



ST HELENS
BOROUGH COUNCIL

**ST HELENS BOROUGH
LOCAL PLAN 2020-2035**

**ST HELENS BOROUGH COUNCIL'S RESPONSE
TO THE INSPECTORS' PRELIMINARY MATTERS
AND ISSUES FOR THE EXAMINATION,
INCLUDING SOME INITIAL QUESTIONS AND
COMMENTS**

January 2021

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Evidence Base

PQ1. The Submission Draft version of the Plan is dated January 2019. Therefore, almost 2 years has elapsed since the preparation of the Plan. Much of the supporting evidence base is of a similar vintage. Is the Council satisfied that the policies and proposals are up-to-date and are underpinned by relevant and up-to-date evidence?

The Council is satisfied that the policies and proposals within the Local Plan Submission Draft, 2019 (LPSD) are underpinned by a wide-ranging, relevant and up-to-date evidence base.

Those pieces of evidence which are integral to the soundness of the Plan, such as those relating to development needs (St Helens Employment Land Needs Study Addendum Report, 2019 (EMP001) and St Helens Strategic Housing Market Assessment Update 2019 (HOU001)) and land availability (St Helens Strategic Housing Land Availability Assessment (SHLAA) 2017), have been the subject of recent review against more up-to-date data and further discussion in the Housing Need and Supply Background Paper (SD025), and the Employment Land Need and Supply Background Paper (SD022). As the Background Papers indicate, the methodologies underpinning these evidence base documents remain consistent with national policy and guidance, and importantly, when considering the latest data, the findings and recommendations of these documents remain valid and credible.

Some evidence base documents relate to subject areas less liable to short term change (such as the landscape character), and therefore while these documents have not been subject to more recent review or reappraisal, they are still considered to be relevant and fit for purpose.

In addition, the Annual Monitoring Report 2020 (SD018) indicates that the Borough's key social, economic and environmental characteristics and issues remain fundamentally the same as those identified in the Plan's evidence base. It does not identify any new issues that now require new evidence or that the Plan does not already seek to address.

PQ2. Is it intended that any of the evidence documents are updated, noting that the submission letter dated 29 October refers to some more recent documents?

It is not intended to update any of the evidence base documents in advance of the hearing sessions.

The Housing Background Paper (SD025) (specifically Appendices 1 and 3) provides an update to the housing supply data (including the assessment of any additional sites that have come forward through the development management process since 2017) and the site assessments contained in the SHLAA 2017.

The Council have commissioned a new Playing Pitch Strategy which is due for completion in autumn 2021.

The Liverpool City Region Combined Authority working alongside St Helens Council have recently commissioned a rail capacity study to further understand the availability of space on the rail network to accommodate a SRFI at Parkside. The current project timetable indicates that the study should be complete by the end of March 2021 (see SD024, section 6.6 for further information in relation to the scope of the study).

PQ3. In terms of documents that have recently been finalised, are the changes in the latest iterations of the documents significant?

The following submission documents were finalised for publication shortly before submission:

- Green Belt Review Stage 2B proformas (SD021); and
- Infrastructure Delivery Plan Update (2020) (SD013).

The changes in these documents are not considered significant.

The conclusions of the Green Belt Review Stage 2B proformas were previously set out in the 2018 Green Belt Review (SD020) (in tables 5.2 and 5.4). However, the full assessments were not published as part of the Green Belt Review, to ensure that the document was kept to a reasonable size. A small number of representations made to the LPSD commented that it would have been desirable to view the Stage 2B proformas. In response to the comments received from representors, SD021 contains all of the Stage 2B proformas, and should be read in conjunction with the main Green Belt Review document (SD020). As the proformas had not previously been published, the opportunity to update factual information regarding any extant planning applications quoted in a proforma was taken. No other details contained in the original proformas prepared in 2018 were changed.

The changes to the Infrastructure Delivery Plan, 2018 (TRA006) proposed through Infrastructure Delivery Plan Update 2020 (SD013), update Table 2 in Chapter 3 in relation to findings of highways related studies, funding streams and potential highway improvements at identified pressure points. There are also updates to Chapter 3 in relation to potential infrastructure provision and the funding position for proposed housing allocations 4HA and 10HA. There are also some minor updates made in Chapter 2 to reflect changes to the PPG. A track change version of the updates made to Infrastructure Delivery Plan, 2018 (TRA006) can be made available if required.

Matter 1: Legal Compliance, Procedural Requirements and the Duty to Cooperate (DTC)

Sustainability Appraisal

PQ4. Was the alternative of not meeting housing and employment needs considered as a reasonable alternative so as to concentrate a greater proportion of development on brownfield land and if not, why not?

No, an alternative that does not meet housing and employment needs during the Plan period would not deliver the strategic objectives of the Plan which include supporting regeneration and balanced economic growth and meeting housing needs within the Borough. This is explained in Table 4.1 of the SA Report (SD005). The Environmental Assessment of Plans and Programmes Regulations 2004 states that there is a need to identify, describe and evaluate the likely significant effects on the environment of reasonable **alternatives taking into account the objectives of the Plan** (our emphasis).

The alternatives which have been considered for the overall housing requirement figure for the LPSD all fall within the range of 451dpa (which was the OAN identified in the 2016 SHMA) (HOU003) to 712dpa. The Council consider that any housing requirement figure which is below 451dpa would fall substantially below the level required to meet housing need (see SD025). The resultant harm would be exacerbated by the fact that no neighbouring district has agreed to accommodate any unmet housing needs of St Helens. As discussed in paragraph 5.4 of the Council's Duty to Cooperate Statement (SD009), "*No spare capacity has been identified in any neighbouring local authority areas to accommodate any of the housing needs arising in the Borough of St Helens*". It also states that, "*All of the immediately neighbouring districts to St Helens Borough have (due to restrictions on the supply of land in their existing urban areas) recently undertaken or are in the process of undertaking Green Belt reviews to meet their development needs*".

In terms of employment land, as set out in pages 12 and 13 of the LPSD SA Report (SD005), a 'low growth' option (131.64ha) was considered as a reasonable alternative, and at the Local Plan Preferred Options Stage (2016) a rejected alternative was to provide significantly less employment land than identified objectively assessed needs. Such alternatives were not considered to be in the spirit of the NPPF for plans to provide a strategy which, as a minimum seeks to meet the area's objectively assessed needs (particularly given the lack of any agreement with any other district to help meet needs arising in St Helens). Also, these alternatives would not proactively encourage sustainable growth and inward investment to the Borough and therefore economic demand and creation of new jobs would not be realised. This would result in slower growth in the Borough's economy and so some of the strategic objectives of the Plan would not be met.

In terms of the distribution of housing and employment and potentially focussing a greater proportion of development on brownfield land, the SA Report (SD005) states the following:

- An alternative to increase the delivery of new employment land on brownfield land in the urban area was rejected as unreasonable. The reasons are set out in paragraphs 4.2.29 to 4.2.33.
- It was assumed that each of the five housing distribution options would maximise opportunities for development on brownfield land. Please refer to paragraph 4.3.19. Further to this, paragraphs 4.3.20 to 4.3.27 explain why alternatives that involve none or limited release of the Green Belt and therefore a greater focus of development on brownfield sites in the urban area, are considered to be unreasonable.

PQ5. Given the great importance that national policy attaches to the Green Belt was the alternative of not meeting housing and employment needs considered as a reasonable alternative and if not, why not?

Please refer to response to PQ4 above.

PQ6. Did the reasonable alternatives consider allocating land in locations that would seek to avoid the loss of Best and Most Versatile Agricultural Land and if not, why not? What implications, if any, does this have for the Plan?

Yes, the loss of agricultural land, including Best and Most Versatile, was explored through the consideration of alternatives in the SA process as follows:

- The appraisal of site options takes account of agricultural land quality, please refer to the site appraisal framework provided in Appendix II of the SA Report (SD005) with agricultural land covered under SA objective 2.
- The reasonable spatial strategy alternatives identified in Table 4.3 and explained in paragraphs 4.3.29 to 4.3.32 explore different levels and distributions of growth across the borough. The appraisal of these alternatives in Appendix III under SA Topic 2 (Land Quality) explored the trade-offs between them in terms of the loss of agricultural land, including Best and Most Versatile.

The findings of the SA work informed the Council's decision-making and the preferred approach to the level and distribution of growth, please refer to Section 4.5 in the SA Report (SD005).

Ultimately, any reasonable alternative for the delivery of growth to meet the Borough's needs will result in the loss of greenfield/ agricultural land. There is not a sufficient supply of available or suitable brownfield sites to meet identified needs (see SD022 and SD025 for further information). Evidence suggests that the higher quality agricultural land is situated in the north west of the Borough, in the Rainford Ward. It should be noted that the preferred approach taken forward in the LPSD

directs a minimal level of development to the Rainford area. Finally, it is important to note that agricultural land quality is just one consideration alongside a range of other factors that need to be taken into account when considering likely sustainability impacts, and when determining the appropriate level and location of growth to meet identified needs during the Plan period.

PQ7. The SA identifies a number of potential impacts arising from the Plan. We are particularly interested in understanding how the following have been taken account in the Plan and whether there are any relevant policies or evidence base documents that address the issue or provide greater detail. The issues include:

The need to ensure necessary infrastructure is in place before development is progressed, for example improvements at Junction 22 of the M6 Motorway in relation to the Parkside employment site.

Various policies within the Plan seek to mitigate potential impacts of development through the provision of necessary supporting infrastructure and mitigation.

Policy LPA02: Spatial Strategy, requires new development to provide a convenient, safe, and sustainable transport network, and the delivery of improvements to the network, in line with Policy LPA07. Policy LPA07: Transport and Travel, seeks to improve existing motorway capacity and infrastructure with particular priority given to Junction 23 of the M6 and Junction 7 of the M62. It also requires all proposals that will generate significant amounts of transport movement to be supported by a Transport Assessment or Statement. Policy LPA08: Infrastructure Delivery and Funding, seeks to ensure that new development is supported by the appropriate infrastructure.

The St Helens Transport Impact Assessment (TIA) (TRA003) provides a high level assessment of the potential transport implications of the proposed site allocations and identified further studies, interventions, and initiatives that could be undertaken over the Plan period to mitigate the impact of development. The Infrastructure Delivery Plan (IDP) (SD013) will support the implementation of the Local Plan and sets out what level of new or improved infrastructure will be required to deliver the growth proposed. Table 2 (page 15) of the IDP sets out the identified pressure points within the highway system and potential improvements to the highway network.

The site profiles for allocated and safeguarded sites in the LP (Appendices 5 and 7) set out necessary infrastructure requirements, this provides clarity on a site by site basis in this respect.

In regard to Parkside specifically, Policy LPA10: Parkside East, requires development within this site to create safe and convenient access from Junction 22

of the M6 for HGV and other vehicles and to mitigate any adverse impacts on the surrounding strategic and local road network.

Work is on-going regarding potential improvements to Junction 23 of the M6. The Council have commissioned studies (TRA007 and TRA008) in partnership with Highways England and Wigan Council as the first stage in considering options for junction improvements in this location.

The Air Quality Management Area close to Parkside allocation and M6 J22 (Newton-le-Willows) and the recommendation of the LP for a phased approach to development.

Policy LPA10: Parkside East, requires development within this site to create safe and convenient access from Junction 22 of the M6 for HGV and other vehicles and to mitigate any adverse impacts on the surrounding strategic and local road network. As set out in the Parkside SRFI Background Paper (SD024) there is currently a live planning application for a single carriageway road referred to as the 'Parkside Link Road', which would link the A49 Winwick Road to the A579 Winwick Lane enabling access to Junction 22 of the M6.

It is anticipated, that due to size, the Parkside sites (7EA & 8EA) will come forward in phases. Policy LPA04.1 requires the masterplans for each Strategic Employment Site to address site specific requirements set out in Appendix 5. The site specific requirements for the Parkside West site (8EA) state that a first phase of development can be accessed by the A49, but require later phases of development to be served by a new link road from the east (linking to Junction 22 of the M6). The site also requires the amount of development achievable within each phase to be determined using a comprehensive transport assessment to be approved by relevant highway authorities. Other requirements include the mitigation of any adverse impacts on the M6 (Junction 22) or other parts of the highway network and 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.

Policy LPA08: Infrastructure Delivery and Funding criterion 3 states: "*where the suitability of development depends upon the provision of additional or improved infrastructure or service capacity, that development should be phased to coincide with the provision of such infrastructure or capacity.*"

The Local Plan contains a specific policy on air quality, Policy LPD09: Air Quality, which seeks to reduce the impact of development on existing AQMAs and air quality as a whole. Policy LPA07: Transport and Travel, seeks to minimise air and noise pollution and carbon emissions from non-residential forms of development that would generate a significant amount of transport movement by employees or visitors by the need for such development to be supported by suitably formulated Travel Plans. It also stipulates that development that would generate significant movement of freight

must be located where there is a safe, convenient, and environmentally acceptable access route to a suitable part of the Key Route Network.

Potential negative effects on landscape in relation to housing and employment allocations in the Green Belt.

It is accepted that due to the nature of built development there will be some unavoidable adverse impacts from Green Belt allocations on landscape. The appraisal of the Plan under the landscape topic in Section 7.8 of the SA Report (SD005), identifies that there is the potential for the Plan to have both positive and negative effects on the landscape.

While the appraisal acknowledges that the likelihood for a significant negative effect increases where development is allocated in areas of higher landscape sensitivity, it concludes that a significant negative effect on the landscape is not likely once mitigation is taken into account, including through Plan policies. This primarily includes Policies LPC09 (Landscape Protection and Environment), LPD01 (Ensuring Quality Development), LPD02 (Design and Layout of New Housing) as well as Policies LPA4.1 (Strategic Employment Sites) and LPA05.1 (Strategic Housing Sites) that seek an attractive built form with high quality landscaping.

Other policies that are likely to provide mitigation indirectly include LPA09 (Green Infrastructure) LPC05 (Open Space), LPC07 (Greenways), LPC10 (Trees and Woodland) and LPC11 (Historic Environment), LPD03 (Open Space and residential Development) and LPD06 (Prominent Gateway Corridors).

The potential impacts with regards to growth in locations that are likely to attract high levels of car usage and the suggestion that monitoring of impacts will be important.

It is accepted that there is a large amount of development in areas that are likely to encourage car usage (sites located at motorway junctions and along key road networks). For the majority of the proposed employment sites this a reflection of the locational requirements of the type of development that is proposed on those sites. The logistics market is strongly driven by location, and for larger regional and national distribution centres motorway access is a key locational factor and proximity to the M6 and M62 Motorways provides north-south and east-west access.

The SA states that a potentially significant negative effect is predicted, however, this may be offset by infrastructure improvement, and encouragement of alternative modes of transport, and with regards to freight, the long term aspiration for a strategic rail freight terminal.

Policy LPA07: Transport and Travel, seeks to ensure new development is accessible by road transport, walking, cycling and public transport. For employment sites it seeks to improve all modes of transport, and those proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Statement. A non-freight 'Key Road Network' has

been identified to restrict freight movement in this area, in order to help reduce traffic, congestion and air quality in more residential areas. In addition, in order to minimise air and noise pollution and carbon emissions, sites generating significant amount of travel movement must be supported by suitably formulated Travel Plans.

Policy LPD09: Air Quality, requires development to demonstrate it will not impede the achievement of any objectives or measures set out in an AQMA Action Plan, introduce a significant new source of air pollution or lead to the deterioration in local air quality. Importantly it states in criterion 3 that *‘Major development schemes should demonstrably promote a shift to the use of sustainable modes of transport to minimise the impact of vehicle emissions on air quality.’*

There are a number of ongoing transport projects that the Council are involved in which seek to link active travel and public transport to growth proposed in the Local Plan. These projects seek to maximise the efficiencies of the Borough’s existing transport network and increase the provision and capacity for travel modes that are most sustainable (walking, cycling and public transport). Examples include the redevelopment of Newton-le-Willows rail station completed in 2019 (which lies in close proximity to the Parkside West site) and the development of the Eastern Region Interchange and Connectivity (ERIC) project centred around Lea Green Station (Final Business Case to be submitted 1 February 2021, if successful to be completed March 2023).

The Local Plan’s Monitoring Framework (Appendix 4 of the LPSD) will also act as a tool and feed into the Annual Monitoring Report. It will be used to monitor the number of Transport Assessments, Statements and Travel Plans. Should the trigger review be implemented, i.e. planning applications being determined without the prescribed information, then a review of how the policy is being applied will take place and consideration as to whether the policy needs to be updated will be take place.

Potential impacts in relation to the proposed employment allocation site 6EA and the proximity of the Listed Building ‘Le Chateau’.

A Heritage Impact Assessment (HIA) for site 6EA has been undertaken and is available to view in the Heritage Background Paper (SD023), it states that *‘while the development of the parts of the site will not harm the setting of the listed buildings, any development which will result in the loss of views across open countryside will have a negative impact on the setting of the listed lodge. The extent of harm would however be minimal as the original parkland setting which is integral to the significance of the lodge will be retained’.*

The HIA found that in policy terms the level of harm associated with the development of site 6EA was ‘less than substantial’. Consequently, it was considered that any proposed development on site 6EA would need to address the requirements of para 196 of the NPPF which states that *“weigh the harm against the public benefits of the proposal where a development proposal will lead to less than substantial harm,*

including securing its optimum viable use.”

The HIA concluded that careful screening of any perimeter development would address much of the conservation based concerns. Any development which would result in the loss of open views of countryside from the lodge would have to be carefully considered and have demonstrable wider public benefits.

PQ.8 What is the justification for concluding that despite the planned growth, the Plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a significant positive effect predicted in the long term, especially when concerning greenfield sites?

The appraisal of the Plan under the biodiversity and geodiversity topic in Section 7.2 of the SA Report (SD005), identifies that there is the potential for the Plan as a whole to have both positive and negative long term effects on biodiversity. The conclusion of a significant long term positive effect arises as a result of strong plan policies that seek to protect and enhance biodiversity as well as deliver net gain (See policies LPA09 (Green Infrastructure) and LPC08 (Ecological Network)). There will always be an element of uncertainty as the significance and nature of effects will be dependent on implementation. Without development, there would be less opportunities to try and deliver significant biodiversity enhancement within the Borough.

In addition, the implications of the proposed Environment Bill add weight to this position in terms of the environmental gains that development will be required to deliver.

Habitat Regulations Assessment

PQ9. The most recent iteration of the HRA is dated September 2020. This is an update to the HRA report undertaken in December 2018. The reports refer to the Court of Justice of the European Union (CJEU) People Over Wind & Sweetman v. Coillte Teoranta judgement. The implication of the CJEU judgment is that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the HRA screening stage whether the plan or project is likely to have an adverse effect on a European Site. Is the Council satisfied that the HRA is legally compliant in the light of the ruling?

The Council is satisfied that the HRA is legally compliant. In producing the HRA AECOM has been precautionary in confining their discussion of anything that could be argued to constitute ‘mitigation’ for impacts on European sites to the appropriate assessment (Chapter 6 onwards). This ensures that no mitigation for impacts on European sites has been discussed in the Likely Significant Effects assessment (Chapter 5 and Appendices D and E) and therefore the cited CJEU ruling has been complied with.

PQ10. Has legal advice been taken to inform this view?

Legal advice is not required due to the precautionary approach taken by AECOM in preparing the HRA. Legal advice would only be required if a decision had been taken to consider measures in the Likely Significant Effects assessment that could be argued to constitute mitigation.

PQ11. The HRA identifies potential impact pathways, both alone and in combination, regarding some policies and site allocations in the Plan, and lists several mitigation measures many of which will require an agreed approach with neighbouring authorities. Have these matters been agreed with Natural England and neighbouring authorities and will the mitigation proposed be realistic and effective?

Addressing recreational pressure is the only impact pathway for which an agreed approach across the Liverpool City Region will (in the long term) be required.

The approach for mitigation of recreational pressure has been agreed with Natural England (email dated 14/08/19 as set out in SD004 Appendix 23). It has also been agreed with surrounding authorities through involvement of Merseyside Environmental Advisory Services (MEAS), which is developing the Recreation Mitigation Strategy (RMS) for the Liverpool City Region (LCR) authorities, in discussion with Natural England. This will ensure that the mitigation strategy (which has much precedent at other coastal European sites around England, such as the Bird Aware Solent or Bird Wise North Kent projects) will be realistic and effective. The long-term approach to be taken is therefore consistent to that being undertaken in other LCR authorities.

To address any increase in recreational pressure arising from St Helens in the interim, until the RMS is finalised, St Helens Council is delivering enhancements to Bold Forest Park, located in the Borough, as discussed on page 35 of the HRA report (SD006.1). This approach was agreed with Natural England in 2019 (see email cited above).

PQ12. The report identifies potential impact pathways in relation to functionally linked land for non-breeding Special Protection Area (SPA) birds (most likely Pink Footed Goose) particularly regarding several employment and housing allocations in the Plan. Recreational pressure, atmospheric pollution and water quality are also identified as potential in combination impact pathways.

What specific measures does the Plan include to ensure that its policies are not likely to give rise to adverse effects, either alone or in- combination with other plans and projects?

The specific measures are as follows:

- a) For recreational pressure, the specific measures to be undertaken are the commitment to the RMS and, until such time as the RMS is available, enhancements to Bold Forest Park, as per page 35 of the submitted HRA (SD006.1). See Policy LPC06 and proposed modifications AM056, AM057 and AM058.
- b) For loss of functionally linked land, the specific measures to be undertaken are updates to the Biodiversity SPD (see AM056) and Policy LPC06 which requires site-specific wintering bird surveys and subsequent mitigation, as per pages 26-28 of the HRA (SD006.1).
- c) For water quality, the specific measures to be undertaken is agreed with United Utilities, that development will be appropriately phased, as per page 38 of the HRA (SD006.1) (also see response to PQ18 and PQ19 below).
- d) For air quality at Manchester Mosses SAC, the specific measure to be undertaken is the requirement for project-specific modelling for developments causing a change of 1000 AADT or 200 HDV on the M62 as per policy LPD09 (air quality) and page 39-41 of the HRA (also see AM 067). This supplements those policies that will have a positive effect on air quality and are contained within the Local Plan as identified on pages 38 and 39 (LPA03, LPA07, LPA11, LPC13, LPC14, LPD01 and LPD09).

The HRA refers to Policy LPC06 and its role in seeking to address the issue of potential impact pathways in relation to functionally linked land. The AMs put forward by the Council suggest some further changes to this policy. Specifically, AM056 proposes to add an additional criteria 7 which states that further details concerning the implementation of the policy will be set out in the Council's proposed Nature Conservation Supplementary Planning Document (SPD).

PQ13. Is this AM in response to the issue highlighted in the HRA and by Natural England regarding potential impact pathways in relation to functionally linked land for bird populations using the nearby SPA? If so how has the HRA assessed this impact at Plan level and what specific mitigation or alternative provision has been considered?

PQ14. What level of certainty is there that the proposed measures could be secured at application stage and would the SPD adequately address this issue?

We can confirm that AM056 is in response to the issue highlighted in the HRA, and by Natural England, regarding potential loss of functionally linked land for bird populations using the nearby SPA. Impacts on functionally-linked land (FLL) from plan allocations have been assessed on pages 25-28 of the HRA. The 12 individual sites considered likely to result in loss of FLL are listed and have been assessed based on the fact that they are located within areas identified in the Lancashire Bird Atlas to support populations of non-breeding SPA birds likely to be found in the borough and/or, based on desk analysis, appear to contain suitable habitat.

The specific mitigation identified as being required to ensure no adverse effect on European sites is:

- a) a requirement for detailed bird surveys of each allocation (several years) to inform detailed design and tailoring of mitigation; and
- b) detail in the Nature Conservation SPD to provide fuller guidance.

As per page 27 of the HRA, the habitats in question are common or widespread. Other LCR authorities such as Sefton Metropolitan Borough Council already follow the same approach to addressing loss of FLL. Moreover, as referenced in the HRA, the Liverpool City Region has an agreed evidence base - the LCR Ecological Network – that clearly identifies opportunities for delivery of mitigation and habitat enhancement through the Nature Improvement Areas. This will facilitate a strategic approach to targeting and delivery of mitigation especially in those instances where there is insufficient land available within the proposed development site.

There is therefore no reason to assume that mitigation measures could not be secured at the application stage. The SPD will play a role in providing guidance to developers in the form of possible habitat enhancements and in directing them to suitable locations such as the LCR Ecological Network and Nature Improvement Areas.

PQ15. AM058 also proposes additional text that refers to a Liverpool City Region Mitigation Strategy which has not yet been completed. When is this document expected to be completed?

PQ16. Is this the Recreation Mitigation Strategy that was referred to in the HRA and was expected to be completed in 2019?

PQ17. Once this strategy is completed are there likely to be any implications arising for the Plan or the HRA?

The LCR Recreation Mitigation Strategy (RMS) is currently planned for completion in January 2023. Additional survey work is needed to inform the final strategy and

there have been delays to commissioning this work as it needs to be undertaken when patterns of recreation use are more “normal” than at present, given Covid-19 restrictions.

We can confirm that this is the same document that is referenced in the HRA and was originally envisaged for completion in 2019.

There are no significant implications for the Plan or HRA as the RMS is considered to be the long-term solution. It is discussed in the Local Plan and accounted for in the HRA report. As 2019 was only an estimated completion timetable, enhancements to Bold Forest Park were identified in the HRA and have been committed to by the Council, to cover the interim period. This is as agreed with MEAS and Natural England.

Paragraph 25 – Air Pollution, Policy LPC06

In relation to proposed AM067, which relates to Policy LPD09 and LPC06, the Council will give consideration to defining ‘smaller development proposals’ more precisely.

PQ.18 Regarding water quality, the HRA refers to supporting text for Policy LPA08 which says that ‘The Mid Mersey Water Cycle Study 2011’ identified that further investigation is required to determine headroom capacity within the St Helens wastewater treatment plant. Is this the 2011 Study the most up to date evidence base document and has this further investigation work taken place?

PQ19. What ongoing liaison, if any, has taken place with United Utilities regarding this issue?

The Mid Mersey Water Cycle Study 2011 is the latest evidence in relation to water quality. There has been ongoing liaison with United Utilities during the plan-making process and at each stage they have provided comments on proposed allocations, housing and employment supply and policies in relation to water quality. Discussions have indicated that further investment could be needed at the wastewater treatment plant to improve effluent quality if water quality regulations are tightened. United Utilities have previously indicated that the treatment plant is operating with a headroom of 10%-15% (dry weather flow).

Importantly, as set out in the Infrastructure Delivery Plan (SD013), United Utilities have not indicated that any specific improvements to the treatment plant are needed at this stage and in their representation to the LPSD (RO0626) no comments were made in relation to this issue.

Discussions between the Council and United Utilities will continue, both regarding planning policy and specific planning applications, to ensure that any future capacity issues that may arise can be identified and resolved. It is assumed that the scale of any future works (if required) will be assessed by United Utilities and any improvements required will be incorporated into future United Utilities funding bids via their five year Asset Management Programme.

Duty to Cooperate

PQ20. The LCR Combined Authority is in the early stages of developing a Spatial Development Strategy (SDS). A Spatial Planning Statement of Common Ground (SOCG) dated October 2019 has been prepared by the authorities within the LCR together with West Lancashire Borough Council.

Based on work on the SDS to date is there likely to be alignment between the Plan and the SDS?

As referenced, the SDS is still in the relatively early stages of development. It has been consulted on between November 2020 and February 2021 seeking views on the proposed vision and policy topic areas and potential suggested policy approaches. Based on the progress to date, the Council considers that the proposed Local Plan will align with the SDS, and there have been no indications, as a result of engagement with the SDS process, that this position is likely to change as the SDS preparation continues.

PQ21. Warrington lies outside the LCR but has close links with it, particularly, St Helens and Halton, which together form the mid-Mersey Housing Market Area (HMA). It is noted that a Draft SOCG was prepared with Warrington but, according to the DtC Statement (para 3.9) has not been finalised. Will the Draft SOCG with Warrington be finalised, and if so, when?

The draft SoCG was agreed by St Helens Borough Council in September 2019 (along with some minor revisions) and was due to be agreed by Warrington and therefore finalised when their draft Local Plan was taken to Members seeking approval to submit to the Secretary of State. However, before this was reached, Warrington Council took the decision to pause work on the Local Plan until Spring / Summer 2021, when this position is due to be reviewed. It is therefore unlikely that the SoCG will be finalised before this time. Notwithstanding this, the draft SoCG sets out the latest agreed position between the authorities.

PQ22. Paragraph 27 of the National Planning Policy Framework (the Framework) indicates that strategic policy-making authorities should prepare and maintain SOCG on cross-boundary matters. The DtC does not refer to any other SOCG.

Have any other SOCG been prepared or are in the course of preparation, for example, with Wigan, Halton, Knowsley or West Lancashire as adjoining authorities?

Yes, St Helens Borough Council, as part of the Liverpool City Region, was involved in the development of, and is a signatory to, the Liverpool City Region Spatial Planning Statement of Common Ground, October 2019 (examination library document reference SD010). Beyond this and the Warrington SoCG, no further SoCGs have been prepared, or are in the course of preparation currently.

PQ23. Are any further SOCG or updates anticipated?

Yes, discussions with Highways England recently have identified the opportunity to prepare a SoCG between St Helens Borough Council and Highways England to inform the Examination process. No updates to the existing SoCGs referenced above are currently planned.

Matter 2: Housing and Employment Objectively Assessed Needs (OAN) and Requirements

PQ24. The Framework requires that strategic policies should look ahead over a minimum period from adoption. The Plan period and housing and employment provision is up to 2035. Adoption is not likely until 2021 at the earliest, probably towards the end of 2021 and so a 15-year period from adoption would not be achieved. Has consideration been given to extending the Plan period beyond 2035 to say 2036 or 2037?

At Publication stage in 2019 there was considered to be a good prospect of the Plan being adopted in 2020 and thereby having a 15 year time span. The Council have considered extending the Plan period (see the response to PQ25 below). A modification (MM) could be proposed to extend the Plan period to 2037.

PQ25. What would be the implications of extending the period in such a way, particularly for the housing and employment land requirement?

Extending the Plan period to 2037 would not have significant implications for the Plan. For housing it would mean increasing the requirement by 972 units. This increase could be met by the existing LPSD proposed housing land supply and proposed allocated sites that would be under construction beyond the existing Plan period.

Set out below is an update to tables 5.2-5.5 of the Housing Need and Supply Background Paper (SD025) which illustrates the implications of extending the Plan period to 2037 for housing land supply.

The updated housing requirement from 2016- 2037 would be 10,206 units (currently 9,234 units) and the updated residual requirement from 1 April 2020 – 31 March 2037 would be 7778 units (currently 6806 units). The total Plan period housing supply would total 8,384 units, this would increase from 7,745 units under a 2020-2035 Plan period, because it would include increased supply from proposed allocations 2 HA, 4 HA, 5 HA, 6 HA and 10 HA, forecast to be under construction in years 2035/36 and 2036/37. It also includes an additional 186 units from the windfall / small sites allowance.

Updated Housing Need and Supply Background Paper Table 5.2: Housing Land Requirement 2016-2037

Requirement	Dwellings
St. Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2037) at average of 486 per year	10, 206 (was 9,234)
Net Completions from 1 April 2016-31 March 2020	2428
Residual requirement over Local Plan period from 1 April 2020 to 31 March 2035	7778 (was 6806)

Updated Housing Need and Supply Background Paper Table 5.3: SHLAA Housing Land Supply 2020-2037

SHLAA Supply 2020 – 2037 (as of 31.03.2020)	Dwellings
Total SHLAA supply– 1 April 2020 until 31 March 2037 as per the updated housing trajectory in Appendix 1 of this Paper (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA)	5097 (inclusive of 180 completions on 6HA and 10HA in years 2036 and 37) (was 4917)
SHLAA capacity reduction for non-delivery as per the updated housing trajectory in Appendix 1 (15% of SHLAA identified capacity for years 6-17 of the Plan period including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA) (3092-15%) (was 2912 -15%)	-464 (was -437)
Residual SHLAA capacity over 17 year Plan period 1 April 2020 - 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA)	4633 (was 4480)
Small sites allowance x 17 years (sites below 0.25ha / 5 dwellings)	1581 (was 1395)
Total Plan period capacity on non-Green Belt land	6214 (was 5875)

Updated Housing Need and Supply Background Paper Table 5.4: Green Belt Land Supply 2020-2037

Green Belt Land Supply 2020-2037	Dwellings
Required capacity to be found on Green Belt land (7778-6214) (was 6806-5875)	1564 (was 931)
20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.)	313 (was 186)
Overall required capacity of sites to be removed from the Green Belt	1877 (was 1117)
Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA)	2170 (was 1870)

Updated Housing Need and Supply Background Paper Table 5.5: Total Supply over the Plan Period 2020-2037

Total Supply over the Plan Period 2020-2037	Dwellings
Total Plan period capacity on non-Green Belt land	6214 (was 5875)
Total Plan period capacity of allocated Green Belt sites	2170 (was 1870)
Total housing supply over Plan period	8384 (was 7745)

Increasing the Plan period to 2037 would increase the employment land requirement by 11.6 ha (ELNS Period 1997-2012, 5.8 ha per annum x 2 years). This increase could be met by the existing LPSD proposed employment land supply. Table 4.4 of the LPSD identifies a residual employment land requirement of 215.4ha (to be updated to 219.2 ha through proposed modification AM015, due to a 'double counting' of site 10EA in both the allocations and existing deliverable supply in Table 4.4 of the LPSD). At 234.08 ha the proposed employment land allocations are 14.68 ha higher than the residual employment land requirement (when excluding site 1EA which is proposed to be allocated to meet Warrington Council's employment land needs, and when allowing for AM015). If the Plan period was extended to 2037, the residual employment land requirement would increase to 230.8 ha (based on a new total requirement of 239 ha for 2012-2037 which is inclusive of 5 year flexibility buffer) which could be met by the proposed allocations which total 234.08 ha.

The Retail and Leisure Study 2017 (EMP004) identifies a need for comparison goods floorspace (between 9,200 and 21,200 sq.m) by 2033. The extension of the Plan period to 2037 is not considered to have significant implications for the retail study forecasts. NPPF paragraph 85 states that in meeting anticipated needs for retail, leisure, office and other main town centre uses, planning policies should look at least ten years ahead. The current forecasts to 2033 would do this.

In terms of the impact on retail floorspace supply, the Council's approach for meeting comparison floorspace need is to pursue 'town centre first' principles and to accommodate as much of this additional floorspace as possible in St Helens Town Centre, specifically to prioritise the re-occupation of vacant units and boost its health. The latest monitoring survey of the town centre undertaken in December 2020 indicated that 26% of town centre units are currently vacant. Through the re-occupation of vacant units and the development of the 'area of opportunity' referred to in Policy LPB01, there is a suitable supply of sites to accommodate the need for comparison floorspace. Given the uncertainty of long term economic forecasts especially for retail provision (particularly at the moment due to the impact of the Covid 19 pandemic) there is not considered to be an urgent need to provide an updated long term forecast to 2037. Instead this could be updated through a Local Plan review.

PQ26. The Plan includes within its title 2020-2035 (front cover), Policy LPA02 has a Plan period of 1 April 2020 to 31 March 2035 and the Glossary refers to the same period. However, the base dates for the employment land and housing requirements are different. Policy LPA04 (employment) refers to a base date of 1 April 2018, whereas Policy LPA05 (housing) refers to a base date of 1 April 2016. What is the base date of the Plan and its period?

The Plan period is 2020-2035. The year 2020 is reflective of when the Council envisaged the Plan would be adopted at the LPSD publication stage in January 2019, i.e. either in the 2019/20 or 2020/21 monitoring years. The base date for the housing requirement is 2016 and the base date for the employment land requirement is 2012.

PQ27. Is there justification for the different base dates for employment and housing requirements?

The base dates applied for the housing and employment requirements have been set to align with the availability of relevant up-to-date data and the methodologies adopted in the housing and employment land need assessments (SD025 and SD022) and are therefore considered justified.

A base date of 2016 is used for the housing requirement as the 2019 SHMA Update (SD025) projected housing need requirements forward from 2016, this was to reflect the use of the 2016-based – ONS Sub-National Population Projections (published in 2018) and the CLG 2016-based household projections (also published in 2018).

As set out on page 33, footnote 20 of the LPSD, the employment land requirement historic take-up methodology used to calculate the OAN (as set out in ELNS Addendum Report, SD022) has a base date of 2012, as there is evidence to suggest that take-up rates since this time have been suppressed by a restricted land supply. Therefore, there is a risk that the inclusion of post-2012 take-up rates in a historic take-up methodology would distort the historic baseline for predicting needs.

LPSD Policy LPA04 refers to a 2018 residual requirement as this accounted for actual take-up of employment land from 2012 (the base date of the employment land OAN) to 2018 at the time of the publication of the LPSD. The calculation of the residual land supply position in the LPSD considered the latest employment land supply monitoring data from 01/04/2012-31/03/2018.

PQ28. In our view the base date of the Plan should align as closely as possible with the evidence base, for example, with Policy LPA05 and a date of 1 April 2016. Are there any significant implications if the base date of 1 April 2016 for the Plan period is used?

There would be no significant implications for the majority of the LPSD policies including LPA05 and the proposed housing requirement.

However, there would be potentially significant implications for the employment land requirement. If the base date of the employment requirement changed from 2012 to 2016 then the OAN requirement would reduce by 23.2 ha or by 11.6 ha (when allowing for an extended Plan period to 2037) compared to the LPSD. This is because four years of the OAN requirement would be removed (or two years under an extended Plan period to 2037).

The ELNS Addendum Report (EMP001) and the ELNS 2015 (EMP002) set out why it was considered appropriate for the base date / forecast period to begin in 2012. In summary it is because 2012 appears to be a reasonable estimate of when supply constraints were starting to have a significant impact on employment land take-up in the Borough. From 2012 up to 2017 there was a significant decline in employment land take-up, which was reflective of a lack of adequate market-attractive supply. If the base date of the employment land requirement was moved to 2016, it would result in 4 years of employment land demand not being accounted for in the employment land requirement, when it is clear there was a need.

If the residual employment land requirement accounted for take-up between 2016-2020, the residual employment requirement would be reduced by 75.11 ha or by 63.51 ha (when allowing for an extended Plan period to 2037) compared to the LPSD. This is because there has been significant take-up in years 2018-2020 at LPSD proposed allocations 2EA, 3EA, and 10EA. If you discounted the proposed allocations that have now been completed (and 1EA which is proposed to be allocated to meet Warrington Council's employment land needs), the remaining proposed allocations would equate to 182.52 ha, which would result in the proposed (non-completed) allocations totalling 26.83 ha above the residual requirement. This differs to the position set out in Question 25 above which would result in the proposed allocations being 4.92 ha above the residual requirement if the Plan period is extended to 2037, but the employment land base date of 2012 is retained. By moving the base date forward from 2012 to 2016 it would remove four years (23.2 ha) from the OAN requirement.

The table below shows how the residual requirement would be calculated (as per Table 4.4 in the LPSD) if the base date of the employment land requirement was changed to 2016 from 2012 and the Plan period extended to 2037.

Local Plan Employment Land Residual Requirement	Hectares
Local Plan OAN 2016-2037 including 5 year buffer and allowance for Parkside SRFI and SuperPort (ELNS Period 1997-2012, 5.8 ha per annum growth scenario over 21 year period: 121.8 ha,+5 year flexibility buffer (29 ha) + 65 ha allowance for SuperPort and Parkside SRFI)	215.8

Take-up between 1 April 2016 and 31 March 2020	56.07
Existing Supply of Developable Employment Land (31 March 2020)	4.04
Total Residual Requirement (2020-2037)	155.69

Paragraph 33 – Local Housing Need Assessment

As set out in Appendix 4 of the Housing Need and Supply Background Paper, (SD025) the current local housing need figure for St Helens is 434 units per annum.

PQ29. Do the reasons for increasing the requirement above the LHN constitute the exceptional circumstances referred to by paragraph 60 of the Framework and set out in the PPG?

The Standard Method was tested in St Helens within the St Helens SHMA Update (January 2019) (HOU001). As set out in Chapter 2, this identified a need for 383 dwellings per annum (dpa). However, in order to meet the Borough’s economic potential, as set out in the St Helens Employment Land Needs Assessment (ELNA) (EMP001) more people and thus more housing was required. The scale of this economic-led housing need is explored in Chapter 4 of the SHMA.

Although Paragraph 60 of the NPPF does talk about exceptional circumstances being required to deviate from the Standard Method, this test is essentially set for authorities seeking a lower number than the Standard Method. In circumstances where a Council is seeking a higher number, Councils should refer to Planning Practice Guidance in relation to Housing and Economic Needs Assessment. At Paragraph 15, the guidance states:

“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.” -Reference ID: 2a-015-20190220 (my emphasis)

As the housing requirement of 486 dpa is in excess of this starting point, the approach in St Helens can be considered sound. As referenced in Paragraph 34 of the Preliminary Matters and Issues document, the PPG provides three examples of where a higher housing need should be considered although the guidance is clear that any consideration of an increase is “*not limited to these situations*”.

It could also be argued that the circumstances in St Helens - in economic terms at least – are relevant to the first example set out in the PPG [2a-010] relating to growth strategies. This is because the employment levels being planned for are

by far in excess of the baseline need. To help achieve this, the Council have also been awarded £1m as part of the Government Towns Fund and are seeking further government and sub-regional funding.

This approach also fulfils the requirement of paragraph 81 of the NPPF which states that planning policy relating to economic growth should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*” (our emphasis).

Whilst fulfilment of economic growth strategies is a legitimate justification for a higher housing figure, there should ideally be a clear link between the evidence to support economic growth and housing growth. This evidence is set out in Chapter 4 of the SHMA Update (HOU001) and is outlined later in this response.

Similarly, economic-led housing numbers have also been tested and found sound elsewhere in the country, including Leeds and Sunderland. In both the named cases, the Local Plans have subsequently been adopted.

PQ30. Should the assessment of employment land requirements align with the most appropriate base date of the Plan, for example 1 April 2016?

See answer to PQ28 above. The alignment of the assessment of employment land requirements to 2016 could have significant implications for the employment land requirement and subsequently for some of the proposed employment allocations, particularly given that they are sites that are proposed to be released from the Green Belt and therefore exceptional circumstances are required to justify their release.

PQ31. Why was there a decline in the take up of employment land between 2012 and 2015 and why has more recent data (for 2016 and 2017) shown that take up remains low? If it is considered that this was due to a lack of adequate supply in the market, what evidence is there to support this assumption?

As set out in Section 2.11 of the ELNS Addendum Report (2019) and section 4 of the Employment Land Need and Supply Background Paper (SD022), employment land take-up in St Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites. This is best illustrated by the experience of other authorities in the same functional economic market area. Halton, Liverpool, Knowsley and Wirral all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015. In Warrington 116.59 ha of employment land (predominately B8) was taken up during 2012-2016. The last large scale B8 site taken up in St Helens prior to the recent completions of proposed allocations 2EA and 3EA was the 15.66 ha Somerfield/Co-op distribution facility (56,290 sqm /605,920 sqft) in 2002/03, and whilst there has clearly been market demand since this time, as illustrated in the high take-up rates in Warrington, there has not been an adequate supply of market attractive sites in St Helens.

PQ32. Is there evidence available to show what demand for employment land has been in the Borough beyond 2017? Does this evidence support the forecasting assumptions that have been made using the baseline scenario?

Up to date land take up data is available in the Employment Land Need and Supply Background Paper (October 2020), which shows continued low take-up beyond 2015 until further land was made available through planning permissions, at which time a significant spike in take-up was recorded (2018/19 4.19 ha and 2019/20 51.53 ha). An upturn in take-up once employment land became available was anticipated in the ELNS Addendum (EMP001).

Stakeholder engagement carried out as part of the ELNS indicated that large scale logistics is the most active market in the region and a particular opportunity for St Helens. There is a clear demand for new employment floorspace in St Helens.

As highlighted in the response to PQ31, high employment land take up in neighbouring boroughs prior to 2017 (when St Helens had very little employment land supply), the responses from stakeholders as part of the ELNS and the large number of planning applications the Council has received for large scale logistics developments since 2017, all support the forecasting assumptions that have been made using the baseline scenario.

PQ33. What evidence is available to support the assumption that past trends in the take up of employment land in the Borough will be replicated in the future during the Plan period?

In 2015 in the preparation of the ELNS, the historic take-up data was reviewed to ensure it was appropriate to take forward as a basis for employment land forecasting. It was observed that the 1997-2015 data had peaks and troughs which is to be expected. In relation to the data, it is noted that:

- The period 1998-2008 was a period of strong economic growth in the UK, reflected in the peak land take-up in St Helens. This period ended with the Global Financial Crisis and subsequent recession, which impacted on business confidence and therefore investment in commercial property.
- Employment land take-up declined in the period 2008-2012, but was not zero, and is most likely to be due to softer market conditions following the Global Financial Crisis.
- There was evidence at the time of the ELNS and Addenda reports that land supply was dampening take-up of employment land in the St Helens market in the most recent years. The evidence of this is that while other areas (e.g. in Warrington at Omega Warrington) saw take up recovering as confidence was rebuilt in the market, St Helens did not see a recovery. As such, the actual land take-up in the period 2012-2015 (which was very low) was excluded from the base upon which the forecast was built. This very low actual take-up was concluded to be due to a lack of supply, rather than a lack of demand.

- As referenced above there has been an upturn in take-up in the last two monitoring years because of new employment sites becoming available, as anticipated in the ELNS Addendum (EMP001).

PQ34. The ELNS Addendum assumes that a large proportion of the need for employment land will derive from the logistics sector (between 110 and 155 hectares). What evidence is available to support this assumption? If it is anticipated that future demand is likely to derive from a greater shift towards large scale B8 logistics and distribution warehousing what effect, if any, is this likely to have on assumptions regarding the need for employment land?

There is strong market evidence that the logistics market is the dominant market currently in St Helens. This includes recent developments for large-scale warehousing at Haydock (Florida Farm and Penny Lane) and current applications or permissions (Parkside, Haydock Point, Omega West). These are for significant, logistics-led schemes, though depending on final permissions, could also accommodate a proportion of B2 industrial or ancillary offices.

If the shift towards B8 is an increase over past take up, then this does not limit the robustness of using historic take up as a method (which assumes that future trends in terms of overall take-up will match past rates). B8 has been a significant component of past take up, so has been accounted for to a significant degree. But if higher take-up than in the past is expected for coming years, which the current market evidence suggests, then this would not be fully accounted for in the baseline take-up forecast. However, this additional shift is for large-scale warehousing, which has a regional function. This is accounted for in the additional demand based on major projects, which is above baseline forecast and is largely to be for B8 uses.

At any rate, overall supply of employment land should be flexible and accommodate a mix of warehousing, industrial and office where appropriate. If it emerges through the lifetime of the Local Plan that the mix between office, industrial and warehousing demand is changing, then having a diverse and flexible range of sites means that such changes can be accommodated.

PQ35. What level of certainty is there that the sites and transport infrastructure will be delivered during the Plan period? Are delivery assumptions realistic?

There is a high level of certainty that the proposed employment allocations and any required supporting transport infrastructure will be delivered during the Plan period. Appendix 1 of the Employment Land Background Paper (SD022) sets out an indicative employment land trajectory which estimates a smooth uptake of employment sites over the Plan period. This is based on realistic assumptions relating to timing of when sites are likely to be brought to the market (including potential phasing), the requirement for any supporting infrastructure, the type of uses proposed on sites and any existing planning approval and developer interest.

The recent take-up of large-scale B8 floorspace at proposed allocations 2EA and 3EA and at Omega, Warrington and the high level of interest within and surrounding St Helens for large scale logistics development, indicates that from a market perspective, there is a high certainty that the proposed employment allocations will be delivered within the Plan Period.

From a deliverability perspective there are no significant transport constraints that would prevent the sites coming forward in the Plan period. Any supporting transport infrastructure is considered deliverable within the Plan period and the Council will continue to work with key partners such as Highways England, LCR Combined Authority, neighbouring authorities and site promoters to ensure such infrastructure is in place to support development. One such example is the approved £24 million funding from the LCR Combined Authority for the Parkside Link Road scheme which will help deliver allocations 7EA and 8EA.

The employment land trajectory set out in the Employment Land Background Paper (SD022) estimates that the Parkside East SRFI site is likely to be operational during the Plan period but may not be fully operational until beyond the Plan period (by 2045). Appendix 2 of the Parkside Strategic Rail Freight Interchange Background Paper (SD024), contains a Delivery Statement prepared by CBRE on behalf of the site promoter iSec, this indicates that development of Parkside East could start in 2024 and would likely take 10 years to complete (therefore completion of this site could be within the Plan period).

Work is on-going regarding potential improvements to Junction 23 of the M6. The Council have commissioned studies (TRA007 and TRA008) in partnership with Highways England and Wigan Council as the first stage in considering options for junction improvements in this location.

PQ36. If the demand for this type of employment land does not come forward as expected during the plan period how will the policies in the plan deal with this issue, including proposals for alternative uses on sites allocated for large scale B8?

As set out in Policy LPA04 Part 4 any proposals to develop the employment allocations for alternative uses not listed in Policy LPA04 Table 4.1 will be refused unless it has been demonstrated that:

- “a) the site is no longer both suitable and viable for an employment use identified in Table 4.1; and*
- b) the site has been offered for employment use on the open market at a reasonable price in a manner and for a period agreed with the Council; and*
- c) the results of the marketing exercise have been transparently shared with the Council; and*
- d) no employment use can be delivered as part of a mixed-use scheme on the site.”*

For all the proposed allocations for large scale B8 uses, Policy LPA04 also identifies B2 as a suitable use, this will provide flexibility should demand for B8 employment land not come forward as expected in the Plan period.

In addition, in accordance with NPPF Paragraph 120, the Council will regularly review land allocations in the Plan and land availability. If at a Local Plan Review stage there was no reasonable prospect of employment land coming forward on a proposed employment allocation, the Council could consider reallocating the land for a more deliverable use that would help address identify needs at the time of the review or if appropriate deallocate a site which is undeveloped.

PQ37. What evidence is available to support the additional need for 55-65 hectares of employment land deriving from major projects and demand from the logistics sector? How has this need been translated into the employment land requirement specified?

The principle of adding further requirement to the baseline demand was due to a recognition that St Helens was likely to have an increased regional role in the LCR, emerging from increasing capacity at the Port of Liverpool and the intended SRFI at Parkside. Given the nature of these emerging assets it was considered that the growth in demand would likely be for large-scale warehousing and for manufacturers attracted to improved logistics assets in the region.

Paragraphs 8.50-8.65 within the ELNS, particularly from 8.59, outline the approach used in looking at additional demand on top of baseline demand. This work has had regard to the LCR regional work on demand for large scale warehousing land across the LCR of 340 ha over 20 years. However, the regional study did not disaggregate to the local authority level and thus the ELNS looked at means of estimating this share for St Helens. It is recognised that it is not an exact exercise to disaggregate this overall demand for St Helens, as it relies on supply and demand issues in each local authority area, local locational benefits, labour force, etc. Therefore, a number of considerations were used (see ELNS paragraph 8.60) when looking to estimate St Helens' share.

Further information was available at the time of the Addenda reports, which demonstrated that the regional and local market for large-scale warehousing, including an updated forecast of large-scale warehousing demand in LCR of 512 ha to 2043. At the St Helens level, there was market evidence that the market was focused on large-scale warehousing as well, with planning permissions at Florida Farm and Penny Lane at Haydock and the Parkside and Haydock Point applications in the pipeline. Recognising this accelerating growth, the additional requirement over the baseline OAN was increased in the Addendum report.

PQ38. The ELNS Addendum also states that the forecasts are based on past trends that included significant periods of recession as well as periods of strong economic growth and periods where the supply of employment land was constrained. The study assumes that once these land constraints are released, there will be a spur on development above the forecast average rate to 2037. What evidence is there to support this assumption and does it

demonstrate that the forecast demand for employment land during the Plan period is realistic?

Up to date land take up data is available in the Employment Land Need and Supply Background Paper (October 2020), which shows continued low take-up beyond 2015 until further land was made available through planning permissions, at which time a significant spike in take-up was recorded (2018/19 4.19 ha and 2019/20 51.53 ha). An upturn in take-up once employment land became available was anticipated in the ELNS Addendum. This would be expected to moderate as the market reaches a new equilibrium.

The forecast growth of employment land to 2037 is based on a baseline take-up matching past growth rates (to 2012, after which supply was too constrained) plus additional demand due to regional factors relating to transport infrastructure projects, which are anticipated to increase demand for logistics space. Therefore, the forecast is realistic, supporting positive growth. However, it is not overly bullish by only being based on a peak period of growth (see response to PQ33), rather it takes into account that there will be variances in demand over the full forecast period.

PQ39. The total supply of allocated employment sites in the Plan (234.08ha - excluding site 1EA) exceeds the residual employment land requirement identified (219.4 ha as updated). What is the justification for this? If it is to provide additional flexibility in supply how does this relate to the 5-year buffer that has also been included in the allowance?

At 234.08 ha the employment land allocations are 14.88 ha higher than the residual employment land requirement (excluding site 1EA and allowing for proposed modification AM015, which updates the residual requirement to 219.2 ha).

The 5 year flexibility buffer (29 ha) aims to ensure an adequate choice of sites by size, quality and location. It is standard practice for employment land assessments to incorporate in a margin of choice into the employment land requirement.

NPPF Paragraph 81 states that planning policies should *“be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances.”* The additional allocations above the employment land requirement (14.88 ha) will provide flexibility to accommodate needs above the St Helens baseline OAN, including for example, providing flexibility to respond to any requirement to meet LCR B8 strategic land needs over and above the 65 ha uplift already applied to the baseline OAN.

The total amount of employment land allocations is also a reflection of the nature and location of the sites considered suitable for allocation. The Plan aims to accord with NPPF Paragraph 139 criterion f, which seeks to ensure that when plans release land from the Green Belt, boundaries are defined clearly, using physical features that are likely to be permanent. Releasing only part of a suitable employment site from the Green Belt to accord neatly with the employment land requirement, would in some instances result in the establishment of a poor Green Belt boundary and piecemeal urban encroachment.

The proposed employment allocations will help ensure that the local economy is able to grow and provide sufficient jobs and prosperity for residents and businesses in the Borough over the Plan period.

PQ40. The LCR Strategic Housing and Employment Land Assessment (SHELMA) identifies a requirement for at least 397 ha of large scale B8 employment development across the Functional Economic Area between 2012 and 2037. These large-scale sites are defined as being capable of accommodating units of over 9,000m2 suitable for the logistics sector.

As the SHELMA does not apportion the need for this type of development at the local authority level what evidence or justification is there to support allocations for this type of development?

See response to PQ37.

PQ41. The supporting text to policy LPA04 also states that the residual employment land needs identified in table 4.4 of the Plan cover a different time period to the SHELMA. How do the time periods differ and what implications, if any, does this have for the need for this type of development during the Plan period?

The forecast period in the SHELMA was 2012-2037, though it did also assess large-scale warehousing growth to 2043 (aligning with the Transport for the North's Freight and Logistics Study). The ELNS and Addenda's forecast period was 2012-2037, matching the SHELMA.

The time period for the employment land requirement set out in Table 4.4 of the Local Plan are for 2018-2035; this is a residual requirement which accounted for actual take-up of employment land from 2012 (the base date of the employment land OAN) to 2018 at the time of the publication of the LPSD.

In transposing the ELNS forecasts to the Local Plan forecast period, representatives of St Helens and BE Group discussed the evidence base and forecasts. As they are primarily based on a land take-up per annum basis, the forecasts were adjusted on a pro rata basis to reflect the adjusted time period at the LPSD stage.

So although the residual employment land requirement set out in the LPSD has different time frames to the SHELMA forecast, the SHELMA forecast has the same base date and time period as the employment land need forecast in the ELNS. The baseline ELNS forecast was simply taken forward on a pro-rate ha/year growth average in the LPSD employment land requirement to match the Plan period (based on the 5.8 ha per year growth scenario – see responses to PQ27 and PQ28 for further information).

The forecasts of the SHELMA were not used to inform the baseline employment land forecast for St Helens but were one factor considered in looking at the additional demand on top of the baseline forecast. As noted in the response to PQ37, the

SHELMA forecast was not disaggregated to local authority area level and thus an exercise was undertaken in the ELNS and the Addenda to estimate St Helens' potential share. The 65ha top up of the baseline forecast to allow for St Helens' potential share of LCR B8 needs identified in the ELNS and Addenda has been fully accounted for in the LPSD residual requirement.

There are therefore considered to be no implications for using a different time period for the residual employment land requirement than the SHELMA forecast period.

PQ42. Warrington Borough Council indicate in the SOCG (SD012) a need for 362 ha of employment land. However, that need has not been tested through an examination. The Warrington LP will not be submitted for examination until 2021 at the earliest. Does the above likely timeline have any consequences for the St Helens LP?

The draft SoCG (SD012) sets out the latest agreed position between the authorities. Under the Duty to Cooperate, employment site EA1 is proposed to meet Warrington Council's employment land needs. It is reasonable to assume that any subsequent revision to Warrington's proposed local plan is unlikely to be as a result of a significantly reduced employment land need. Like St Helens, there continues to be a high level of interest within and surrounding Warrington for large scale logistics development, indeed this was the case when Warrington's existing Local Plan was adopted in 2014 (which has an employment land requirement of 277ha).

Therefore, it is reasonable to assume that the Omega strategic employment site will continue to be a primary focus for major warehousing and distribution developments, and therefore EA1 would continue to be a suitable site to meet Warrington's employment land needs with it forming an obvious extension to Omega.

PQ43. It is stated that the St Helens LP housing requirement is based on the employment allocations in the LP which were reduced from the Preferred Options Stage. Is there sufficient evidence to indicate a clear alignment between housing and employment land requirements?

The evidence in relation to economic-led housing need is set out in Chapter 4 of the St Helens SHMA Update (January 2019) (HOU 001). This draws on the evidence produced by BE Group within the St Helens Employment Land Needs Assessment (ELNA) (EMP 001).

The ELNA considered 3 scenarios that set out different growth rates and four options which modelled particular sites not coming forward. Combined, eight sensitivities were run including scenario 2, option 3 which the housing requirement is based on.

As Table 4 of the SHMA update sets out, Scenario 2 identifies a B-class jobs growth of 7,380 jobs by 2033, which is the middle rate of growth. In addition, 4,587 non B-class jobs are added. Table 5 applies assumptions on commuting to identify a total of 8,503 jobs filled by residents of St Helens.

As Table 8 of the SHMA sets out, Option 3 reflected the removal of Omega South (EA1) and Land North East of Junction 23 M6, Haydock (EA4). These were the two sites the Council removed from meeting St Helens need between the preferred options and submission draft stages.

To clarify, EA1 remains a proposed allocation; however, it is now proposed as an allocation to meet Warrington's employment land need. This contrasts with the position at the preferred options stage, where it was proposed to meet St Helens need.

The homes associated with this site also form part of Warrington's housing land supply. The Warrington Proposed Submission Local Plan (2019) proposed an economic-led housing figure of 945 dpa compared to a standard method (2021-31) of 834 dpa. This economic-led need is based on the LEPs Strategic Economic Plan.

The impact of removing these sites on overall job numbers is seen in Table 9 of the SHMA which identifies an overall growth for St Helens residents of 7,797 jobs. As Table 10 of the SHMA sets out, Scenario 2 Option 3 results in a housing need of 486 dpa which has been taken forward as the housing requirement. There is, therefore, a clear alignment between the scale of economic growth and the housing requirement being planned for.

Matter 3: Spatial Strategy

PQ44. In dealing with density, the Framework requires that minimum density standards should be used for town centres and other locations well served by public transport. In this respect there is no distinction between 3. b) and 3. c) of Policy LPA05 as both aim for 30 dwellings per hectare (dph). Taking into account paragraph 123 of the Framework, should sites falling within b) seek a higher density? (MM). Are there any implications for other policies and proposals within the Plan if higher densities are applied to sites falling within 3. b) of Policy LPA05?

All new housing development should be at a density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport and are in or a district or local centre. Policy LPA05 encourages the use of higher densities in appropriate locations, for example on sites that are close to town or district centres or to public transport facilities. The density as set out in section 3. B) (30 dph) is a minimum. Due to the urban and rural nature of the Borough, a 30dph will be acceptable and in keeping with the existing built development in some local centres, whilst other parts of the Borough (in locations of existing denser development) will require a higher density.

It is intended that this policy approach will enable the Council to review proposals on a case-by-case basis in order to ensure that the appropriate densities are secured. The proposed LPSD provides indicative densities to enable greater discretion and capacity to consider the local character. In addition, the anticipated capacities of the proposed housing allocations as set out in Policy LPA05 (Table 4.5) are informed by consideration of suitable densities having regards to local character and sustainability. The stated capacities of each site listed in the table are indicative and do not represent either maximum or minimum figures. The actual capacity will also be determined having regard to the acceptability of specific proposals in relation to relevant national and local policies. The SHLAA (paragraph 3.47, Figure 3.9) also sets out the rationale for anticipated densities for sites.

On reflection, the Council considers that criterion 3b could be changed to capture 'all other sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services'. Therefore, criterion 3c could be deleted.

Increasing the density numbers for sites falling with 3b of Policy LPA05, may impact slightly on the number of sites required to meet housing requirements, but there would still be a clear need for Green Belt release to meet housing needs.

PQ45. How has the quantum of land to be safeguarded been determined?

NPPF Paragraph 139 requires that when local planning authorities define Green Belt boundaries, they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period. However, national

planning policy and guidance does not set out how local planning authorities should determine what amount of land beyond the Plan period would be deemed adequate.

In the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land. Being mindful of the uncertainties that are inherent with calculating longer term needs and the need to demonstrate exceptional circumstances to justify the release of Green Belt land, the Council have not sought to identify a specific employment land need figure for post 2035. The Council have instead identified a reasonable amount of land to be safeguarded in order to meet future development needs. Policy LPA06 identifies 2 sites to be removed from the Green Belt and safeguarded in order to meet longer term development needs beyond the Plan period:

- Site 1ES: Omega North Western Extension, Bold (29.98 ha); and
- Site 2ES: Land north east of Junction 23 M6, south of Haydock racecourse, Haydock (55.9 ha).

The estimated combined capacity of 1ES and 2ES safeguarded for employment use is 85.88 ha. Of these sites, site 1ES would form an extension to Omega North (but would meet employment land needs in St Helens), whilst site 2ES would form an easterly expansion of Haydock Industrial Estate, albeit on the opposite side of the M6.

While the Council have not used a specific methodology for calculating post Plan period needs, the Plan period housing requirement is considered a reasonable basis to measure the provision of safeguarded land against. When projecting forward the housing requirement of 486 dwellings per year, the estimated combined capacity of the sites safeguarded for housing of 2,641 dwellings equates to 5.4 years of housing supply. If you remove the cap of 500 dwellings applied at site 3HS by Policy LPA06 (based on highway capacity issues), then the safeguarded sites provide for 6.4 years of housing supply.

PQ46. We would like clarification on whether site 1ES 'Omega North Western Extension, Bold' is being safeguarded to meet any unmet future need for employment land arising from Warrington BC. We also note the consultation response from Warrington BC regarding this site that due to its scale and possible access arrangements, they do not consider that the site could contribute to Warrington's future employment land supply. Considering the above, is the safeguarding of site 1ES justified and consistent with national policy?

Site 1ES is safeguarded to meet future need for employment land arising in St Helens not Warrington. Site 1ES would form an extension of the current Omega North strategic employment site which is located in Warrington but borders St Helens.

As referenced above, it is recognised that Warrington Council have identified potential access issues with the site and suggest a new access from the M62 would be required to serve the site. St Helens Council accept that there could be potential feasibility issues with access, as access would have to be gained through third party land. The Council also recognise that any potential impacts on Junction 8 of the M62 would have to be considered and the subject of agreement with Warrington Council and Highways England. However, current access issues are not considered insurmountable and therefore the site is still considered developable. The safeguarding of the site is therefore justified and consistent with national policy.

PQ47. Paragraph 138 of the Framework requires that Plans set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements. How does the Plan intend to deliver compensatory improvements as there do not appear to be any relevant policy provisions?

The Council's strategic compensatory improvement to offset the impact of removing land from the Green Belt is the implementation of the Bold Forest Park AAP (2017) (LOC004). The BFP Area Action Plan (AAP) forms part of the St. Helens Development Plan and provides a framework for the development of the BFP area. BFP occupies an area of 1,800 hectares of Green Belt land in the southern-most part of St Helens Borough, The Forest Park is 2 miles from St. Helens Town Centre and well served by public transport, providing a sustainable and accessible recreational resource for residents to enjoy. In that sense, the Council already has a borough-wide initiative to provide a very large semi-natural greenspace recreational resource in the Green Belt.

In addition, policies within the BFP AAP seek to ensure that new development in the BFP contributes to the further enhancement of the BFP, including improving connectivity between the Borough's urban area and the Forest Park and contributing financially to the infrastructure of the park.

Compensatory improvements will be also addressed on a site by site basis with the main compensatory improvements likely to take the form of expanding and improving public rights of ways in and around proposed development sites, providing opportunities for outdoor sport and recreation on previously inaccessible Green Belt sites, providing woodland and ecological network links, improving access to existing sites and retaining and enhancing landscapes, visual amenity and biodiversity.

For example, in regard to sites 4HA & 5HA, the Council will seek compensatory improvements to the Bold Forest Park, for which both these sites lie within. Site 4HA is expected to provide additional tree planting and a choice of foot, bridleway and cycle routes through the site and this must include new provision in line with the relevant policies of the Bold Forest Park AAP. While site 5HA is required to provide good connectivity to the Park and assist in providing access and utility services to a new visitor's car park and centre.

The required approach for comprehensive masterplanning for the strategic housing and employment sites (Policies LPA04.1 and LPA05.1) provides the opportunity through the masterplanning process to seek compensatory improvements to the environmental quality and accessibility of the Green Belt.

Various policies within the Local Plan will help achieve the compensatory improvements, including:

- Policy LPA09: Green Infrastructure;
- Policy LPA11: Health and Wellbeing;
- Policy LPC07: Greenways;
- Policy LPC08: Ecological Network; and
- LPC09: Landscape Protection and Enhancement.

These policies will help seek improvements to the landscape, including additional tree coverage; improve and increase the connectivity of the Greenway network, including incorporation of holistic Green Infrastructure Plans; and increase accessibility of open space within walking distances of housing and employment sites, thereby encouraging public health principles by encouraging improved access to attractive public areas and green spaces, by promoting opportunities for walking and cycling.

PQ48. The Plan at paragraph 4.6.2 refers to the need in the LCR to accommodate the growth of the logistics and warehousing sector. Is St Helens the most sustainable location for this form of development having regard to connections to the port of Liverpool?

St Helens is a very strong area for large-scale employment, midway between Liverpool and Manchester and with major east/west and north/south arterials (M62, M6, A580) and east/west and north/south rail links. With the intent for Parkside to include an SRFI, which would include connections to Port of Liverpool, there is a strong argument for significant large scale logistics in St Helens. The SRFI would enable a higher percentage of freight to be moved by rail, which would have efficiencies of movement and reduced emissions. Furthermore, given land supply constraints in close proximity to the Port, it is appropriate that St Helens have an increased role in the supply of land to support the logistics sector. It is not unusual for logistics parks to be located away from a port, but still have a significant working relationship with it.

PQ49. Policy LPA02 requires that substantial new employment development is required to be served by high quality road, public transport and active travel links. Although Policy LPA04.1 requires provision of, or financial contributions to, transport infrastructure for strategic employment sites, this may not, in itself, deliver the infrastructure required by Policy LPA02. Taking into account the above how will necessary transport infrastructure for substantial new employment development be delivered?

Alongside Policy LPA04.1, Policies LPA07 and LPA08 seek to ensure that new

development is supported by appropriate transport infrastructure.

The Council will continue to work with key partners including the Liverpool City Region Combined Authority, Merseytravel, Highways England, developers, landowners and neighbouring authorities to secure funding (where required) to deliver the infrastructure required to deliver the strategic employment sites. One recent example is the £24 million funding for the proposed Parkside Link Road scheme from the Liverpool City Region Strategic Investment Fund. Another is the £2,856,000 (+ 10% developer contribution) Local Growth Fund Sustainable Transport Enhancement Programme (STEP) funding received for the new highways junction to enable access to site 2EA.

As set out above in the response to PQ7, there are a number of ongoing transport projects that the Council are involved in which seek to link active travel and public transport to proposed Local Plan allocations. These projects seek to maximise the efficiencies of the Borough's existing transport network and increase the provision and capacity for travel modes that are most sustainable (walking, cycling and public transport). An example is the redevelopment of Newton-le-Willows rail station (which lies in close proximity to the Parkside West site). This approach will continue throughout the Plan period.

Paragraph 58: Policy LPA01 (Presumption in Favour of Sustainable Development)

This can be dealt with through a modification which removes the policy from the Plan (MM).

Matter 4: Housing and Employment Allocations and Safeguarded Land

Paragraph 60: planning permissions or applications pending for proposed allocations.

A schedule of planning permissions and live applications for the proposed allocations can be found in Appendix 1. This will be updated in advance of the hearing sessions.

Paragraph 61: Requirements within Appendix 5 should be site specific.

The Council have reviewed the requirements within Appendix 5 and could address this issue by removing any reference to the generic policies of the Plan through a modification (MM).

The following generic wording could be removed from the site profiles:

- ~~The design and layout of the development must integrate well with that of the surrounding area.~~
- ~~Financial contributions for education and off-site highway works may also 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.~~

Paragraph 62: Site profiles in Appendix 7 for safeguarded land should be deleted.

The Council consider that the site profiles in Appendix 7 help illustrate that the safeguarded sites are developable sites over the longer term, and therefore assist in justifying their removal from the Green Belt. Given that the sites are being removed from the Green Belt, it is felt that the profiles provide some development parameters that offer reassurance to the local community and certainty to developers as to what future development requirements could be.

Matter 5: Housing Land Supply

Paragraph 65: Updates to Table 4.6

As referenced Appendix 5 (specifically tables 5.2, 5.3, 5.4 and 5.5) of the Housing Need and Supply Background Paper (SD025) provide an update to (as of 31 March 2020) and a simplified version of LPSD Draft Table 4.6. The Council wish to put these tables forward as a replacement to Table 4.6 in the LPSD. This could be proposed as a modification (MM).

As suggested these tables will be updated in advance of the hearings to show the supply position as of 31 March 2021 (inclusive of an extended Plan period to 2037 if appropriate).

PQ50. Why has a lapse rate not been included for those sites with planning permission?

An allowance of 15% has been made for reduced delivery on the SHLAA sites over the later years of the Plan period (6-15 years). This is inclusive of those sites with planning permission that are expected to be under construction during years 6-15. Of the 2912 units expected to be under construction in years 6-15 on SHLAA sites and including non-Green Belt allocations 9ha and 10ha, 1697 of these units are on 35 sites that have a planning permission (inclusive of the following 'type of sites' as set out in the housing trajectory in Appendix 1 pages 40-49 of the SD025: *SHLAA_2017 - now with planning permission and not started, SHLAA_2017 - now with planning permission and under construction, planning permission: not started, planning permission: under construction, planning permission: historically stalled site and new large site with planning permission and under construction*). A 15% discount on these sites equates to 255 units. It is considered that applying a separate lapse rate for those sites with planning permission for sites in the 6-15 year supply would involve double counting.

There are 31 sites (with a total of 1647 units) with planning permission expected to be under construction in years 0-5. 18 of these sites (totalling an expected delivery of 729 units) are currently under construction. 13 of these sites have a planning permission (totalling 918 units) but have not yet commenced. A lapse rate has not been applied to sites with planning permission expected to be under construction in years 0-5 years as these sites are considered deliverable. It is not considered appropriate to apply a lapse rate for sites with planning permission considered deliverable because the majority of sites with planning permission in the Borough consistently commence on site.

As set out in Table 4.1 of SD025, the annual average rate of housing completions achieved over the past 10 years is 517 gross dwellings (497 net) which is higher than the proposed housing requirement of 486. These completions have taken place on a mix of site sizes and are therefore similar to those proposed in the LPSD housing supply.

In addition, in order to provide flexibility in the housing supply, a 20% increased allowance has been added to the Green Belt required capacity. It is considered that this alongside the delivery discount to the SHLAA 6-15 year site supply will help to ensure a flexible and deliverable supply can be maintained in the Plan period.

Housing delivery will be monitored annually to ensure that there is a deliverable 5 year supply and there is a requirement for a Local Plan review after 5 years. Such mechanisms will allow the Council to identify any potential problems with housing delivery well before the end of the Plan period.

In addition, there is no specific national guidance requiring that a lapse rate should be applied to sites with planning permission in the 5 year housing land supply. The key consideration within the NPPF and the PPG is the inclusion of deliverable sites. The NPPF focuses on identifying a suitable supply of deliverable sites and then applying a 5% or 20% buffer. The increased 20% buffer is to be provided in cases where there is a persistent record of under achievement against the housing requirements. St Helens does not have a record of persistent under delivery of housing completions.

Notwithstanding the Council's view on this matter as set out above, if a lapse rate were to be applied, then this should only be applied to the 13 sites that have a planning permission (totalling 918 units) that have not yet commenced and are expected to be under construction in years 0-5. If a 10% lapse rate was applied this would equate to 92 units.

Representations to the LPSD have not raised the issue of a lapse rate.

PQ51. Other than those which have secured planning permission since the SHLAA base date of 1 April 2017, is there further evidence to support the SHLAA sites being considered deliverable or developable? For example, could updated Site Assessments be provided for those sites which do not have planning permission?

Updated SHLAA site assessments are to be provided by 26th February 2021.

PQ52. Would greater certainty be provided within the Plan if SHLAA sites (or the larger sites) were to be allocated?

SHLAA sites over 300 units that had not commenced at the time of the publication of the 2017 SHLAA are proposed to be allocated in the LPSD. It is not considered that greater certainty would be provided by allocating more SHLAA sites (or the larger sites) as many large sites counted in the SHLAA supply have an existing planning permission which in itself offers a high degree of certainty. The Council already acknowledge there will likely be some delays to the delivery of some of the brownfield sites, hence the application of a 15% delivery discount applied to the SHLAA supply (including proposed allocations 3HA, 6HA, 9HA and 10HA). This discount alongside the 20% increased allowance to the required Green Belt capacity will help ensure that a flexible and deliverable supply can be maintained in the Plan period.

There would need to be an update to the SA and HRA for additional proposed allocations and updates to Policies LPA05 and LPA05.1.

The proposed approach for SHLAA sites to form part of the housing land supply alongside specific allocations, is an approach that has been found sound in various other Local Plans, for example in the Sunderland and Sefton Local Plans.

PQ53. What evidence has been used to inform the delivery assumptions about these stalled sites? Should a lapse rate be applied to stalled sites?

As set out in SD025 there are 4 historically stalled sites (HL189, RH11, HL363 and TC43) counted in the housing supply (in years 11-15) totalling 235 units. HL363 (84 units) has now commenced. The sites are still considered developable as they have each stalled for unique site specific reasons that are capable of being addressed, as has happened for HL363. Discussions with landowners and stakeholders have informed the delivery assumptions. The updated SHLAA site assessments will provide an update to the assessments for these sites.

As set out in the response to PQ50 an allowance of 15% has been made for reduced delivery on the SHLAA sites over the later years of the Plan period (6-15 years). This is inclusive of those sites with planning permission that have historically stalled. It is considered that applying a separate lapse rate for historically stalled sites would involve double counting.

Paragraph 69: Housing Trajectory

As referenced an updated housing trajectory has been included in Appendix 1 of SD025, this could replace 4.3 through a modification (MM). If required, this will be updated following the updated SHLAA assessments and will be provided by the 26th February.

As requested, building on the information provided in SD025 a composite spreadsheet will be prepared showing how allocations and other major sites (including commitments and SHLAA sites) will deliver for each year over the Plan period. This will be provided by the 26th February.

PQ54. The trajectory shows a very significant increase in delivery between 2025/26 and 2026/27, particularly from SHLAA sites. Is the significant spike in delivery realistic and supported by evidence?

As above the trajectory will be updated following the updated SHLAA assessments and will be provided by the 26th February.

It is recognised that there is a spike in the 2025/26 and 2026/2027 years as this is when the proposed Local Plan allocations (from the Green Belt supply) start to feature more considerably in the supply once appropriate lead-in times have been allowed for. Such a spike is also reflective of the fact that the Council has been cautious when assessing sites as deliverable, and there are therefore a number of sites in the 6-10 year period that do not have any significant site constraints preventing them from coming forward within the 0-5 year period, but because they do not currently have a planning permission or are not being promoted actively through the development management process yet, they have not been counted in

the 5 year supply. Instead they are considered developable and are counted in the 6-10 year period. Other sites are in the 6-10 year period as a result of discussions with landowners, site promoters and stakeholders and assumed delivery is based on evidence of likely lead-in times and infrastructure requirements (particularly for the proposed allocations from the Green Belt supply). The spike is therefore considered realistic, but it will be reconsidered as part of the updated SHLAA site assessment referred to above.

PQ55. Are there any measures that the Council can take to provide more elbow room in terms of the 5-year supply?

In preparing the housing trajectory (as updated in SD025), the Council has given detailed consideration to the rate that new homes can be built on different types of sites within the overall land supply, and the lead in times required for supporting infrastructure. As set out above, the Council have taken a cautious and sensible approach when assessing sites as deliverable in the first 5 years. The trajectory confirms that the Plan provides for a sufficient land supply to deliver the overall housing requirement for the Borough. However, the need to release Green Belt land and the lead in times and infrastructure requirements to support these sites as well as some of the large brownfield land allocations, means that there is likely to only just be a 5 year supply on adoption of the Local Plan.

In order to provide more elbow room in the supply, the Council could consider stepping the housing requirement whereby there is a slightly lower level of housing delivery for the first 5 years of the Plan period (with a lower annual requirement) and then an increased annual requirement over the remaining years of the Plan.

As set out in section 4.10 of SD025 there is evidence to support increasing the small sites allowance from 93 to 103 units per annum; this would provide a further 50 units in the 5 year supply.

The 5 year supply position on adoption of the Plan could change following the updated SHLAA site assessment work. Any updates will be provided by 26th February.

PQ56. What evidence is there that housing completions on the SHLAA sites without planning permission will begin within 5 years?

Response to be provided by 26th February.

Paragraph 72: 5 Year Supply key assumptions and parameters

The Local Plan 5 Year Housing Requirement table in Appendix 2 of SD025 sets out the key assumptions and parameters which will be relied upon to calculate the five-year housing land supply upon adoption of the Local Plan. This illustrates that currently the use of a 5% buffer is appropriate and that any shortfall in supply will be spread over the next 5 years (the Sedgefield approach). This table could be added to the reasoned justification of Policy LPA05 through a modification (MM).

Policy LPA05 4 b) states that the 5 year land supply requirement shall include any buffer that is required under national policy.

Matter 6: Employment Land Supply, Employment Policies and Town Centres

Paragraph 74: Residual Employment Land Supply Position

Table 4.2 of the Employment Land Need and Supply Background Paper (SD022) provides an update to LPSD (as of 31.03.2020) Table 4.4: Residual Employment land requirement – 2018 until 2035. As suggested this table could be updated through a modification (MM). By the time of the hearings the position will reflect the position at 31.03.2021.

PQ57. Is the existing land supply only 5.46 ha? What about the permissions for 4 sites referred to in Footnote 15 (as amended by AM016)?

As set out in the Table 4.2 of SD022, the existing supply of developable employment land at 31.03.2020 is 4.04 ha. Sites 2EA, 3EA and 10EA have all now been completed. 9EA has extant planning permission (1291/107) for the erection of a 6500m² industrial building and other industrial development, which was granted 20/5/1992 and lawfully commenced (only material works have been carried out on site). The site also has lapsed permission P/2012/0043 for the erection of an industrial/warehouse unit 15,500m² (use classes B1/B2/B8). Given the length of time that has passed since the extant planning permission was obtained it has not recently been counted in the supply of employment sites as the deliverability of the extant permission is uncertain. The site is proposed as an allocation for B1, B2 and B8 uses.

PQ58. Section 5 of Policy LPA04 seeks protection of existing employment sites unless other uses can be justified. However, paragraph 121 of the Framework advocates a positive approach to applications for alternative uses of previously developed land. Is the Council satisfied that Policy LPA04 is consistent with national policy in relation to these particular provisions?

Policy LPA04 does not exclude future alternative development on existing employment sites, but in the first instance seeks to protect existing employment sites and premises. This approach is to protect employment opportunities in the Borough and to provide opportunities for the growth of existing businesses in the Borough. The proposed allocations within the LPSD mainly focus on large scale employment development and the Council recognise that some losses of employment sites will take place during the Plan period reflecting local restructuring, as the current stock contains several older sites that are less likely to meet future needs, and are on a scale that reflects past industrial patterns rather than future requirements. However, smaller existing urban employment areas will still have an important role to play in accommodating smaller scale employment development.

As per existing Core Strategy Policy CE 1, the Council are satisfied that Policy LPA04 is flexible enough to protect existing employment sites where appropriate, while allowing for the redevelopment of existing employment sites for non-employment uses where it can be demonstrated that sites are no longer suitable or economically viable for employment uses. Such an approach has enabled alternative

uses to come forward on existing employment uses in recent years when existing employment sites have faced increased pressure from higher value uses such as residential and retail. For example, the Borough experienced a loss of 28ha of employment land between 2012-2020. There are also a number of large sites with extant planning permission for residential use that have not yet commenced (as of 31.03.2020) on former employment sites, these include Former Linkway Distribution Park (proposed housing allocation 9HA), Former Ibstock Brick Site (SHLAA ref HL483) and Land At Lea Green Farm East (SHLAA ref HL496), these total 27.94ha. At 31.09ha proposed LPSD housing allocation 6HA would also represent a large loss of employment land. Approval for non-employment uses on these sites illustrates the flexibility of the policy approach.

Paragraph 77: Marketing Period for Employment Use on Allocated Sites

This could be dealt with through a modification (MM) which updates the reasoned justification to Policy LPA04 to include reference to a minimum marketing period of 18 months for allocated employment sites.

Paragraph 78 & 79: Changes to the Use Classes Order (UCO)

The changes to the UCO will have no significant impacts on the effectiveness of the LPSD, but there will need to be some modifications made to the wording of those policies impacted by the change in use classes.

NPPF Paragraph 85 criterion b sets out that planning policies are expected to define the extent of primary shopping areas. The primary shopping area relates to the application of the sequential approach, with the aim of focusing retail development in the primary shopping area. Following the changes to the UCO, with retail and other main town centres uses now included in Use Class E, the difference between retail and other town centre uses is now unclear. However, it is considered that continuing to support and retain retail uses within the primary shopping area is still a credible objective.

The table below sets out potential updates to specific LPSD policies.

Policy	Implications from UCO change	Explanation
Policy LPA02	Reasoned Justification, Para 4.6.11 which reads: <i>'new employment development falling within use classes B1, B2 and B8'</i> , will be updated to: <i>'new development falling within uses classes B2 and B8 and for light industrial, offices and research and development uses'</i>	Class B1 uses are now subsumed into the new Class E.

Policy LPA04	Criterion 5 a) which reads: <i>'the land or building (or any part of it) is no longer suitable and economically viable for B1, B2 or B8 use'</i> will be updated to: <i>'the land or building (or any part of it) is no longer suitable and economically viable for B2, B8 or light industrial, offices and research and development uses.'</i>	Class B1 uses are now subsumed into the new Class E.
Policy LPA04	Criterion 6 which reads: <i>'Proposals for the re-use, re-configuration or re-development for B1, B2 or B8 uses of land or buildings used for B1, B2 or B8 uses'</i> will be updated to: <i>'Proposals for the re-use, re-configuration or re-development for B2, B8 or light industrial, offices and research and development uses of land or buildings used for B2, B8 or light industrial, offices and research and development uses'</i>	Class B1 uses are now subsumed into the new Class E.
Policy LPA04	Reasoned Justification, Para 4.12.2 which reads: <i>'within the B1 (business), B2 (general industrial) and B8 (storage and distribution) use classes'</i> will be updated to: <i>'within the B2 (general industrial), B8 (storage and distribution) use classes and for light industrial, offices and research and development uses'</i>	Class B1 uses are now subsumed into the new Class E.
Policy LPA04 Table 4.1 'Appropriate Use(s)	For allocations 9EA, 10EA and 11EA	Class B1 uses are now subsumed into the new

	appropriate uses reads: 'B1, B2, B8' this will be updated to ' <i>light industrial, offices and research and development, B2, B8</i> '	Class E.
Policy LPA04 Table 4.2 'Employment Type' Column	<p>'B1 (a) Office' will be updated to 'Office'.</p> <p>B1 (b) '<i>Research and development</i>' will be updated to '<i>Research and Development</i>'.</p> <p>B1 (c) '<i>Light Industry</i>' will be updated to '<i>Light Industry</i>'.</p>	Class B1 uses are now subsumed into the new Class E
Policy LPA04	Reasoned Justification, Para 4.12.11 which reads: ' <i>The draft SHELMA also assesses the need for B1, B2 and for smaller scale B8 development (of less than 9,000m2)</i> ' will be updated to: ' <i>The draft SHELMA also assesses the need for light industrial, offices and research and development, B2 and for smaller scale B8 development (of less than 9,000m2) uses</i> '	Class B1 uses are now subsumed into the new Class E
Policy LPA04	Reasoned Justification, Para 4.12.12 which reads: ' <i>the Borough's needs for B1, B2 and small scale B8 uses</i> ' will be updated to: ' <i>the Borough's needs for light industrial, offices and research and development, B2 and small scale B8 uses</i> '	Class B1 uses are now subsumed into the new Class E
LPB01	Criterion 3 which reads ' <i>refused unless they would be to Class A1 retail use or</i> ' will be updated to ' <i>a main town</i>	Class A1 now included in Use Class E. Primary Retail Frontages and Secondary Retail Frontages proposed to be

	<i>centre use or uses that would contribute positively to the overall vitality and viability of the centre’.</i>	removed (see answer to Paragraph 82 below)
LPB01	Reasoned Justification Para 5.3.10 which reads: <i>‘The first preference for the location of new retail development is within the Primary Shopping Area. Proposals for retail uses’</i> will be updated to: <i>‘The first preference for the location of Class E and Sui Generis retail main town centre uses development is within the Primary Shopping Area. Proposals for Class E and Sui Generis retail main town centre uses that are...’</i>	Retail main town centres uses are now included in Use Classes E and Sui Generis.
LPD10	Reasoned Justification Para 8.30.2 which reads: <i>‘Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses within Classes A3 to A5 of the Use Classes Order i.e., restaurants and cafes, drinking establishments and hot food takeaways. 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’</i> will be updated to <i>‘Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses within Class E and Sui</i>	Use Classes A1, A3 & A5 all now fall within Use Classes E and Sui Generis

	<p><i>Generis uses, of the Use Classes Order 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 Sui Generis. The policy does not apply to shops within Use Class E that sell food for consumption off the premises’.</i></p>	
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PQ58. Policy LPB01 refers to St. Helens Town Centre and Central Spatial Area. Is it sufficiently clear from the wording of the policy how the ‘Central Spatial Area’ is defined?

The Central Spatial Area designation is shown on the Policies Map. The reasoned justification to Policy LPB01 could be amended to signpost to this (AM). A plan showing the Central Spatial Area boundary could also be inserted into Appendix 11 (MM).

PQ59. Policy LPB01 also refers to ‘areas of opportunity’. The policy states that these areas have been identified for future development. How have these areas been identified and defined? When is development expected to take place in these areas and how will the policies in the Plan deal with development proposals that come forward?

The ‘Area of Opportunity’ was identified through the St Helens Consultation Draft Town Centre Strategy (2017) (EMP011). The area defined indicatively on the Policies Map reflects one part of the ‘Growth Quarter’ (located to the south of the Primary Shopping Area) identified in the Strategy. The Growth Quarter has been identified as an arc of opportunity to enhance the vitality and viability of St Helens town centre and its role as a sub-regional shopping centre.

As set out in modifications to the Plan, the Council has entered into a strategic partnership agreement with the English Cities Fund (ECF) that seeks the delivery of a Borough wide regeneration strategy, commencing with St Helens Town Centre. The ECF Regeneration Partnership will help deliver a comprehensive redevelopment of the Town Centre and Central Spatial Area, including new commercial activity. The Council has also successfully secured an initial capacity funding grant to support the development of a Town Deal Board and Investment Plan from the Government’s Town Deal fund to help with projects around land use and regeneration. The Town Investment Plan is being submitted to Government at the end of January 2021.

Initial ECF masterplanning work to understand the Borough's needs and priorities, along with identifying the potential first phases of regeneration to be developed in the two town centres of St Helens and Earlestown, is underway and is expected to be complete by summer 2021 alongside the creation of a Development Framework. As there is no programme for the commencement of development as yet, whether it is expected to take place in the area of opportunity has not yet been established. However, alongside the ECF work, proposals for redevelopment of St Helens Town Centre are being advanced; one such example is the proposed demolition of Chalon Way Car Park (which was granted approval in December 2020) which lies directly south to the area of opportunity and is seen as a key development site providing the opportunity for transformational canal-side regeneration.

The Town Centre Strategy (2017) identifies the need for a transformational solution to re-position and 'shrink and link' the town centre to become an attractive destination with a varied offer of retail, leisure and culture - particularly for families, to quickly reverse a declining trend and find the basis for a more sustainable future.

As set out in Policy LPB01 criterion 1 "*Development that would support the delivery and implementation of the Council-led strategy for the future regeneration and development of St. Helens Town Centre will be supported.*" It is considered that policies in the Plan will provide a flexible framework to support future regeneration proposals. For example, Policy LPB01 supports housing proposals and other suitable uses within or on the edge of St Helens Town Centre where they would avoid prejudicing the retail and service role of the Town Centre.

Paragraph 82: Primary and Secondary Frontages

The Council recognises the shift away from 'Primary and Secondary Frontages' to a 'Primary shopping area' as outlined in Paragraph 85a) of the NPPF and supporting Town Centre definition.

On reflection the Council do not consider the identification of a Primary and Secondary Frontages is necessary. The Council consider that this could be addressed through modifications (MM) along the lines of those shown in the table below.

Current policy/ paragraph	New policy/ paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification
LPB01 Criterion 3		Proposals for the change of use of units in the Primary Retail Frontages <u>Primary Shopping Area in St Helens Town Centre</u> will be refused unless they would be to a be to Class A1 retail use or another main town centre use <u>main town centre use</u> 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.	To align with the NPPF.
LPB01 Reasoned Justification Paragraph 5.3.9		5.39 To guide the application of 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)	
LPB01 Reasoned Justification Paragraph 5.3.13 – 5.3.14		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. The Secondary Frontages will provide greater opportunities for a diversity of	

		<p>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</p> <p>secondary frontages that would result in the loss of an active ground floor use with open display windows.</p>	
Policies Map		<i>Remove Primary and Secondary Frontages area designations</i>	
Appendix 11 St Helens Town Centre Plan		<i>Remove Primary and Secondary Frontages area designations</i>	
Glossary		<p>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</p>	

Matter 7: Specific Housing Needs and Standards

PQ60. Policy LPC01 refers to 5% of homes on larger developments being bungalows. However, the SHMA Update (HOU001) indicates that it is difficult to quantify the need/demand for bungalows. Taking into account the above, is the 5% requirement justified.

The NPPF requires local planning authorities to plan for a mix of housing to address the housing needs of groups with particular needs such as older and disabled people. The SHMA Update, 2019 (HOU001) states that the sources used for analysis in the SHMA make it difficult to quantify a need/demand for bungalows as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, the SHMA does indicate that it is typical to find a demand for this type of accommodation and thus the Council should consider the potential role of bungalows (paragraph 7.40) as part of the future mix of housing.

The table below helps to illustrate how an ageing population is forecasted to increase through the Plan period from 2020 to 2035. It shows that St Helens currently has a higher population percentage of 65 years+ than England, the North West and the Liverpool City Region, and that this is forecasted to remain the position in 2035. It is forecasted to have a higher population percentage of 85 years+ than the Liverpool City Region and the North West region by 2035.

	Population Change: 65yrs +		Population Change: 85yrs +	
	2020	2035	2020	2035
England	18.53%	22.96%	2.50%	3.73%
North West	18.88%	22.95%	2.39%	3.52%
Liverpool City Region	19.18%	23.12%	2.50%	3.38%
St Helens	20.70%	24.13%	2.33%	3.59%

(Source: ONS 2018 - based subnational principal population projections for local authorities and higher administrative areas in England)

Analysis of local demographic data and RSL and Council housing waiting lists demonstrate the need for bungalows within the Borough. For example, RSL Torus have confirmed that they currently have 789 applicants on their lists who need a ground floor property. Of this total, 646 need a one bedroom property whereas 118 need a two bedroom property. Over the past 12 months (from January 2020) only 80 bungalows have become available.

The Council's Occupational Health service have been working very closely with Torus over the years in placing people in purpose built bungalows and demand for them has always been very high when people have bid on the properties. The Council will always try to adapt existing properties or move people to an adapted property that meets their needs but the most suitable outcome for most people would be wheelchair accessible bungalows.

LPC01 requires 5% of dwellings on greenfield sites delivering 25 or more units to be bungalows. This requirement was tested in the Local Plan Economic Viability Assessment, 2018, (VIA001) and was found to be viable. This gives the Council confidence that new development in the Borough will be able to fulfil this policy requirement and remain viable.

There has been continuous support for this policy requirement during the consultation stages from local residents who have identified a lack of bungalows in existing settlements. The 5% seeks to provide a balance between meeting the housing needs for particular groups with specific needs and ensuring the policies within the Plan are deliverable and justified, given potential impacts on viability (through increased plot sizes) this requirement can potentially have.

Based on local evidence and the results of whole plan viability testing (VIA001), it is the Council's position that the 5% requirement is justified.

PQ61. The Framework (footnote 46) indicates that policies may make use of the NDSS where the need for an internal space standard can be justified. Has consideration been given to the inclusion of a policy requirement relating to the NDSS?

The Council did consider utilisation of internal space standards through the NDSS in the plan-making process, however, there was a lack of sufficient local evidence available to the Council that would justify their inclusion. Furthermore, the Council consider that there are sufficient policies within the LPSD, that enables decision makers to resist development that would not provide a high standard of amenity for future or existing residents. For example, Policies LPA03 and LPD01 require new development to secure a high standard of amenity for future and existing occupiers.

PQ62. Paragraph 64 of the Framework expects that at least 10% of homes on major developments should be for affordable home ownership. However, sites in Affordable Housing Zone 1 would not be expected to provide any affordable housing. Whilst reference is made to viability constraints, paragraph 64 of the Framework does not include such a consideration as an exception. Is Policy LPC02 justified and consistent with national policy?

There is a need for affordable housing across the whole of the Borough. However, it is recognised that delivery of this is dependent on the viability of development. The zonal approach taken in Policy LPC02 seeks to ensure that the policy is realistic and deliverable, whilst trying to ensure affordable housing requirements are achievable across the broadest range of sites.

NPPF Paragraph 64 is not a mandatory requirement in so far that it states that "planning policies and decisions **should** expect at least 10% of the homes to be available for affordable home ownership" (our emphasis).

The NPPF should be read as a whole. NPPF Paragraph 34 says that Plans should set out what development is expected to provide, and that the requirement should not be so high as to undermine the delivery of the Plan:

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”

NPPF Paragraph 57 stresses the importance of viability in the plan-making process:

“Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.”

Paragraph 67 of the Framework clearly states that:

“...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability...”

Furthermore, the PPG sets out requirements with regard to the need for planning policies to be informed by evidence and the need for policies to be realistic:

“Plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards including the cost implications of the Community Infrastructure Levy (CIL) and planning obligations. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (PPG23b-005-20190315).

Affordable Housing Zone 1 proposed in Policy LPC02 includes the St Helens Town Centre and Parr wards. Both these wards fall within the most deprived 10% of LSOAs in England and are lower value areas in terms of house prices. Utilising their extensive and in depth knowledge of development within the Borough, Keppie Massie produced a Local Plan Economic Viability Assessment (VIA001). The results of their testing proposed and supported this zonal position. On brownfield sites the results show that even without affordable provision, development is generally not viable in either of the Town Centre and Parr wards. At higher densities, with a greater amount of built floorspace and more efficient use of the site the level of deficit reduces, but the provision of affordable housing is still not viable.

The table provides an overview of recent applications on SHLAA sites located within these two Affordable Housing Zone 1 wards. Applications for residential development are predominantly for 100% affordable housing provided by a Housing Association or provide no affordable housing provision due to viability issues.

Affordable Zone 1 – Town Centre Ward	
SHLAA Sites	Notes
7	The site has been built out by a Housing Association and has therefore provided 100% affordable housing – 26 units.
16	The site proposes 12 units to be built out by a Housing Association, thereby providing 100% affordable housing.
21	The site has been built out by a Housing Association and has therefore provided 100% affordable housing – 66 units.
78	The site is currently under construction and comprises of 130 extra care apartments by a Housing Association, thereby providing 100% affordable housing.
89	The site is currently under construction and comprises of 32 units by a Housing Association, thereby providing 100% affordable housing.
9, 23, 59, 61, 62, 64, 65, 79, 100, 106, 115, 116, 133, 142, 143, 151, 154, 156	Sites within this ward that do not benefit from planning permission (an update of these sites will be provided as part of the response to the Inspectors question in Paragraph 67).
Affordable Zone 1 – Parr Ward	
SHLAA Sites	Notes
3, 4, 5	These three sites comprised of the same development scheme, that have now been completed. The residential development consisted of 52 new dwellings, no affordable housing or financial contribution was provided due to viability issues.
85	The site has been built out by a Housing Association and has therefore provided 100% affordable housing.
13, 18, 69, 114, 129, 130	Sites within this ward that do not benefit from planning permission (an update of these sites will be provided as part of the response to the Inspectors question in Paragraph 67).

The Council therefore consider that the zonal approach in terms of Zone 1 is justified and based on proportionate local evidence as shown in the Local Plan Economic Viability Assessment and local knowledge and experience. It is a realistic and deliverable policy approach that accords with the NPPF as a whole and the guidance in the PPG.

PQ63. The Plan does not include provisions for rural exception sites for affordable housing. Has consideration been given to such a policy?

Consideration has been given to such a policy but there is no local evidence indicating the need for such a policy. The 2019 SHMA update (HOU001) considered the affordable housing needs of the whole Borough and did not identify separate housing market areas within the Borough. There is no separate rural housing study which demonstrates the need for rural exception sites for affordable housing. The

need for such a study has not been suggested or raised through the plan-making process.

Whilst it is recognised that rural exception sites can be an important policy tool to deliver affordable housing to smaller settlements, which can help to maintain the sustainability of rural communities, there are very few areas / settlements that could be considered remote in St Helens, and as such would benefit from a housing exception sites policy. Furthermore, the Plan is proposing to allocate sites in the Green Belt as extensions to the existing urban settlements located in close proximity to the rural areas, it is considered the delivery of affordable housing on these sites will help meet the need for affordable housing for residents in those areas.

PQ64. Policy LPC03 includes criteria that will be considered for traveller sites. Is it realistic to expect traveller sites to be within walking distance of shopping, education and health facilities and employment opportunities or served by public transport? PPTS does not include any such requirement, including in paragraph 13. In terms of travelling showpeople, should the policy include a criterion relating to space for fairground rides, larger vehicles and repair equipment?

Paragraph 13 of the PPTS clearly stipulates that “*Local Planning Authorities should ensure that traveller sites are sustainable economically, socially and environmentally*”. Therefore, it is considered that in order for sites to be ‘socially sustainable’ they should have access to shopping, education and health facilities and to help ensure sites provide a settled base.

Due to the extensive public transport network in the Borough, the majority of existing Traveller sites within the Borough are situated within walking distance or have good access to public transport which allows them access to a range of community facilities and employment opportunities. Therefore, the Council do not consider it unrealistic that future traveller sites would also be able to benefit from the same advantage.

Regarding whether the policy should include a criterion relating to space for fairground rides, larger vehicles and repair equipment, on reflection the Council feel that the policy should include a criterion relating to space for fairground rides, larger vehicles and repair equipment. This could be dealt with through a modification (MM) along the lines of:

“b) sites for Travelling Showpeople must also be of sufficient size to accommodate suitable storage, maintenance and testing of items of mobile equipment, as appropriate”.

Matter 10: Infrastructure and Delivery

PQ65. Is the Council satisfied that the LP proposals would not have an unacceptable impact on highway safety or the residual cumulative impacts on the road network would not be severe?

The Council is satisfied that proposed development in the Local Plan would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe.

Page 132 of the Local Plan Transport Impact Assessment (TRA003) states that: *“the additional traffic growth (in the region of 14-16%) associated with traffic from the Local Plan Sites is also forecast to worsen the level of operation at some locations. However, the forecast models indicate that the impact can be substantially mitigated by a combination of committed and emerging future highway infrastructure projects, modest changes in travel behaviour and lower cost improvements across key junctions”.*

The Transport Impact Assessment does not identify any highway safety concerns as a consequence of additional traffic on the network arising from the development. Several of the committed network changes referred to in section 3.7 of the report refer to road safety improvements being incorporated within the improvement schemes.

As set out in the LPSD, the Council is working closely with infrastructure and service providers (including the Liverpool City Region, Merseytravel, Highways England, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including (in appropriate cases) through the use of contributions and through the implementation of highway improvement schemes.

The Infrastructure Delivery Plan (IDP) (SD013) will support the implementation of the Local Plan and sets out what level of new or improved infrastructure will be required to deliver the growth proposed. Table 2 (page 15) of the IDP sets out the identified pressure points within the highway system and potential improvements to the highway network. All infrastructure improvements designed to mitigate Local Plan development included within the IDP would fully incorporate road safety considerations and features within schemes. Some of the highway schemes included in the IDP are complete, others are in progress, with funding secured for a number of significant schemes.

As evidenced in the Transport Impact Assessment, whilst there are potentially some individual locations where the highway network may see some cumulative impacts higher than the baseline position after mitigation, these will need to be considered and understood in the context of more detailed local assessment work associated with individual planning applications and Transport Assessments.

When considering the network as a whole, the Council is satisfied that residual cumulative impacts are manageable and at an acceptable level, rather than a severe level. This conclusion is further strengthened given the amount of growth and allocations proposed in the LPSD were reduced from those modelled in the Transport Impact Assessment, and as such the modelling results represent a robust and worst-case scenario.

Policy LPA08 seeks to ensure that new development is supported by the appropriate infrastructure. Policies LPA07 and LPA08 address the potential issue of traffic from new development. Policy LPA07 states that “*all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement*”.

Through the robust Transport Impact Assessment, the implementation of Policies LPA07 and LPA08 and the tailored mitigation measures included in the IDP, the Council is satisfied that the Local Plan proposals would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe.

PQ66. Section 1 a) of Policy LPA07 refers to the delivery of transport infrastructure but there is no reference to rail improvements. Is there any particular reason for the exclusion of rail within this part of the policy?

Paragraph 1(e) of Policy LPA07 refers to rail improvements. For clarity the wording in Policy 1(a) could be amended to include ‘rail’ through a modification (MM).

PQ67. Is there an evidence base document or background paper that provides more detail on the new station at Carr Mill and the proposed Skelmersdale Rail Link referred to in policy LPA07 e)?

A development brief for the new Station at Carr Mill exists titled: Land adjacent Laffak Road and Carr Mill Road Development Brief, October 2009 (LOC021). The site is currently the subject of a planning application for residential use (which also seeks to safeguard land for the railway station), Liverpool City Region Combined Authority and Merseytravel transport officers have been consulted appraising the application. The new station is referred to as ‘a selected new station’ in the Liverpool City Region Combined Authority Long Term Rail Strategy (2018) (see TRA009).

The Skelmersdale Rail Link scheme is also referenced in the Long Term Rail Strategy (TRA009). Skelmersdale Rail Link Business Case Study Final Report was complete in 2015 (see TRA010). The Skelmersdale Rail Link scheme is being led by Lancashire County Council.

PQ68. Section 9 refers to vehicle parking standards being included in a review of the Ensuring a Choice of Travel SPD, June 2010 (LOC009). However, any requirements for parking and vehicle charging points are likely to have impacts on viability and should normally be included within the Plan, possibly as an Appendix. In setting standards, paragraphs 105

and 106 of the Framework are relevant. *Is it feasible to include local parking standards in the LP?*

The Local Plan Economic Viability Assessment, 2018, (VIA001) tested vehicle charging points. As set out in the Study

“We have assessed a cost of £220 per dwelling for electric vehicle charging points based on a 15 amp (3.7kw) supply using heavy duty cables from the distribution board and located within the walls of the house. This would be switched with a dual pole ‘garage unit’ in a suitable location. The costs exclude any charging equipment which is assumed to be supplied with the electric vehicle.” (Paragraph 2.49).

“The cost of electric vehicle charging points is minimal and makes no significant difference to the base construction costs and will have a very limited impact on overall viability (Paragraph 6.65).

The viability assessment based the assumed parking provision for new development on the minimum standards set out in Appendix 3 of the Council’s existing Ensuring a Choice of Travel SPD (2010) (LOC009). An update is planned for this SPD but it is envisaged that this will not be complete until the Local Plan is adopted. However, any new parking standards are not expected to depart too much from the adopted standards.

PQ69. Policy LPA02 indicates that housing development on previously developed land will be encouraged by setting lower thresholds for developer contributions. However, Policy LPA08, other than a reference to economic viability, does not provide any further policy criteria to reflect the spatial strategy. Other than the affordable housing zones in Policy LPC02, other policies do not appear to differentiate in terms of developer contributions for infrastructure. How is the strategy in relation to developer contributions to be implemented by the LP?

The re-use and redevelopment of previously developed land in key settlements remains a key strategy and priority not only for the Plan but for the Council as a whole. The Council clearly wants all proposed development sites to deliver an appropriate level of developer contributions. However, it is recognised that viability is a challenge in particular parts of the Borough (see the response to PQ62 above).

As referenced, the zonal approach for the delivery of affordable housing is one part of the Council’s strategy to encourage the development of previously developed land. The other will be the implementation of Policy LPA08 which provides the flexibility for the relaxation of developer contribution requirements if through a site specific viability appraisal, it is demonstrated that development contributions would not be viable. Policy LPA08 also provides a Hierarchy of Developer Contributions where viability constraints are robustly demonstrated. Decisions will be made on a site by site basis, as infrastructure planning is an iterative process and the precise nature of infrastructure needed to support a specific site will be influenced by a

number of factors that will change over time, such as the state of the economy and the nature of any site specific constraints.

The IDP (SD013) which will be updated regularly through the lifetime of the Plan, will act as a tool to help ensure that any existing or likely infrastructure capacity issues are understood and clearly identified.

PQ70. The PPG indicates that strategic policies can identify existing and proposed green infrastructure networks. Policy LPC05 refers to open space. Policy LPC06 refers to the hierarchy of wildlife sites. Policy LPC07 refers to 'Greenways'. These areas are identified on the Policies Map. Are these designations the full extent of the Green Infrastructure network to be identified by the LP?

Various designations are identified on the Policies Map that are encompassed within the term 'Green Infrastructure'. These are nature improvement areas (NIA's), local wildlife sites (LWS) and nature reserves (LNR), greenways and open space and recreation areas.

NIA's are an integral component of the wider LCR Ecological Network as they are a principle mechanism for improving, restoring and managing wildlife. These specifically identified areas provide opportunities to improve existing nature conservation sites, build ecological connectivity through habitat creation and restore ecological processes. There are two NIA's located within the St Helens Borough namely, Knowsley and Sefton Mosslands and Blackbrook and Sankey Valley Corridor. Biodiversity off-setting, mitigation, compensation or changes in land management can be delivered specifically within these areas.

Additionally, St Helens Borough currently has many LWS's located across the borough and seven LNR's.

Importantly, it should be noted that any areas of open space equating to 0.2ha or less are not identifiable on the Policies Map, however such are protected by policy LPC05.

The current greenway network is displayed on the Policies Map, The Reasoned Justification to Policy LPC07 states that two new greenway routes are proposed by the Council but are subject to funding and other feasibility requirements being met. These potential new routes are shown indicatively in Figure 7.2 of the LPSD (p.107) but are not on the Policies Map.

Matter 11: Monitoring and Implementation

Paragraph 104: Development Plan Policies to be replaced by the Local Plan

A proposed modification (AM) could address this issue. An additional appendix could be added to the LPSD which states the following:

“When adopted the new St Helens Borough Local Plan 2020-2035 will replace all of the policies contained in the St Helens Local Plan Core Strategy (2012) and the St Helens Unitary Development Plan Saved Policies (2007).

The Joint Merseyside and Halton Waste Local Plan (2013) and The Bold Forest Area Action Plan (2017) will not be replaced by the new Local Plan; these will remain part of the St. Helens Development Plan.”

Clarification on Additional Modifications

PQ71. AM079 refers to ‘land rear of 2 to 12 Leyland Green Road and 168 Booth’s Brow, Garswood’ that has been included in the Green Belt. The land was not included in the Green Belt in the 1998 UDP and was also identified in error in the earlier 2016 Green Belt Review as location. It is proposed that this land is removed from the Green Belt as it was included in error. What implications, if any, would this change have for the Plan? Was this land the subject of representations at any stage during the Plan’s preparation and if so what comments were made?

Land identified in AM079 was incorrectly identified as Green Belt on the LPSD Policies Map. The Council can confirm that the Local Plan is not proposing to establish any new Green Belt and therefore this area of land should not be displayed as Green Belt land.

There are no direct implications for the Plan.

This land was not subject to any representations at any stage of the Plan’s preparation. Planning permission was approved in 2016 for a detached dwelling and garage.

PQ72. AM080 and AM081 propose some boundary changes to various sites including the Borough Cemetery, Windle – Registered Park and Gardens and the Rainhill Conservation Area boundary.

Are these changes necessary for soundness reasons and if so why? What implications, if any, would these changes have for the Plan? Was the land the subject of representations at any stage during the Plan’s preparation and if so what comments were made?

The changes as proposed in AM080 (boundary change to the Borough Cemetery, Windle) and AM081 (Rainhill Conservation Area) are not considered necessary for soundness reasons as they are merely drafting corrections to ensure their boundaries are correctly defined, as they were originally inaccurately drawn on the LPSD Policies Map.

There are no direct implications for the Plan.

The proposed change AM080 was identified by the Lancashire Gardens Trust (RO1539), who commented “*Borough Cemetery, Windleshaw is shown as RPG but the north boundary is indicating a slightly smaller area of listing than the actual boundary currently indicated on HE website. This needs correcting.*” This detail was then verified via Historic England’s website and amended accordingly.

Proposed change AM081, was identified by officers following the publication of the LPSD Policies Map.

Other Minor Comments

We suggest some minor changes to assist with clarity. These do not go to soundness but to be helpful we have set these out in Appendix 2.

The suggested changes can be incorporated into an updated schedule of modifications (AM).

Appendix 1: Schedule of Planning Permissions or Applications Pending for Proposed Allocations and Safeguarded Sites

Proposed Employment Site Allocations

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
1EA	Omega South Western Extension, Land North of Finches Plantation	Bold	Application called in for determination by SoS	P/2020/0061/HYBR	Site currently the subject of a planning application for: full Planning Permission for the erection of a B8 logistics warehouse (unit 1: 81,570 sqm) offices ... Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices ... the outline proposals include an extension to unit 1 of 123,930 sqm. (Totalling 205, 500 sqm). No date has been set yet for the public inquiry.
2EA	Land at Florida Farm North, Slag Lane	Haydock	Site is complete and fully occupied	P/2016/0608/HYBR	P/2018/0478 Florida Farm (M6 Major) two units complete (measuring 34 ,114 sqm and 48,634 sqm). Smaller unit occupied by Amazon and larger unit by Kellogg's.
3EA	Land North of Penny Lane	Haydock	Site is complete and fully occupied	P/2015/0571/HYBR	Penny Lane North (Haydock Green) - unit is occupied by Movianto.
4EA	Land South of Penny Lane	Haydock	Site does not have an extant planning permission or pending application		
5EA	Land to the West of Haydock Industrial Estate	Haydock	Site does not have an extant planning permission or pending application		
6EA	Land West of Millfield Lane, South of Liverpool	Haydock	Site does not have an extant planning permission or pending application		

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Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
	Road and North of Clipsley Brook				
7EA	Parkside East	Newton	Site does not have an extant planning permission or pending application		The delivery of the Parkside Link Road (PLR) is critical to delivering this site. An application for the PLR has been submitted (from the A49 Winwick Road through the former Parkside Colliery to junction 22 of the M6 motorway) (P/2018/0249/FUL) and was called in by SoS and was the subject of a public inquiry in January 2021.
8EA	Parkside West	Newton	Application called in for determination by SoS	P/2018/0048/OUP	Phase 1 application for the construction of up to 92,000 sqm of employment floorspace (Use class B8 with ancillary B1(a)). A public inquiry took place in January 2021. Please note a separate application for a link road from the A49 Winwick Road through the former Parkside Colliery (Site 8EA) to junction 22 of the M6 motorway, known as the 'Parkside Link Road' (P/2018/0249/FUL) was also called in by SoS and was the subject of a public inquiry in January 2021.
9EA	Land to the West of Sandwash Close	Rainford	Site has an extant planning permission		Site has an extant planning permission (1291/107) for the erection of a 6500m ² industrial building and other industrial development, which was granted 20/5/1992 and lawfully commenced (only material works have been carried out on site).
10EA	Land at Lea Green Farm West	Thatto Heath	Fully operational and complete	P/2016/0567/HYBR	
11EA	Land at Gerards Park, College Street	Town Centre	Site has an extant planning permission	P/2016/0903/FUL	P/2016/0903/FUL granted permission for phase 2: erection of three industrial units containing 20 workshop units for use class B1, B2 and B8 totalling 3308sqm. Development not yet commenced but site clearance is underway.

Proposed Safeguarded Employment Sites

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
1ES	Land North of M62 and South of Gorse Lane	Bold	Site does not have an extant planning permission or pending application.		
2ES	Land to the East of M6 Junction 23 (South of Haydock Racecourse)	Haydock	P/2017/0254/OUP was refused and has been called in for determination by SOS	P/2017/0254/OUP	Outline Planning application with all matters other than access reserved for the development of the site for up to 167,225m ² of B8/B2 (up to 20% B2 floor space), ancillary office and associated site facilities floor space, car parking, landscaping, site profiling, transport, drainage and utilities infrastructure. Public inquiry to take place in February 2021.

Proposed Housing Site Allocations

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
1HA	Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood	Billinge & Seneley Green	Site does not have an extant planning permission or pending application		
2HA	Land at Florida Farm, (South of A580), Slag Lane	Blackbrook & Haydock (area outside Green Belt)	Site does not have an extant planning permission or pending application		
3HA	Former Penlake Industrial Estate, Reginald Road	Bold	Site has an extant planning permission and is under construction	P/2018/0251	134/337 units completed as of 31.03.2020
4HA	Land bounded by Reginald Road/Bold Road/Travers	Bold	Site does not have an extant planning		

ST HELENS BOROUGH LOCAL PLAN 2020-2035
 RESPONSE TO PRELIMINARY MATTERS, ISSUES AND INITIAL QUESTIONS (JANUARY 2021)

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
	Entry/Gorse Lane/Cawford Street (Bold Forest Garden Suburb)		permission or pending application		
5HA	Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane	Bold	Site does not have an extant planning permission or pending application		
6HA	Land at Cowley Street, Cowley hill, Town Centre	Moss Bank	Planning application pending	P/2020/0083/OUEIA	Demolition of existing buildings and outline planning permission with all matters reserved except for means of access for up to 1,100 dwellings and up to 3,925sqm of mixed use floorspace providing for flexible use within Use Classes A1, A2, A3, A4, B1, C1, D1 and D2 with associated landscaping and infrastructure. Expected to go to planning committee in spring 2021.
7HA	Land west of the A49 Mill Land and to the East of the West Coast Mainline Railway Line	Newton	Site does not have an extant planning permission or pending application		
8HA	Land South of Higher Lane and East of Rookery Lane	Rainford	Site does not have an extant planning permission or pending application		
9HA	Land at former Linkway Distribution Park, Elton Head Road	Thatto Heath	Site has an extant outline planning permission	P/2018/0060/HYB	Hybrid Planning application comprising of a full planning permission for demolition of existing buildings and structures and outline application all matters reserved except for access for residential development (up to 352 dwellings).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
RESPONSE TO PRELIMINARY MATTERS, ISSUES AND INITIAL QUESTIONS (JANUARY 2021)

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
10HA	Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton	Town Centre	Site has outline planning permission and reserved matters application is pending	P/2011/0058 / P/2021/0015/RES	P/2021/0015/RES application pending for approval of Reserved Matters (Layout, Appearance, Landscaping and Scale) following approved permission P/2011/0058 for a residential development comprising 258 dwellings.

Proposed Safeguarded Housing Sites

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road	Billinge & Seneley Green	Site does not have an extant planning permission or pending application		
2HS	Land between Vista Road and Belvedere Road	Earlestown	Site does not have an extant planning permission or pending application		
3HS	Former Eccleston Park Golf Club, Rainhill Road	Eccleston	Site has a pending application	P/2020/0791/HYEIA	Hybrid Planning Application comprising of Outline Consent for up to 646 dwellings (Parcels 1(a), 2, 4, 5, 6 & 7) up to 4,000 Sq. ft of Convenience Retail (E(a) Use) and up to 7,100 Sq. ft E(f) Nursery.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
 RESPONSE TO PRELIMINARY MATTERS, ISSUES AND INITIAL QUESTIONS (JANUARY 2021)

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
					Detailed planning permission for 168 dwellings (Parcel 1) and 186 dwellings (Parcel 3).
4HS	Land East of Newlands Grange (former Vulcan Works) and West of West Coast Mainline	Newton	Site does not have an extant planning permission or pending application		
5HS	Land West of Winwick Road and East of Wayfarers Drive	Newton	Site does not have an extant planning permission or pending application		
6HS	Land East of Chapel Lane and South of Walkers Lane, Sutton Heath	Thatto Heath	Site does not have an extant planning permission or pending application		
7HS	Land South of Elton Head Road (adjacent to St, John Vianney Catholic Primary School)	Thatto Heath	Site does not have an extant planning permission or pending application		
8HS	Land South of A580 between Houghtons Lane and Crantock Grove	Windle	Site does not have an extant planning permission or pending application		

Proposed Gypsies and Travellers Site Allocations

Site Reference	Site Name	Ward	Planning Status	Planning Reference	Further information
GTA01	Land north of Sherdley Road and West of Sutton Heath Road, Sherdley Road	Thatto Heath	Site does not have an extant planning permission or pending application		
GTA02	Land adjacent to land east of Sherdley Road Caravan Park, Sherdley Road	Thatto Heath	Site does not have an extant planning permission or pending application		