	Reasoned Justification Paragraph 4.18.19	*"4.18.19 … It is assumed that* ***the majority of housing on*** *most sites allocated in Policy LPA05 will be developed ~~in their entirety~~ within the Plan period. …"*
	47	Table 4.7 and Figure 4.3	*Replace LPSD Table 4.7 and Figure 4.3 in the Plan with the table and trajectory provided in Annex 10.*

	47	Reasoned Justification Paragraph 4.18.21	"4.18.21 … the Council may undertake a Local Plan **update** ~~review~~ to bring forward additional sites such as those …"
	47	Reasoned justification	*Add the 5 year housing land supply tables in Annex 4 to the end of the Reasoned Justification of Policy LPA05 under a new sub-heading 'Five year housing land supply', along with the following text:* "**Five year housing land supply** **4.18.22 The following tables provide the current housing land supply position and set out the key assumptions and parameters used to calculate it.**" *[then insert tables in Annex 4]*
	47	Reasoned Justification	*Following on from the end of the Reasoned Justification new paragraph 4.18.22 on five year housing land supply, the following text is to be added* "**Green Belt Exceptional circumstances** **4.18.23 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.** **1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood** **4.18.24 The Green Belt Review (2018) found the parcel of land corresponding to this site to make a 'low' overall contribution to the Green Belt purposes. In summary, all sides of the site have strong boundaries, and it is therefore well contained. The strategic gap**

			between Billinge and Garswood could also be maintained notwithstanding the release of this site from the Green Belt. It also found the site to have 'good' development potential. The site is in a sustainable location within walking distance of a local shop and public transport links, including the nearby railway station. Safe access to the site can be provided, and a suitable sustainable drainage scheme also. Indeed, development of this site could help solve flooding issues in the surrounding urban area. The Sustainability Appraisal (SA) found development of the site would result in a high number of positive effects. **2HA – Land at Florida Farm (South of A580), Slag Lane, Blackbrook** **4.18.25 The Green Belt Review (2018) found the parcel of land generally reflecting this site to make a 'low' overall contribution to the Green Belt purposes, with strong permanent boundaries and not having a sense of openness or countryside character. In summary, there is existing residential development on three sides of the site, and the East Lancashire Road (A580) on the fourth side. It also found the site to have 'good' development potential. The site is in a sustainable location with good levels of accessibility to key services and jobs (including at the Haydock Industrial Estate). The site presents no technical constraints that cannot be satisfactorily addressed. Indeed, the provision of flood mitigation measures for the site could have the beneficial effect of helping alleviate flooding in the wider area. The SA found development of the site would have a mixed impact on achieving SA objectives, with a high number of positive effects, including good access to public transport and employment opportunities.** **4HA – Land bounded by Reginald Road / Bold Road / Travers Entry / Gorsey Lane / Crawford Street, Bold (Bold Forest Garden Suburb)** **4.18.26 The Green Belt Review (2018) found the parcels of land that form this site make a 'low' to 'medium' contribution to the purposes of the Green Belt, with 'good' development potential. The land on which the**

			site is located forms a notable indent in the alignment of the southern edge of the built up area of St Helens. Whilst there are open views across the parcel, it has strong, robust physical boundaries including existing development to the north, east and west, and Gorsey Lane to the south. The site has good levels of accessibility to jobs in nearby industrial areas, and to public transport services, including via St Helens Junction railway station. **4.18.27 The site would be sufficiently large to include new social infrastructure (i.e. a new primary school, local retail centre and potentially health facilities). It is a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough and incorporate and deliver the framework and philosophies of the Bold Forest Park Area Action Plan. There are no technical constraints to development of this site that cannot be satisfactorily addressed. Due to its scale and location, development of this site would contribute strongly towards meeting the strategic aims and objectives of the Local Plan.** **5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold** **4.18.28 The Green Belt Review (2018) found the parcel of land generally corresponding to this site boundary to make a 'low' overall contribution to the purposes of the Green Belt, benefitting from a high degree of visual enclosure with strong, robust boundaries. The Review also found the site to have 'good' development potential. The site is in a sustainable location with good transport links, including safe, convenient access by foot to the nearest local centre, bus stops and a railway station. It would form a natural expansion of the surrounding settlement and help deliver a range of housing in a relatively deprived area. Development of the site also provides the opportunity to facilitate improvements in line with the Bold Forest Park Area Action Plan. The**

			SA found development of the site would have a mixed impact on the achievement of SA objectives, with a high number of positive effects. **7HA – Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows** **4.18.29 The Green Belt Review (2018) found the parcel of land containing this site to make a 'low' overall contribution to the purposes of the Green Belt, given its strong boundaries, high level of enclosure and the brownfield nature of much of the site. It does not have a strong sense of openness or countryside character. The Review also considered the site to have 'good' development potential. The site is in a sustainable location within a convenient walking distance of a local centre, various employment areas (existing and planned), a railway station and other public transport facilities. There are no technical constraints on the site that cannot be satisfactorily addressed. The SA concluded that development of the site would result in a high number of positive effects. This site is of particular significance given its brownfield nature, and the importance of making effective use of such land, where appropriate.** **8HA – Land South of Higher Lane and East of Rookery Lane, Rainford** **4.18.30 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a 'low' overall contribution to the Green Belt purposes given its limited role in preventing sprawl and the merging of settlements. It also has strong boundaries and a high degree of visual containment. The Review found the site to have 'good' development potential. The site is sustainable, with good access to public transport, the local highway network and employment areas. There are no technical constraints that cannot be satisfactorily addressed. The SA found that development of the site will have a mixed impact on the achievement of SA objectives, with a high number of positive impacts. The location of the site also aligns with the Plan's spatial strategy as Rainford is identified as a Key Settlement.**"

MM010	48	**LPA05.1**	"1. The following sites allocated under Policy LPA05[35] 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) …."
	48	Footnote 35	"35 Within the list of Strategic Housing Sites, sites ~~3HA,~~ 9HA~~,~~ and 10HA are subject to …"
		Section 2f	"f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways **(including any proposed new greenways as referred to in policy LPC07)**, ecological network, landscape character, trees, woodlands and water storage in a holistic and integrated way."
	49	Section 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 5 **(in the case of sites 2HA, 5HA, 6HA, 9HA and 10HA) and Policy LPA13 (in the case of site 4HA)**."

MM011	50	**LPA06** Section 2	"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~~ **this** Plan period. Such Safeguarded Land is not allocated for development in ~~the~~ **this** Plan period. The future uses that the sites are safeguarded for 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~~ **update (full or partial)** that proposes such development **based on the evidence showing a need for additional land or issues with the supply of land identified by this Local Plan**. ~~Accordingly~~ **Otherwise**, proposals for housing and employment development of safeguarded sites in ~~the~~ **this** Plan period will be refused. ……"
	51	Table 4.8	*Updated version of Table 4.8 provided in Annex 11 to replace Table 4.8 in the LPSD, to reflect the increased site area and indicative capacity of site 4HS following on from the site boundary change.*
	52	Reasoned Justification, paragraph 4.24.1	"4.24.1 In accordance with Policy LPA02, 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 203~~5~~**7**. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 203~~5~~**7**. The reasons why specific sites are safeguarded rather than allocated for development before 203~~5~~**7** 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, potentially, they could 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 **update, either full or partial,** confirms that such development is both acceptable and required**, and proceeds to allocate such sites for development in that update**. **The Council may undertake and bring into effect such a Local Plan update within the current plan period of 2020-2037, should this be required and justified by the latest evidence.** Th**is** ~~e 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 needs** and any other factors that may affect the delivery of the sites at that time. ….. 4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,**739**~~641~~ dwellings. To this can be added the indicative post-203**7**~~5~~ delivery of ~~2,995~~**3,223** dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA **and 10HA** (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 203**7**~~5~~. Further contributions are likely to be made from windfall sites and other sources after 203**7**~~5~~. 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, 203**7**~~5~~, meaning that it is likely that post-203**7**~~5~~, housing needs may be lower than between 2020 and 203**7**~~5~~. …."
		Reasoned Justification, New Paragraphs following 4.24.5	"**Green Belt Exceptional circumstances** **4.24.6 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis for safeguarding for development beyond the end of the plan period. This builds on the exceptional circumstances strategic**

			case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context. **Employment safeguarded sites** **1ES – Omega North Western Extension, Bold** **4.24.7 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a 'medium' overall contribution to the Green Belt purposes as it contains no inappropriate development and has open views across the site, but it is bordered by large scale built development at Omega North and the M62 and therefore only has a moderate countryside character. It should be noted that this contrasts with the scoring of other Green Belt parcels in this area which were found to make a 'high' or 'high+' contribution to the Green Belt purposes.** **4.24.8 The site has potential to form a logical extension to the Omega employment site. However, there are current highway and accessibility constraints that would require mitigation, including the provision of access across land in separate ownership. Further, as Junction 8 of the M62 experiences congestion and capacity issues, the cumulative impacts of development of this site would need to be addressed in conjunction with Warrington Borough Council and Highways England. Due to the location of the site within 1km of an area of 20% of the most deprived population in the UK, development of this site would help to reduce poverty and social exclusion. This site therefore has clear potential to meet longer term employment needs, and by safeguarding it, there is time to address the highways and access issues noted.** **2ES – Land North East of Junction 23 M6 (South of Haydock racecourse), Haydock** **4.24.9 The Green Belt Review found the parcel of land generally reflecting this site boundary to make a 'high' overall contribution to the**

			Green Belt purposes. Whilst ordinarily a site with such a score would not be considered further, there is a clear need to provide sufficient land for employment both within the plan period, and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site for longer term needs beyond the Plan period. Whilst there are clear harms in relation to the development of this site, including harm to Green Belt and adverse landscape impacts, it should also be noted that the site is located within 1km of an area with the 20% most deprived population in the UK, so development here in the longer term would help to reduce poverty and exclusion. Whilst the site did not score as well as the allocated employment sites through the Green Belt Review, the need to make provision for employment land beyond the Plan period forms the basis for the exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding. **Housing safeguarded sites** **1HS – Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood** **4.24.10 The Green Belt Review (2018) found the sub-parcel of Green Belt land containing this site to make a 'medium' contribution to the Green Belt purposes and has a 'medium' development potential. The site is within walking distance of a local convenience shop and is readily accessible by bus and rail. There are not considered to be any technical constraints to delivering development on this site that cannot be satisfactorily addressed over the necessary timeframe. However, as the site projects further into the countryside than housing allocation 1HA, it is considered to be a less logical extension to the village within the Plan period. On that basis, site 1HA is allocated for development within the Plan period, and this site is safeguarded for development subsequent to that, beyond the end of the Plan period to meet longer term needs,**

			creating a logical phased extension of the village both within and beyond the Plan period. **2HS – Land between Vista Road and Belvedere Road, Earlestown** **4.24.11 The Green Belt Review (2018) found the sub-parcel of land that contains this site to make a 'medium' contribution overall to the Green Belt purposes, and also found the site to have 'good' development potential. The site proposed for safeguarding sits within a notable indentation in the existing urban edge and benefits from clearly defined boundaries. There are not considered to be any technical constraints that cannot be addressed satisfactorily to enable this site to meet development needs beyond the end of the Plan period.** **3HS – Former Eccleston Park Golf Club, Rainhill Road, Eccleston** **4.24.12 The Green Belt Review (2018) found the parcel of land that generally reflects the boundary of this site to make a 'low' overall contribution to the Green Belt purposes, due to its strong boundaries and because of the extent of urban development around its boundaries and its limited role in preventing the merging of settlements. However, the site is identified as being affected by a number of constraints that will have a significant impact on its net developable area and deliverability of development within it, including its use as a golf course, constraints in relation to the highway network and some physical constraints within the parcel itself, including electricity pylons, the proximity of the railway line in noise terms, woodland to the north of the parcel and some infrastructure assets running through the parcel as advised by United Utilities.** **4.24.13 Notwithstanding this, the site has good accessibility to a range of services, jobs, and public transport (including Eccleston Park railway station). The safeguarding of this site is justified to help meet development needs beyond the Plan period and will provide sufficient**

			time to satisfactorily address the identified constraints, and exceptional circumstances are therefore justified. **4HS – Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows** **4.24.14 The Green Belt Review (2018) found the parcel of land that contains this site to make a 'low' overall contribution to the purposes of the Green Belt and has 'medium' development potential. The site is in a sustainable location, within walking distance of a local convenience shop and public transport facilities. However, the highway network in the surrounding area has a number of constraints, and further work is required prior to development coming forward. Further, attenuation measures will be required to limit noise from the railway line running along the eastern site boundary. However, the site is considered able to contribute to potential development needs beyond the end of the Plan period, and by safeguarding the site, there is sufficient time for the above issues to be addressed.** **5HS – Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows** **4.24.15 The Green Belt Review (2018) found the sub-parcel of land within which this site sits to make a 'low' overall contribution to the Green Belt purposes and have 'medium' development potential. The site is within a sustainable location, close to a railway station. The site is affected by a number of constraints, which will require further investigation before development can be brought forward, including the difficulty of providing a secondary access to the site, the proximity to a Local Wildlife Site and a historic landfill site in close proximity to the site (to the south), and associated potential contamination issues. There is also a railway line to the east of the site, so noise attenuation measures would be required. The sub-parcel is considered suitable to help meet needs in the longer term beyond the Plan period, and the safeguarding**

			of the site will enable the required further investigation in relation to the above constraints to make efficient use of land within the site. **6HS – Land East of Chapel Lane and South of Walkers Lane, Sutton Manor** **4.24.16 The Green Belt Review (2018) found the sub-parcel of land that reflects this site to make a 'low' overall contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site has 'medium' development potential. The site does project notably outwards into the countryside from the current urban edge and is considered more suitable as a longer term extension of the urban area, contributing to meeting housing needs after the end of the Plan period. Other technical constraints on the site (such as the presence of protected woodland and a Local Wildlife Site) are considered able to be satisfactorily addressed.** **7HS – Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath** **4.24.17 The Green Belt Review (2018) found the sub-parcel that broadly reflects this site boundary to make a 'low' contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site was also considered to have 'medium' development potential. The site is sustainably located within walking distance of a local convenience shop and accessible by public transport users and the local highway network. As the surrounding area includes opportunities for redevelopment of previously developed sites, to ensure an appropriate phasing of development within the Thatto Heath area, it is appropriate to delay any development on this site until after the end of the Plan period. Therefore, it is safeguarded to meet development needs for the longer term.**

			8HS – Land South of A580 between Houghtons Lane and Crantock Grove, Windle **4.24.18 The Green Belt Review (2018) found the parcel of land that reflects this site boundary to make a 'low' overall contribution to the Green Belt, with a 'medium' development potential. The site comprises a significant greenfield site that forms a sizeable outward extension of the urban area into the countryside. The site also has a number of technical issues which would need to be addressed prior to development, including required significant improvements to highways infrastructure and suitable ecological evidence in relation to the potential of the site to provide functionally linked habitat for bird species, which may require a mitigation strategy. Such issues could take some time to address. Furthermore, given the scale of the site, some social infrastructure (such as a primary school) is likely to be required. There are further physical constraints in relation to the site, which could likely be addressed satisfactorily. On the basis of the above, this site provides the opportunity to meet longer term development needs and safeguarding the site will provide sufficient time to address the identified issues.**"
MM012	54	**LPA07** Section 1	"1 … a) Secure the delivery of new or improved road, **rail,** walking, cycling, and / or bus infrastructure where required;"
		Section 2	"2. All proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement**, the scope of which must be agreed by the Council**."
	55	Section 4	"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. **Conditions and/or legal agreements will be used to ensure**

			that Travel Plans submitted in such cases are fully implemented and monitored."
	55	Section 6	"6. Direct access from new development on to the Strategic Road Network will only be permitted **as a last resort,** where agreed by Highways England **and where the necessary levels of transport accessibility and safety could not be more suitably provided by other means**."
	56	Reasoned Justification, paragraph 4.27.2	"Carbon Emissions and air quality 4.27.2 Transport is a major source of carbon emissions that, in turn, area 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 reduce carbon emissions resulting from transport**, and therefore supporting the Council's Climate Change Emergency declaration**. Measures to reduce the need to travel, widen travel choice and reduce dependence on the private car, alongside investment in low-carbon vehicle technologies area 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 …."
	57	Reasoned Justification, new paragraph to be inserted after paragraph 4.27.8	"**Proposed Major Road Network** **4.27.9 As part of the Transport Investment Strategy published in 2017, the Government committed to creating a Major Road Network (MRN). Draft proposals were issued for consultation, outlining how a new MRN would help the Government deliver a number of objectives, including supporting housing delivery and economic growth. The creation of an MRN will allow for dedicated funding from the National Roads Fund to be used to improve this middle tier of the busiest and**

			most economically important local authority 'A' roads. Parts of the A58 and A570, and the whole of the length of the A580 which falls in St Helens, have been proposed for inclusion in the MRN. Supporting Supplementary Planning Guidance 4.27.**10**~~9~~ A new Supplementary Planning Document ….”
MM013	58	**LPA08** Section 2	“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 ……”
	59	Section 5	“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 economic viability evidence including 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. **In light of the viability evidence, where a developer can demonstrate that meeting all policy requirements would not be viable, a pragmatic approach will be taken to s106 contributions on sites within zone 1.**”

	59	Section 6	"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, **depending on site surroundings and the level of existing infrastructure,** for example education needs or greenspace provision in areas of deficit; and iii) contributions that would not fall into categories i) or ii) as set out above."
	60	Reasoned Justification paragraph 4.30.1	"… In this context, the term 'infrastructure' ~~(which is defined in full in Appendix 2)~~ includes: …"
MM014	62	**LPA09** Section 1	"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~~ **rural** areas."
	62	Section 4	"4. … Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused. The only exception to this will be where it has been demonstrated that: **a)** appropriate protection or retention of Green Infrastructure assets cannot be achieved **in the pursuit of wider planning objectives**; **b)** the development would bring benefits that would over-ride the resultant

			harm; and **c)** there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation**, for example, in the form of incorporating the identified Green Infrastructure assets into the scheme design and layout through a masterplanning process to maintain the key Green Infrastructure assets and connections,** and / or as a last resort compensatory provision will be required."
	63	Reasoned Justification, paragraph 4.33.1	"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 **(supporting the Council's Climate Change Emergency declaration)**, public access, health, heritage, biodiversity, water management and landscape character; providing a sense of place …"
		Reasoned justification, paragraph 4.33.2	"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 undertaken with the Countryside Agency (now Natural England) in 2006~~. In 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."

MM015	66	**LPA10** Section 3	"3. Proposals for development within site 7EA will be required to: a) satisfy the masterplanning requirements set out in Policy LPA04.1 …… 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~~.~~**; and** **j) ensure the timely delivery of the rail terminal infrastructure of the SRFI or other rail served employment development, in accordance with the comprehensive masterplan to be prepared for the whole site as required by Policy LPA04.1, section 2. Within this, details of the phasing for the whole site must include a clear and justified employment floorspace trigger for the delivery of the rail terminal infrastructure.**"
	66	Section 4	"4. That part of the site 7EA which falls to the west of the M6 is safeguarded from all forms of development **unless it can be shown that such development within it will not prejudice, or** ~~so that it~~ may provide**, effective and deliverable** 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)."
MM016	70	**LPA11**	"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~~ **Through the planning system, the Council will seek to**: 1. encourage improved access … " 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 anti-social behaviour** and that promote social cohesion and mental wellbeing; ….”
MM017	72	**New Policy LPA12 and associated Reasoned Justification**	**4.40 Policy LPA12 – Parkside West** **Policy LPA12: Parkside West** **1. The Parkside West site (identified as site 8EA in Policy LPA04) shall be considered suitable for B2 and B8 uses.** **2. Proposals for development within site 8EA will be required to:** **a. Satisfy the masterplanning requirements set out in Policy LPA04.1;** **b. Provide safe and convenient access to and from the M6 for Heavy Goods Vehicles and other vehicles:** **i. Access to an initial phase of development can (subject to detailed assessment) be provided off the A49 (Winwick Road)** **ii. Later phases of development should be served by a new link road from the east (linking to Junction 22 of the M6)** **iii. The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by the relevant highway authorities;** **c. Suitably mitigate any adverse impacts on the M6 (Junction 22) or other parts of the highway network (strategic and local);** **d. Include suitable measures to control impact of increased traffic movement or uses within the site on residential amenity, noise and / or air quality in the surrounding area;**

			e. **Include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area;** f. **Secure suitable access to the site by walking and cycling, such as, the provision of segregated walking and cycling routes which must run through the site and link to nearby highways; and improved bus provision, including upgraded bus stops;** g. **Establish and implement a Travel Plan incorporating measures to encourage travel to / from the development by sustainable modes;** 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 employment at the site;** **The development of Parkside West (site 8EA) must ensure that the part of site 7EA (Parkside East) which falls to the west of the M6 (as shown on the Policies Map) is safeguarded from all forms of development unless it can be shown that such development within it will not prejudice, or may provide, effective and deliverable future siding facilities in connection with the development of an SRFI or other rail-enabled development on land to the east of the M6 (site 7EA).** **4.41 Policy LPA12:** **Strategic Aims, Objectives, and Key Delivery Mechanisms** **Strategic Aims Met** | **SA 1, SA 3, SA 5**

Strategic Objectives Met	**SO 1.1, SO 1.3, SO 3.1, SO 5.1, SO 5.4**
Is this a 'strategic' or 'local' policy?	**Strategic**
Key Delivery Mechanisms	• **Development management process** • **Liverpool City Region Combined Authority funding** • **St Helens Infrastructure Delivery Plan**

4.42 Reasoned Justification

4.42.1 The Core Strategy (2012), Policy CAS 3.2 identified the site of the former Parkside Colliery and immediately adjacent land as a strategic location with the potential to facilitate the transfer of freight between road and rail. It was considered that a deliverable and viable SRFI could be developed on the western side of the M6, provided a number of criteria were met. On that basis, the principle of delivering a Strategic Rail Freight Interchange (SRFI) in this location was supported.

4.42.2 Furthermore, Policy CAS 3.2 recognised that there may be a need for a larger area of land, extending to the east of the M6 to accommodate an enlarged SRFI, on the basis of operational, viability and commercial reasons. Therefore, the Policy supported the development of land to the east of the M6 provided that 1) the area of land to the west of the M6 was

			developed first, and 2) that the SRFI would be undeliverable without the additional land to the east of the M6. **4.42.3 Since the Core Strategy, the policy in relation to Parkside has evolved to reflect the latest evidence. The Council commissioned consultants AECOM to undertake the Parkside Logistics and Rail Freight Interchange Study (2016). The findings of this Study informed the proposed approach to Parkside in this Plan: The development of Parkside East as the location of a SRFI (together with other industrial and logistics uses), and the development of Parkside West as a separate, though linked, employment site for logistics use, which will be served by road only, although it will accommodate rail siding facilities for incoming trains linked to Parkside East. Parkside West could also potentially be served from the SRFI by tractor units.** **4.42.4 Accordingly, Parkside West is allocated for 79.57ha of employment land for B8 and B2 uses. This area excludes 5.58ha of land at Parkside West required to facilitate rail access to Parkside East (7EA) and a further 12.1ha of land occupied by a spoil heap, which is not considered developable.** **4.42.5 The delivery of this site will be supported by the delivery of the Parkside Link Road, which will provide access to the M6 Junction 22 from both the Parkside West and East sites. The Council has secured the funding to progress the delivery of the link road scheme. On 11 November 2021, the SoS granted planning permission for the development of Parkside Phase 1 and the link road.** **4.42.6 The allocation of Parkside West will contribute to meeting the identified employment needs over the Plan period as set out in Policy LPA04 and explained in the associated Reasoned Justification. The site also contains a significant amount of Previously Developed Land, and so its allocation will contribute to the effective use of land in the Borough to meet identified development needs.**

			4.42.7 The site is located within close proximity of an area within the 20% most deprived population in the UK, and therefore offers not only wider economic benefits, but also presents the opportunity to help reduce poverty and social exclusion in the local areas and provide regeneration benefits. **4.42.8 The exceptional circumstances justifying the removal of this site from the Green Belt is set out in the Reasoned Justification of Policy LPA04.**
MM018	72	**New Policy LPA13 and associated Reasoned Justification**	**"4.43 Policy LPA13: Bold Forest Garden Suburb** **Policy LPA13: Bold Forest Garden Suburb** **The Bold Forest Garden Suburb site (identified as site 4HA in Policy LPA05) is allocated for housing development, with an indicative site capacity of 2,988 dwellings, of which a minimum of 510 dwellings will be delivered during the plan period. The site boundaries are set out in the Appendix 5 site 4HA profile and on the Policies Map.** **1. Development of the site should deliver the following requirements:** **Housing** **a) At least 30% of homes to be delivered on site should fall within the definition of 'affordable housing' in accordance with Policy LPC02, with the affordable housing mix reflecting Policy LPC02, part 3), unless up-to-date and robust evidence indicates otherwise;** **b) Provide an appropriate mix and standard of housing to meet local needs in accordance with policy LPC01;** **c) Deliver at least 10% of the site's energy needs from renewable and / or other low carbon energy sources in accordance with**

			Policy LPC13, part 4), unless this is shown to not be practicable or viable; **Design and Layout** **d) The development of this site should be consistent with the vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (2017);** **e) 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;** **Social Infrastructure** **f) Contributions towards primary and secondary school provision in the area, to meet the identified need for additional school places, through the extension of existing schools and / or delivery of new school facilities;** **g) Provision of a new GP surgery within the development, which could be in the form of the relocation and expansion of an active practice onto the site;** **h) Provide a small local centre containing community and retail facilities;** **Play, Open Space and Green Infrastructure** **i) Provision of an accessible, comprehensive, high quality and connected network of multi-functional green spaces in accordance with a Green Infrastructure Plan to be provided as part of the comprehensive masterplan approach for the whole site as required by Policy LPA05.1, section 2f);** **j) Retention of existing and provision of new high quality, well designed and accessible open space and play space provision in accordance with Policies LPC05 and LPD03. Details of how open**

			spaces will be subsequently maintained will need to be considered through the masterplanning process; **Landscape and biodiversity** **k) 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;** **l) 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;** **Access and Highways** **m) Provision of safe access arrangements for the site;** **n) Creation of a permeable layout with a range of highways provided through the site with access via the B5204, Neills Road and Gorsey Lane;** **o) Provision of a bus service through the site between Clock Face and St Helens Junction, and the layout of the site must be compatible with this;** **p) Provision of a permeable network 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;** **q) Provision of any other measures necessary to secure suitable access to the site by walking, cycling and public transport such as:**

			a. The provision of new accessible bus stops to an agreed specification through the site so that none of the proposed dwellings are more than 400 metres walking distance from a bus stop; and **b. A financial contribution towards the improvements of St Helens Junction station;** **r) Masterplanning of site must take into account the opportunity to expand the Greenway network, and make provision for this in line with Policy LPC07, and the accompanying Figure 7.2; and** **s) Masterplanning of the site must be informed by the findings of the Bold Forest Garden Suburb Transport Review (August 2019) and any other relevant evidence.** **2) As above, financial contributions or the provision of on-site infrastructure for education, health and offsite highway works may be required. The detailed infrastructure requirements to support the delivery of the site will be further assessed through the comprehensive masterplanning process.** **3) In accordance with Policy LPA05.1, section 2), any planning application for development within the site will need to accord with a single comprehensive masterplan covering the whole of the Bold Forest Garden Suburb site, and to be approved by the Council, which will need to set out the listed details in sub-sections a) to i) as a minimum. Any proposal will need to demonstrate how it complies with this masterplan in order to ensure a comprehensive, co-ordinated, and well-designed development is delivered with the necessary supporting infrastructure.** **4.44 Policy LPA13:** **Strategic Aims, Objectives, and Key Delivery Mechanisms**

Strategic Aims Met	**SA 1, SA 2, SA 3, SA 4, SA 6**
Strategic Objectives Met	**SO 1.1, SO 1.2, SO 2.1, SO 2.3, SO 3.1, SO 4.1, SO 6.1, SO 6.3**
Is this a 'strategic' or 'local' policy?	**Strategic**
Key Delivery Mechanisms	• **Development management process** • **Masterplanning process** • **St Helens Infrastructure Delivery Plan**

4.45 Reasoned Justification

4.45.1 The Bold Forest Garden Suburb (BFGS) is the largest allocation identified in the Plan. It comprises a large area of undeveloped agricultural land, located on the urban edges of Clock Face, Sutton and Bold. The site contains a scattering of farm buildings, a transmitter station and some limited areas containing trees and hedges. A line of electric pylons run through the site along the north-western boundary, and a Local Wildlife Site 108 (LWS) (Tunstalls Farm), lies to the north-western side of the site, beyond the site boundary. Existing residential development surrounds the site on three sides, including Reginald Road Industrial Estate; the southern edge, for the most part, is defined by Gorsey Lane.

			4.45.2 The Green Belt Review (2018) informed this allocation. The Review identified that land at Bold forms a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough, contributing to the balanced growth of the Borough. It also has good accessibility to jobs and services and high levels of compliance with other aspects of the Green Belt Review methodology. This land therefore forms a substantial element within the overall housing strategy, striking the right balance between meeting housing and employment development needs, while protecting the most valuable environmental resources and the overall function of the Green Belt. **4.45.3 The Review concluded that the BFGS site as a whole should be allocated for development, noting that it "forms a notable indent in the alignment of the southern edge of the built-up area of St Helens." It added that due to "the size of the parcel, it has the potential to form a 'garden suburb' extension to the south of Bold, which would be sufficiently large to include new social infrastructure (such as a new primary school, local retail centre and potentially health facilities). It would constitute a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough."** **4.45.4 The BFSG is located within the Bold Forest Park, and therefore the development of this site allocation must be consistent with the vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (BFPAAP) (2017), which forms part of the Development Plan. The requirements set out in this policy provide a strong and robust foundation in developing the vision and objectives for the Bold Forest Garden Suburb, which will be further refined through the masterplanning process.** **4.45.5 Throughout the preparation of the Local Plan, the Council have consulted with various internal and external infrastructure providers,**

			including the Council's Schools Support Services Team, National Highways, and St Helens Clinical Commissioning Group (CCG) to ascertain the level of infrastructure required to support the BFGS. This work will continue through the masterplanning process for the site. **Housing** **4.45.6 The site has an indicative capacity of 2,988 dwellings (in accordance with Table 4.5), of which it is anticipated that some 510 dwellings would be completed within the Plan period (i.e. by 31 March 2037).** **4.45.7 Given the size of the BFGS site, a lead in time of seven years on adoption of the Plan has been applied for the BFGS to allow for a thorough masterplanning process. This work may then form the basis of a site-specific Supplementary Planning Document (SPD).** **4.45.8 A build-out rate assumption of 60 units per annum has been used for the BFGS, reflecting a cautious approach due to uncertainties in relation to uncertainty on the economic impacts of the Covid-19 pandemic and the supporting infrastructure required to deliver the site. Actual build-out rates will depend on the number of housebuilders and sale centres that are operational at any one time on the site.** **Social Infrastructure** **4.45.9 The Council's School's Support Services Team have considered capacity at the existing schools in the area, both in terms of primary and secondary provision. It is likely that the BFGS will necessitate the expansion and / or provision of new school facilities. Work to consider school needs is ongoing in terms of determining which schools may be capable of extension and where a new school may be required, and this will feed into the BFGS masterplanning process.**

			4.45.10 St Helens CCG advised that there is a deficiency of healthcare practitioners to the south of the Borough, particularly in Bold. Therefore, there could be a need for a new general practice surgery to be constructed within the BFGS to accommodate the increased demand for healthcare in Bold (and from surrounding areas). The CCG have indicated that this new practice could be in the form of relocating and expanding an active practice onto the site. This need will be further refined through the masterplanning process. **4.45.11 The BFGS is not within walking distance of a local or district centre. However, due to its size it is considered that it could support a small local centre containing community and retail facilities, which will make the development more sustainable. Retail provision will be looked at in more detail through the comprehensive masterplanning process and in any subsequent SPD.** **Transport** **4.45.12 Consultants WSP undertook an initial transport review to understand the likely impact of the BFGS on the wider highways network and to consider transport initiatives that could support development of the site. The Review consists of two key elements: a) examination of the likely trip generation, distribution, and route assignments on the local highway network, based on a core and alternative scenario; and b) preparation of a study report setting out the findings of a review of local transport infrastructure. It also identifies strategic network improvements and likely masterplanning design requirements.** **4.45.13 In its initial findings, the Review anticipates that there will be highways junctions that will experience impact in terms of traffic flow as a result of development but that there are opportunities to achieve a significant modal shift towards sustainable travel that would reduce the impact of the proposed development on the local highway network. Highways England have provided initial comments on the Review and**

			the Council will continue to engage with Highways England throughout the BFGS masterplanning process. **4.45.14 The Review is an initial element of the masterplanning process that will be required prior to the site being developed.** **Masterplanning** **4.45.15 The site is under the control of multiple landowners, and it is therefore particularly important that an appropriate mechanism is in place to ensure a comprehensive, well connected, and well-designed development is delivered on the site, with the necessary supporting infrastructure. Section 2 of Policy LPA05.1 provides for this mechanism in the form of any planning application for development within the site needing to accord with a comprehensive masterplan covering the whole site, which sets out a wide range of details, as listed in sub-sections a) to i). This masterplan will need to be approved by the Council in advance of any planning applications and will be prepared in consultation with a range of stakeholders. In the case of the BFGS, this is particularly critical to ensure that a high quality development is delivered in a comprehensive manner, and the various phases of development can be delivered in accordance with an overarching, agreed masterplan, and in a timely manner."**
MM019	73	**LPB01** New Section 2	**"2. The English Cities Fund Regeneration Partnership will help deliver a comprehensive redevelopment of the Town Centre and Central Spatial Area, including new commercial activity, upgraded infrastructure, the provision of quality housing, and the overall improvement of the social and economic viability of the area.** ~~2~~**3**. Proposals for retail and leisure development will be directed …." *Subsequent policy sections will be renumbered accordingly.*

	73	Section 3 (to be renumbered Section 4)	"~~3~~**4**. Proposals for the change of use of units in the Primary ~~Retail Frontages~~ Shopping **Area** in St Helens Town Centre will be refused unless they would be to **a** ~~Class A1[45] 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.~~"
	73	Footnote 45	*Delete footnote 45*
	74	Reasoned Justification Paragraph 5.3.1	"5.3.1 The St. Helens Central Spatial Area (as shown in Appendix 11 **and on the Policies Map**) includes the Town Centre and its surrounding hinterland. This includes …"
	75	Reasoned Justification, paragraphs 5.3.6 and 5.3.8	"5.3.6 …… The Strategy set out a vision for the future of the town centre detailing thematic initiatives to deliver this. **In January 2020 the Council successfully received an initial £173,029 capacity fund as part of the Governments Town Deal initiative. The Council has now successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts, and culture. A Town Investment Plan will be developed and will sit alongside the Town Centre Strategy.**" "5.3.8 ……. 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. **To support this initiative and to assist in the regeneration of the area, the Council has entered into a regeneration partnership with the English Cities Fund to deliver a comprehensive redevelopment of the Town Centre (and wider Borough on a phased basis).**"
	75	Reasoned Justification Paragraph 5.3.9	"~~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 11).~~" *Re-numbering of subsequent Reasoned Justification paragraphs to be done.*
	75	Reasoned Justification Para 5.3.10 (to be renumbered 5.3.9)	"5.3.~~10~~**9** The first preference for the location of new ~~retail~~ **Class E and Sui Generis retail main town centre uses** development is within the Primary Shopping Area. Proposals for ~~retail~~ **Class E and Sui Generis retail main town centre** uses that are …"
	76	Reasoned Justification Paragraphs 5.3.13 – 5.3.14	"~~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.~~" *Re-numbering of subsequent Reasoned Justification paragraphs to be done.*
MM020	77	**LPB02** Section 4	"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. **The English Cities Fund Regeneration Partnership will help deliver a mix of residential, leisure, business and retail development all centred around the Town Centre.**"
	78	Reasoned Justification, paragraph 5.6.3	"5.6.3 The Council will seek to safeguard **and build upon** 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. **Through its partnership with the English Cities Fund the Council will work towards creating a mix of residential, leisure, business and retail development all centred around the Town Centre.**"
	78	Reasoned Justification, paragraph 5.6.8	"5.6.8 To provide a focus for future development of the town centre and positively promote Earlestown as a location to live, **through the English Cities Fund Regeneration Partnership,** the Council and its partners intend to bring forward a dedicated Town Centre strategy, ……..."

MM021	79	**LPC01** Section 1	"1. New market and affordable housing ~~must~~ **should** be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by **up-to-date,** relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)."
	79	Section 2	"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* ***adaptable***" dwellings standard set out in Part M4(3)**(2)(a).** ….."
	79	Section 3	"3. ~~At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows.~~ Exceptions to paragraphs 1 **and 2** ~~to 3~~ of this Policy may be made where the applicant …."
	79	Section 5 (to be re-numbered to section 4)	"~~5~~**4**. The Council will work with partners to facilitate the provision of **bungalows, and** 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.

			…." *Re-number subsequent policy sections.*
	81	Reasoned Justification Paragraph 6.3.3	"6.3.3 … extend this assessment of annual need up until the end of the Plan period (**2037**~~2035~~). Of the overall housing provision of **10,206**~~9,234~~ dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,**457**~~223~~ (24%) should be affordable. The amount of …."
	82	Reasoned Justification, paragraph 6.3.8	"6.3.8 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 new homes should be designed to the 'wheelchair user~~'~~ **adaptable'** dwellings~~'~~ standards set down in Part M4(3)**(2)(a)** 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. **A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.**"
MM022	84	**LPC02** Section 2	"2. Proposals for new open market housing developments of ~~11~~ **10** units or more**, or when the number of units is not known, sites of 0.5ha or more,** will be required to….."
	88	Reasoned Justification, paragraph 6.6.9	"6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. **Furthermore, it is acknowledged that 'First Homes' have been introduced by the Government and fall within the definition of 'affordable housing'.**

			However, as this Plan is being progressed under the First Homes transitional arrangements, it is not required to reflect the First Homes policy requirement. Instead, this will be addressed in a future update of the Plan."
MM023	89	**LPC03** Section 1	"1. The following sites are allocated for the provision of pitches to **help** meet the Borough's **identified** need for Gypsy and Traveller accommodation **of 18 pitches** over the Plan period, and are identified on the Policies Map: …"
	90	Section 5	"5. In addition to meeting the criteria in paragraph 4 of this Policy, 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 ~~.~~**; and** **c) allow for the provision of suitable space and storage for rides and associated equipment, where applicable.**"
	92	Reasoned Justification, paragraph 6.9.6	"… and a rise in the number 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 by 2016. **This is comprised of the 8 pitches identified within the GTAA, 4 private pitches which are not authorised but tolerated, an additional 2 unauthorised pitches and 4 pitches provided for the loss of pitches at Berry's Lane which is a closed site and at Suez Street due to the construction of a bungalow on the site.** The existing provision of 12 pitches would therefore be likely, on its own to fall short of meeting needs. For this reason Policy LPC03 allocates an additional site …"

MM024	93	**LPC04** Section 2	"2. **The development of main town centre uses within the defined centres will be supported. Proposals for other uses in such locations will be considered having regard to the scale and nature of the proposal and the role and function of the centre.** 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."
MM025	98	**LPC05** Reasoned Justification, paragraph 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. **Furthermore, provision of new and / or enhancement of existing open spaces will support the Council's Climate Change Emergency declaration.**"
	99	Reasoned Justification, paragraph 7.3.11	"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. **Further, even where there is considered to be sufficient open space in quantitative terms, larger residential developments may be expected to provide certain types of open space (such as play areas for children and young people and amenity green space) to provide local recreational opportunities and visual relief as part of an attractive and well-**

			designed development."
	99-100	Reasoned justification, paragraphs 7.3.11 – 7.3.12 (inclusive of Table 7.1)	*Remove paragraphs 7.3.11 and 7.3.12 (inclusive of Table 7.1) from the reasoned justification for Policy LPC05, and add into the reasoned justification for Policy LPD03, and adjust paragraph numbering in both Reasoned Justification sections accordingly. Table 7.1 will also need to be renamed Table 8.1 to follow the table numbering convention, and references to this table updated in the 'List of Tables' (page 2) and within the policy text of LPC05 and LPD03.*
MM026	101	**LPC06**	"**1. In accordance with NPPF Paragraph 175, the Council is committed to ensuring the protection and enhancement of St Helen's biodiversity and geological asset and interests. In order to do this, the Council will have regard to the following hierarchy of nature Conservation sites when making planning decisions, according to their designation as follows:** - **International and European Sites** - **Sites of Special Scientific Interest** - **Local Wildlife Sites** - **Local Nature reserves** - **Local Geological Sites** - **Priority Habitat(s)** - **Impact on Legal Protected Species and/or priority Species** **The following hierarchy of sites and habitats are found in the Borough:** **i) International** **• 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.**

			ii) National **• Sites of national nature importance, which in St. Helens Borough include 2 Sites of Special Scientific Interest, Stanley Bank Meadow and Highfield Moss** **iii) Local** **• 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)** **In addition, priority habitats and species, and legally protected species.** European Sites ~~1.~~ **2.** 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~~ **and** 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.~~ **3.** 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, **without adequate mitigation** ~~that would not be adequately mitigated or as a last resort compensated~~, will be refused. ~~3.~~ **4.** 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.~~ **5.** 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. **This sequential approach will also apply to the delivery of Biodiversity Net Gain improvements to be delivered in line with new development, in accordance with the Environment Act.**" Evidence requirements ~~5.~~ **6.** Development proposals that would affect a 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 and 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.~~"
	102	Add new section 7	"**7. Further details concerning the implementation of this policy will be set out in the Council's proposed Nature Conservation Supplementary Planning Document.**"
	102	Reasoned Justification, paragraphs 7.6.1 – 7.6.2	"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 within 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)~~ ~~• Priority habitat and species, and legally protected species.~~ 7.6.2 Policy LPC06 sets out how ~~sites, habitats, and species within this~~ **the** hierarchy **of sites, habitats and species** 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."
	104	Reasoned Justification, paragraph 7.6.5 onwards	"7.6.5 It has been identified that new housing development in the **Liverpool City Region** ~~Borough~~, particularly when considered cumulatively, ~~may~~ **is likely to** cause **significant** 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, **through the preparation of a City Region wide Recreation Mitigation Strategy**, 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.

7.6.6 The City Region Recreation Mitigation Strategy referred to in paragraph 7.6.5 above has yet to be completed. However, within St Helens any developer contributions are likely to be focussed at least in part on the delivery of strategic greenspace enhancements in the local area, for example at Bold Forest Park. The Bold Forest Park (BFP) Area Action Plan forms part of the St Helens Development Plan and provides a framework for the development of the BFP area, which covers about 1,800ha of land in the southern part of the Borough. Due to its location on the urban fringe of St Helens, the BFP is potentially accessible to a large sub-regional population and is capable of playing an important role as an alternative recreational destination. The Council will continue to promote the BFP as a sub-regional greenspace and to seek opportunities for additional funding to help improve the functionality and management of the BFP.

Nationally and locally important sites and species

7.6.~~6~~**7** Paragraphs ~~2-4~~ **3-5** 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.

7.6.8 As at October 2020, there are seven LNRs in St Helens Borough which collectively cover an area of 11.27 hectares these are listed below.

Local Nature Reserves in St Helens

LNR	O/S Grid Reference	Principle Habit

Stanley Bank	**SJ534,971**	**Neutral Wet grassland, Ancient Semi-Natural Woodland**
Siding Lane	**SD463,020**	**Broadleaf Woodland**
Thatto Heath Meadows	**SJ508,936**	**Neutral grassland, Stream, Hedgerows**
Parr Hall Millennium Green	**SJ527,961**	**Marshy Grassland, Wetland Reedbed, River**
Colliers Moss Common (North)	**SJ543,939**	**Lowland Heath, Raised Bog, Reedbed, Wetland, Scrub**
Clinkham Wood	**SJ515,980**	**Broadleaf Woodland**
Mill Brow consisting of: **Mill Wood** **Mill Brook Parish Nature Reserve**	 **SJ486,955** **SJ488,957**	**Wet Woodland, River, Marshy Grassland, Wetland, River**

St Helens Borough includes 116 Local Wildlife Sites. These are Listed in Appendix B of the Nature Conservation SPD.

7.6.~~7~~**9** 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~~**10** The Priority Species in St. Helens …"
	105	Reasoned Justification, new paragraph after 7.6.16 (to be renumbered 7.6.17)	"7.6.1~~6~~**7** …..will be set out in the Council's Nature Conservation SPD. **Monitoring** **7.6.18 Monitoring of Biodiversity Net Gain is likely to be undertaken in response to Government requirements outside the scope of the Local Plan. Further clarity on this is awaited at the national level.**"
MM027	106	**LPC07** New Section 3 to be added to Policy	"**3) The Council will support the expansion of the Greenway network, including through the provision of new routes, such as those set out in Figure 7.2, subject to the availability of funding and other feasibility requirements being met."**
	107	Reasoned Justification, paragraph 7.9.3	"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. **Collectively, greenways support the Council's Climate Change Emergency declaration through providing opportunities to travel by sustainable modes.** The European Greenways Association defines greenways as …"
MM028	110	**LPC09** Reasoned Justification, paragraph 7.15.1	"7.15.1 The NPPF states that ~~the planning system~~ **planning policies and decisions** should contribute to and enhance the natural and local environment by ~~protecting and enhancing valued landscapes~~ **recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital**."

MM029	112 113	**LPC10** Section 6 Reasoned Justification, paragraph 7.18.2	"6. Development proposals **should** ~~must~~ be designed and laid out in a manner that would **retain** ~~not damage or destroy~~ any tree subject to…" "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. **Therefore, the retention of existing, and the planting of new trees and woodland areas will support the Council's Climate Change Emergency declaration.** Their value is recognised in the Regional Forestry Framework Woodland …."
MM030	116	**LPC11** New Section 3 to be added, and updates to following policy sections	"3. **The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation, and the National Planning Policy Framework.** Development affecting heritage assets ~~3.~~**4.** 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 **only** be **permitted where the benefits are considered sufficient to outweigh the harm, having regard to the scale of the harm and the significance of the heritage asset.** ~~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~~ **6**. 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~~ **7**. Any development proposal that may affect one or more asset(s) of …" *Re-number subsequent Policy sections*

MM031	121	**LPC12**	Flood Risk **1. The impact of development proposals on flood risk and water management assets will be considered in accordance with case law, legislation, and the National Planning Policy Framework.** ~~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.~~**2.** 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.~~**3.** Any proposal for major development[56] on a site that would abut, run alongside, or straddle any watercourse[57] 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.~~**4.** 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.~~**5.** 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.~~**6.** ~~Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.~~ **Inclusion of sustainable drainage systems within proposed major development sites will be assessed in accordance with national policy.** 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.~~**7.** Surface water management infrastructure within new developments should …. ~~10~~**8**. … with multiple developers involved, the drainage proposals should cover all phases and the full construction period. **Any development proposal should demonstrate unfettered rights to discharge between various phases.**”

			Re-number subsequent policy sections accordingly.
MM032	128	**LPC13** Section 4	"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 **equivalent to CSH level 4, i.e. 19% carbon reduction against Part L 2013 unless proven unviable**. To this end they should use energy efficiently and where feasible incorporate decentralised energy systems …."
	129	Reasoned Justification, paragraph 7.27.1	"7.27.1 …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**, and this Policy, in conjunction with a number of other Policies in this Plan, will support the Council's Climate Change Emergency declaration**."
	129	Reasoned Justification, paragraph 7.27.5	"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.~~"

MM033	131	**LPC14** Section 1 Section 4	"1. The Council will seek to ensure that the Borough of St. Helens provides a steady and adequate supply of minerals to contribute towards **local,** regional, and national needs. To minimise the …" "4. Proposals for the exploration, extraction, storage, processing and / or distribution of minerals will ~~only~~ be permitted if it has been demonstrated that…"
MM034	140	**LPD01** Section 1	"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**, with a focus on the importance of local distinctiveness, as well as using good design to improve the quality of areas that may have become run down and be in need of regeneration**, 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 **unacceptable** 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 **a high** ~~an appropriate~~ standard of amenity and will not be **unacceptably** ~~adversely~~ affected by neighbouring uses and vice versa; d) Link … g) Provide landscaping**, including tree-lined streets**, as an integral part of the development …. h) **Encourage the inclusion of,** ~~Include~~ or ~~contribute~~ **make a contribution** to**,** ~~the provision of~~ public art **with**in appropriate **schemes** ~~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 **as identified in Policy LPC01**; and j) Protect the …"
	143	Reasoned Justification, paragraph 8.3.10	"8.3.10 …. 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. **Taken together, this approach will support the Council's Climate Change emergency declaration, particularly in respect of delivering energy efficient and low-carbon developments.**"
MM035	144	**LPD02**	"3. Provide appropriate landscaping**, including tree-lined streets,** using native tree and … 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,~~ **ensure heritage assets are treated** in accordance with Policy LPC11 **to support the Council's ambition to promote the conservation and enhancement of the Borough's heritage assets and their settings in a manner appropriate to their significance**; 7. **consider the Borough's environmental assets (including, but not limited to, biodiversity and associated habitats, landscapes, trees, woodland and hedgerows) in accordance with policies LPC06, LPC08, LPC09 and LPC10** ~~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;”
MM036	146	**LPD03** Section 1	“… a) …. 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~~.~~**; or** **c) it is appropriate to provide certain typologies of open space as part of the design to provide accessible children’s play areas and create a visually attractive development.**”
	146	Addition of new section 3	“…. b) the quantity, accessibility, and quality of existing provision in the area. **3. Provision for outdoor sports facilities will be achieved through contributions to enhance existing facilities or the provision of new facilities, which will be informed by the Council’s latest Playing Pitch Strategy and Action Plan.**” ~~3.~~**4.** The required amount of open space …” *Subsequent policy paragraphs to be re-numbered.*
	147	Reasoned Justification, paragraph 8.9.5	“~~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.~~”

	147-148	Reasoned Justification	*Make changes to the Reasoned Justification in accordance with the modifications listed in this document under MM025, associated with Policy LPC05.* *Subsequent paragraphs to be re-numbered.*
MM037	149	**LPD04** Criterion 2 Criterion 4	"2. There would be no **significant** ~~adverse~~ impact on the **living conditions** ~~amenity~~ of any occupiers of neighbouring properties caused by overlooking~~,~~ ~~loss of privacy~~ or reduction of daylight **/ sunlight** to habitable rooms or garden areas; …. 4. … off road parking~~,~~ **or** lack of visibility ~~or impact on the safety and free flow of traffic~~; …."
MM038	155	**LPD07**	"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.~~"

MM039	161	**LPD09** Reasoned Justification, Paragraph 8.27.6	"8.27.6 … 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. **In doing so, this Policy will support the Council's Climate Change Emergency declaration.**"
	161	Reasoned Justification, Paragraph 8.27.7	"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 paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. **Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, 'smaller developments' is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council's 'Guidance Notes for the Submission of Transport Assessments' (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will be determined on a site by site basis.** Any significant effects would need to be addressed in line with Policy LPC06.

		Insert new Reasoned Justification paragraph 8.27.8	"**8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:** **1. Electric vehicle charging points at parking spaces;** **2. Provision of a communal minibus (particularly if electric), and car club space;** **3. Cycle parking and shower facilities for staff;** **4. On-site services (e.g. GP surgeries and shops) to reduce need for off-site movements;** **5. Personalised Journey Planning services for residents. If employment premises the company could provide incentives for car-sharing and** **minimising car journeys for work;** **6. Production of sustainable travel information for residents e.g. accurate and easily understandable bus timetables;** **7. Implementation of a Staff Management Plan to place restrictions on car use by Staff;** **8. For vehicles generating HGV movements, restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.**"
MM040	162	**LPD10** Reasoned Justification, paragraph 8.30.2	"1. Proposals for food and drink uses (including restaurants, cafes, drinking establishments and the sale of hot food for consumption off the premises) **which consist of new built development or those that are not classed as permitted development for Change of Use under use Class E or are Sui Generis** will only be permitted where all of the following criteria are met: …." "8.30.2 ~~Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses~~

			~~within Classes A3 to A5 of the Use Classes Order[1] i.e., restaurants and cafes, drinking establishments and hot food takeaways. Paragraphs 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.~~ **The Government introduced a new Use Class E on 1st September 2020[2] which now groups Restaurants and Cafes within Use Class E. Therefore, proposals to change within the same use class do not require Planning Permission. Paragraphs 1 and 2 of Policy LPD10 only apply to restaurant and café applications where a new unit is proposed or where the existing use class E cannot be demonstrated. Proposals for drinking establishments and hot food takeaways are now Sui Generis and remain unaffected. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways.**"
MM041	176	Appendix 1 Glossary	"**Green Infrastructure:** 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~~,~~ **and** 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."
	183		"~~**Primary and secondary frontages:** 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.~~"

~~1 Town and Country Planning (Use Classes) Order 1987 (as amended)~~

2 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

MM042	189-190	Appendix 2 Definition of Infrastructure	*Delete Appendix 2*
MM043	195-215	Appendix 4 Monitoring Framework	*See Annex 6 for proposed modifications.*
MM044	218-242	Appendix 5 Site profiles Allocated Employment and Housing Sites	*Proposed changes to the site profiles are set out in Annex 1.*
MM045	248-259	Appendix 7 Site profiles Safeguarded employment and housing sites	Proposed changes to the site profiles are set out in Annex 2
MM046	283-284	Appendix 11 St Helens Town Centre Plan	*Update the St. Helens Town Centre Map to show the removal of the primary and secondary frontages. Please see Annex 9.* *Plan showing the St Helens Central Spatial Area boundary (as per Annex 9 of this Main Modifications Schedule) is to be inserted into Appendix 11 of the Local Plan Submission Draft and associated renaming of Appendix 11 to "Appendix 11: Central Spatial Area, Town, District and Local Centre Boundaries".*

Annexes

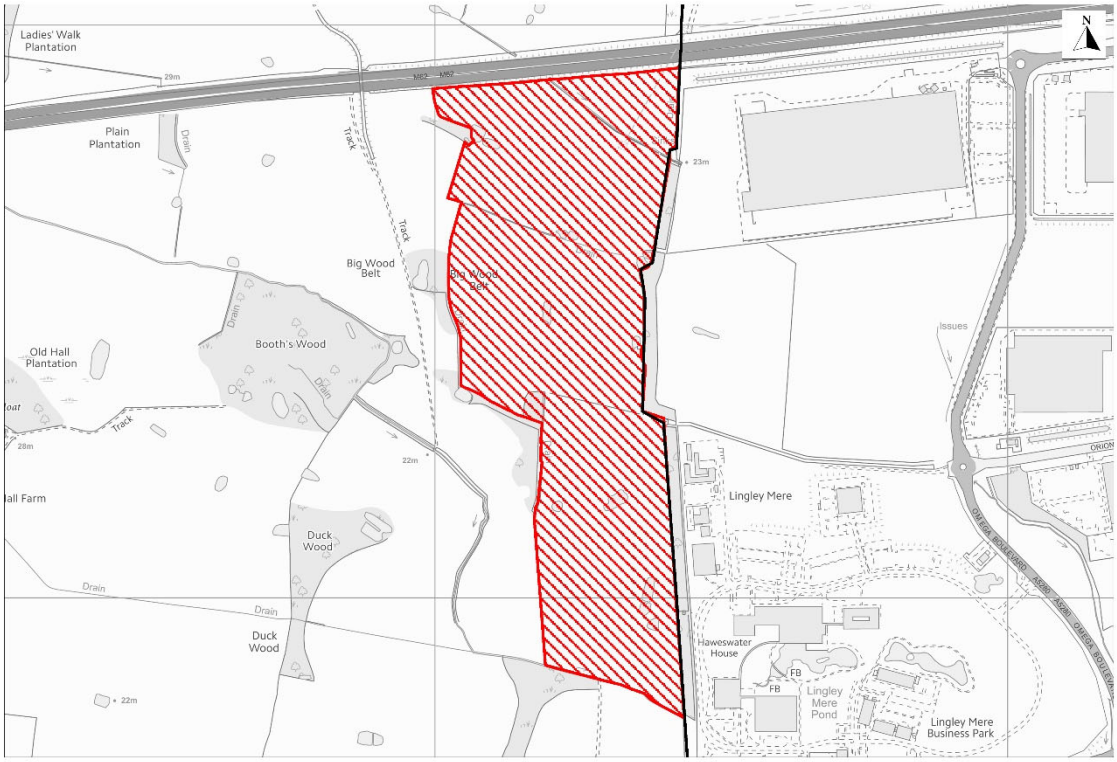
Annex 1

Updated LPSD Appendix 5 site profiles.

Appendix 5: Site Profiles – Allocated Housing and Employment Sites

[Please note: the requirements set out for each site in this appendix are in addition to any others that are needed to comply with Plan policies e.g., in relation to infrastructure provision]

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

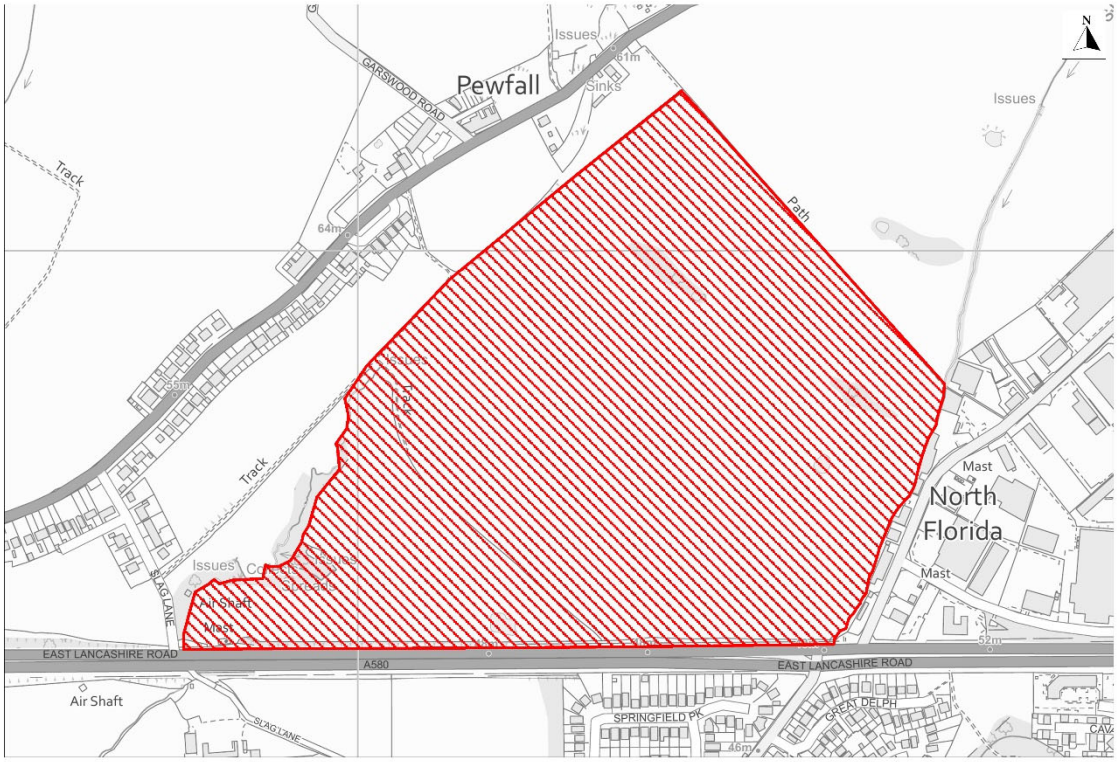


Requirements:

- 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~~ **such as the provision of a footpath and cycleway through the site to connect existing residential areas in Bold and Clock Face with Omega Boulevard within Warrington, and the provision of accessible bus stops with shelters to facilitate the extension of bus services to serve the site from both Warrington and St Helens**

Note – On 11 November 2021, the SoS granted planning permission for land at the Omega South Western Extension, which incorporates this site allocation area (reference P/2020/0061/HYBR).

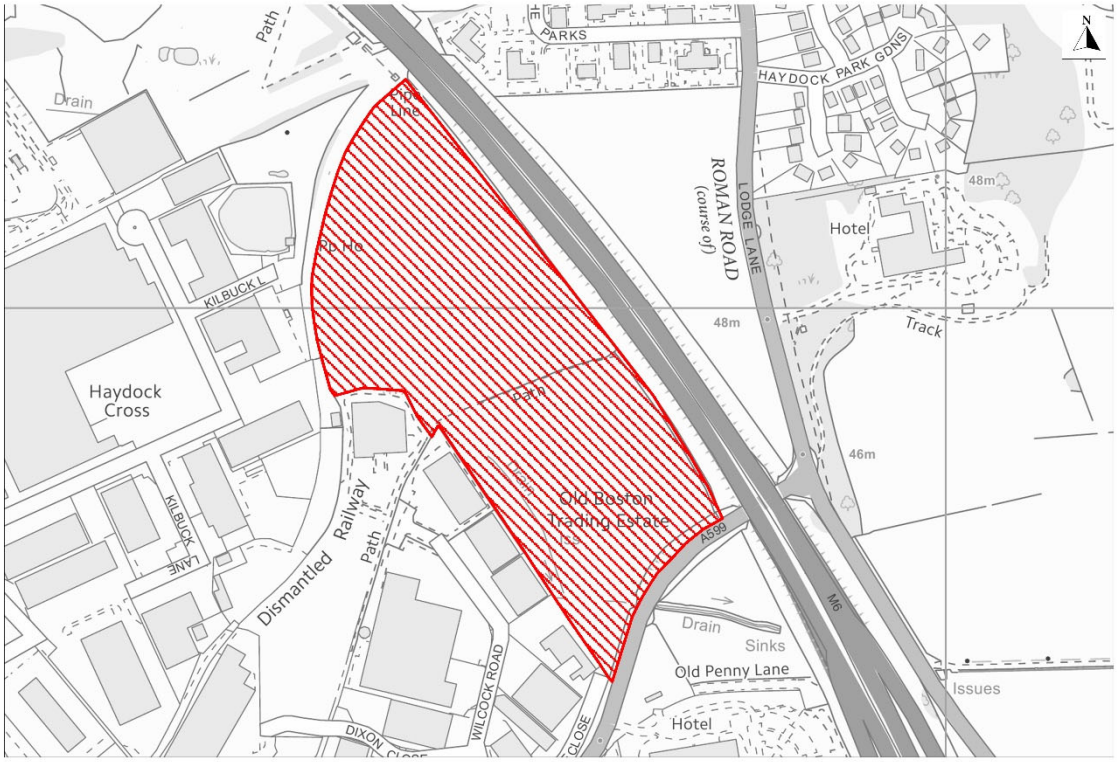
~~LPSD Ref:~~	~~2EA - Land at Florida Farm North, Slag Lane, Haydock~~	~~Ward:~~	~~Haydock~~
~~Notional Capacity:~~	~~36.37ha~~	~~Designation:~~	~~Allocate~~



~~**Requirements:**~~

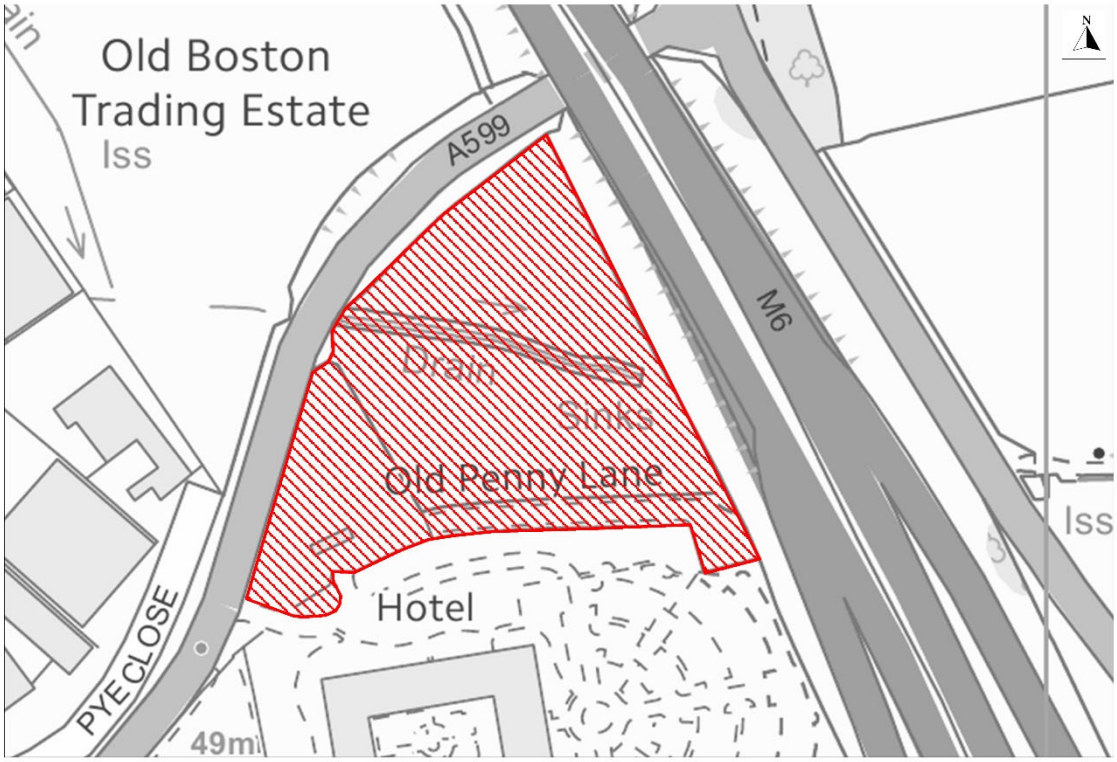
- ~~Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2016/0608/HYBR, granted in 2017.~~

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



~~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.~~

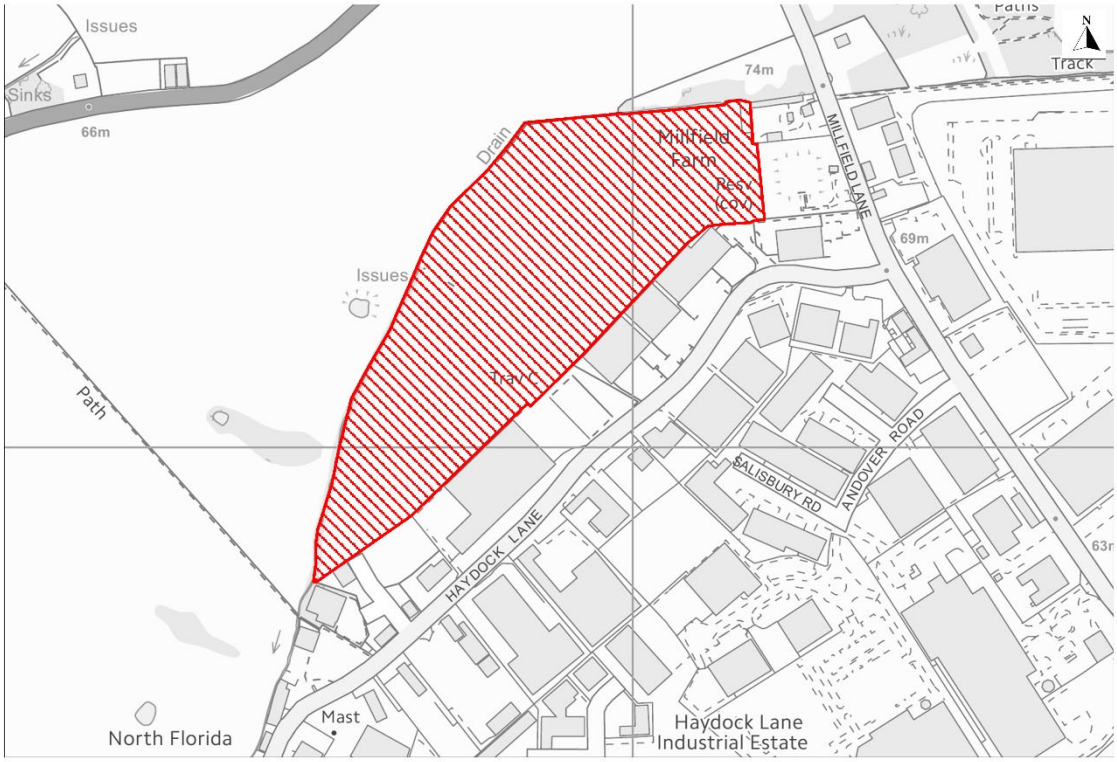
LPSD Ref:	4EA - Land South of Penny Lane, Haydock	Ward:	Haydock
Notional Capacity:	2.16ha	Designation:	Allocate



Requirements:

- Safe highway access ~~can~~ **should** 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 2~~2~~**3**) or other parts of the highway network must be suitably mitigated.
- **Measures to secure suitable access to the site by walking, cycling and public transport, such as the provision of segregated walking and cycling access of Penny Lane, and of accessible bus stops (in consultation with Merseytravel) on Penny Lane.**

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

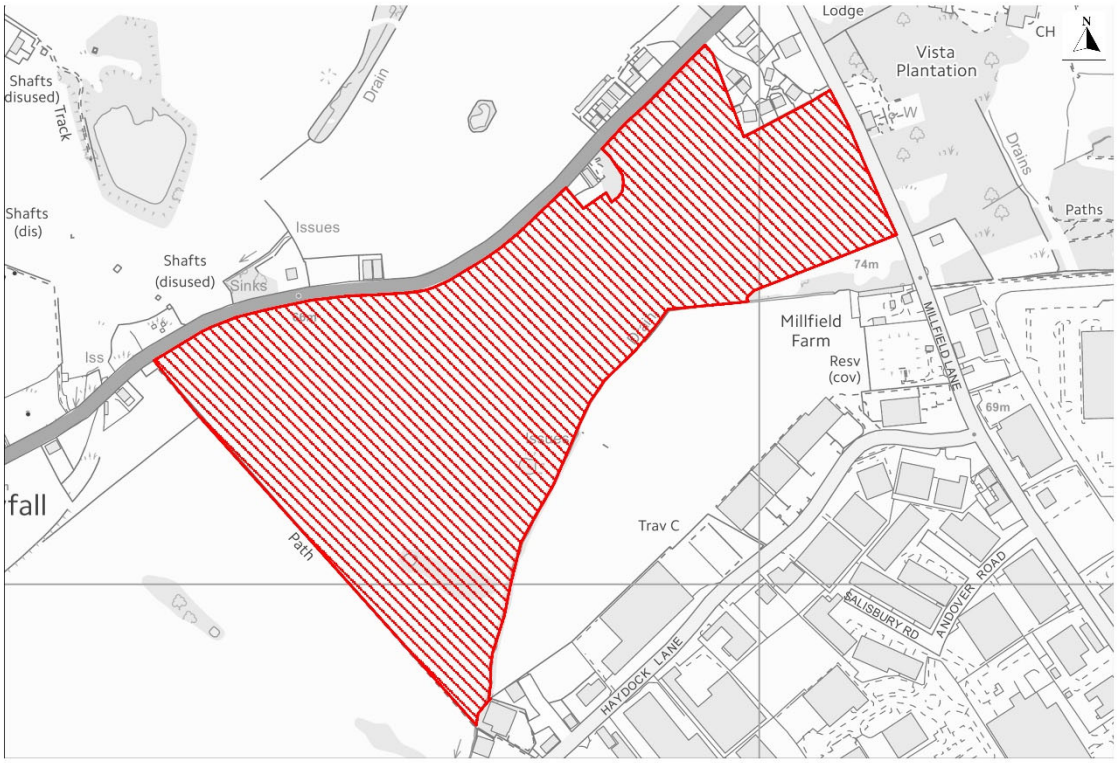


Requirements:

- 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 by gained through neighbouring allocated site 2EA and 6EA~~ **The provision of safe highway access following detailed highway assessment work on the local network which should include an appropriately designed connection off Haydock Lane, and to also serve employment site allocation 6EA unless it is demonstrated to the satisfaction of the Council that this is not needed to enable a suitable form of development within site 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.~~
- **Provision of effective flood management measures for Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.**

- **Measures to secure suitable access to the site by walking, cycling and public transport, such as: segregated walking and cycling routes linking to nearby highways and to public right of way 654 (which runs to the south west of the site); the provision of a financial contribution towards upgrading of public right of way no.656 which links to Wigan; and accessible bus stops with shelters to facilitate connections to Earlestown, St Helens and Wigan**

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

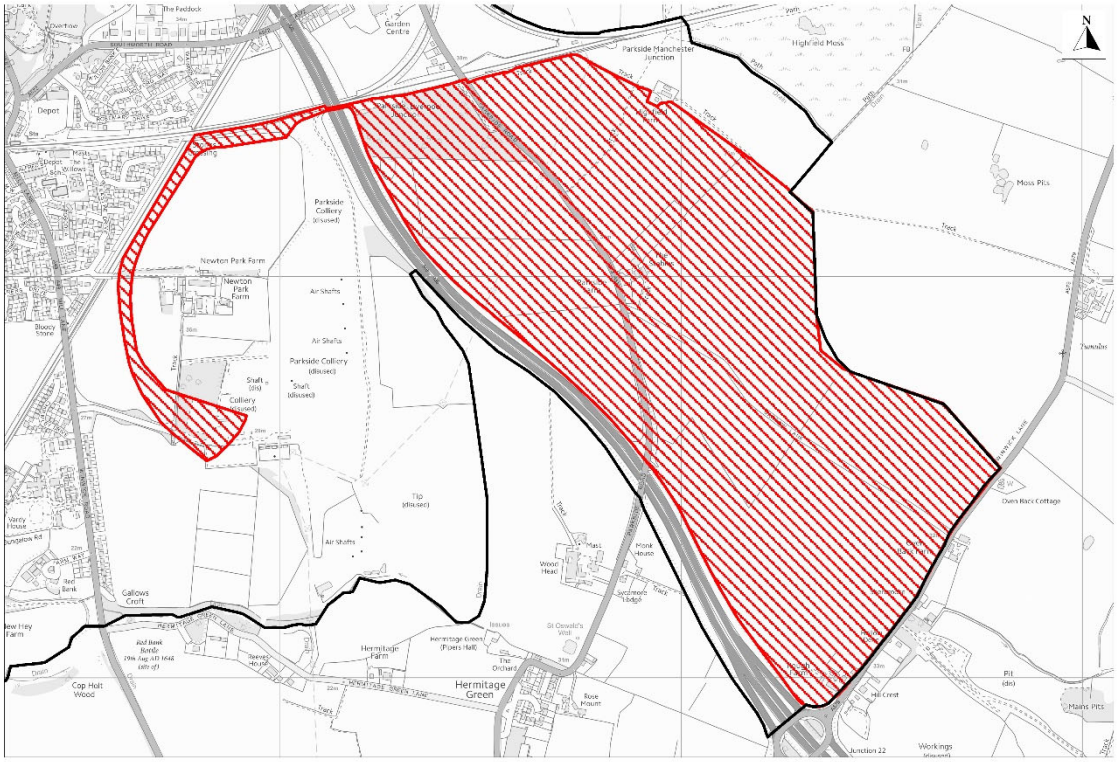


Requirements:

- ~~Appropriate highway access via Millfield Lane; and allocated 2EA site;~~ **The provision of safe highways access following detailed highway assessment work on the local network, including a suitably designed improvement to the highway layout, and signalling equipment at the junction of Millfield Lane and Liverpool Road, or alternative access arrangements if found acceptable by the Council. The site should also include an appropriately designed spine road through it from Haydock Lane to serve employment site allocation 5EA (unless it is demonstrated to the satisfaction of the Council that this is not necessary).**
- 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~~ **5EA and the neighbouring, existing Florida Farm North development.**
- Provision of effective flood management measures for Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.

- **The development must include a buffer of green space alongside Millfield Lane to minimise any effects on the setting of the listed building at "Le Chateau".**
- **Measures to secure suitable access to the site by walking, cycling and public transport, such as: segregated walking and cycling routes linking to nearby highways and to public right of way 654 (which runs to the south west of the site); the provision of a financial contribution towards the upgrading of public right of way no.656 which links to Wigan; and accessible bus stops with shelters on Liverpool Road and Millfield Lane to facilitate connections to Earlestown, St Helens and Wigan.**
- **The design of the site must take account of the role of this land in preventing ribbon development along Liverpool Road and the separation of Haydock and Ashton-in-Makerfield through the use of layout, boundary treatments, landscaping areas and other means.**

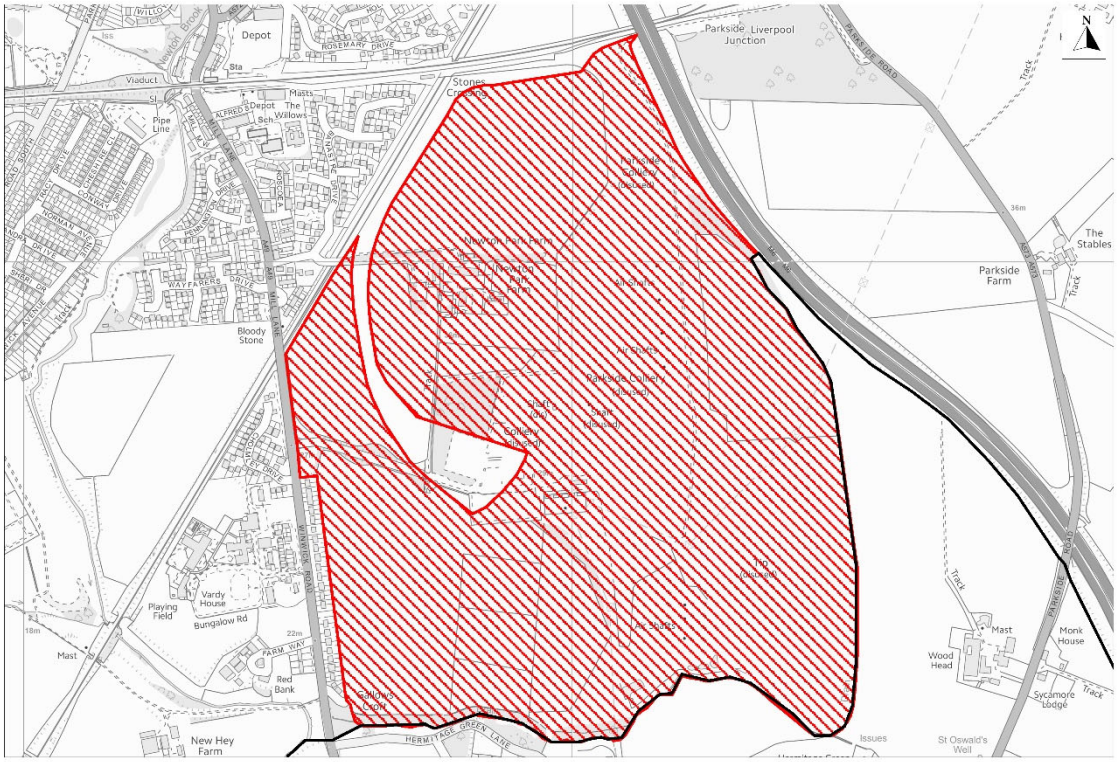
LPSD Ref:	7EA - Parkside East, Newton-le-Willows	Ward:	Newton
Notional Capacity:	64.55ha	Designation:	Allocate



Requirements:

- See Policy LPA10

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



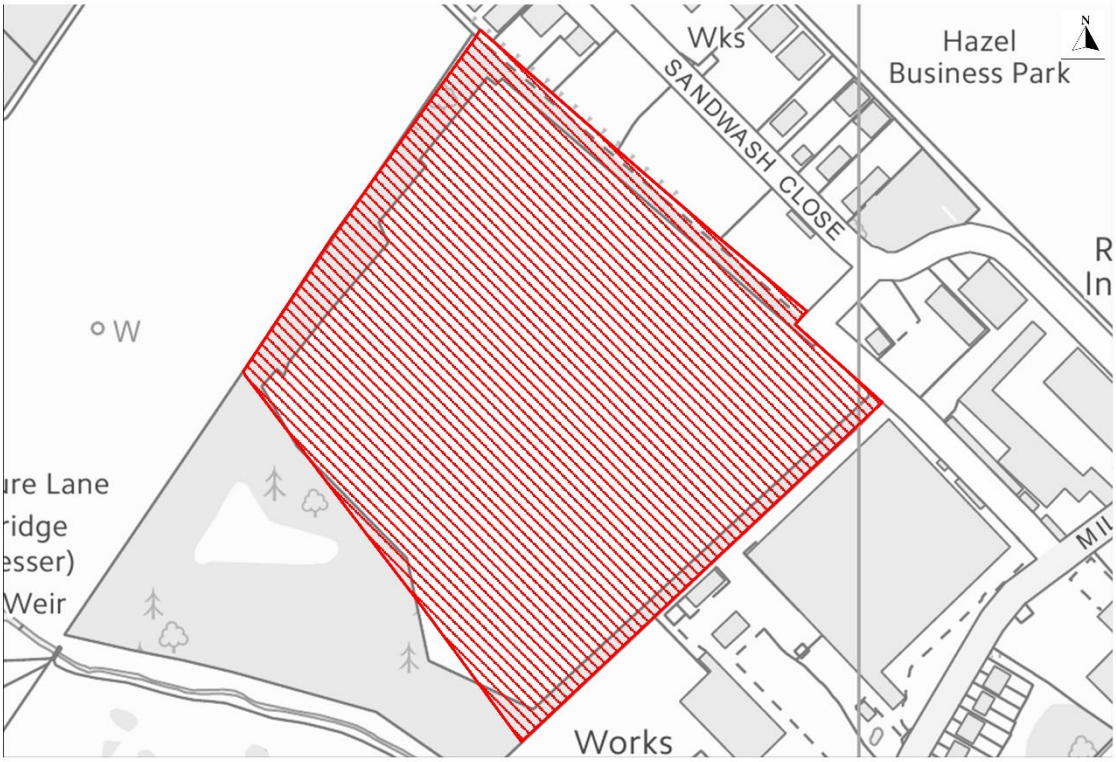
Requirements:

- ~~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.~~

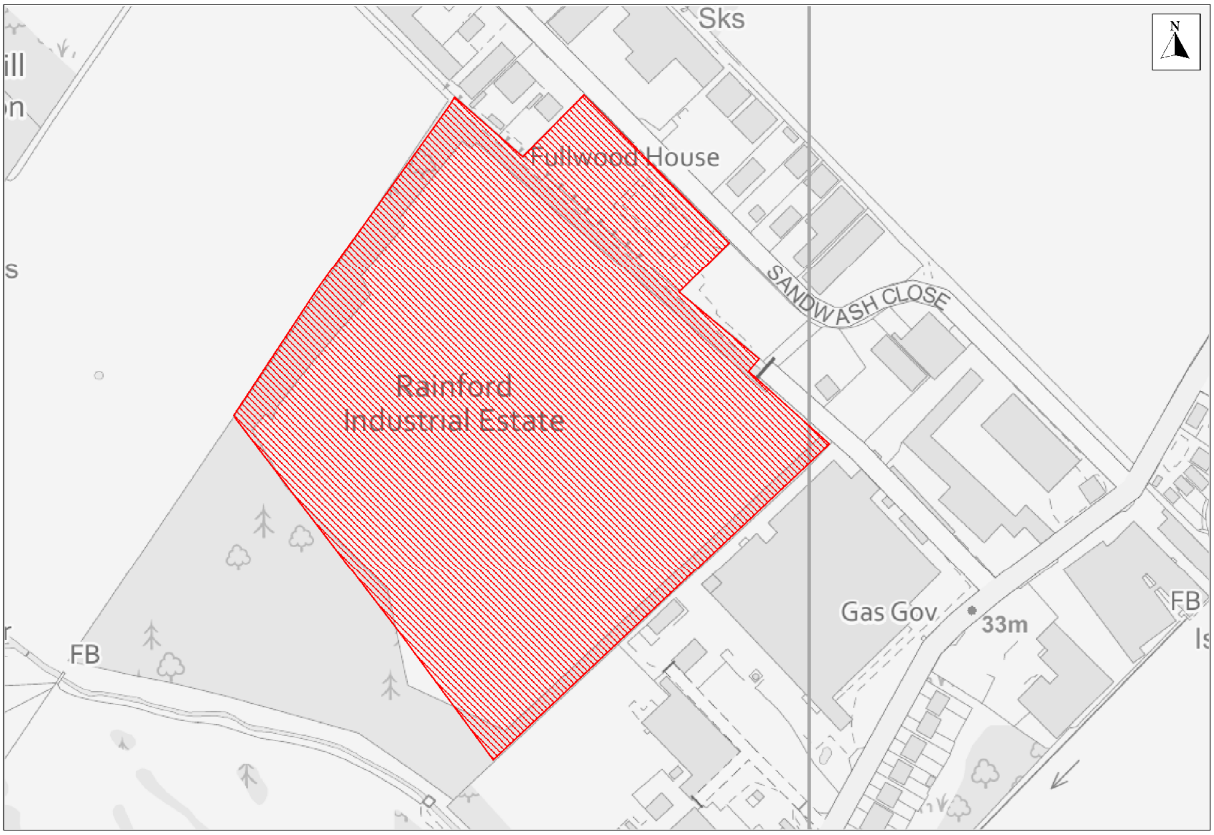
- ~~Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.~~
- ~~The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.~~
- **See Policy LPA12**

LPSD Ref:	9EA - Land to the West of Sandwash Close, Rainford	Ward:	Rainford
Notional Capacity:	~~6.96~~7.70ha	Designation:	Allocate

Site Plan as submitted:



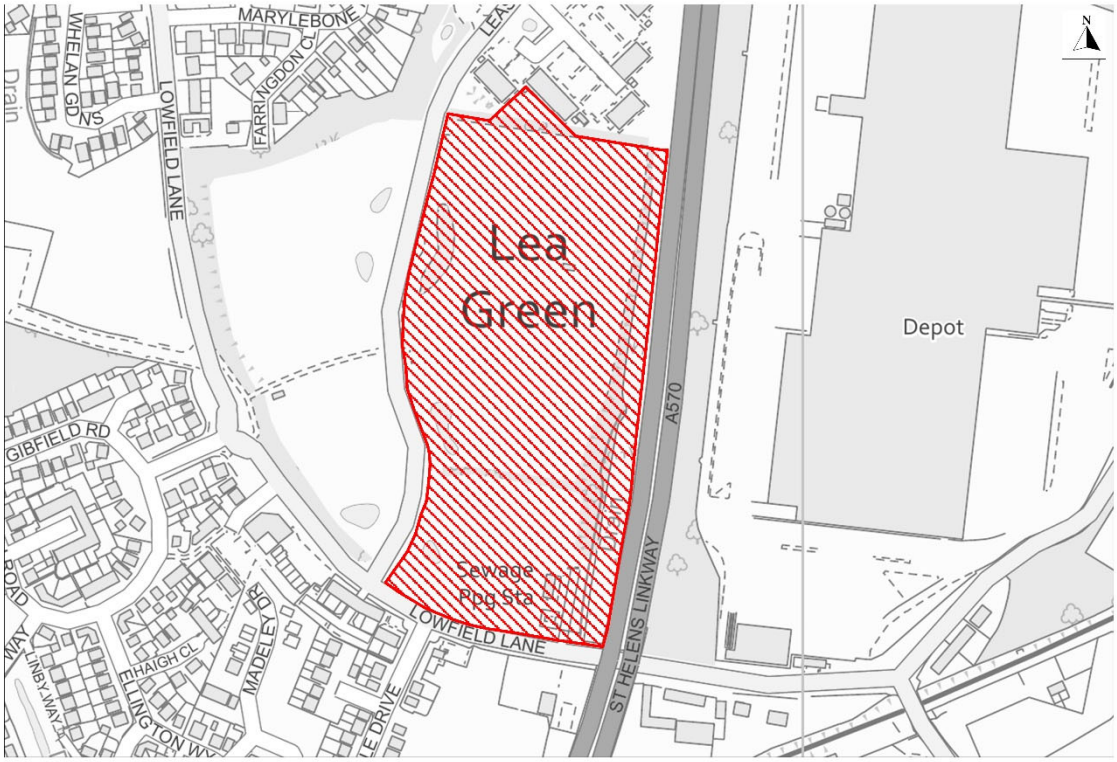
Proposed site changes:



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.~~
- **The development must provide details of trees & landscaping to reduce impact on the landscape and provide effective screening**
- **Safe highway access should be provided including sight splays in accordance with the Manual for Streets**
- **Provision of effective drainage to reduce the risk of surface water flooding**
- **Proposals need to include an effective Travel Plan**

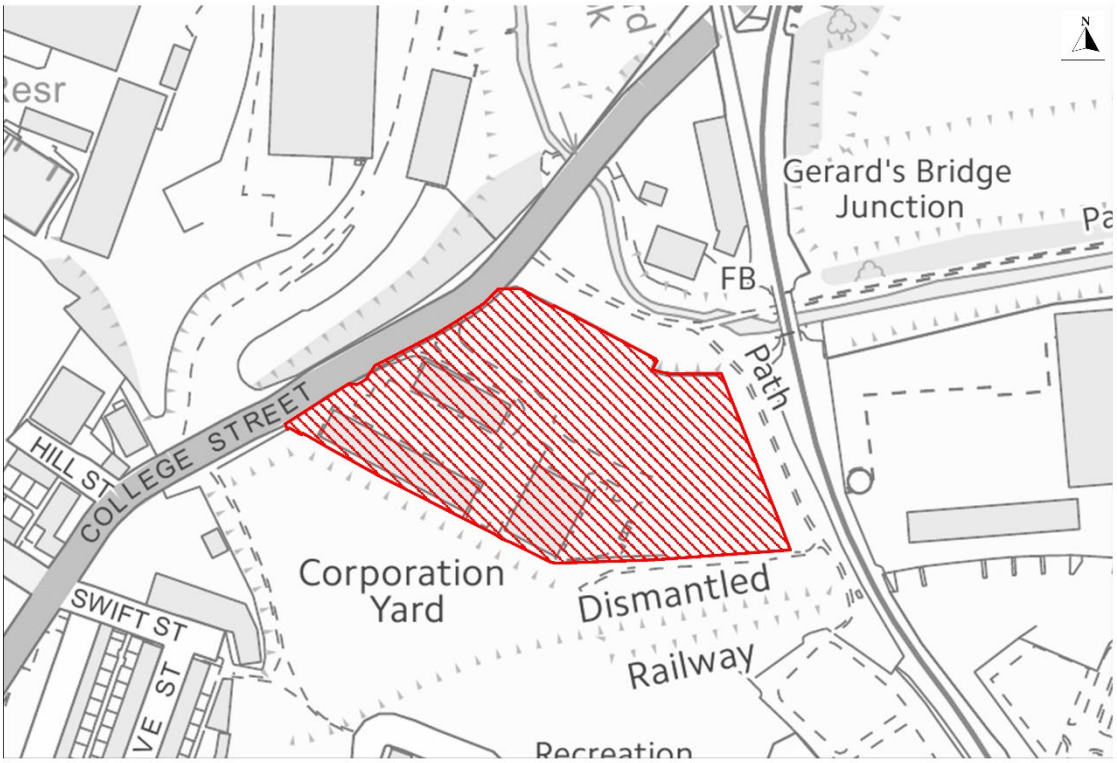
~~LPSD Ref:~~	~~10EA - Land at Lea Green Farm West, Thatto Heath~~	~~Ward:~~	~~Thatto Heath~~
~~Notional Capacity:~~	~~3.84ha~~	~~Designation:~~	~~Allocate~~



~~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.~~

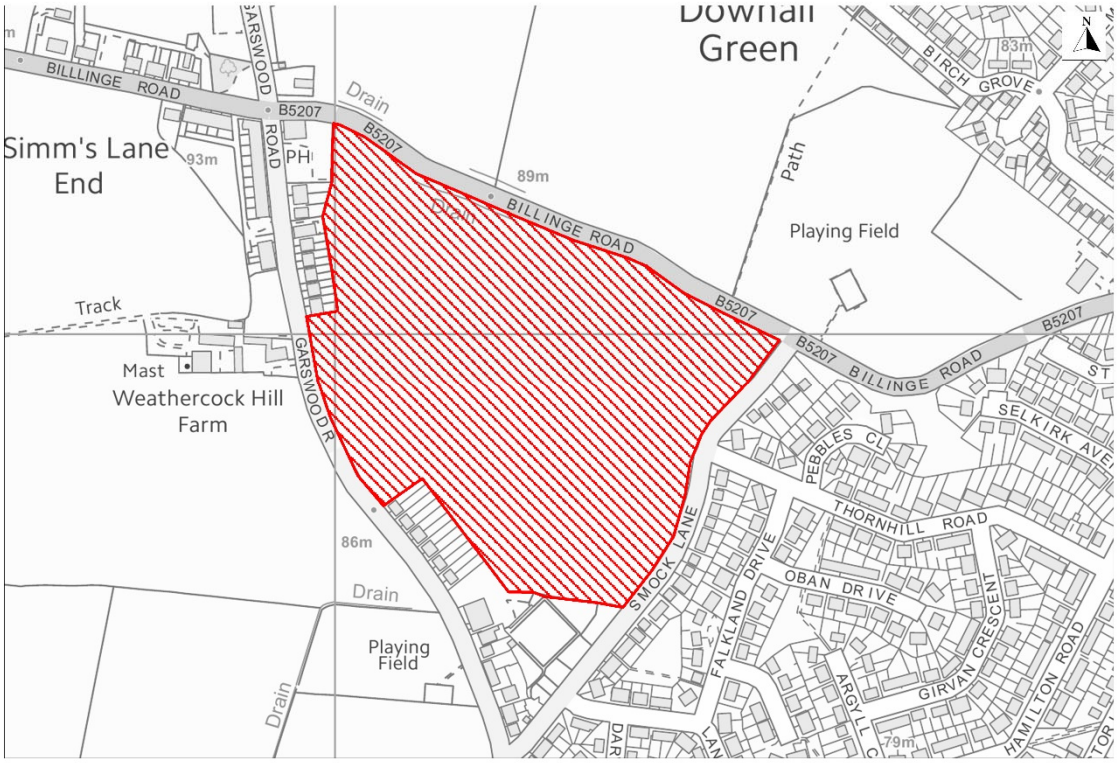
~~LPSD Ref:~~	~~11EA - Land at Gerards Park, College Street, St. Helens Town Centre~~	~~Ward:~~	~~Town Centre~~
~~Notional Capacity:~~	~~0.95ha~~	~~Designation:~~	~~Allocate~~



~~**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.~~

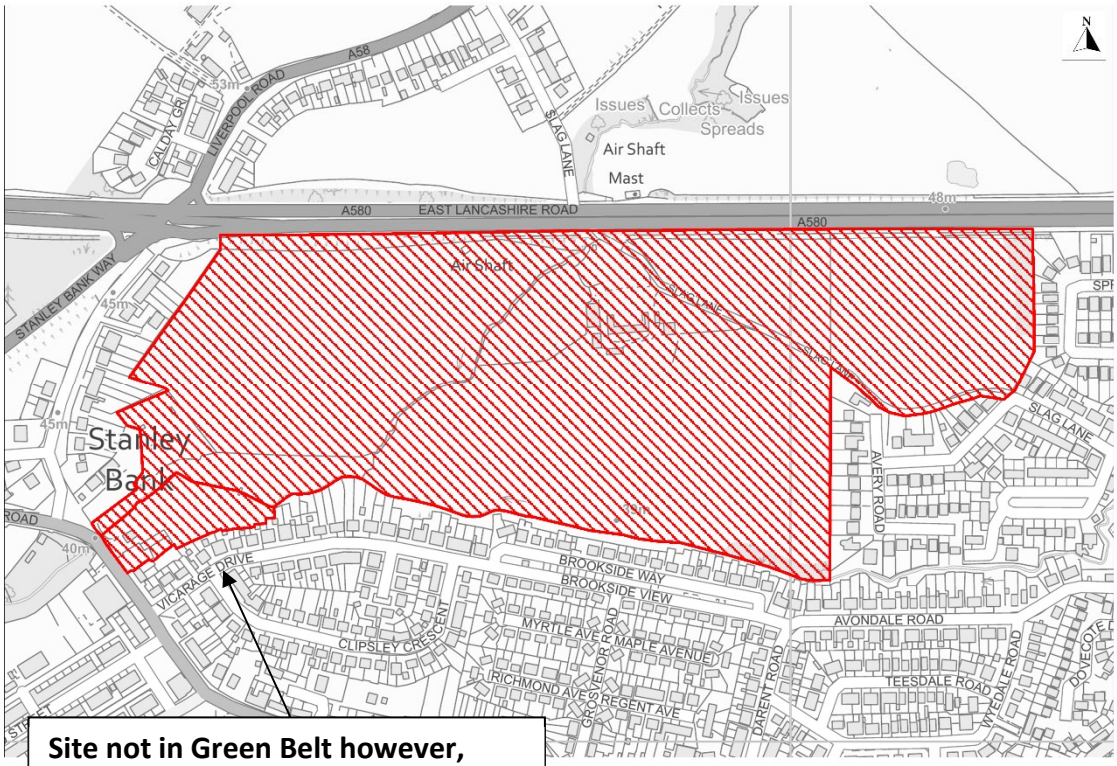
LPSD Ref:	1HA - Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood	Ward:	Billinge & Seneley Green
Notional Capacity:	216 units	Designation:	Allocate



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.~~ **Measures to secure suitable access to the site by walking, cycling and public transport such as: (a) the provision of segregated walking and cycling routes which must run through the site and link to nearby highways; (b) the upgrading of pedestrian footways alongside existing highways around the site; (c) the upgrading of existing bus stops on Garswood Road, Billinge Road and Smock Lane close to the site so that they become fully accessible (including for disabled persons); and (d) a financial contribution towards the upgrading of Garswood station.**
- 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.~~

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

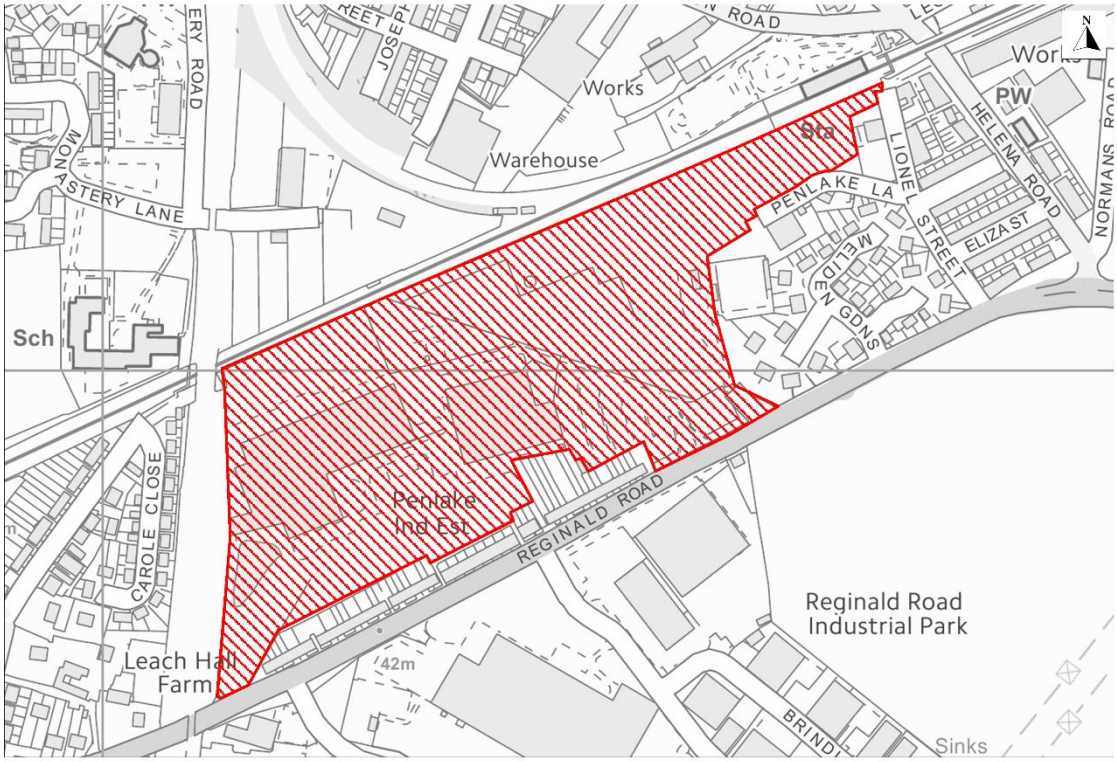


Requirements:

- 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~~. **Measures to secure suitable access to the site by walking, cycling and public transport such as: (a) the provision of segregated walking and cycling routes which must run through the site and link to nearby highways at Haydock Lane (via Slag Lane), Vicarage Road and the A580 East Lancashire Road (to the north east and north west of the site); and (b) the upgrading of existing bus stops on Vicarage Road and Clipsley Lane close to the site so that they become fully accessible (including for disabled persons)**
- 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.~~

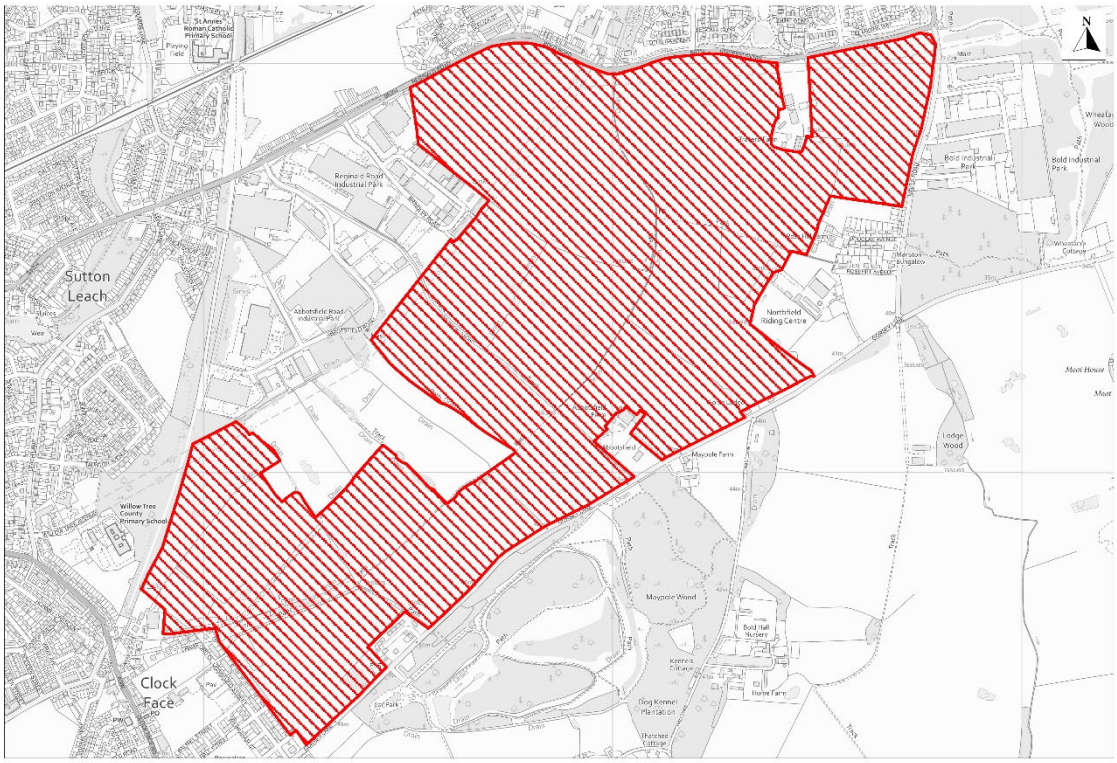
~~LPSD Ref:~~	~~3HA - Former Penlake Industrial Estate, Reginald Road, Bold~~	~~Ward:~~	~~Bold~~
~~Notional Capacity:~~	~~337 units~~	~~Designation:~~	~~Allocate~~



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.~~

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



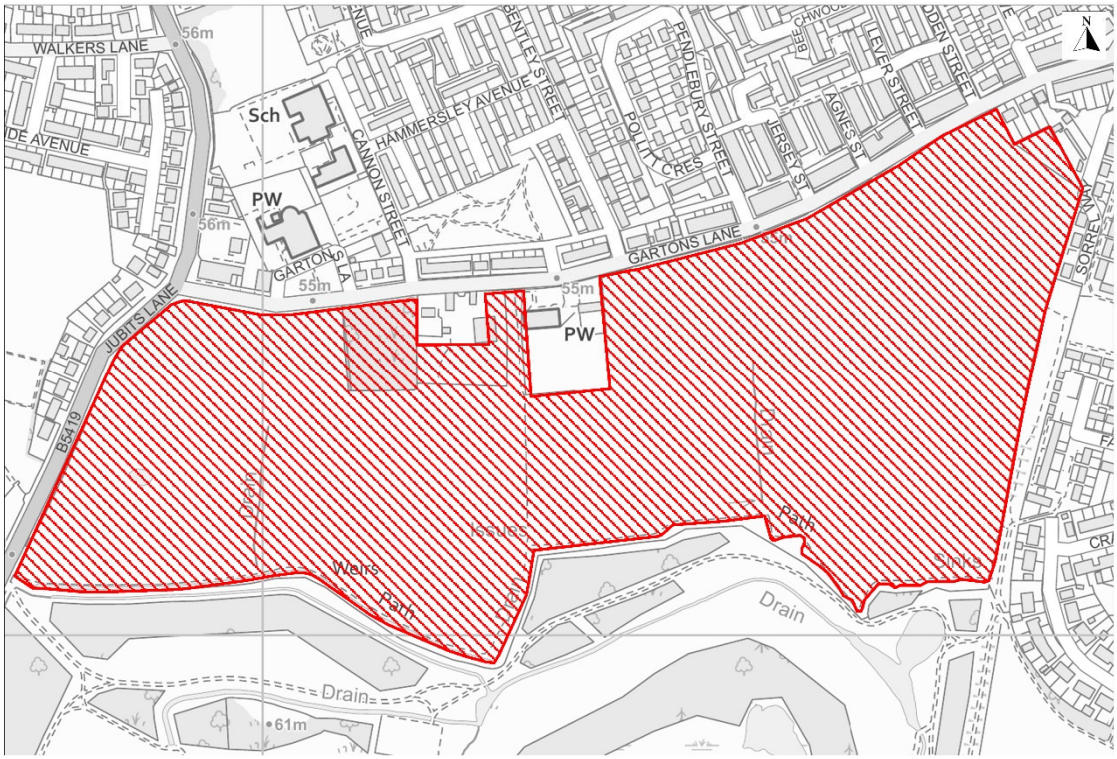
Requirements:

- ~~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.~~
- **See Policy LPA13**

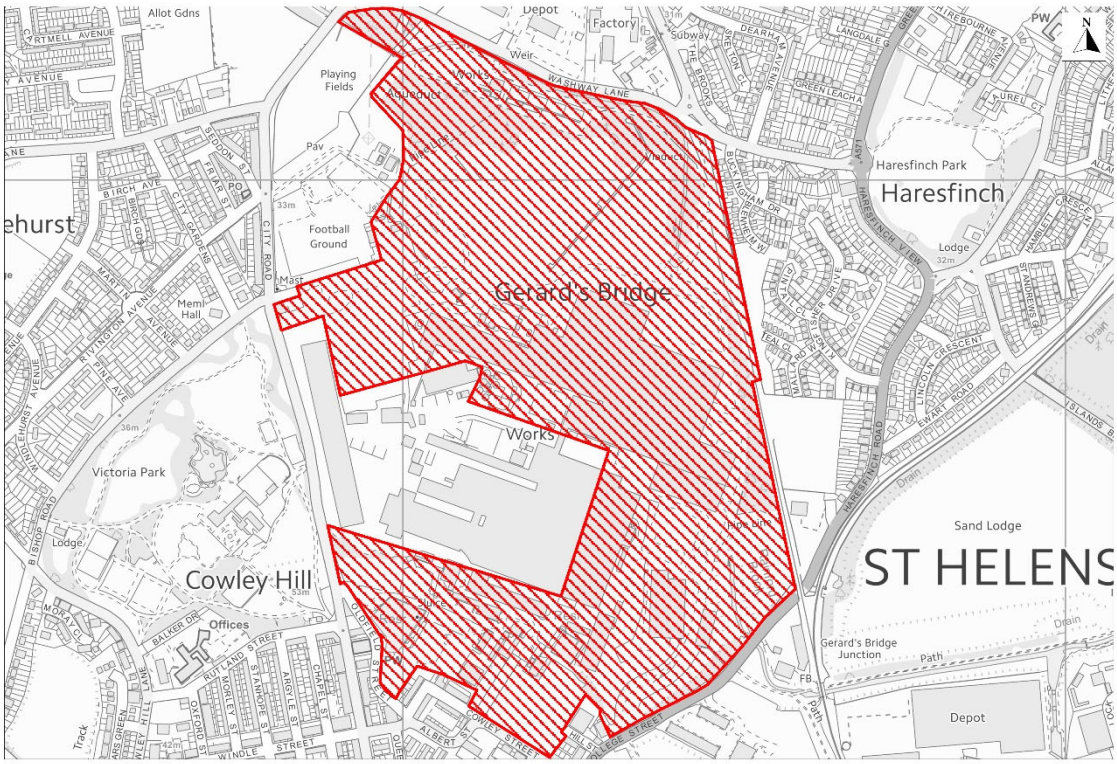
LPSD Ref:	5HA - Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold	Ward:	Bold
Notional Capacity:	569 units	Designation:	Allocate



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 **and the improvement of St Helens Junction and/or Lea Green stations** may be required; ~~this~~**. These and any other requirements** will be subject to further assessment at the master planning stage.

LPSD Ref:	6HA - Land at Cowley Street, Cowley Hill, Town Centre	Ward:	Moss Bank
Notional Capacity:	816 units	Designation:	Allocate



Requirements:

- **<u>The development must provide a permeable layout with a range of highways provided through the site with links</u>** ~~Appropriate highway access should be provided~~ from City Road and College Street (with any necessary off-site improvements). **<u>Any development proposal must also consider the potential to provide a new spine road providing a strategic link to the A580 East Lancashire Road</u>**

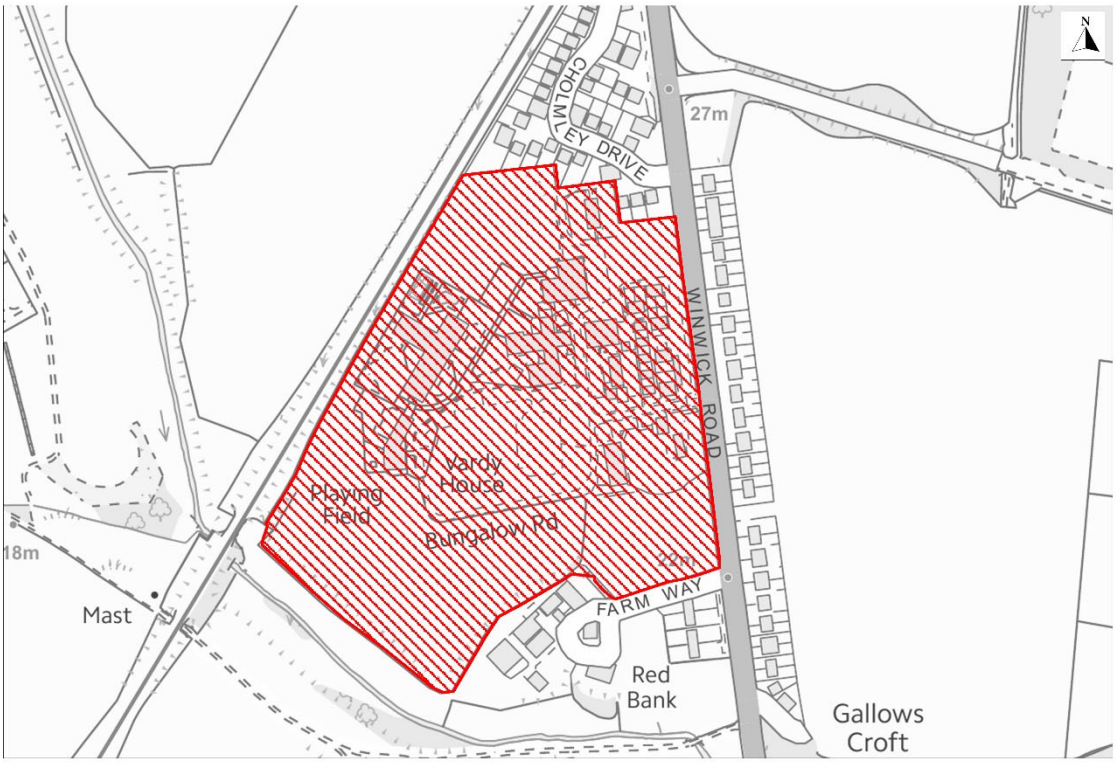
- **<u>The layout must be compatible with the provision of a bus service through the site and linking to St Helens Central rail station. New accessible bus stops should be provided through the site according to Merseytravel's specification, so that none of the new dwellings are more than 400 metres walking distance from a bus stop.</u>**

- **<u>The internal site layout should provide a permeable network for walking and cycling, linking to adopted highway and greenway networks outside the site. As part of this, a</u>** Green corridor, incorporating the **<u>Local Wildlife Site</u>** 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.

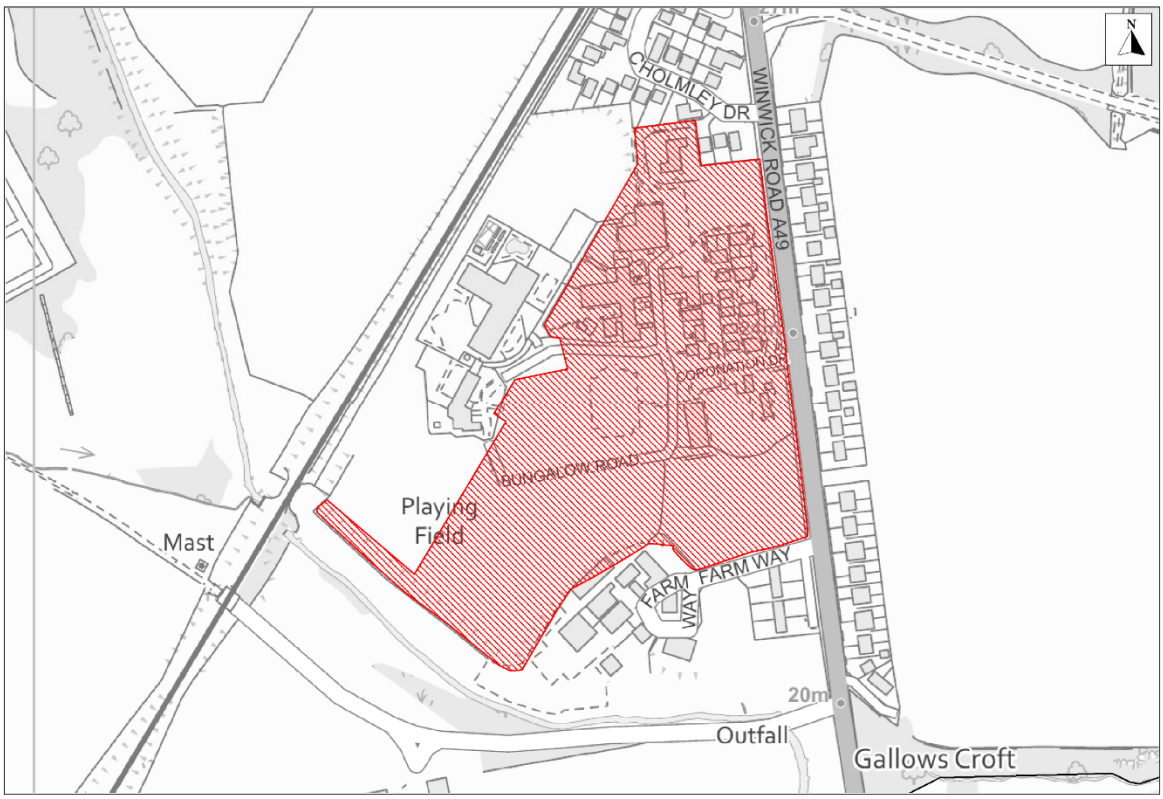
- Measures to ‘slow the flow’ and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 ‘flood Risk and Water Management’.
- The development should include appropriate measures to attenuate noise from the adjacent employment use(s).
- The development area allows for the inclusion of 4ha of ~~B1 employment~~ **Light industrial, offices and research and development** 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.~~

LPSD Ref:	7HA - Land West of the A49 Mill Lane and to the East of the West Coast Mainline Railway Line, Newton-le-Willows	Ward:	Newton
Notional Capacity:	~~181~~140 units	Designation:	Allocate

Policies Map as submitted



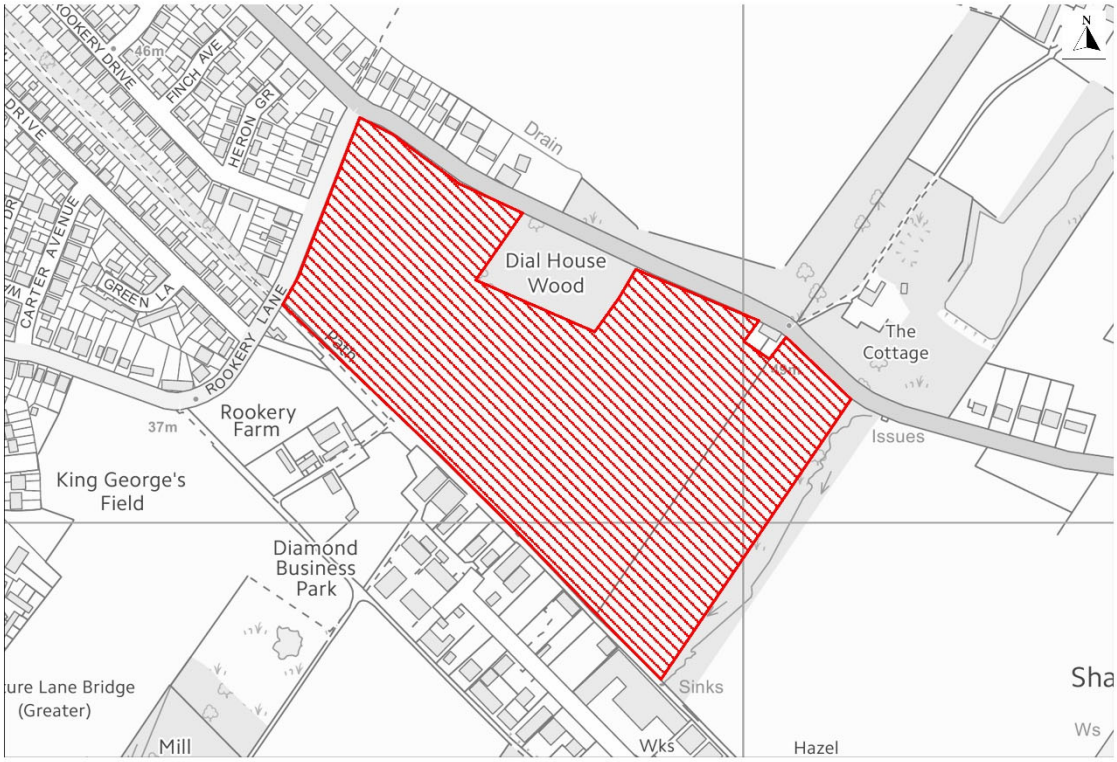
Proposed modification:



Requirements:

- Safe highway access should be provided from Winnick Road (with any necessary off-site improvements).
- **<u>The internal site layout should provide a permeable network for walking and cycling, linking to the external adopted highway and greenway networks.</u>**
- **<u>Accessible bus stops should be provided adjacent to the site according to Merseytravel's specification.</u>**
- 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.~~

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

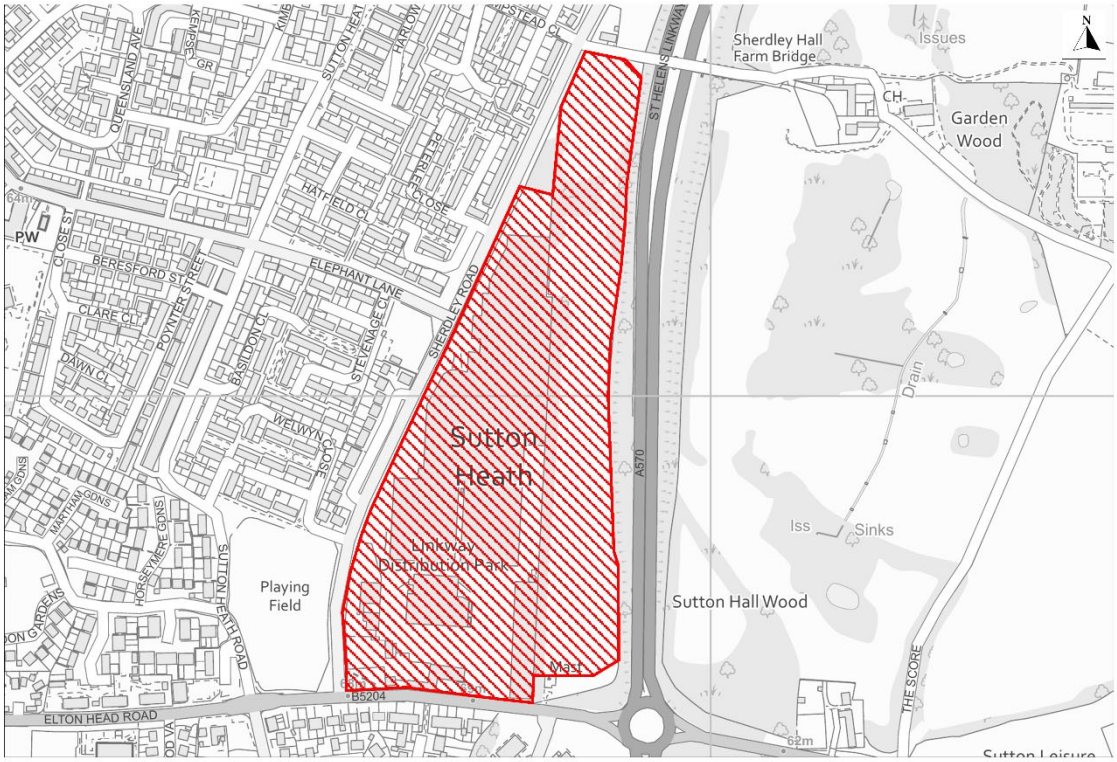


Requirements:

- Safe highway access should be provided from both Rookery Lane and Higher Lane (with any necessary off-site improvements).
- **<u>The internal site layout should provide a permeable network for walking and cycling, linking to the external adopted highway and greenway networks. This shall include the provision of pedestrian and cycleway access to and along Rainford Linear Park and to public right of way 831.</u>**
- **<u>Accessible bus stops should be provided adjacent to the site according to Merseytravel's specification.</u>**
- 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.~~

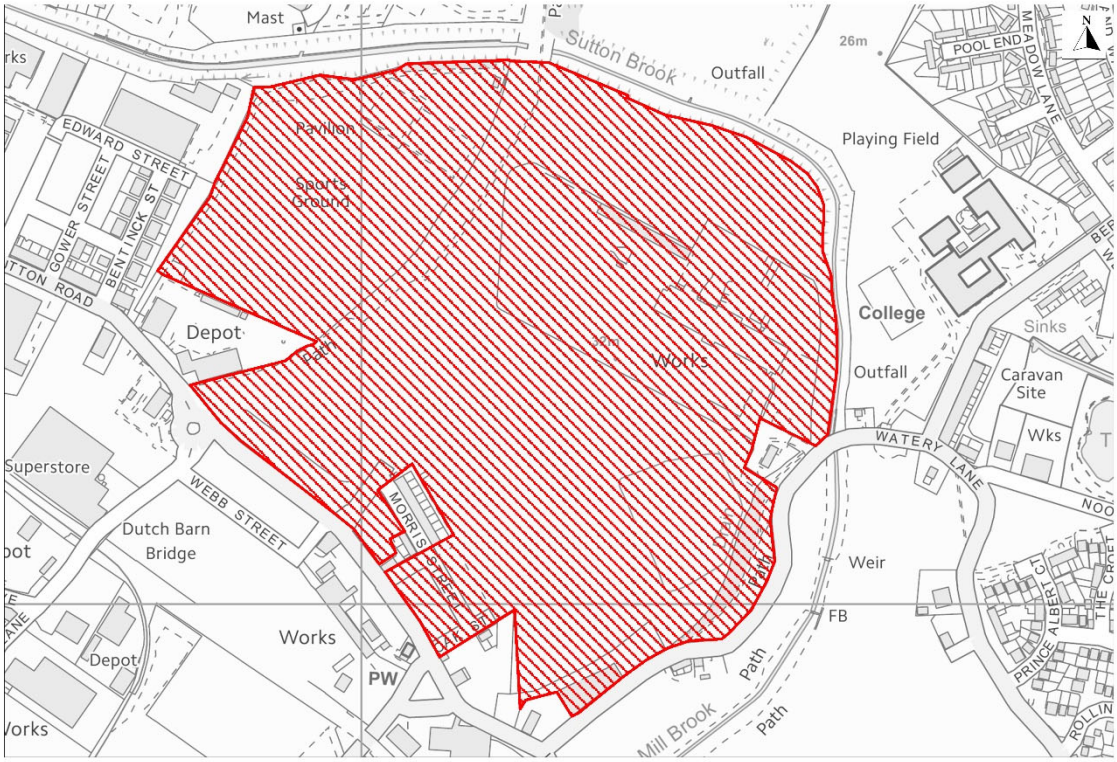
LPSD Ref:	9HA - Land at former Linkway Distribution Park, Elton Head Road, Thatto Heath	Ward:	Thatto Heath
Notional Capacity:	350 units	Designation:	Allocate



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.~~
- **Development should address any contamination issues and/or other geo-technical issues affecting the site.**
- **Existing protected trees within the site should be given due consideration in line with Policy LPC10.**
- **Appropriate consideration of archaeological finds prior to commencement on site must be given, including a watching brief during construction.**
- **Scheme required for intrusive site investigations relating for mine entry and the carry out of those works.**

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



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.
- **The layout must be compatible with the provision of a bus service through the site. New accessible bus stops should be provided through the site according to Merseytravel's specification, so that none of the new dwellings are more than 400 metres walking distance from a bus stop.** ~~Suitable measures will be required to ensure accessibility through the site by bus.~~
- **The internal site layout should provide a permeable network for walking and cycling, linking to adopted highway and greenway networks outside the site. This shall include the provision of links to and along the Sutton Brook greenway.**
- **The implementation of any other measures necessary to promote sustainable transport or other infrastructure provision, in accordance with policies LPA07 and LPA08.**
- 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).

Annex 2

Updated LPSD Appendix 7 site profiles.

Appendix 7: Site Profiles – Safeguarded Employment and Housing Sites

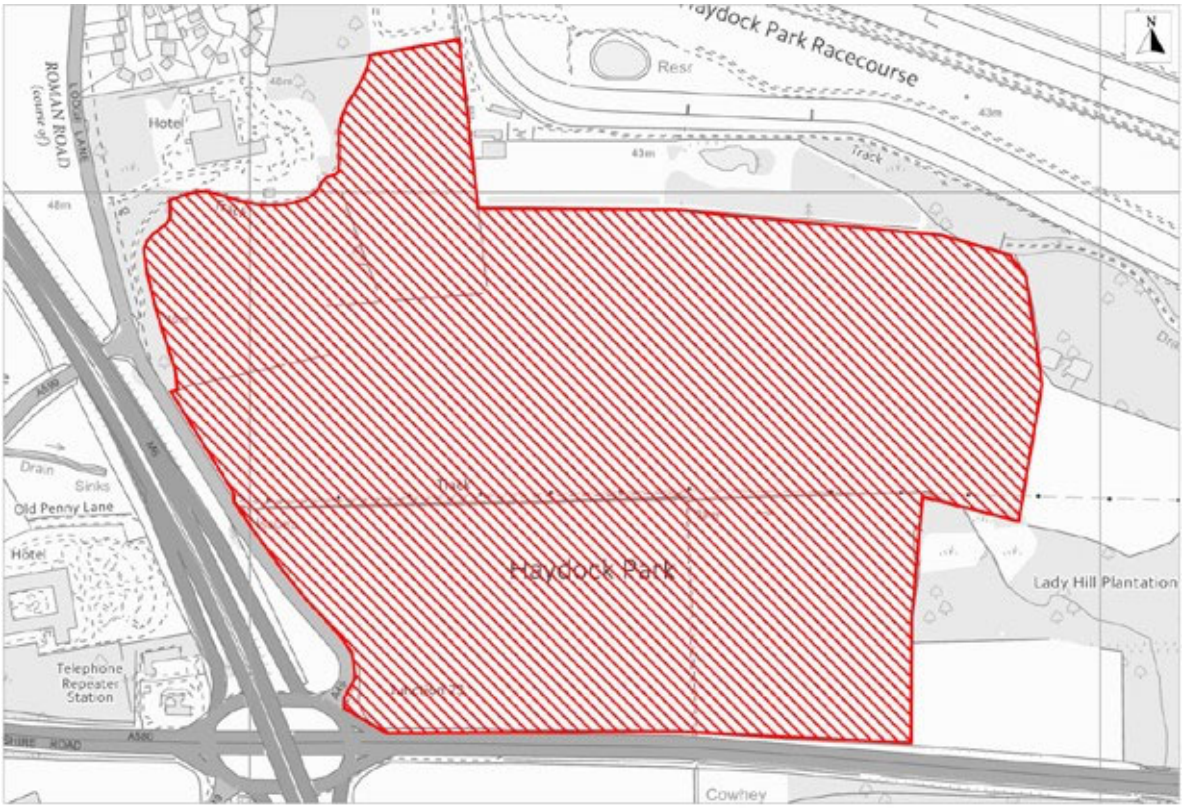
[Please note: the **sites listed in this appendix are not allocated for development within the Plan period. The** requirements set out for each site in this appendix are in addition to any others that ~~are needed to comply with Plan policies~~ **may apply to a future development proposal at the time** e.g., in relation to infrastructure provision]

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

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 **and other sustainable modes** from residential areas in St Helens and Warrington.

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



Requirements:

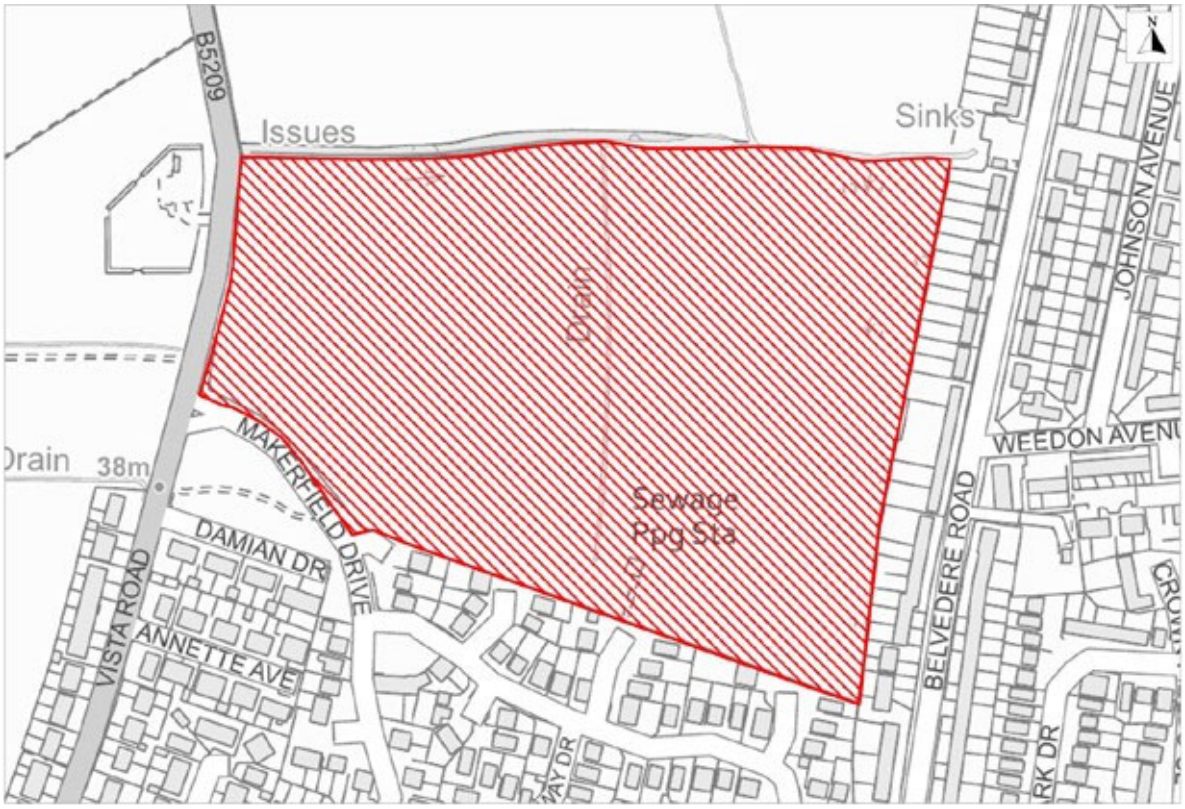
- Appropriate highway access should be provided via the A580 (East LancashireRoad).
- Developers must liaise with Highways England and St. Helens Council to identify anddeliver any enhancement work required to M6 Junction 23 to mitigate any impacts from the proposed development.
- ~~Opportunities to provide improved bus services and pedestrian and cycle links fromresidential areas in St. Helens to the site should be delivered if practicable.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes from residential areas in St Helens, Wigan, and Warrington.**
- **Appropriate landscape mitigation measures must be provided to ensure landscape harm is minimised to an acceptable degree.**

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

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.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**
- Provision of effective flood management measures to reduce the risk of flooding.
- ~~Appropriate provision of open space must be included in accordance with PolicyLPC05 and LPD03.~~
- ~~The design and layout should provide for a range of house types in accordance withPolicy LPC01 and LPC02.~~
- The ground conditions are unknown, although historic mineshafts are recorded withinthe sub-parcel, so further investigation is required.

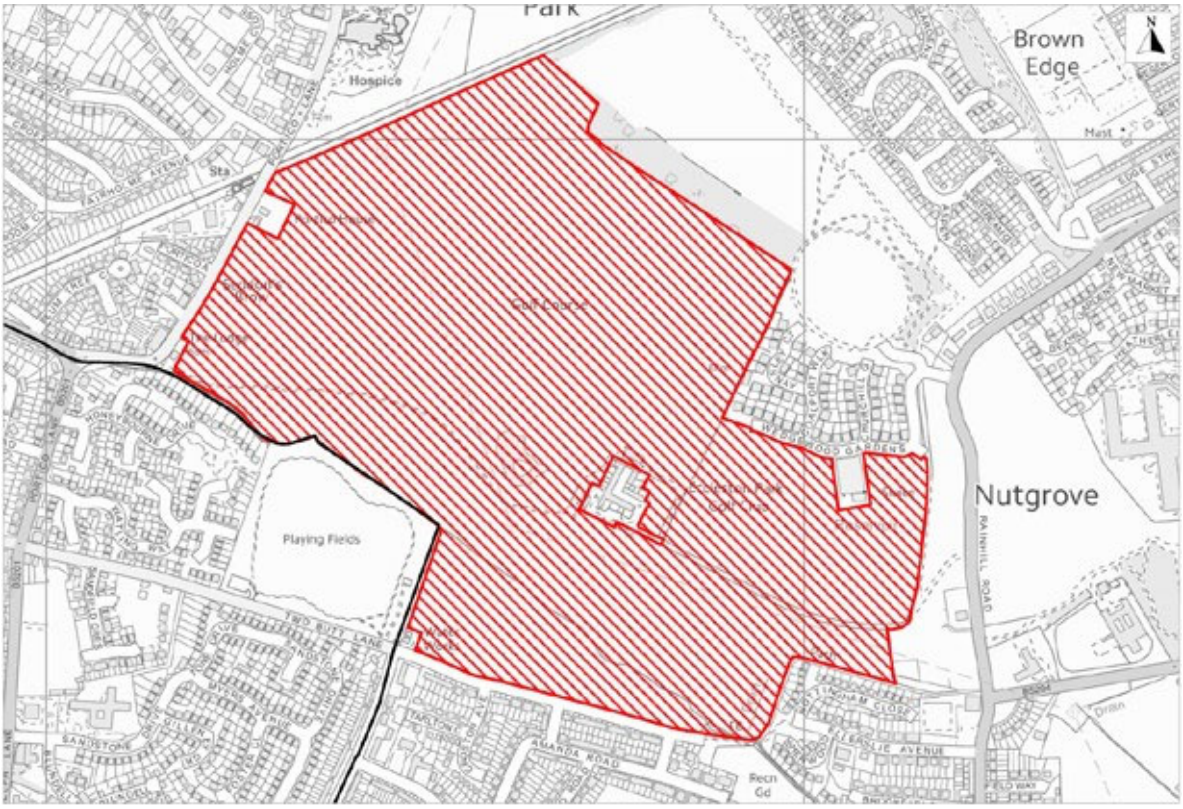
LPSD Ref:	2HS - Land between Vista Road and Belvedere Road, Earlestown	Ward:	Earlestown
Notional Capacity:	178 units	Designation:	Safeguard



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 withdue consideration to be given to the existing UU pumping station.
- ~~Appropriate provision of open space must be included in accordance with PolicyLPC05 and LPD03.~~
- ~~The design and layout should provide for a range of house types in accordance withPolicy LPC01 and LPC02.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

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



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 numberof 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;~~

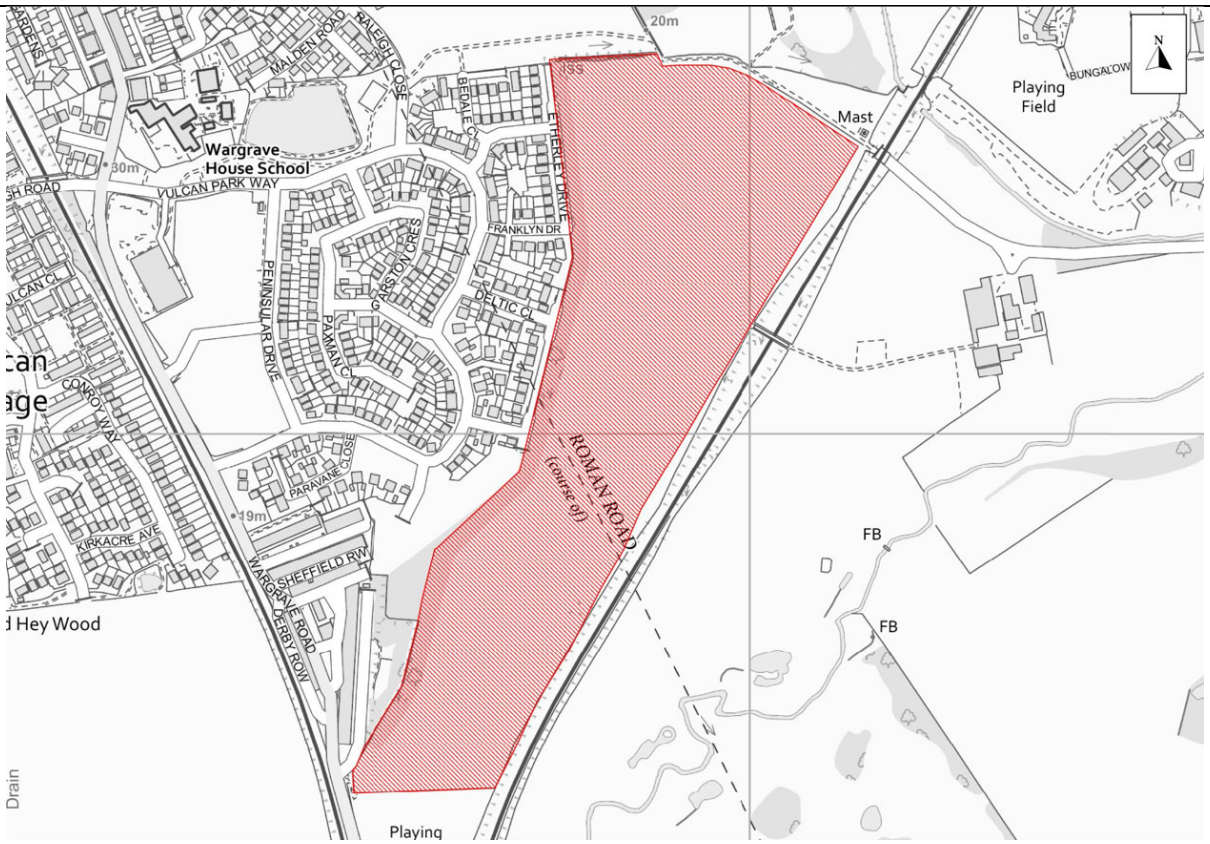
~~thiswill be subject to further assessment at the master planning stage.~~

- 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.
- **Any other measures needed to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

LPSD Ref:	4HS - Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	Ward:	Newton
Notional Capacity:	~~256~~355 units	Designation:	Safeguard

Policies Map as submitted

Proposed modification:



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 **railway line**.
- ~~Appropriate provision of open space must be included in accordance with PolicyLPC05 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 withPolicy LPC01 and LPC02.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

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

Requirements:

- Safe highway access should be provided from the A49 (Mill Lane), (with anynecessary off-site improvements).
- Appropriate noise attenuation measures, including buffers, should be incorporated toprotect 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 PolicyLPC05 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 withPolicy LPC01 and LPC02.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the**

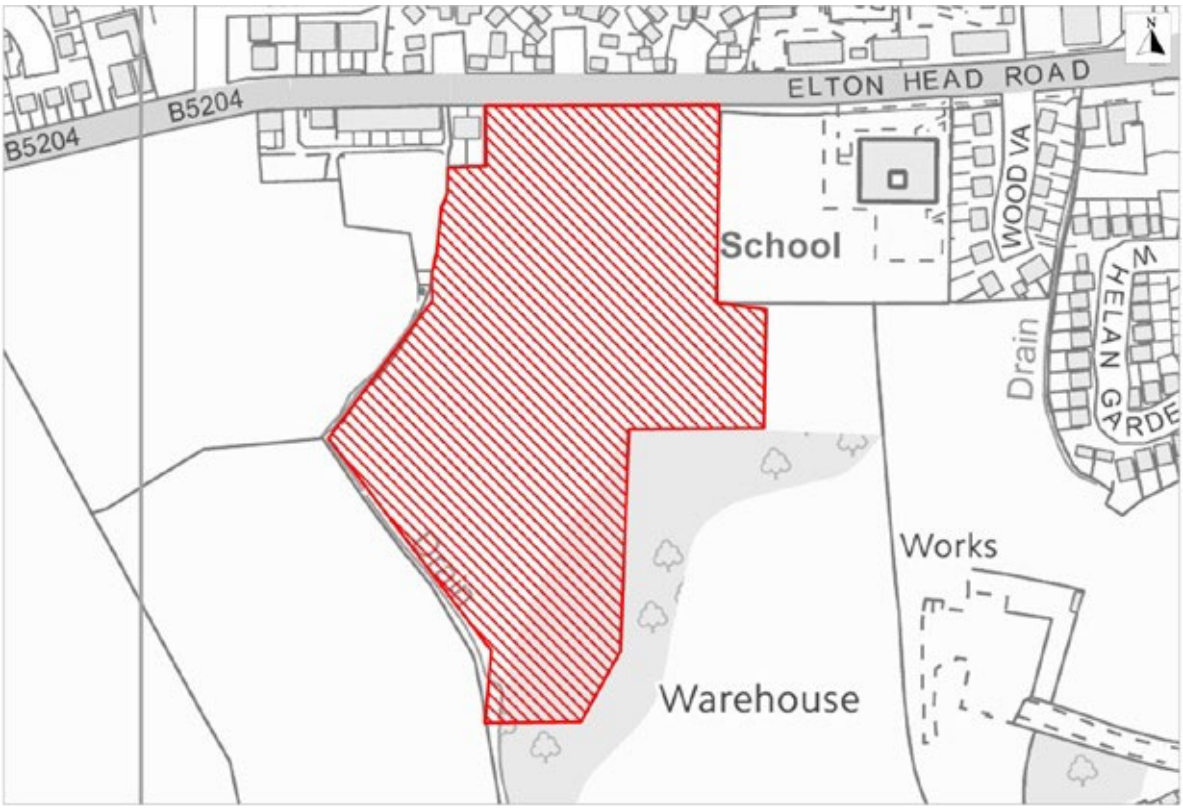
surrounding area.

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

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 PolicyLPC05 and LPD03.~~
- Appropriate buffers should be provided from the proposed site and adjacent woodlandand LWS (Pendlebury Brook).
- ~~The design and layout should provide for a range of house types in accordance withPolicy LPC01 and LPC02.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

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



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 PolicyLPC05 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 withPolicy LPC01 and LPC02.~~
- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

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

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 must 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.

- **Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health, and other services in the surrounding area.**

Annex 3

Update of Table 4.6 of the LPSD, and to represent the position up to 2037.

Table 5.2: Residual Housing Land Requirement 2021-2037

Requirement	Dwellings
St. Helens housing requirement (21 years from 1 Apr 2016 to 31 Mar 2037) at average of 486 per year	10,206
Net Completions from 1 April 2016- 31 March 2021	3074
Residual requirement over Local Plan period from 1 April 2021 to 31 March 2037	**7132**

Table 5.3: SHLAA Housing Land Supply 2021-2037

SHLAA Supply 2021 – 2037 (as of 31.03.2021)	Dwellings
Total SHLAA supply– 1 April 2021 until 31 March 2037 (including non-Green Belt Local Plan allocation sites 6HA, 9HA and 10HA)	4626
SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-16 of the Plan period including non-Green Belt Local Plan allocation sites 6HA,9HA and 10HA) (2957 -15%)	-444
Residual SHLAA capacity over 16 year Plan period 1 April 2021 - 31 March 2037 (including non-Green Belt Local Plan allocation sites 6HA, 9HA and 10HA)	4182
Small sites allowance (93dpa) x 16 years (sites below 0.25ha / 5 dwellings)	1488
Total Plan period capacity on non-Green Belt land	**5670**

Table 5.4: Green Belt Land Supply 2021-2037

Green Belt Land Supply 2021-2037	Dwellings
Required capacity to be found on Green Belt land (7132-5670)	1462
20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g., infrastructure provision, delays, lead-in times tostart of housing delivery etc.)	292
Overall required capacity of sites to be removed from the Green Belt	1754
Total Plan period capacity of allocated sites removed from the GreenBelt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA)	**2114**

Table 5.5: Total Supply over the Plan Period 2021-2037

Total Supply over the Plan Period 2021-2037	Dwellings
Total Plan period capacity on non-Green Belt land	5670
Total Plan period capacity of allocated Green Belt sites	2114
Total housing supply over Plan period (2021-2037)	**7784**

Annex 4

Local Plan 5 Year Supply Position 31.03.2021

Local Plan 5 Year Housing Requirement	
Local Plan Annual Housing Requirement	486
Local Plan Housing Requirement 2016-2037 (486x21)	10206
Net Completions 2016-2021	3074
Local Plan Residual Housing Requirement 2021-2037 (10206-3074)	7132
Local Plan Residual Annual Housing Requirement 2021-2037 (7132/16)	446
Local Plan Housing Requirement 2021 - 2026 (446 x 5)	2230
Local Plan Housing Requirement 2021 - 2026 (5% buffer applied)	2342
Annualised Housing Requirement (2342/5)	468

Local Plan 5 year supply as of 31.03.2021	
Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	475
Large sites - planning permission under construction (including SHLAA 2017 and new large sites with planning permission and under construction)	605
Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that has now expired)	208
Local Plan Allocations (including those previously counted as SHLAA sites, 6HA, 9HA and 10HA)	635
Small sites allowance (93 x 5)	465
5 year supply	2388
Number of years supply of deliverable housing land (2388/468)	5.1

Annex 5

Update of Table 4.4 of the LPSD, and to represent the position up to 2037.

Table 4.4 Residual Employment Land Requirement 2021-2037 (as of 31.03.2021)

Requirement	Hectares
Local Plan OAN 2012-2037 including 5 year buffer and allowance for Parkside SRFI and SuperPort	**239**
Take-up between 1 April 2012 and 31 March 2021 (includes completions at Florida Farm, Slag Lane Haydock, Land North of Penny Lane, Haydock, and Land at Lea Green Farm West, Thatto Heath)	**60.77**
Existing Supply of Deliverable Employment Land including allocations under construction currently (31 Mar 2021) **(This is made up of Land North of Kilbuck Lane (3.46ha), Pilkingtons Cowley Hill Site (0.58ha) and Gerards Park, College Street, St Helens Town Centre, site allocation 11EA (0.95ha))**	**4.99**
Total Residual Requirement 2021-2037	**173.24**
Supply from remaining allocations to meet the St Helens residual requirement (from sites 4EA, 5EA, 6EA, 7EA, 8EA and 9EA)	**182.31**

Annex 6

Updated LPSD Appendix 4 - Monitoring Framework

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
~~**LPA01 - Presumption in Favour of Sustainable Development**~~	~~All Local Plan indicators~~	~~St. Helens Authority Monitoring Report (AMR)~~	~~Delivery of sustainable development.~~	~~Failure to deliver a coherent, implementable strategy to facilitate progress towards sustainable development.~~	~~Review of Local Plan.~~
LPA02 - Spatial Strategy	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 strategic locations.	Failure to deliver the quantity and distribution of development proposed by the Local Plan	Review of land identified for development. ~~Review~~ **Update** of Local Plan.
	~~Percentage of housing completions on brownfield sites~~	~~Annual SHBC house completion survey.~~	~~No target set~~	~~Not yet determined~~	~~Review of Local Plan policies.~~
LPA03 - Development Principles	All Local Plan indicators	St Helens Authority Monitoring Report (AMR)	Delivery of sustainable development.	Failure to deliver a coherent, implementable strategy to facilitate progress towards sustainable development	Review of Local Plan policies.
LPA04 - A Strong & Sustainable Economy	Employment land **take-up** ~~available~~ per annum by type	St Helens Authority Monitoring Report (AMR)	~~Monitor provision of new~~ **Take-up of** employment land by type on a yearly basis	Cumulative take up of allocated employment land for employment development	Where take up of allocated employment land for employment development is higher than expected,

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
			as anticipated in the Plan.	less than 50% of the expected pro-rata amount, or more than 150% of the expected pro-rata amount.	consider **update** ~~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 businesses	SHBC employment monitoring	Increase on previous years	Decrease over the Plan period	Review of Local Plan policies.
	~~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~~
LPA04.1 - Strategic Employment Sites	~~**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 masterplans submitted	**Development management processes**	**Every planning application for an allocated Strategic Employment Site should be accompanied by a masterplan.**	**Planning applications determined without the prescribed information.**	**Review how the policy is being applied; consider whether the policy needs to be updated.**

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
LPA05 - Meeting St Helens' Housing Needs	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~~ **Net** 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 2020-2037~~5~~ 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. **Failure to meet the requirement of housing delivery in national policy, including the Housing Delivery Test, or any subsequent tests that may replace it.**	Prepare and publish an action plan setting out key reasons for the situation and actions the Council and other parties need to take. **Implement the required actions set down in national policy when not meeting the required levels of housing delivery.** **See below actions that could be implemented in relation to the 5 year housing land supply.**
	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,	30dph or more (dependent on location) dwellings not achieved on completed sites, using a net developable site area of	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

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
			Earlestown Town Centre and on the edge of these centres.	75% of the site area.	met; if the policy has been applied accurately to the permissions which led to the trigger being applied, consider whether the policy needs to be **updated** ~~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.	**Consideration of the barriers to delivery of sites after permission is granted and working with partners to overcome them.** **Consideration of whether sufficient planning permissions are being granted (and within statutory time limits).** **Seek to maintain an appropriate mix of sites to sustain delivery.** **Use proactive pre-application process to speed up the application process.** **Seek funding to unlock brownfield sites to boost the housing supply.**

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
					Consider **the need for an** early ~~review~~ **update** of the Local Plan **if there is long-term underperformance against the 5 year supply, or if the housing land supply position falls significantly below the required level.**
LPA05.1 - Strategic Housing Sites	**Number of dwellings granted planning consent and delivered on strategic housing sites**	**Housing monitoring**	**Delivery of strategic sites in accordance with the housing trajectory**	**Number of dwellings completed on strategic sites falls below 75% of target**	**Consideration of the barriers to delivery of sites after permission is granted and working with partners to overcome them.** **Use proactive pre-application process to speed up the application process.** **Consider the mix of homes on site to drive** **Consider early update of the Local Plan if there is significant under-delivery on the strategic sites.**
LPA06 - Safeguarded Land	Number and extent of planning applications approved on	Development management processes	Zero	~~10% (or more) of land~~ Safeguarded land granted planning	Consider early **update** ~~review~~ of the Local Plan as actioned for Policies LPA04,

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	land safeguarded for post-203**7**~~5~~			consent for built development or a f**ailure to deliver sufficient employment or housing land**	LPA04.1, LPA05 and ~~LPA04.1~~ **LPA05.1**
LPA07 - Transport and Travel	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 **updated** ~~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 transport infrastructure and services	St Helens Council, Merseytravel	All new sites allocated for development should have easy access to public transport.	Any allocated sites developed with no access to public transport.	Review how the policy is being applied and how external providers are consulted and what (if any) obstacles are in the way of providing public transport that can be overcome.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	~~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 see~~s~~ 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.
LPA08 - Infrastructure Delivery and Funding	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 **update** ~~review~~ of Local Plan policy.
	Number of planning applications amended on economic viability grounds	St. Helens Council, Development management processes	None – due regard should be made at application stage on the ability of development proposals to support the required level of developer contributions	Planning applications amended due to economic viability	Review how the policy is being applied and considers any means that exist within the Local Plan to prevent this, potential **update** ~~review~~ of Local Plan policies.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	~~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~~
LPA09 - Green Infrastructure	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**; consider whether the policy needs to be updated.**
	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~~ **Review how the policy and updated Nature Conservation SPD is being applied. Initiate any updates necessary to the policy and SPD.**
	~~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.~~

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
LPA10 - Parkside East	**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 East for employment purposes by the end of the Plan period in accordance with the provisions of Policy LPA10**	**Progress stalled to the extent that minimal implementation can be expected prior to 2037**	**Work with site promoters and other partners to overcome any potential identified issues and speed up delivery** **Longer term non-implementation to lead to update of Local Plan policy**
LPA11 - Health and Wellbeing	~~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~~ **See the indicators for Policies LPA04, LPA04.1, LPA05, LPA05.1, LPC05, LPD03 and LPD10**	~~Development management records; Sport England; NHS, public health records, 2021 Census~~ **See the data sources for Policies LPA04, LPA04.1, LPA05, LPA05.1, LPC05, LPD03 and LPD10**	~~A decline in lifestyle related illness, and in average years-of-life-lost.~~ **See the targets for Policies LPA04, LPA04.1, LPA05, LPA05.1, LPC05, LPD03 and LPD10**	~~Decline in health of wider population or increases in health and well-being that are less than significant.~~ **See the triggers for action for Policies LPA04, LPA04.1, LPA05, LPA05.1, LPC05, LPD03 and LPD10**	~~To be determined~~ **See the potential actions for contingency for Policies LPA04, LPA04.1, LPA05, LPA05.1, LPC05, LPD03 and LPD10**
LPA12 – Parkside West	**Substantial progress towards site development, e.g. completion of**	**Development Management process; reports considered by Members;**	**Site is complete and operational by end of the Plan period (2037);**	**Progress stalled to the extent that site will unlikely be delivered by**	**Work with site promoter and other partners to overcome any potential identified issues**

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	a site masterplan; agreed timescale for implementation; planning application process; works commencing on site	employment monitoring data	Necessary infrastructure (including the Parkside Link Road) has been delivered to enable delivery of the site	2037 (including due to the non-delivery of identified essential infrastructure)	(including infrastructure provision) and speed up delivery. Longer term non-implementation to lead to update of Local Plan policy.
LPA13 – Bold Forest Garden Suburb	Substantial progress towards site development, e.g. progress on preparation of a site masterplan and / or Supplementary Planning Document; agreed timescale for implementation; planning application process; works commencing on site	Development Management process; reports considered by Members; housing monitoring data; SPDs produced	Development of the site commences within the Plan period in accordance with the housing trajectory and delivers at the rate envisaged within it.	Progress stalled to the extent that the site will unlikely be delivered in accordance with the housing trajectory, and that this will adversely impact on the overall rate of housing delivery anticipated over the Plan period.	Work with site promoters and other partners to overcome any potential identified issues and speed up delivery. Use of proactive pre-application process to speed up the application process. Dedicated Development Management resource to efficiently manage the planning application processes for the site and effectively troubleshoot issues. Longer term non-implementation to lead to update of Local Plan policy.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
LPB01 - St Helens Town Centre and Central Spatial Area	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.	**Bid for funding to deliver regeneration scheme(s) for town centre.** **Further work with partners and stakeholders to address barriers to growth in the town.** ~~Review~~ **Update** of Local Plan
LPB02 - Earlestown Town Centre	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.
~~**LPA04.1 - Strategic Employment Sites**~~	~~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 masterplans submitted~~	~~Development management processes~~	~~Every planning application for an allocated strategic employment site should be accompanied by a masterplan.~~	~~Planning applications determined without the prescribed information.~~	~~Review how the policy is being applied; consider whether the policy needs to be reviewed.~~
~~**LPA10 - Parkside East**~~	~~Substantial progress towards site development, e.g., completion of a masterplan; agreed timescale for~~	~~Development management process: reports considered by members; memoranda of understanding~~	~~Substantial development of Parkside for employment purpose; a minimum of 60ha identified and reserved for rail-enabled~~	~~Progress stalled to the extent that minimal implementation can be expected prior to 2035~~	~~Review of Local Plan~~

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	~~implementation; planning application process; works commencing on site~~	~~agreed with developers~~	~~employment development~~		
~~**LPA05.1 - Strategic Housing Sites**~~	~~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 dwellings completed on strategic sites falls below 75% of target~~	~~Consider early review of the Local Plan.~~
LPC01 - Housing Mix	~~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 dwellings 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	Information will be derived from the approved planning applications.	"At least 20% of new dwellings on sites of 25 or more new homes should be designed to meet Part M4(2) of the Building Regulations 2010.	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 **updated** ~~reviewed~~.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
LPC02 - Affordable Housing Provision	Percentage of market housing developments of 1**0**~~1~~ or more homes granted planning permission that provide~~s~~ ~~30%~~ affordable homes **at the quantum required by the Policy**.	Development management processes	All market housing developments of 1**0**~~1~~ or more homes to provide **the necessary percentage of** ~~30%~~ affordable homes **as set out in the Policy**.	Fewer than 90% of market housing schemes of 1**0**~~1~~ or more homes granted planning permission in any given year provide~~s~~ **the required number of** ~~30%~~ affordable homes **set out in Policy**.	Review the circumstances of the permissions granted that have led to the trigger. If a generalised viability problem is indicated, ~~Review a~~ **potential update** ~~review~~ of the requirement in the policy.
LPC03 - Gypsies, Travellers and Travelling Show People	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.
LPC04 - Retail and Town Centres	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~~ **Proactive work with partners and stakeholders to drive forward regeneration.** **Review how the policy is being applied, consider whether the policy needs to be updated.**
LPC05 - Open Space	Quantity and extent of new sport, open space, and	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

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	recreational development.				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~~
LPC06 - Biodiversity and Geological Conservation	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.
LPC07 - Greenways	Number 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.
LPC08 - Ecological Network	Quantity and extent of additional land contributing to the ecological network as a result of planning permissions granted.	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~~ **Finalise** updat~~ed~~ **of** Nature Conservation SPD. **Work with partners such as Merseyside Environmental Advisory Service (MEAS) or the Mersey Forest to**

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
					consider improvements. Review Local Plan policy.
LPC09 - Landscape Protection	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.~~ **Review how the policy is being applied, consider whether the policy needs to be updated.**
LPC10 - Trees and Woodland	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~~ **update** 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~~ **update** of Local Plan policy.
LPC11 - Historic Environment	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	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	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	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

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	Assets (once established).		heritage assets once established.	Borough. Identification of a locally listed heritage asset that could be at risk through periodic review.	heritage assets, and if so, consider whether the policy should be **updated**.
LPC12 - Flood Risk	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.
LPC13 - Renewable and Low Carbon Development	~~Amount of grid connected renewable energy by type~~ **Number of proposals resulting in an unacceptable impact under paragraph 1 of policy not delivering agreed mitigation measures**	~~St. Helens Council, development management process.~~ **Development Management process**	~~Increase from start of Plan period.~~ **No such planning applications granted without delivery of agreed mitigation**	~~Not yet determined~~ **Planning applications for proposals with unacceptable impact under paragraph 1 of policy not delivering agreed mitigation measures**	~~To be determined~~ **Review how the policy is being applied, potential update of Local Plan policy**
	~~Number and capacity of permitted and installed renewable energy developments~~	~~St. Helens Council, development management process, Department for Business,~~	~~To contribute towards the achievement of set national targets for renewable energy (15% by~~	~~Not yet determined~~ **Development within strategic employment**	~~To be determined~~ **Review how the policy is being applied, consider whether the**

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	~~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 (ground source, air source and water source),~~ ~~- individual biomass boilers~~ **Proportion of new developments within strategic employment and housing sites ensuring at least 10% of their energy needs are met from renewable and / or other low carbon energy sources, unless shown not to be practicable or viable**	~~Energy & Industrial Strategy~~ **Development Management process**	~~2020) and reduction of CO2 emissions (80% by 2050).~~ **All developments within strategic employment and housing sites, unless shown not to be practicable or viable**	**and housing sites not ensuring at least 10% of their energy needs are met from renewable and / or other low carbon energy sources for reasons other than being not practicable or viable**	**Council (with partners) can help facilitate such an approach if appropriate, or potential review of Local Plan policy.**
	~~Number and capacity of permitted/installed wind turbines~~	~~Development management process~~	~~No target set - monitor~~	~~Not yet determined~~	~~To be determined~~

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
LPC14 - Minerals	~~Number of operational mineral extraction and recycling units~~ **Number of proposals for non-mineral related uses permitted within the Mineral Safeguarding Area without demonstrating parts 2a) – i) of the policy**	~~St. Helens Council, development management process, Merseyside Environmental Advisory Service (MEAS)~~ **Development Management process, Merseyside Environmental Advisory Service (MEAS)**	~~Sub-regional needs are met.~~ **All proposals for non-mineral related uses within the Minerals Safeguarding Area have met the criteria set out in parts 2a) – i) of the policy**	~~Not yet determined~~ **Permissions granted for proposals for non-mineral related uses within the Minerals Safeguarding Area without demonstrating parts 2a) – i) of the Policy**	~~To be determined~~ **Review how the policy is being applied, work with MEAS to understand reasons for proposals being permitted without demonstrating the relevant policy criteria, or potential review of Local Plan policy**
LPC15 - Waste	See Indicators within the Merseyside and Halton Joint Waste Local Plan	Merseyside Environmental Advisory Service (MEAS)	N/A	N/A	N/A
LPD01 - Ensuring Quality Development in St. Helens	~~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 years.~~	~~Not yet determined~~	~~To be determined~~
	Protection of the best and most versatile land from	St Helens Council (development	No loss of the best and most versatile land unless justified	Unexpected loss of land not proposed for	Review how the policy is being applied, whether any means exist

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
	development (Grades 1, 2, and 3a)	management process).	by the benefits of the development.	development in the Local Plan**, and not justified by wider benefits**.	of preventing or mitigating any loss not already covered by Policy. Potential **update** ~~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~~
LPD02 - Design and Layout of New Housing	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 **updated** ~~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 **updated** ~~reviewed~~.
LPD03 - Open Space and Residential Development	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 type (with reference to the typology used	St Helens Council, Sport England, sports clubs, schools, and developers	Net gains in open space provision.	Unexpected specific losses of facilities **not in accordance with Policy** (**i.e.** without like for like replacement or	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
	in the Open Space Study).			enhancement).	
	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 **not in accordance with policy** (**i.e.** 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 **updated** ~~reviewed~~.
LPD04 - Householder Developments	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 **updated** ~~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	Review how the policy is being applied, consider whether the policy needs to be **updated** ~~reviewed~~.

POLICY	INDICATOR	DATA SOURCE	TARGET	TRIGGER FOR ACTION	POTENTIAL ACTION OF CONTINGENCY
				highway safety.	
LPD05 – Development in Green Belt.	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 **updated** ~~reviewed~~.
LPD06 – Development in Gateway Corridors	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 **updated** ~~reviewed~~.
~~**LPD07 - Digital Communications**~~	~~% 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~~
LPD08 - Advertisements	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 **updated** ~~reviewed~~.
LPD09 - Air Quality	All development in designated AQMAs should	St Helens Council	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	(Environmental Health)	not result in a worsening of air quality and where possible improve it.	planning permission contrary to Policy.	policy needs to be **updated** ~~reviewed~~.
LPD10 - Food and Drink	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 **updated** ~~reviewed~~.

Annex 7

Proposed modifications to LPSD Table 4.5:

Table 4.5: Sites allocated for new housing development

Site Ref.	Name	Area[23] (hectares)	NDA[24]	Minimum Density (units per hectare)	Indicative site capacity (new dwellings)		*Total*
					Before 31.03.3~~5~~ **7**	After 31.03.3~~5~~ **7**	
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~~**427**	~~122~~**95**	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~~**510**	~~2,508~~**2,478**	2,988
5HA	Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold	21.67	75%	35	~~520~~**562**	~~49~~**7**	569
6HA	Land East of City Road, Cowley Hill, Town Centre	31.09	75%	~~35~~**47**	~~540~~**607**	~~276~~**493**	~~816~~**1,100**
7HA	Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows	~~8.03~~**5.33**	75%	~~30~~**35**	~~181~~**140**	0	~~181~~**140**
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~~**352**	0	~~350~~**352**
10HA	Moss Nook Urban Village, Watery Lane, Moss Nook	26.74	75%	40	~~802~~**652**	~~0~~**150**	802
				Totals	~~4,085~~**3,725**	~~2,955~~**3,223**	~~7,040~~ **6,948**

Annex 8

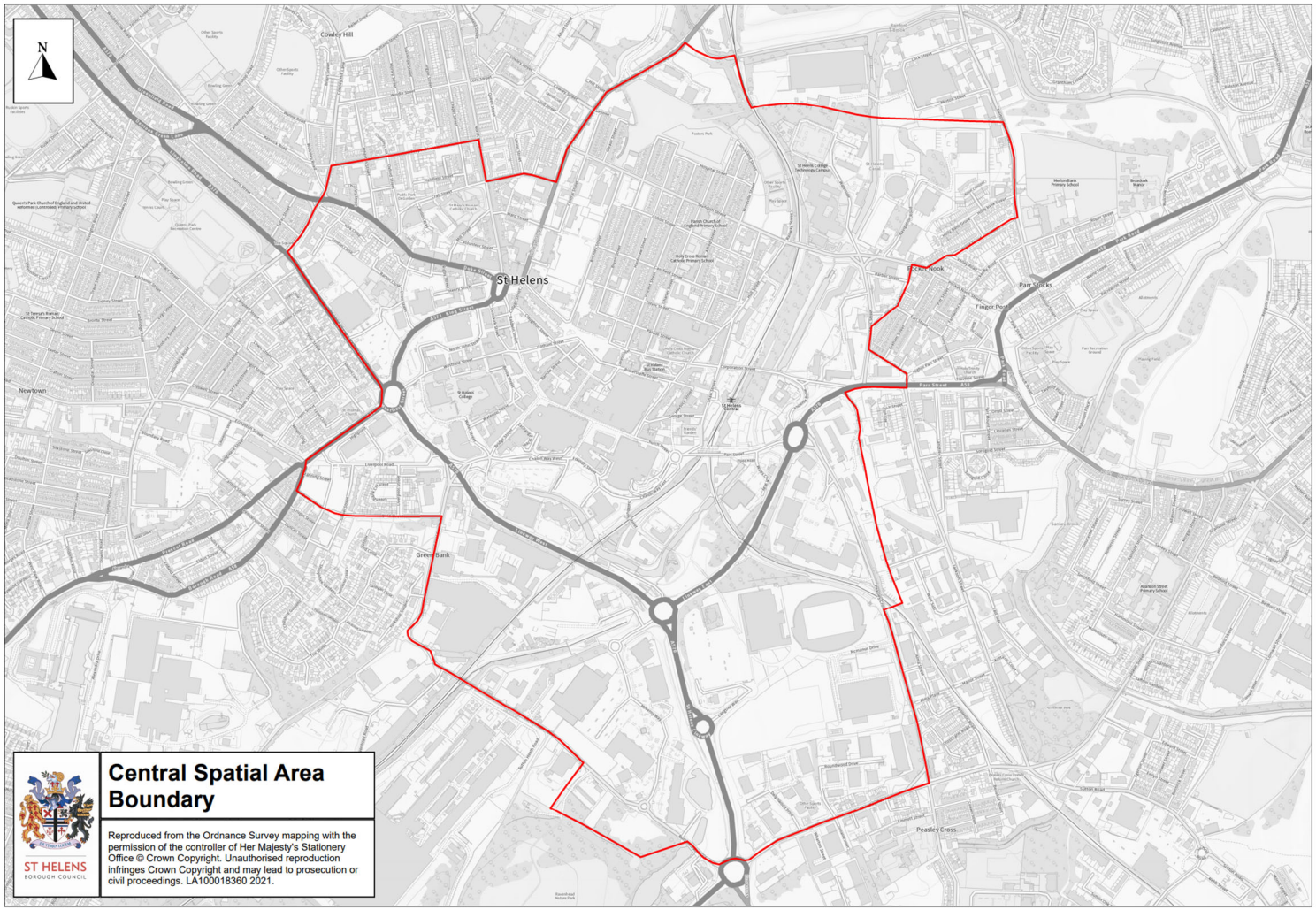
Proposed modifications to the Table 4.1

Policies Map Site Reference Number[15]	Site Name	Indicative Site Area (hectares)	Appropriate Uses [16]
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[17]	See Policy LPA10
8EA	Parkside West, Newton-le-Willows	79.57[18]	B2, B8
9EA	Land to the West of Sandwash Close, Rainford	~~6.96~~**7.70**	**Light industrial, offices and research and development uses,** B2, B8
~~10EA~~	~~Land at Lea Green Farm West, Thatto Heath~~	~~3.84ha~~	~~B1, B2, B8~~
~~11EA~~	~~Gerards Park, College Street, St. Helens Town Centre~~	~~0.95~~	~~B1, B2, B8~~
TOTAL		~~265.3~~**213.53**	

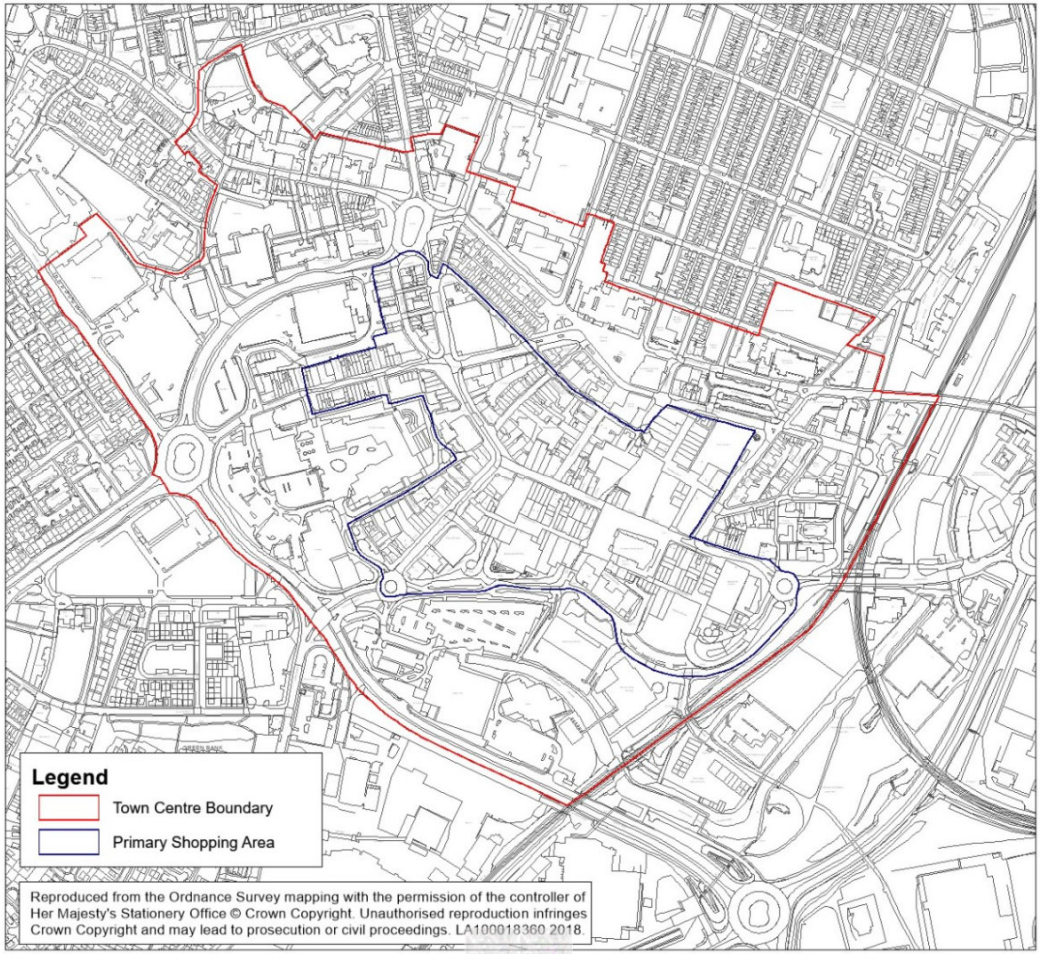
Annex 9

Proposed modifications to Appendix 11 of the Local Plan Submission Draft (2019).

Insert a plan showing the Central Spatial Area boundary into Appendix 11 as follows:



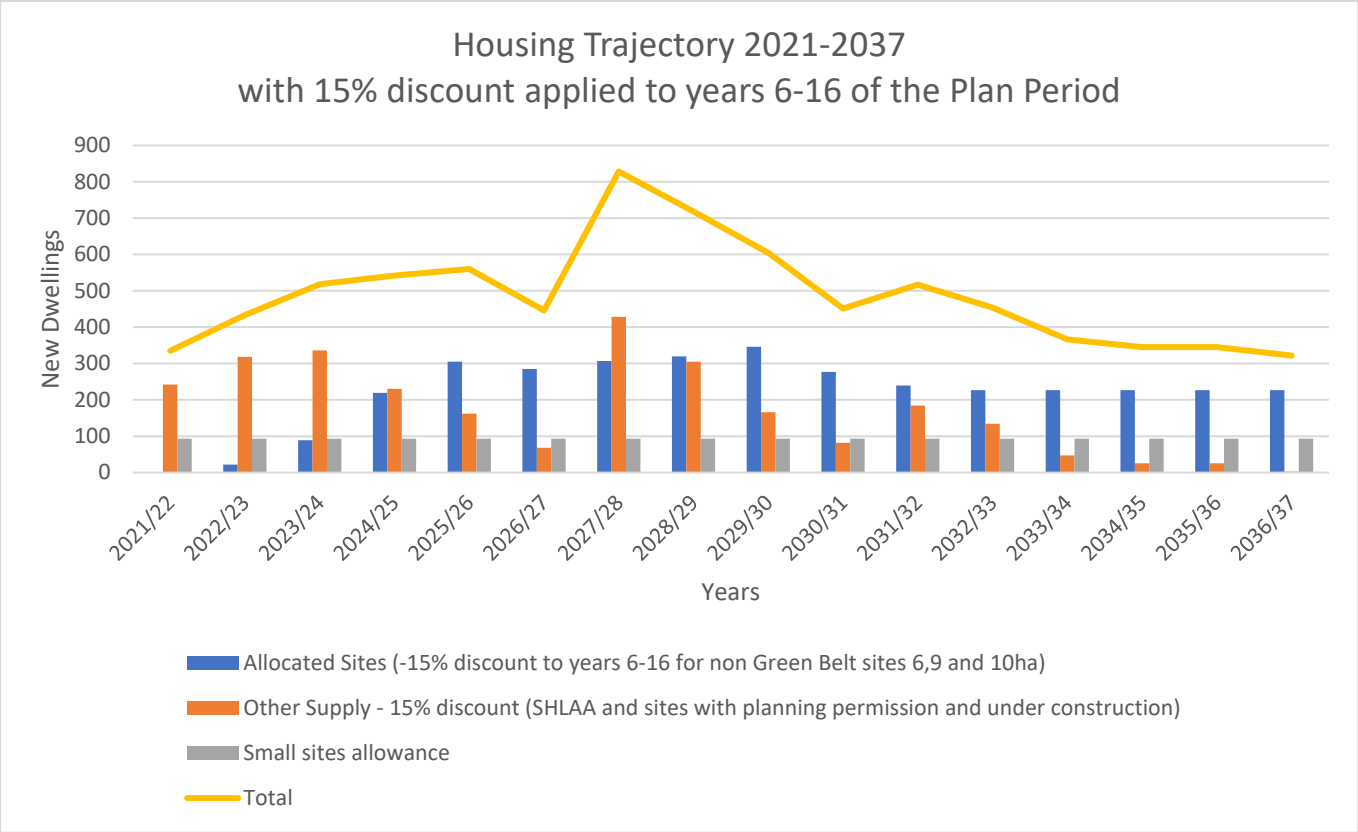
Replace the St. Helens Town Centre Map in Appendix 11 of the Local Plan Submission Draft with the following map to remove the primary and secondary frontages:



Annex 10

Updated version of Figure 4.3 and Table 4.7

Plan Trajectory 2021-2037 with a 15% discount applied to years 6-16 of the SHLAA Supply and non-Green Belt allocations (6HA, 9HA and 10HA)



Year	Allocated Sites (-15% discount to years 6-16 for non-Green Belt sites 6,9 and 10ha)	Other Supply - 15% discount (sites without planning permission (SHLAA), with planning permission and under construction)	Small sites allowance	Total Dwellings
2021/22	0	242	93	335
2022/23	22	318	93	433
2023/24	89	336	93	518
2024/25	219	230	93	542
2025/26	305	162	93	560
2026/27	285	68	93	446
2027/28	307	428	93	828
2028/29	320	305	93	718
2029/30	346	166	93	605
2030/31	277	82	93	451
2031/32	239	184	93	517
2032/33	227	134	93	454
2033/34	227	47	93	366
2034/35	227	26	93	345
2035/36	227	26	93	345
2036/37	227	3	93	322
Total				**7784**

Annex 11

Updated version of LPSD Table 4.8.

Ref.	Site Name	Area (hectares)	NDA [36] (indicative)	Density (Dwellings per hectare)	Capacity [37] (indicative)
1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	12.92	75%	30	291
2HS	Land between Vista Road and Belvedere Road, Earlestown	7.92	75%	30	178
3HS	Former Eccleston Park Golf Club, Rainhill Road, Eccleston	49.00	65%	30	956[38]
4HS	Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	~~9.76~~**13.51**	75%	35	~~256~~**355**
5HS	Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows	7.29	75%	35	191
6HS	Land East of Chapel Lane and South of Walkers Lane, Sutton Manor	5.04	75%	30	113
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	52.69	65%	30	1,027
				Housing Total	~~2,641~~**2,739**