

# St Helens Local Plan

Sustainability Appraisal

Second Addendum to the SA Report

June, 2021

## **Revision History**

Revision	Revision date	Details	Name	Position
v1.0	1 <sup>st</sup> June, 2021	Draft report for client review	lan McCluskey	Associate Consultant
V1.1	3 <sup>rd</sup> June, 2021	Final Report	lan McCluskey	Associate Consultant

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## NON TECHNICAL SUMMARY

This SA Addendum has been prepared in response to discussions held at Hearing Session 1 (25<sup>th</sup> May, 2021) of the St Helens Local Plan Examination in Public.

Several participants at the session claimed that there were inconsistencies / formatting errors in relation to the site appraisal summary tables in the main SA Report and the corresponding site proformas in the technical appendix.

As a result, further checks have been carried out and any inconsistencies have been rectified.

In summary, the following issues were identified and changes made accordingly.

#### Employment site appraisal summary - Table 6.1

No changes required. All 22 sites correct.

#### Housing site appraisal summary - Table 6.2

76 housing sites in total (2 colouring errors)

- SA5 needs to change from grey to green for site AECOM22
- SA8 needs to change from grey to amber for site AECOM 46

#### Site selection outline rationale – Table 6.3

• Site AECOM 31 was transposed incorrectly and has now been changed.

#### Site Proformas in Technical Appendix A

Three errors were found in total in relation to colouring.

- Site 80 Proforma Criteria SA9 colour is incorrect (but correct in table 6.2)
- Site 82 Proforma SA17 is green, should be / (not applicable) is correct in the summary table 6.2
- Site 89 Proforma SA17 is green, should be a / (not applicable) Is correct in the summary table 6.2

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## 1. Introduction

- 1.1.1 During Hearing Session 1 (25<sup>th</sup> May, 2021) of the Examination in Public for the St Helens Local Plan, participants raised concerns that there were factual errors in the SA Report (SD005). These issues are listed below and are dealt with through this Addendum.
  - It was claimed by participants that parts of Table 6.1, Table 6.2 and Table 6.3 of the SA Report did not match with the corresponding site appraisal proformas in Technical Appendix A (SD005.3) (specifically in relation to the colouring of criteria).
  - It was claimed that the SA site appraisal framework contains incorrect colouring for Criteria SA16.
  - It was claimed that the application of SA Criteria SA13a is not consistent across all of the sites.
- 1.1.2 In addition, there were discussions about the source of information and methods employed when determining site appraisal scores. To improve clarity, an additional column has been added to the site appraisal framework addressing these matters.

# 2. Formatting corrections

#### 2.1 Action taken

- 2.1.1 In response to discussions at Hearing Session 1, all of the site appraisal scores in tables 6.1, 6.2 and 6.3 of the SA have been cross referenced with the corresponding proformas in Technical Appendix A (SD005.3).
- 2.1.2 No formatting errors have been found with regards to Table 6.1 in the SA Report. Therefore, no further action is required.
- 2.1.3 For Table 6.2, two formatting errors have been found within the SA Report.
  - For Site AECOM 22, Criteria SA5 needs to change from grey to green
  - For Site AECOM 46, Criteria SA8 needs to change from grey to amber
- 2.1.4 For Table 6.3, only Site AECOM 31 has incorrect text in relation to the rationale. This is the site that was identified at the hearings as being incorrect (GBP\_033).
- 2.1.5 All site scores in relation to SA criteria 13a have been cross referenced with the site appraisal framework to ensure that a consistent approach is taken to the application of a green score for 'larger housing sites that could deliver a primary school on site'. As a result, the score for SA13a has been changed from grey to green for all of the following sites:
  - AECOM75 / Site 8HS (GBP\_98).
  - AECOM 21 / Site 1HS (GBP\_025a)
  - AECOM 76 / Site 10HA (Moss Nook Urban Village)
  - AECOM53 / Site 2HA (GBP\_60)
  - AECOM78 / Site 6HA (Land East of City Road)
  - AECOM55-59 / Site 4HA (GBP\_74)
  - AECOM 34 / GBP\_037
  - AECOM 54 / GBP 70
  - AECOM 99 / GBP\_104
- 2.1.6 A number of corrections to site scores were also made in the first SA Addendum (SD005.4). For clarity, we have replicated the relevant sections of Tables 6.1, 6.2 and 6.3 below to reflect all of the changes made since the publication of the SA Report (i.e. capturing the site corrections recorded in both SA Addendums). Where criteria have been changed, the cell in the matrix has been highlighted in bold.

## 2.2 Amendments to Table 6.2 (including changes detailed in SD0054)

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3.Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
21	GBP_025_a	Land west of Garswood	Garswood	Site 1HS						ı											/		
22	GBP_025_b	Land west of Garswood	Garwood	Site 1HA																	/		
34	GBP_037	Land east of M6 and south of Haydock Park Golf Club	Haydock	Discard																	/		
46	GBP_051_a	Land north-east of Newton-le-Willows, adjacent to M6	Earlestown	Discard																	/		
53	GBP_060	Land at Florida Farm, Slag Lane, Haydock, WA11 0UZ	Blackbrook	Site 2HA																	/		
54	GBP_070	Land west of Parr and Sutton	Parr	Discard																	/		
55- 59	GBP_073	Land west of Neills Road, and south of Bold, north of Gorsey Lane	Bold	Site 4HA																	/		
78	N/A	Land east of City Road, Cowley Hill	Urban area	Site 6HA																	/		
75	GBP_098	Land south of A580 East Lancashire Road and east of Houghtons Lane, Windle	Windle	Site 8HS																	/		?
76	N/A	Moss Nook Urban Village, Watery Lane	Urban area	Site 10HA																	/		
99	GBS_104	(H61) Land south of Howards Lane East of Gillars Lane	Eccleston	Discard																	/		

#### 2.3 Amendments to Table 6.3:

2.3.1 Table 6.3 in the SA Report (page 45) sets out the 'outline reasons' for the allocation, safeguarding or discarding of sites. Where changes have been deemed necessary, they are included below. Given that the table consists of more than 90 sites, and only one has been found to be transposed incorrectly, it is considered unnecessary to replicate the entire table.

Aecom Site ID	GB ID	Site Name	Status	Rationale (See the St Helens Green Belt Review 2018 for further details)
31	GBP_0 33	Land to the east of M6 Junction 23	Discard	The site is not currently available and contains a LWS that will require a significant buffer. The site also contains an Ancient Scheduled Monument and partially falls within a conservation area. Allocation would require a large site to be released from greenbelt when only a proportion is suitable.  Development could potentially have significant effects with regards to the highway capacity of Junction 23 of the M6. The site makes a high contribution to the Green Belt and could have negative effects on biodiversity. The Council considers that it can meet its needs for employment development up to 2035 elsewhere within the Borough without this parcel being allocated.

### 2.4 Amendments to proformas

- 2.4.1 As a result of the additional checks that have been performed, it was found that three formatting errors exist in the actual site proformas within Technical Appendix A. These are as follows:
  - Site AECOM 80 Criteria SA9 colour is incorrect. This is correct in corresponding table 6.2.
  - Site AECOM 82 SA17 is green, should be / (not applicable). This is correct in corresponding table 6.2.
  - Site AECOM 89 SA17 is coloured green, it should be / (not applicable). This is correct in corresponding table 6.2.

# 3. Confirmation of site assessment methods and sources of data

#### 3.1 Introduction

- 3.1.1 The Site Appraisal Framework is set out in **Appendix II** of the SA Report (SD005, page 145). It has been replicated below with the following corrections and additions:
- 3.1.2 **Criteria SA 16** The colouring for one of the criteria thresholds was incorrect. This has been addressed as follows:

The site has potential deliverability issues.

The site has potential deliverability issues.

3.1.3 An additional column has also been added to the table to explain data sources and methods in more detail.

# Updated Site Appraisal Framework

	SA Objectives	Criteria	Date source / appraisal method
1	To protect and enhance biodiversity	<ul> <li>Effects unlikely</li> <li>Over 400m from a SSSI, SAC or SPA.</li> <li>Over 100m from a local wildlife site.</li> <li>Potentially adverse effects</li> <li>Within 400m of a SSSI</li> <li>Within 100m of a local wildlife site, priority species or habitats, ancient woodland.</li> </ul>	Open source GIS shape files: SPA, SAC  Council supplied data: SSSI Local wildlife site TPO Ancient woodland Local Sites RAG Sept15
	Applicable to all site options	<ul> <li>Effects likely without mitigation</li> <li>Contains or adjacent (50m) to a SSSI.</li> <li>Loss of Local Wildlife Site.</li> <li>Contains priority species. TPO on site. Ancient Woodland onsite</li> </ul>	Measurements taken from site boundary with Euclidian distance.
2	To protect and improve land quality in St Helens  Applicable to all site options	Does not contain any agricultural land Grade 1-2 Contains less than 10 ha of agricultural land 1-3b Contains more than 10 ha of agricultural land 1-2 or >20ha of 1-3b land. Contains more than 20ha of agricultural land 1-2 or >50ha 1-3b	Open Source Data GIS files: Provisional Agricultural land Classification  Overlap tool used to identify % and amount of intersect between sites and agricultural land layers.
3	To improve air quality in St Helens  Applicable to all site options	Housing development under 1000 dwellings over 2km from an AQMA HGV generating employment development over 2km from an AQMA Housing development within 1km of AQMA HGV generating employment development within 2km from an AQMA HVG generating development within AQMA Housing development over 200 units in AQMA	Council supplied data: AQMA shape files  Measurements taken from site boundary to AQMA boundary with Euclidian distance

4	To maintain and enhance the quality of controlled waters and to sustainably manage water resources.  Applicable to all site options	Site is located within or adjacent to (within 100m) a groundwater source protection zone 1 or 2 Site is not located within or adjacent to groundwater source protection zone 1 or 2	Open Source Data GIS files: Source Protection Zones  Measurements taken from site boundary to SPZ boundary with Euclidian distance
5	To mitigate and adapt to the impacts of climate change  Applicable to all site options	Site presents opportunities for enhancement of GI network.  Site will be required to contribute towards increased tree cover  Site too small to accommodate green infrastructure enhancements on site.	Indicative boundary of Bold Forest Park Digitised.  Measurements taken from site boundary to Bold Forest Park boundary with Euclidian distance
6	To minimse the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.  Applicable to all site options	Site is located entirely within Flood Zone 1 and / or Surface water flooding 1000 years  Some of the site is in Flood Zones 2 or 3 (up to 50%) and / or Surface water flooding 100 years  Most of the site is in Flood Zones 2 or 3 (more than 50%) and / or surface water flooding 30 years	Council supplied data: Flood Zones 2 and 3  Overlap tool used to identify % of intersect between sites and flood zone 2 and 3 layers with the remainder being in flood zone 1.
7	To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.	Site will lead to enhancement of a derelict site.  Site is within a landscape character area considered to have a low landscape sensitivity  Site is within a landscape character area considered to have a low -medium or medium landscape sensitivity  Within 400m of a prominent ridgeline  Site is within a landscape character area considered to have a medium-high or high landscape sensitivity	Council supplied data: Landscape Sensitivity Areas and Prominent Ridge Lines.  Overlap tool used to identify % of intersect between sites and landscape sensitivity areas.  Measurements taken from site boundary to prominent ridges with Euclidian distance

	Applicable to all site options				
8	To protect, enhance and make accessible for enjoyment, the cultural heritage and historic	Site includes heritage assets in need of repair/occupation/enhancement. Development has potential to incorporate such assets into the development.  Site more than 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological interest site  Site in urban area more than 50m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.  Urban site within 50m of listed buildings, conservation area, scheduled monument, registered	Council supplied data:  Conservation Areas, Listed Buildings, Areas of Archaeological Interest, Registered Parks and Ancient Monuments.  Measurements taken from site boundary to the feature boundary or point location with Euclidian		
0	environment.  Applicable to all site options	park/garden, archaeological remains Site in open setting within 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.  Urban site containing heritage assets which are likely to be damaged or lost.  Site within an open setting within 50m of heritage assets.	distance.		
9	Ensure access to and protection and enhancement of high quality public open space and natural greenspace.	400m from public open space or natural greenspace of at least 1ha in size 1200m from public open space or natural greenspace of at least 1ha in size More than 1200m from public open space or natural greenspace of at least 1ha in size Severance of PROW	Council supplied data: Amenity Greenspace Public Rights of Way  Measurements taken from site boundary to the feature boundary with Euclidian distance.		
10	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources.	No criteria established. Any development has the potential to be designed and constructed to a high quality, including energy efficiency and the use of low carbon technologies. Sites cannot therefore be distinguished on this basis. The potential for district heating networks may be higher for sites in close proximity to anchor heat loads and a heat demanding land uses (e.g. leisure facilities, residential, educational facilities). However, there are no specific opportunities identified.			

11	To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered	No criteria established. Not appropriate as all development has the potential to generate waste, techniques. Recycling of buildings could be perceived as waste minimisation, but this would require likely to be reused or demolished (which actually would create inert waste requiring dispos	uire an understanding of whether buildings on site al).
12	To improve health and reduce health inequalities.	Access to healthcare Within 10 minutes journey (<800m walking, cycling <1.6km, public transport 2km) of a GP or health centre  Within 15 minutes journey (Walking 800m-1200m, Cycling 1.6km - 2.5km, public transport, 2km - 3.5km) from a GP or health centre  Within 20 minutes journey (Cycling 2.5km-3.2km, public transport 3.5km-4.6km) from a GP or health centre  Over 20 mins journey (cycling 3.2km, public transport 4.6km).  Leisure facilities (Allotments, Children's play areas, cycle routes, parks and gardens)  Within 1200m of more than 3 facilities Within 1200m of 1 facility No facilities within 1200m	Council supplied data:  Health Centres, Children's Play Areas, Allotments, Cycle Infrastructure, Parks and Gardens  Network Analysis (walking and driving distances): Walking distance measured along roads and footpaths, driving distance measured along roads. The shortest distance between where the site connects to the network and where the feature of interest connects to the network is reported.  Number of features within a certain distance determined by creating service areas using the road/path network and intersecting the features of interest with the relevant service area to get a count.

13	To improve the education and skills levels of the population overall	Primary  Site would support new primary education facilities (over 500 dwellings)  Within good walking distance (400m) of a primary school with spare capacity or with space for expansion through developer contributions.  400m-1200m from a primary school with spare capacity or with space for expansion through developer contributions.	Council supplied data: Primary Schools and Secondary Schools  Network Analysis: Walking distance measured along roads and footpaths. The shortest distance between where the site connects to the network and where the feature of interest connects to the network is reported.
13	Applicable to housing sites	No primary school within 1200m with adequate spare capacity and no space for expansion on site. Site below 500 dwellings not considered sufficient to support new facilities.  Secondary Site is within 1200m of a secondary school Site is within 5km of a secondary school. Site is more than 5km from a secondary school	
14	To ensure local residents have access to employment opportunities.	Less than 1.2km from a key employment site 1.21km - 5km from a key employment site More than 5km from a key employment site	Council supplied data: Employment Sites  Network Analysis: Driving distance measured along roads. The shortest distance between where the site connects to the network and where the feature of interest connects to the network is reported.
15	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.  Applicable to all site options	Employment site less than 5km from a Motorway/A580 Junction or offices/retail within town centre or existing successful business retail/ park Employment site more than 5km from Motorway/A580 or office/retail uses outside of a town centre or established successful business/retail park Housing site on land not suitable/attractive for employment. Housing site on land suitable for employment (*not mixed use). Housing site on high quality employment land	Council supplied data: Town centre boundaries, primary shopping area and retail parks.  Open Source data: M6/A580 junction digitsed from base mapping  Network Analysis: Driving distance measured along roads. The shortest distance between where the site connects to the network and where the feature of interest connects to the network is reported.

16	To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough.  Applicable to housing sites	The site (or a considerable part) is considered to be available and/or achievable in the first 5 years.  The site is considered to be potentially available and/or potentially achievable over the plan period  The site has potential deliverability issues.  Site is critically constrained by infrastructure (i.e. within Shell pipeline buffer zone)	Council supplied data: Shell pipeline buffer zone  Measurements taken from site boundary to the buffer boundary with Euclidian distance.  Deliverability data drawn from SHLAA and / or Green Belt Review
17	To reduce poverty and social exclusion.  Applicable to employment / retail	Employment generating development within 1km of areas within the top 20% most deprived in the UK  No areas within the top 20% deprived in the UK within 1km	Open Source Data GIS files: IMD 2015 dataset  Overlap tool used to identify % of intersect between sites and the 20% most deprived areas in the UK.
18	To reduce crime, disorder and the fear of crime.	No criteria established.	
19	To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.  Applicable to all site options	<400m from a bus stop or train station with 2/3 or more services per hour <800m from a bus stop or train station with 4 or more services per hour <400m from a bus stop or train station with 1 service per hour <800m from a bus stop or train station with 2/3 services per hour 800-1200m from a bus stop or train station with more than 4 services per hour 800-1200m from a bus stop or train station with 2/3 services per hour <800m from a bus stop or train station with 1 service per hour >1200m from a bus or train station	Council supplied data: Bus Stops  Open Source Data GIS files: Railway Stations  Network Analysis: Walking distance measured along roads and footpaths. The shortest distance between where the site connects to the network and where the feature of interest connects to the network is reported.

20	To improve access to and use of basic goods, services and amenities in town and local centres.  Applicable to housing sites	Within 400m walking distance to convenience store or supermarket Within 800m walking distance to a convenience store or supermarket 800m-1200m walking distance to a convenience store or supermarket More than 1200m walking distance to a convenience store or supermarket	Council supplied data: Convenience Stores and Supermarkets  Network Analysis: Walking distance measured to convenience stores along roads and footpaths. Driving distance measured to supermarkets along roads. The shortest distance between where the site connects to the network and where the
	Tiousing sites		feature of interest connects to the network is reported.