

St. Helens Local Plan 2018 - 2033

Summary of Representations on St. Helens Local Plan Scoping Consultation 20th January – 2nd March 2016



St. Helens
Council

Summary of Representations on St. Helens Local Plan Scoping Consultation

1. Introduction

- 1.1 A full public consultation was held on the Local Plan Scoping Document for a six week period between 20th January 2016 and 2nd March 2016. The consultation asked residents, businesses and other groups which issues are important and what the new Local Plan should contain. This included views on planning policies and which sites - including those in urban areas and the Green Belt - should be developed or protected.
- 1.2 A total of 212 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period.
- 1.3 The consultation asked 21 questions in relation to the Scoping Document. A summary of the key issues raised for each question along with the Council's response is provided below.
- 1.4 The comments received have been taken into consideration in the preparation of the 'St. Helens Local Plan Preferred Options November 2016' which is referred to throughout this report and should be read in conjunction with this report.
- 1.5 The comments received in relation to the 'Sustainability Appraisal (SA) Scoping Report December 2015' have been taken into consideration in preparation of the 'St Helens Local Plan Sustainability Appraisal: Interim SA Report December 2016'. This Interim SA Report has been referred to in relation to Questions 19-21 and should also be read in conjunction with this report.

2. Summaries of Comments and Council Response

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations?

Response	Number
Yes	37
No	53
Not Specified	122

Summary of Comments

From those consultees who considered that process was appropriate, the following points were made:

- It provides the opportunity for all parties to identify the main issues in broad terms.
- Based upon the information available the process appears to be appropriate and therefore should meet relevant requirements of relevant legislation and regulations.
- It should now be a priority for the Borough to progress the Local Plan swiftly to adoption to provide certainty and to plan positively.
- The proposed course of action is consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- National policy is clear that early and meaningful collaboration with neighbourhoods, local organisations and businesses is essential and a wide selection of the community should be engaged. The steps identified by the council in the preparation of the Local Plan meet the requirements of the Planning Acts and Regulations.
- The preparation of a new up to date Local Plan which accords with the NPPF is the right approach for the Borough. It will ensure the Local Plan is up to date and capable of meeting development needs. It provides an important opportunity to establish a vision and action plan which can deliver the sought after step change in economic performance and to secure a sustainable future for people living in the borough and provided certainty.
- There is a clear and pressing need to progress the identification of sites for allocation for housing and employment uses, and for Green Belt release to accommodate housing and employment growth needs of the Borough – given the passage of time since the adoption of the Core Strategy in 2012 and the changed circumstances in terms of development requirements particularly for employment land, and reflecting the Government's aims to have full Borough wide Local Plans in place by 2017 (including identification of land allocations).
- St Helens adopted a Core Strategy on October 2012 only six months after the publication of the NPPF and significantly in advance of many subsequent pieces of case law which have provided a detailed understanding of how the policies of the NPPF should be interpreted and applied. In particular the CS evidence base was prepared significantly before the publication of the NPPF as such was not prepared in accordance with the NPPF and is not considered to be up to date.
- The consultation process has been over a long enough period to allow everyone concerned to respond.

From those consultees who considered that process was not appropriate, the following points were made:

- The proposals are against the core principles of legalisation in the National Planning Policy Framework and Green Belt.
- There is nothing that suggests an entirely new plan is needed this is a waste of valuable public funds and is driving the borough in entirely the wrong direction.
- There is no evidence to restart this process other than an opinion there is a greater emphasis on logistics than what was proposed in the 2012. This is difficult to rationalise given the regional market, economy including Liverpool super port were well understood at that time. This is further complicated by the Liverpool City region devolution agreement formation which is in the early stages of structure which may render much of a new metropolitan borough plan obsolete as devolved strategy and governance matures.
- The NPPF main tenet is that of Sustainable Development. Large scale use of farmland is not sustainable as is increasing the use of congested motorways.
- Certain developments should not be considered e.g. where housing green belt land promised by the government to stay Green Belt It shouldn't now be necessary for a further review and the consequent increase in the area required.
- As well as being against NPPF, this is against the spirit of the (Planning) Act, especially in an environmental role, also closely linking to planning on Green Belt, should be on a case by case, established by facts, not on speculation in advance by developers.
- The Core Strategy was only approved 3 and half years ago. What has changed?
- There has been very little promotion or publicity of consultation.
- Whilst the proposal meets legislative requirements in producing a new Plan, we consider the decision of St Helens Council to abandon the adopted Core Strategy and programmed Site Allocations DPD to be flawed and based on an overly cautious legal opinion. If the Council were to progress to Site Allocations stage, the risk of legal challenge would be minimal. Returning to first principles risks the Plan production being taken out of the Borough's hands as the plan-making period will extend beyond 2017.
- The abandonment of the Site Allocations process will cause immediate uncertainty by the resulting reduction in delivery of new homes and commercial opportunities. This will have unwelcome consequences for the Borough's housing land supply position and will result in a prolonged period of under-delivery.
- The recently adopted Local Plan October 2012 should have had the current issues documented and argued before being submitting for examination with the Planning Inspectorate in June 2011. Although the procedure is technically correct the cost with this current addition to the St Helens' ratepayer shows the adopted Local Plan in 2012 was a waste of time.
- To have a "Preferred Options" consultation later in 2016 based on this Scoping consultation phase ending 2nd March 2016, goes against what Parliament has decided to hold the EU Referendum throughout the country. Therefore, as various aspects of the Scoping consultation concern EU issues; it is best to wait until after the EU stay-in/Leave referendum has been decided by the people of the United Kingdom on 23 June 2016.

- We have concerns regarding the language chosen for the next stage of the Local Plan. The 'Preferred Options' stage, could appear to have a final feel to it, more so than if it were to be called an 'Issues and Options'. The use of the phrase 'Preferred Options' implies that decisions have already been made by the Council.

Council Response

The Council considers that it is undertaking the preparation of the Local Plan in full accordance with the requirements of the Planning Acts and Regulations. In preparing the Plan, the Council must seek to ensure that its policies are in accordance with the National Planning Policy Framework (NPPF) and therefore must achieve all three dimensions of sustainable development: economic, social and environmental.

Regarding the need to prepare a new Local Plan, on 18 November 2015 Cabinet resolved to proceed with a new Local Plan even though the Core Strategy for St. Helens was only adopted in October 2012. This was based on Officers' recommendations and legal advice from Counsel. The new single Local Plan for the Borough will replace the Core Strategy and incorporate the planned content of the Allocations and Sustainable Development Management Local Plans. It was considered that any delay to the completion of a Green Belt review and release of Green Belt land to meet housing need through an Allocations Local Plan was offset by the need to address significant changes in employment land requirements.

A key factor behind this rationale was that employment land was not being taken up for development and research indicated that the quality, site size and location of the existing supply was inadequate. Furthermore, although the housing target had been examined against the NPPF, there was concern that new guidance and case law on setting housing targets had since emerged, suggesting a review of the housing Objectively Assessed Need. This led to the preparation of new housing and employment objectively assessed needs (OAN) studies in 2015, which found that the employment growth needs for the Borough are much greater than the target in the adopted Core Strategy. This has implications for how much development should take place and where, and for the Council's plan making to meet these needs. Local authorities are required to plan positively to meet their identified local needs.

In addition, since the Core Strategy was adopted national policy guidance now places greater importance on demonstrating that sites included in the Council's housing land supply are in fact viable and deliverable within each Council's Local Plan period. The Strategic Housing Land Availability Assessment (SHLAA) is a review of the potential housing sites, including brownfield and greenfield sites. However, the amount of sites predicted to come forward in the 2012 SHLAA has not been fulfilled, so a review has been undertaken and was completed in late summer 2016. It demonstrates that the Council no longer has a five year housing supply, because some of the sites taken into consideration for the Core Strategy have had to be discounted as they have failed to come forward since the adoption of the Core Strategy and have no realistic prospects of being deliverable. This indicates that there is a need to consider Green Belt release to meet housing needs.

In accordance with the plan making regulations¹, the Council is required to consult on the 'draft' stages of the plan. The term 'Preferred Options' is being used as it presents for the next draft stage as it presents what the Council considers to be its preferred approach to various policies and site allocations. This approach is sets out on what the Council considers it needs to do to comply with national policy based on the evidence available and having considered other options.

The Preferred Options is not the final stage of the Plan and by consulting on this draft stage, people are given the opportunity to state whether or not they agree with Council and if they think other alternative options to the ones that the Council are putting forward should be followed instead.

With regards to publicity the Scoping Document, the Council has followed is adopted Statement of Community Involvement which set out the various way and means publicizing consultations on the Local Plan. The Council is committed to ensuring that consultation on the Local Plan are well publicised the will continue to act in accordance with the SCI for future consultation stages.

With regards to the question of the consequences of the EU Referendum, the Council does not consider it appropriate to delay the preparation of the Local Plan to await any outcomes of the UK exiting the EU which remain uncertain at present and will continue to prepare the Local Plan in accordance with the relevant existing legislation and regulations. Any future legislative or regulatory changes with implications for the plan making process will need to be addressed when the full details are known.

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date

Response	Number
Yes	30
No	128
Not Specified	54

Summary of Comments

From those consultees who considered an end date of 2033 was appropriate, the following points were made:

- In line with paragraph 157 of the NPPF, Local Plans should be drawn up over an appropriate time scale, preferably a 15 year time horizon, taking account of longer term requirements.
- It is appropriate for the end date of the Plan to be at least 15 years from its base date. If St. Helens intends to adopt the Local Plan by 2018, then 2033 is an appropriate end date. This follows the same time frame as many other Local Authorities.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

- The Scoping document also indicates a 5 year supply of land to be safeguarded, based on the 15 year requirement. 5 years is sufficient for safeguarded land later in the plan making process once the suitability of the suite of sites has been established.
- There should be provisions for a review of the Local Plan prior to 2033 and also make provisions within the Local Plan to meet housing and employment needs beyond that plan period.
- The Council should look beyond the end date of the plan period to ensure that the Borough's longer term development needs can be met. This is particularly important in undertaking a review of the Green Belt boundaries to ensure that they are capable of lasting beyond the end of the plan period through the identification of safeguarded land.

From those consultees who considered an end date of 2033 was not appropriate or that an alternative date should be used, the following points were made:

- These timescales are far too long and, given the gravity of some of the proposals, they should be subject to more regular scrutiny.
- The timescale should be 2027 as is the original (Core Strategy) plan.
- Shorter, reviewable dates for consideration of the appropriateness of any planned developments would seem to make infinitely greater sense.
- The last plan had nothing like this amount of time. Is it to justify what is likely to happen to this area? How you could get it so wrong last time.
- The needs of the neighbourhood change far too frequently to have this extended to this date.
- I do not believe these plans should be prepared with such elongated dates. Planning laws and environment issues are too fast moving for this approach
- Adding 10 years to the local plan makes it easier to justify taking land out of the green belt. It is clearly unfair to take a huge piece of green belt based on a 20 year dubious forecast
- A 17 year forecast is unreliable and unpredictable and likely inaccurate. A 5 year plan would be more reasonable.
- St Helens council may wish to consider extending the end date of the Local Plan by a year or two as a contingency in case the date of adoption (currently 2018) were to slip. Unforeseen circumstances could potentially delay the adoption of the plan beyond 2018 potentially resulting in a plan period of less than 15 years.
- An end-date for the Local Plan at 2035 would provide for the minimum 15-year lifespan in accordance with NPPF paragraph 157 and sufficiently allow for any unexpected delays that may occur during preparation and/or Examination. This would also avoid the Local Plan underproviding against objectively assessed needs.
- Consideration should be given to extending the Plan period to 2037 to coincide with the evidence base which has assessed housing need (Mid Mersey SHMA 2015) and employment land requirements (St Helens Employment Land Needs Study 2015) over this period. It may also be that the new Local Plan's for neighbouring Halton and Warrington, located within the same Housing Market Area, will also be prepared over this planned period so some consistency here would be beneficial.

- A 5 year safeguarding period is too little when compared to the length of the plan period. In many instances of Local Plans coming forward over the course of the NPPF, safeguarding for an additional 50% of the Plan period has been put forward in similar Local Plans.
- 5 years does not represent a period "stretching well beyond the plan period" as required by the NPPF (p. 85) Whilst there is no specific guidance on how much land should be safeguarded, a number of LPAs have tended to identify at least 10 years worth of safeguarded land to ensure that the Green Belt Boundaries retain a degree of permanence.
- Forecasting employment and development needs up to 18 years ahead (the evidence papers have been prepared in 2015) is too far ahead to forecast. It is well known that the further out you forecast, the more likely you are to be wrong. A better target would be 2028, 10 years ahead of the planned adoption date 2018.

Council Response

The reasons for preparing a new Local plan have been outlined in response to Question 1 above. With regards to selecting an appropriate timespan for the Plan, comments on the ability to plan for such a long period in preference to shorter period are acknowledged. The Council however must consider National Planning Policy Framework (NPPF) which states (at paragraph 157) that a 15-year horizon is preferable. Planning over a longer period allows for strategic needs to be planned for and offers a degree of certainty to communities and developers as to where is and isn't acceptable to develop to meet these needs. The Council considers 2018 to be reasonable start date for the adoption of the plan allowing sufficient time for consultation and examination, therefore taking the plan period up to 2033.

With regards to safeguarding land for development beyond the plan period, paragraph 85 of the NPPF states that where necessary, (local planning authorities should) identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Council agrees with some of the comments regarding five years beyond 2033 for the safeguarding of land (and its removal from the Green Belt) not appearing to be long enough to meet future housing and employment development needs. The Council notes that a period of 10 years beyond the plan period is another common option. A period of 15 years has been used in the Preferred Options as this provides a greater degree of certainty as to where longer term future development should take place, aiding infrastructure planning, and to ensure that changes to the Green Belt endure beyond the plan period.

With regards to the need to review the plan ahead of the 2033 end date, the Council will consider then need for this based upon information that arises as a result of the monitoring of the Plan's performance of the policies.

Q3. Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this?

Response	Number
Yes	85
No	13
Not Specified	114

Summary of Comments

From those who felt that there were other issues, plans and strategies to be taken into account, the following points were raised:

- Concerns over the environmental impact of development including climate change and flooding, water quality, pollution and air quality, loss of agricultural land, ecological protection and heritage loss.
- It is probable that there will be more development and biodiversity and green leisure space will inevitably be compressed. Simply developing on the basis of economic or housing need and hoping the future environment will take care of itself is no longer adequate now with the pace of urbanisation.
- Green Space and corridors should be protected and meticulously planning for the future is imperative. There should also be a green map of interconnecting green corridors containing active biodiversity plans.
- Active Design Principles should be considered to promote healthy communities through good urban design.
- The road network is a breaking point in many areas. The council simply cannot keep overlaying development onto existing road infrastructure and expecting it to cope for commuting, well-being and health issues. The issue of motorway congestion and evidence that this is a negative factor in generating economic growth.
- There should be reference to managing traffic accommodation and ensuring availability of the additional school places, which will undoubtedly be required due to an increased home building programme.
- The Council should ensure all 'brownfield' land is used.
- Housing issues emerging from the Local Plan are also more extensive than simply providing an adequate number of new homes. In line with the NPPF, the Council must seek to boost significantly the supply of housing and provide the size, type and tenure and range of new homes that are required to address local demand.
- The Local Plan should recognise, protect and support community and cultural facilities. The importance of planning for culture and cultural facilities is emphasised in the NPPF by being included as a core planning principle (item 17). This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities.
- Plans to develop a Strategic Rail Interchange at the former Parkside Colliery site as should recognise the locally important battlefield of Winwick (1648) which is under

active consideration by Historic England for inclusion in the list of registered battlefields in England.

- The insufficiency of the evidence base regarding employment which is singular in dimension concentrating too much on logistics. There are opportunities within the wider remit of the Atlantic Gateway such as super high speed broadband and the development of the knowledge sector.
- Of specific relevance to the Parkside site are the City Region reports relating to economic growth, employment land, particularly in relation to the logistics sector (including SuperPort) and emerging studies relating to the Northern Powerhouse and transport links (e.g. Transport for the North (TfN)).
- The Northern Powerhouse agenda and associated investment in infrastructure should be considered.
- Account should also be taken of the future plans and reports/programmes of the Combined Liverpool Regional Authority.
- The need to Duty to co-operate with Neighbouring Local Authorities and other relevant organisations on strategic priorities.

Council Response

The following response takes each 'theme' in turn:

Climate Change and Flood risk

With regards to concerns raised over how the Plan will address climate change and risk of flooding, in consistency with the NPPF, Draft Policy LPD02 in Preferred Options Local Plan sets out the principles of sustainable development that will be applied to all development proposals. A key element to this is the need to be climate change resilient, in particular reducing the risk from all types of flooding and improving water quality. Flood risk in particular has been a key factor in the selection of all allocated sites and where issues have been raised as issues that must be addressed on strategic employment and housing sites.

Draft Policy LPC12, as general policy that will apply to all development, sets out the Council's approach to flood risk and water management. It seeks to ensure that new development will not cause an unacceptable risk of flooding and water quality and sets the requirements from developer to demonstrate how flood risk will be addressed.

Air Quality and Pollution

With regards to the issue of air quality and pollution, this is a cross cutting theme covered by several policies. Draft Policy LPD01 will set out standards to minimise and mitigate to acceptable levels against the effects of air, light and water pollution (including contamination of soil, surface water and groundwater resources) and noise, vibration, smells, dust and electromagnetic fields caused by the development. Draft Policy LPD09 of the Preferred Options Local Plan in particular will require development proposals to specifically address potential impacts on air quality with regard to existing Air Quality Management Areas. Draft Policy LPD11 will require air quality to be considered in relation to health and wellbeing whilst Draft Policy LPA07 will seek to minimise the negative impacts of transport including air

and noise pollution through requiring developers to implement Travel Plans in accordance with the requirements of the Ensuring a Choice of Travel SPD. Furthermore the need to consider potential impacts on air quality has been raised as a key issue that must be addressed on identified strategic employment and housing sites.

Green Spaces and Green Infrastructure Network

With regards to the importance of green spaces and provision of an interconnected green space network, the Council recognises and values the importance of its Green Infrastructure and will actively seek to protect and enhance these sites. The Council's approach to Green Infrastructure has been set out in Draft Policy LPA09 in Preferred Options Local Plan which, amongst other measures, will require development to contribute to the expansion and/or improvement of the functionality and connectivity of the Green Infrastructure network, in accordance with local circumstances. This policy approach also recognises the cross boundary and 'interconnected' nature of Green Infrastructure and sets the Council's commitment to work in partnership with neighbouring authorities to develop multifunctional green corridors. The Preferred Options Local Plan will also identify a strategic network of 'greenways' to be protected from inappropriate development and enhanced. The selection of allocated and safeguarded sites does not involve the loss of Public Open Space or wildlife sites.

Biodiversity

With regards to concerns over impacts on biodiversity, these are understood and noted. The Local Plan will afford significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. The Council's approach to the conservation of biodiversity has been set out in more detail in Draft Policy LPC06 in Preferred Options Local Plan with designations including Local Wildlife Sites, Local Geological Sites and Local Nature Reserves will be identified on the Policies Map. In line with the NPPF, which advises that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity, the Local Plan will also identify Nature Improvement Areas. These are areas in St. Helens that form part of a wider Liverpool City Region 'ecological network' and are opportunity areas for nature improvement and off-site mitigation.

Design Principles

With regards to active design principles being applied, the Council is committed to ensuring the design and layout of new residential development is the highest standard. Draft Policy LPD02 in Preferred Options Local Plan sets the scope of type of requirements expected. This policy will be further refined following public consultation and consideration of relevant evidence and guidance.

Impact on Highways Network

The Council acknowledges that proposed future development will likely have impacts on the existing highway network and accepts that any significant adverse impacts will need to be addressed, and the nature of the mitigation will need to be assessed to be feasible.

Alongside the preparation of Local Plan, the Council will also prepare an Infrastructure Delivery Plan. This will set out the key infrastructure requirements necessary for development to take place. The Council's approach to the delivery of infrastructure has been set out in Draft Policy LPA08 in Preferred Options Local Plan which will require, where appropriate, developer contributions to fund necessary improvements.

With regards to concerns raised over the impacts of future housing and employment development on the motorway network, the Council will need to take full consideration of the responses made by Highways England as a statutory consultee on the allocation of sites with regard to the Road Investment Strategy.

Schools

The housing development proposed in the Local Plan is likely to have impacts on existing schools and may require additional capacity to be provided at existing schools or even require the creation of new schools. The exact impact will vary according to the occupancy and capacity of existing schools, which varies over time, and on the exact nature of the housing provided on sites (family housing, retirement housing, etc.). As this may change over the life of the plan a flexible approach must be taken. Alongside the preparation of Local Plan, the Council will also prepare an Infrastructure Delivery Plan. This will identify the key infrastructure requirements, which includes schools, necessary in order for development to take place. The developers of new sites will be expected to make a significant contribution to any creation of new school places and may be required to provide space for new schools on their sites. The Council's approach to the delivery of infrastructure has been set out in Draft Policy LPA08 in Preferred Options Local Plan which will require, where appropriate, developer contributions to fund necessary improvements.

Development on Brownfield Sites before Green Belt

With regards to continuation of the use of previously developed land ("PLD" or "brownfield") to meet future housing and employment needs, the Council remains committed in principle to the development and regeneration of brownfield sites. The Council is proposing in the LPPO that contributions towards affordable housing is reduced to zero on brownfield sites in most of the urban area and only 10% in the outlying areas in order to encourage the use of brownfield land compared to greenfield land. However the evidence available now shows that this land alone cannot meet St.Helens future needs in full. Furthermore, a "brownfield first" approach may not ensure that a five year supply of land is maintained, or that housing needs are met in all settlements. Therefore an approach to release land from the Green Belt to meet these needs both during the plan period (2018-2033) and beyond is considered necessary. Draft Policies LPA02 in Preferred Options Local Plan sets out this approach and its justification in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

Housing Supply

With regards to a future supply of housing in St.Helens and in particular the supply of a mix of housing types, sizes and tenures to meet identified needs, Draft Policies LPA03, LPA05, LPC01 and LPC02 have been included in Preferred Options Local Plan which specifically

seek to address this matter. These policies set out the Council's expectations for, amongst other considerations, dwelling size, tenure type, density, provision of bungalows and provision of affordable housing. As this may vary over the life of the plan, a flexible approach to house types, sizes and tenures will be adopted, using the latest available information about needs in St. Helens and the locality of the development.

Protection of Cultural and Community Facilities

With regards to the protection of cultural and community facilities it is accepted and acknowledged that Local Plan will need to address this issues in order for the plan to be compliant with the NPPF. Draft Policy LPA08 has been included in Preferred Options Local Plan which specifically seeks to protect cultural and community facilities from loss where there is an identified need, building upon the approach in the Core Strategy.

Heritage and Archaeology

Concerning the issue raised around the archaeological importance of areas of the former Parkside Colliery Site, Draft Policy LPC11 in Preferred Options Local Plan specifically seeks to address the issues relating the development and the historic environment including the requirement for development proposals that may include heritage assets of archaeological interest undertake and submit an archaeological evaluation as part of any application. Any planning application made on this or any other allocation would need to comply with this Policy where relevant.

Approach to Planning for Future Employment Needs

With regards to comments relating to the Council's employment land evidence base on the need for employment land and a singular emphasis on logistics, in accordance with the requirements of the Planning Practice Guidance published by the Department for Communities and Local Government, the Employment Land Needs Study (ELNS) (2015) has assessed the quantitative demand for employment land in St Helens up to 2037. This included using economic forecasts to assess likely future growth in all industry sectors. The ELNS indicates that whilst traditionally St. Helens has been a manufacturing centre, with the largest consumers of land being B2 (general industrial) operations, it is likely that the mix of uses will change during the new Local Plan period (2018-2033), with a strong shift to B8 (storage and distribution) uses as St. Helens' location, astride the M6 and M62 motorways makes it particularly attractive for B8 development. Therefore the Local Plan Preferred Options allocates enough land to meet the future requirements for B8 uses, but also allocates land for B2 uses. In addition, there are vacant premises and land on the Borough's existing business and industrial areas (which are to be protected by the new Local Plan) which could accommodate various B1 and B2 uses. The comment about broadband is noted and in response, employment developments will be required to provide fibre optic cabling to the premises, alongside fibre optic to the cabinet for new housing development.

Parkside and relevant City Region and regional reports

Liverpool City Region reports relating to SuperPort and studies relating to the Northern Powerhouse and the latest Transport for the North studies (Transport for the North Freight

Strategy (2016)) have been considered in the Parkside Logistics and Rail Freight Interchange Study (August 2016).

Northern Powerhouse

With regards to the Northern Powerhouse and related transport interventions, Draft Policy LPA07 has been included in Preferred Options Local Plan which outlines the Council's commitment to work in partnership with statutory bodies including integrated transport authority for Liverpool City Region (Merseytravel), Transport for North, and the Department for Transport in the delivery of transport schemes during the plan period.

Liverpool City Region

With regards to future plans and strategies prepared for the Liverpool City Region, the St. Helens Local Plan will take full account of these. Details of the full scope of a sub-regional planning strategy continue to be refined but it is expected that there will be a high level strategic plan covering the city by 2020, the Local Plan will still need to be developed before then to set out how the strategic needs of St. Helens will be met, and to set out detailed local planning policies that will not be in the city region plan. The Local Plan will aim to reflect the emerging evidence informing the city region plan and vice versa, and the Local Plan will include a degree of flexibility to be compatible with the LCR plan.

Duty to Co-operate

Concerning engagement with neighbouring planning authorities on cross-boundary planning matters, the Council is committed to fulfil its 'Duty to Co-operate' with the relevant prescribed bodies and will actively engage these organisations throughout the local Plan Process; seeking agreement and solutions to strategic planning issues where necessary.

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	52
No	21
Not Specified	139

Summary of Comments

The following key issues were raised:

- Parkside Colliery site should not be used for a strategic rail interchange.
- Loss of Green Belt is unacceptable and 'Brownbelt' (brownfield) land should always be considered to be developed on first.
- Owing to tight Green Belt boundaries and previous policy regimes which have sought to concentrate growth in urban centres, almost exclusively at the expense of growth

outwith, many of these settlements have been unable to grow and prosper with services having been lost owing to the absence of any adequate critical mass of local population. Reversing this trend should be an important issue for the Local Plan.

- The spatial distribution of growth across the Borough, particularly in respect of housing and employment land should be addressed early in the Plan preparation.
- There should be a broader economic strategy that aims to maximise employment opportunities and economic growth.
- The need to maximise employment opportunities for the benefit of the local economy, taking advantage of growth sectors and the significant locational advantages of the Borough on the strategic road and rail network to strengthen and diversify the Borough Economy. There is a need to invest in skilled work which will further help the economy.
- The need to boost significantly the supply of new homes and supply the right type of homes required.
- Food security, flood defence and biodiversity should be key issues.
- Reference should be made to wildlife and enhancing biodiversity.
- There should be more focus on heritage.
- Impacts on health need to be addressed.
- There is insufficient infrastructure.
- Environmental impacts of Junction 22 to 23 on M6 will worsen.
- St.Helens' role within the Mid-Mersey sub-region, Liverpool City Region and wider region should not be downplayed and should be recognised.
- Cross Boundary issues and growth opportunities.

Council Response

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Question 3, please see the Council responses to Question 3 set out above.

Matters where a response has not been provided are set out below.

Parkside

In 2016 consultants AECOM and Cushman & Wakefield undertook the Parkside Logistics and Rail Freight Interchange Study. The Study identifies Parkside as a site of national importance as well as regional significance in relation to national and regional policy, the market demand and need for the delivery of new and improved Strategic Rail Freight Interchanges (SRFI). The Study found that there is a clear demand for a new SRFI in the North West, with Parkside regarded as the best placed site to satisfy this need. The Council considers that the Parkside site remains the single largest potential economic development site in the Borough, providing the greatest opportunity to meet the economic development aspirations of the Borough, being in a prime location for a SRFI. The site continues to offer unique opportunities to attract new inward investment and economic growth and continues to provide a substantial opportunity for the wider North West region through increasing freight capacity and capability in a growing economic sector.

Local Plan Preferred Options Policy LPA10 details the Council's proposed policy approach to the development of a SRFI at Parkside including what the Council will require in relation to the environmental impact of development proposals.

Spatial Distribution of Development

With regards to the proposed spatial distribution of the development, the Council acknowledges that this should be set out early on in the plan process. Therefore draft Policy LPA02 of the Preferred Options Local Plan sets out the Council's approach to the distribution of allocated sites to meet identified housing and employment needs. Draft Policies LPA04 and LPA05 specifically give details, including locations, of sites proposed for allocation to meet these needs.

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan?

Response	Number
Yes	59
No	10
Not Specified	143

Summary of Comments

- It is considered that the proposed Strategic Housing and Employment Land Market Assessment (SHELMA) should be included in the evidence base for the St Helens Local Plan. It is considered that this is particularly important to be referenced as St Helens is the lead authority for its production. If the St Helens Local Plan did not take into account the findings of the SHELMA this would call into question the whole purpose of the study and its relevance.
- Green Belt Review - the guiding principles of the Green Belt protection need to be accorded proper consideration as outlined in the national Planning Practice Guidance
- Updated SHLAA.
- The following documents are out of date: Landscape Character Assessment (2006), Phase 1 Habitat Survey (2001), St Helens & Earlestown Retail & Town Centre Uses Study (2011), Open Space Sports Study. Sports Facilities Strategy, Playing Pitch Strategy
- Traffic Studies on the effects of motorway congestion on regional economic growth.
- Traffic and Air Pollution/Air Quality Surveys
- Plans to use the Sutton Manor Colliery Site.
- Water Framework Directive with regards to water quality and the Council should refer to the North West River Basin Management Plan
- It is essential that the Local Plan recognises the potential economic growth opportunities offered by the initiatives and funding support being secured through the Combined Authority and Liverpool City Region.

Council Response

With regards to the comments received on the various evidence base documents needed in support of the Local Plan, the following explains the latest position broken down by theme:

Strategic Housing and Employment Land Market Assessment (SHELMA)

The Council acknowledges that the SHELMA will form a key piece of evidence concerning the strategic housing and employment needs for the Liverpool City Region.) Due to the timing of the study however, the Preferred Options Local Plan cannot yet have full regard to the implications of the SHELMA.

Green Belt Review

A Draft Green Belt Review has been prepared alongside the Local Plan Preferred Options in order to provide rationale for removing from the currently defined Green belt in order to meet identified housing and employment needs. The Draft Green Belt Review will also be available for comments as part of consultation.

Strategic Housing Land Availability Assessment (SHLAA)

The Council acknowledges the need for an updated SHLAA to inform the preparation of the new Local Plan and justify the approach to allocating land to meet future housing need. The SHLAA June 2016 (with a base date of April 2016) has since been prepared to ensure this aspect of evidence is as up to date.

Open Space, Sports and Recreation Assessment (OSSRA)

The Council acknowledges the need for updated evidence in relation to sports and recreations facilities and open space. A suite of documents collectively referred to as the 'OSSRA' has been prepared on behalf of the Council by consultants KKP. This includes: Indoor and Built Sports Facilities Needs Assessment June 2016 (with Golf Course Addendum); Open Space Assessment June 2016; Playing Pitch Strategy Assessment Report February 2016 and Playing Pitch Strategy & Action Plan July 2016. The OSSRA 2016 will directly inform the preparation of Local Plan policies concerning open space and sports facilities in the Local Plan.

Retail Needs Study

The Council acknowledges the need for updated evidence in relation to the future needs for main town centre uses including retail and leisure. A Retail and Leisure Needs Study is therefore being prepared by consultants WYG to update existing evidence. The study is expected to be finalised in early 2017 although emerging findings from the study have informed the retail and town centre uses related policies in the Preferred Options Local Plan.

Landscape Character Assessment

The Council considers that the Landscape Character Assessment 2006 remains capable at this stage of providing an essential overview of the landscape character of the Borough and provides borough-wide guidance on landscape and visual sensitivity, woodland planting and landscape strategies.

Phase 1 Habitat Surveys

Whilst the initial surveys date from 2001, this still provides a good overview for the natural habitat of the Borough, and is supplemented by more up to date site specific information where this is available.

Air Quality and Traffic Studies

The Council is committed to addressing the issue of air quality in the Borough. Draft Policy LPD09 seeks to ensure that Development proposals must demonstrate that they will not hinder the achievement of Air Quality Management Area (AQMA) objectives and the measures set out in an Air Quality Management Area Action Plan.

Policies in the Local Plan will seek to minimise the negative impacts of transport including air and noise pollution through requiring developers to implement Travel Plans in accordance with the requirements of the Ensuring a Choice of Travel SPD.

With regards to traffic surveys, where necessary the Council will require specific traffic surveys to be undertaken by applicants in order to demonstrate that impacts on the road network will not be unacceptable.

Water Framework Directive and Water Quality

The Council fully recognises the requirement to protect the water environment under the Water Framework Directive, which not only serves as a source of water but provides essential habitats and a valued resource for leisure and recreation.

Draft Policy LPC12 of the Preferred Options Local Plan will set out the Council's approach to ensuring water quality. St. Helens Council is working in partnership with the Environment Agency, Healthy Rivers Trust, Halton and Warrington Councils as part of a catchment based approach, to produce a Sankey Catchment Action Plan which has the aims of reducing the reactive nature of the catchment by "Slowing the Flow" in the rural headwaters and filtering agricultural run-off, improving water quality and wildlife habitat; addressing issues in the urban areas of the catchment such as wrong connections and removing pinch-points that can contribute to poor water quality and localised flooding.

Former Sutton Manor Colliery Site

The Council's approach to future development of the former Sutton Manor colliery is set out in The Bold Forest Park Area Action Plan (AAP) which is currently under examination in the with adoption expected in early 2017. The AAP has identified the Sutton Manor site as a key 'recreation hub' offering visitor facilities serving both the Sutton Manor site the wider forest park area.

Liverpool City Region

Any evidence prepared on a Liverpool City Region wide basis (including the SHELMA as detailed above) will be considered in preparation of the Local Plans as and when it becomes available. The Council continues to pursue opportunities for funding associated with LCR initiatives where appropriate.

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	39
No	19
Not Specified	154

Summary of Comments

A wide range of comments were received in response to this question suggesting differing views on what the vision of the future of the borough should be. A summary of these viewpoints is provided below:

- Be realistic but more aspirational.
- Acknowledge the drive for housing and employment growth.
- We need employment but not at the expense of well-being and health.
- Include something about enhancing the environment & biodiversity.
- Needs to be more focus on preservation of architectural heritage
- Desire to develop Green Belt land without reference to the need to engage with brownfield opportunities before such action present a turnaround from previous approaches
- Place a higher priority on the use of brownfield sites before raiding the valuable Greenbelt land.
- Should also detail a more comprehensive approach to addressing the full, objectively assessed housing needs across the Borough.
- Land that is suitable for release from the Green Belt should be released wherever it is sustainably located.
- Include reference to St Helens creating opportunities for residents to be active in their work and play.
- Engagement on how to develop our neglected town centre
- Green Infrastructure planning corridors.
- Should support the delivery of housing in sustainable locations throughout the borough and to those market areas where deliverability is better assured.
- The Vision should refer to longer-term aspirational projects or sites, rather than developments that have already taken place (e.g. the new Rugby League stadium and St.Helens College).
- Should be updated to reflect more recent evidence particularly in relation to future economic growth objectives linked to the wider Liverpool City Region
- Should recognise the location of St. Helens between Liverpool and Manchester as a major advantage to achieving a regenerated Borough with a vibrant economy. The opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City

Region and North West in general (such as the Superport, Airport City, and major upgrades to the M6 and M60 to make them Smart Motorways)

- Should be better option for Parkside than an SRFI or HGV distribution centre as you might expect. There is too much focus on logistics.
- Should reference the employment opportunity at the Parkside site rather than being specific about it being an SRFI.

Council Response

The Council has acknowledged the various comments received on the vision which will need to set out the Council's aspirations for the Borough's future development over the next 15 years and beyond and lead to the identification of objectives on how this will be achieved. Having considered the latest available evidence, taken account of the range of viewpoints on how the Borough should develop and look, and then consider what can realistically be achieved within the framework of national planning policy; a refined vision has been presented in the Preferred Options Local Plan. This vision seeks strike the balance between aspiration and achievability to encompass the key themes of urban regeneration, environmental sustainability, provision of housing and jobs, town centre vibrancy, transport and culture.

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	39
No	15
Not Specified	158

Summary of Comments

A wide range of comments were received in response to this question suggesting differing views on what the aims and objectives of the Plan. A summary of these viewpoints is provided below:

- Be to attract industries including manufacturing that give the possibility of a sustainable future environmentally and providing work opportunities.
- The strategy of building an entire economy for the borough on a tiny number of logistics sites at the edge of the borough should be revised creating a wider economic plan for the borough as a whole with a diverse range of industries.
- The local infrastructure is clearly in need to vast improvement and investment before any plans for 2033 to be considered

- There should be greater emphasis on delivering economic growth and meeting housing needs as reflected in the NPPF.
- Health, leisure and transport infrastructure need to be aligned with development, this is lacking in both plans.
- Require some amendments to make them aspirational - the Council needs to be satisfied that sufficient brownfield sites remain that are available and deliverable. In order to be truly aspirational the plan needs to achieve the boost in housing supply as required by the NPPF. In order to achieve this, the Council needs to identify a range of suitable sites across a much wider housing market.
- It is considered however that the aspirations set out by the council do not accord with the core principles of NPPF, which whilst encouraging the redevelopment of brownfield sites, instead seeks to significantly boost the supply of homes. To achieve this, it is likely that the council will require greenfield sites.
- The NPPF no longer places a priority of PDL over greenfield land. The revised aims should also recognise the intrinsic link between economic growth and housing development, to ensure sufficient new employment land is identified to meet the needs to new and existing businesses which are closely aligned with new housing development to ensure that adequate provision is made for economically active households to locate close to economic development, helping to create more sustainable communities throughout the Borough.
- The objectives should be updated in the Local Plan to acknowledge that whilst priority will be given to derelict and vacant sites, such sites are not available in the quantity needed to provide for the employment and housing needs of the Borough. Furthermore, development on such sites is often constrained by viability issues which prevent development.
- The objectives in the Local Plan should be similar to that in the Core Strategy but should also refer to St.Helens key location between Liverpool and the National Infrastructure network in relation to economic growth.
- Objectives should reflect the economic opportunities presented by the Borough's location and should refer to the latest evidence base documents that demonstrate the need for economic development, and include more positive language aimed at boosting the economy.
- Objectives should be to attract industries including manufacturing that give the possibility of a sustainable future environmentally and providing work opportunities.
- Objectives should be more aspirational in order to accommodate an increase in economic activity, attract new jobs and investment and reduce levels of unemployment.
- The Housing Aim should be given more consideration within the Local Plan to reflect the growing importance government is placing upon housing as an issue that the planning system must tackle on both the national and local scale.
- Should make it clear that new housing should be provided throughout the borough and include land removed from the Green Belt as this is the only way which the council can deliver the necessary housing.

Council Response

The Council acknowledges the various comments received on the aims and objectives of the Plan which will need to set out how the vision can be achieved.

Having considered the latest available evidence, taken account of the range of viewpoints on how what the Plan's objectives should be, and then consider the requirements of the National Planning Policy Framework; the Council considers that the strategic aims and objectives set out in the Local Plan Scoping Document provides an appropriate framework to deliver sustainable development in St. Helens. However in light of the comments received there was a change made to the title of Strategic Aim 1 and Strategic Objective 5.4 was added.

The Council consider that whilst all the key themes should be covered, the aims and objectives should set the 'headline' priorities with the details of how these will be achieved laid out in the relevant policies.

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say?

Response	Number
Yes	42
No	18
Not Specified	152

Summary of Comments

A summary of the comments made in relation to what policies should and should not be included in the new Local Plan are provided below:

- Not to develop the former Parkside Colliery as a strategic rail interchange.
- Not to develop land by Junction 23 of the M6, Haydock Island.
- The policy of developing logistics as the core future industry for the St Helens borough should be abandoned in favour of a more diverse economy.
- Housing and Employment Requirement should be separate policies.
- Housing, Employment and Mixed Use Allocations - full site details should be provided including site boundaries on a plan base.
- Strategic Sites: it should be clarified how such sites would fit with the overall housing or employment requirement figures.
- Policy should retain the Green Belt
- The least sensitive Green Belt sites should be removed from the Green Belt in the first instance as part of the Green Belt review.
- Should be appropriate to include a strategic policy on 'the extent of the Green Belt' in order to make minor or major changes to the green belt where necessary.

- Safeguarded Land: the provision of a 5 year safeguarded land supply for both employment and housing development is considered insufficient as it does not meet NPPF requirements for Green Belt boundary change to endure beyond the Plan period.
- Policy upon 'Affordable and specialist housing needs' this will also need to consider starter homes. Specialist housing should be provided including extra care villages, retirement housing and care homes.
- The absence of a policy relating to existing Retail Parks
- Councils have a statutory duty to ensure development does not jeopardise the attainment of "good" status under the Water Framework Directive and as set out in the River Basin Management Plan.
- Should be a Development Management Policy worded along the following lines: "The Council's Biodiversity and Ecological Network resources will be protected, conserved and enhanced".
- Local standards for playing pitches and other outdoor sport provision is no longer appropriate because the standards have historically resulted in single pitch sites that are not sustainable and quickly fall out of use. These types of provision do not meet demand.
- Health and Leisure should be included.
- Should include policy stating: The Council will resist the loss or change of use of existing community and cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.
- Linkway Distribution Park is not suitable or viable for continued employment use/economic development and should be allocated for residential development.
- The need to preserve important heritage sites in the borough and In Rainhill especially (specifically Rainhill Trials of 1829).
- Respect Parkside's historical significance and archaeological heritage.

Council Response

The Council acknowledges the comments received on a range of matters and recognises that there is a need to address these in policy with regard to the evidence available and National Planning Policy Framework.

Former Parkside Colliery

The Council's response concerning the justification behind its preferred approach to the future development of the former Parkside Colliery has been set out in response to Question 4 above.

Emphasis on Logistics and Land at M6 Junction 23

The justification for allocating land for B8 employment uses (logistics and distribution) in the Local Plan Preferred Options is summarised in response to Question 3 above.

A number of sites close to M6 Junction 23 have been identified as Preferred Options for allocation for B8 and B2 employment uses. The selection of the proposed allocations are in response to the findings of the Draft Green Belt Review and also the findings of the Allocations Local Plan Economic Evidence Base Paper (2015) and the Employment Land Need Study (2015), which both found that St. Helens' location on the M6 motorway means that it is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector.

Green Belt and Green Belt Review

The Council's proposed policy position concerning the need to release land out of the existing Green Belt in order to meet projected housing needs over then Plan period is set out in Draft Policy LPA02 in Preferred Options Local Plan. The justification of this policy seeks to explain the rationale behind this approach. The Council recognises the importance of a comprehensive documented review of the Green Belt in support this approach and has prepared a Draft Green Belt Review which will be subject to full consultation.

Safeguarded Land

The response to Question 3 sets explains the Council's position on safeguarding land to meet future needs beyond the Plan Period. Draft Policy LPA06 of the Preferred Options Local plan outlines the Council's proposed approach to Green Belt Land and Safeguarded sites.

Housing and Employment Allocations

The Council's proposed policy approach to the identification of future employment and housing allocations is set out in draft Policies LPA04 and LPA05. These sites are identified on the Draft Policies Map with individual site boundaries shown in the appendices of the Preferred Options Local Plan. Draft policies LPA04.1, and LPA05.1 set out the initial 'high level' site specific requirements of those employment and housing considered to be strategic in nature.

Specialist Housing Needs

The Council fully recognises the need for the right mix of housing types to meet the range of housing need. Draft Policy LPC01 sets out the Council's approach to providing this mix including, amongst other measures, provision for bungalows, specialist and supported housing for elderly and vulnerable people and self and custom build schemes. This policy is informed by the Mid Mersey Strategic Housing Market Assessment (SHMA) 2016 which provides the justification for this approach.

Retail Parks

In relation retail parks, the Council recognises the role and function of the Ravenhead and St.Helens Retail Parks which have been identified within the St.Helens 'Central Spatial Area'. Draft Policy LPB01 of the Preferred Options Local Plan sets out the council's approach to planning for retail with this are with a focus on the continuation of a 'town centre first' approach in line with national policy in order to enhance the vitality and viability of the town centre. The policy will seek to facilitate linked trips between the Primary Shopping Area

and other existing and developments within the St. Helens Central Spatial Area, including the Ravenhead and St. Helens Retail Parks.

Water Framework

The Council's proposed policy approach to the meeting requirement has been summarised in response to Question 5 above.

Playing Pitches

The Council's approach to planning for playing pitches is set out Draft Policy LPC05. This supports the delivery of programmes and strategies to provide and enhance open space and sports and recreation provision. The application of this policy will have regard to the Council's latest Playing Pitch Strategy (PPS) as referred to in response to Question 5. The latest PPS was prepared in line with Sport England's methodology and approved for adoption by the Council in August 2016. This policy is approach considered in line with national planning policy and the current guidance and policy adopted by Sport England.

Health and Leisure

The Council will seek to promote health and leisure through the Local Plan. This is a cross cutting theme, and has been addressed by Draft Policies LPA01, LPA03, LPA08, LPC05, LPC07 and LPD11 of the Preferred options Local Plan.

Loss of Community Facilities

The Council's proposed policy approach to the meeting requirement has been summarised in response to Question 3 above.

Linkway Distribution Park

The site of the Linkway Distribution Park has not been proposed as a housing allocation in the Preferred Options Local Plan. The site was identified in the SHLAA 2016 (site 38) which assessed the site as not being suitable for housing.

Heritage and Archaeology

The Council recognises the importance of significance of heritage and archaeology in the planning process. Draft Policy LPC11 in Preferred Options Local Plan specifically seeks to address the issues relating the development and the historic environment. The Council's proposed policy approach addressing heritage matters is summarised in the response to Question 3 above.

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this?

Response	Number
Yes	68
No	8
Not Specified	136

Summary of Comments

A summary of the comments made in relation to which sites should require specific policies are provided below:

- Parkside is the last remaining potential for a buffer zone between the urban sprawl of St. Helens and Warrington. With the move towards the promotion of out of town retail developments encroaching more and more into this dividing space, we are in danger of reaching the point before too long at which neighbouring towns will blend seamlessly into one another and lose any sense of individuality.
- The Parkside site needs long term consideration as to how this will affect the area beyond recognition. Development of the brownfield section would not seriously affect the area to the same degree. Removing the Greenbelt status therefore seems a step too far.
- Protection of heritage. The former Parkside Colliery site needs to be protected as the location of the 1648 battle of Winwick as is the only major action from the second Civil War that has survived intact and offers the potential to learn much more about the battle. This aspect of heritage conservation needs to be included in future plans. Protection of the Huskisson memorial, Protection of the wild life and fauna in and around Parkside.
- The Parkside Site is a key area for biodiversity being in one of the remaining semi-rural locations in the area and serves as a critical wildlife corridor being linked to Winwick Countryside, Lowton, Kenyon and Highfield Moss SSSI.
- The original footprint of the Parkside Colliery site (brownfield) should be given over to housing. The remaining area left as public wildlife park, but with the addition of a lake for waterfowl.
- Parkside should be the subject of a new Local Plan site specific policy which removes it from the Green Belt and allocates it for employment purposes.
- Since the preparation and adoption of the Core Strategy, there have been significant changes in circumstances with regards to Parkside that warrant such a changed approach including: baseline objectively assessed employment need is new and significant, changed strategic (and local) economic context (Northern Powerhouse/ Liverpool City Region)
- Junction 23 and Parkside - the traffic cannot cope at present not just the motorway but local roads particularly going into Warrington.
- The Vulcan Site redevelopment of houses is incomplete and the roads are inadequate, schools and medical centres will struggle with new families. The massive

redevelopment of the Burtonwood airbase has given massive capacity for warehouses and freight and so we need to give up green belt site for more freight.

- The Florida Farm North site no longer fulfils the purposes of including the land within the Green Belt and should be removed and allocated for B2/B8 employment development.
- The Overall Spatial Strategy should identify the St. Helens Core Settlement as a priority area for residential development but should also set out a hierarchy of settlements such as Newton-le-Willows, in and around which employment land should be allocated in order for sustainable growth to be achieved across the Borough.
- Policies setting out both employment and housing allocations should be included in the Local Plan. The locations of such sites should be fully informed by the consideration that a sufficient supply of homes within easy access of employment represents a central facet of any efficiently functioning economy. It is therefore important to include a clear Overall Spatial Strategy policy in the Local Plan which sets out where employment and residential sites will be located, reflected by a Key Diagram.
- The Borough's employment needs and requirements and the consequential site allocations to meet the need should be broken down into the component business classes, e.g., B1/B2/B8 and large scale logistics to reflect the growth potential and the specific needs of the different forms of employment development.
- The Housing and Planning Bill is expected to receive Royal Assent in 2016 and will include powers to grant automatic planning permission in principle to land allocated in Local Plans. Land would be awarded "permission in principle" subject to criteria set out in a development order and subject to subsequent grant of consent to "technical details" and would likely remove need to pursue outline planning permission. These powers may be in force prior to the adoption of the emerging Local Plan and it will be necessary to have regard to this and consider policies about specific sites. This is likely to include details regarding the extent of the site and type/scale of development which is permitted and requirement (or not) for Environmental Impact Assessment. Implications for "permission in principle" should be carefully monitored by the Council in progressing the Local Plan.
- Overly prescriptive and onerous site-specific policies should be avoided unless such sites are strategic in scale. It is considered that in the main, such matters can be dealt with through the development management process.
- Re-use Brownfield sites in Town Centres.
- High quality agricultural land (vital at a time of a growing national and world population), woodland and public open spaces should be protected from development.
- Need for specialist housing including extra care villages, retirement housing and care homes.
- The need to preserve important heritage sites in the borough and In Rainhill especially e.g. Need to make more of the Rainhill Trials of 1829.
- St. Helens should give recognition to its existing Retail Parks that complement the town centre's role and acknowledge that they are established retail destinations in

their own right, employing hundreds of workers and contributing significantly to the local economy.

- Sites that are allocated for the accommodation of Gypsies and Travellers in close proximity of the strategic highway networks would benefit from specific policies to guide development in order to minimise the potential impacts of proposals on neighbouring authorities.

The Council acknowledges the comments received on site specific sites policies. A summary of the how the Council proposes to approach these site specific considerations is provided below.

Former Parkside Colliery Site

Concerning the former Parkside Colliery site, the justification for the proposed use of this site has been summarised in response to Question 4. With regards to site specific issues, the Council had identified site specific requirements for Parkside East and West in Draft Policies LPA04.1 (under EA9) and LPA10 of the Preferred Options Local Plan. A key requirement of the delivery of this site is the need to address the impacts of the proposals on the existing infrastructure (as detailed in the Draft Policies). In addition to these requirements, proposals on the site will be required comply with all relevant development plan policies addressing a wide range of environmental matters including, but not limited to: air quality, heritage and archaeology, landscape protection ecology, biodiversity trees and woodland.

Former Vulcan Works and Infrastructure

The Council acknowledges that there are existing infrastructure issues and that proposals brought forward through the Local Plan on allocated sites will have potential impacts on this. As stated in Draft Policy LPA08, following the consultation on the Preferred Options, the Council will prepare an Infrastructure Delivery Plan. This will specifically identify where additional infrastructure or service capacity is needed order for new development to be acceptable.

Florida Farm

The Florida Farm North site (site ref EA2) has been identified in the Preferred Options as appropriate for B2 and B8 Uses.

Spatial Strategy

The Council's proposed strategic approach to the distribution of development over the Borough has been summarised in the response to Question 4 above.

Employment Needs

The Council's proposed approach to planning for employment needs has been summarised in the response to Question 4 above.

Level of Site Specific Details

The Council has identified site specific requirements for strategic housing and employment sites as detailed in Draft Policies LPA04.1 and LPA05.1. For all identified allocated sites, proposals on the site will be required comply with all relevant development plan policies. Specific requirements for sites will be further developed in the next stage of Plan (Publication Version) along with an Infrastructure Delivery Plan. The Council is keeping the issue of Permission in Principle (PiP) under review as there is currently a lack of detail from the Government on how this will operate and what level of detail will be required in plans. Until this detail emerges, the plan is not granting PiP to allocated sites.

Use of Brownfield Sites

The Council's approach to bringing forward the development of 'brownfield' sites has been summarised in response to Question 3.

Protection of Woodland and Open Space and Agricultural Land

The Council's approach to ensuring that open space and woodland is protected is set out in Draft Policy LPA09. Under paragraph 112 of the NPPF, Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.

Provision of Specialist Housing

The Council's proposed policy approach to provision of specialist housing has been summarised in response to Question 8 above.

Retail Parks

The Council's proposed policy approach to the consideration of the existing retail parks has been summarised in response to Question 8 above.

Gypsies and Travellers

The Council's proposed policy approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople has been set out in Draft Policy LPC03. The Draft Policy identifies and details locations of a permanent and transit site (site refs GTA01 and GTA02) to meet identified needs.

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens?

Response	Number
Yes	16
No	36
Not Specified	160

Summary of Comments

A summary of the comments made in relation to housing growth and objectively assessed need are provided below:

- St. Helens needs more new housing.
- The North West has a housing crisis.
- Use of Green Belt should be kept to a bare minimum and brownfield sites should be used and should always be the first option.
- Effects of climate change and impact on air quality need to be taken into account.
- Empty homes should be brought back into use.
- The capacity of existing infrastructure and the need for new health, education and transport infrastructure needs to be considered.
- Development should be spread fairly across the Borough.
- 451 dwellings per annum is based on a 'policy off' figure. This should be a minimum annual requirement.
- The overall methodology within the 2016 SHMA appears to be broadly appropriate.
- It is important that the overall housing requirement for St Helens is set in the context of the neighbouring authority areas.
- The OAN has underestimated needs in St Helens. There are a number of issues within the SHMA which render it unsound and inconsistent with national guidance. It is imperative that the resulting housing target is reviewed upwards by a significant amount as the new Local Plan emerges.
- The OAN for employment land should be aligned with the OAN for housing in the Borough.
- Historic rates of delivery suggest that higher rates of development can and have consistently been achieved in St. Helens. The suggested need for 451dpa would therefore not appear to provide the significant boost to supply required by the NPPF nor the aspiration set by the Northern Powerhouse agenda.
- St Helens should plan for a higher level of housing growth than 451 dwellings per year.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

Housing Requirement

The Council recognises that the Borough needs more housing to meet future housing need. At 570 dwellings per annum the housing requirement in the Local Plan Preferred Options is set at a level above the objectively assessed housing need (OAN). The Local Plan Preferred Options housing requirement of 570 dwellings per annum is the same as the annual average net housing target of 570 set in the St. Helens Local Plan Core Strategy (2012). The Core Strategy target was set by the Regional Spatial Strategy for the North West and was a target for growth that was above housing need estimates. A growth approach in Local Plan is still considered appropriate to help meet St. Helens development

needs and economic growth plans and it is considered realistic as this target has been met in years including 2013/14 and 2015/16.

Aligning the housing and economic growth strategies

The recommended OAN of 451 new homes per year up to 2037 identified in the Mid-Mersey Strategic Housing Market Assessment (SHMA, January 2016) factors in forecasted economic growth for St. Helens (Cambridge Econometrics Baseline Forecast June 2015). The Local Plan Preferred Options housing requirement of 570 dwellings per annum up to 2033 is set at a level above baseline economic growth needs in order to help meet the Borough's economic growth plans.

Environmental Impacts

Potential effects of the Local Plan on all social, economic and environmental issues including climate change and air quality have been considered in the Sustainability Appraisal for the Local Plan Preferred Options and would be considered further at the planning application stage if development proposals come forward.

Brownfield Land

Brownfield land will play a major role in meeting housing need over the plan period (59% of all housing need identified for the period 2018 to 2033 in the Local Plan Preferred Options is to be delivered on brownfield land), but the 2016 Strategic Housing Land Availability Assessments (SHLAA) has found that there is inadequate available brownfield and greenfield land (not previously developed land) in the urban areas to meet housing needs. Therefore the release of Green Belt will be required to meet future housing need in the Borough.

Empty Properties

The Council do actively try to bring empty homes back into use. The Council's latest strategy is set out in the St Helens Empty Homes Strategy 2013-2015.

Infrastructure

Working with partners and infrastructure providers, the Council will ensure that sufficient physical, social and community infrastructure is provided to support the development identified in the Local Plan through the use of integrated demand and asset management or new infrastructure provision. This will set out in an Infrastructure Delivery Plan which will be prepared for the Publication Draft Local Plan.

Proportionate Development

As explained in Local Plan Preferred Options Policy LPA02, the Local Plan aims to ensure there is additional new housing provided in every Key Settlement to ensure all communities have access to new market and affordable housing. Appendix 10 of the Local Plan Preferred Options sets out the distribution per ward.

Neighbouring Authorities and Duty to Co-operate

Concerning engagement with neighbouring planning authorities on cross-boundary planning matters, the Council is committed to fulfil its 'Duty to Co-operate' with the relevant prescribed bodies and will actively engage these organisations throughout the Local Plan Process; seeking agreement and solutions to strategic planning issues where necessary.

A Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) is currently being undertaken which will identify housing and employment land objectively assessed needs for each Liverpool City Region. Due to the timing of the Study, the Preferred Options Local Plan could not have full regard to the implications of the SHELMA.

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target?

Response	Number
Yes	25
No	30
Not Specified	157

Summary of Comments

A summary of the comments made in relation the objectively assessed need and housing target are provided below:

- The findings of the Liverpool City Region SHELMA should be taken into account when determining the housing target including the need to accommodate additional unmet or overspill need from other authorities.
- An arbitrary target will lead to poor outcomes for the future of the borough.
- Impact on current environmental matters should be considered.
- Economic growth aspirations of St Helens should be factored into the assessment and that the housing and economic strategies align with one another.
- The current evidence base fails to adequately align housing need with the stated economic ambitions of the authority.
- A level of housing need some 100 to 120 dwellings per annum higher than the housing OAN is needed.
- Ensure housing is built on Brownfield Land
- Road Infrastructure should be adequate before housing is built
- A housing target higher than the OAN should be set in the SHLP to provide enough flexibility and choice to help ensure that enough housing is delivered over the plan period.
- Any shift from objectively assessed needs to a housing target must ensure that the target is not lower than the identified need. If the target is lower than the objectively assessed need the identified housing needs for the borough may not be met and sufficient supply may not be identified.

Council Response

The responses above have been used to inform the Local Plan Preferred Options. All of the issues raised by consultees in response to this question were very similar to those raised in response to Question 10, please see the Council responses to Question 10 set out above.

Q12. What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens

Response	Number
Yes	12
No	102
Not Specified	98

Summary of Comments

A summary of the comments made in relation economic growth and objectively assessed need are provided below:

- Negative impact through air pollution.
- This is entirely inappropriate and is only based on a single dimensional strategy for logistics to dominate the St Helens economy based on isolated reports this is driving the plan to release huge areas of green belt from the area likely in a single location which in itself has major traffic infrastructure problems.
- The local area does not have the infrastructure for a development of this size. The roads are already far too congested and pollution is far too high.
- What is important to recognise is the need to stimulate economic growth and promote new job creation. These outcomes should not be constrained by a failure to plan for sufficient employment space.
- From the evidence available it is apparent that St Helens does not have sufficient land available to meet its housing and employment requirements. As a result, Green belt release in sustainable locations should be considered for release.
- The objectively assessed need of 178.5ha employment land up to 2033 is considered to be constrained and not fully representative of St. Helens economic growth potential. A range of 217-244 ha is a more appropriate figure and reflective of St. Helens playing a more significant role in meeting demand emanating from both SuperPort and enhanced demand for general large scale logistic operations.
- The estimated figure of 178.5 Ha of employment land to 2033 is too low and lacks ambition. St Helens should consider attracting 25-30% of the 340 Ha SuperPort
- The figure of 178.5ha to 2033 seems appropriate, being derived from an up to date (2015) study, and taking into account the increased demand for logistics uses because for the new Liverpool 2 Terminal at the Port of Liverpool.
- The employment land OAN should be used as a starting point, with the employment land requirement in the SHLP set at a higher level than the OAN to build in flexibility and help ensure that the necessary level of development is delivered over the plan period.
- In 2012, the need was stated in the Local Plan as 37ha. The only reason for such a huge increase in such a short space of time is to take a massive, pre-determined area of land out of the Green Belt in order to satisfy St Helens Council's desire to develop the area around the former Parkside Colliery at any cost.

- Documentation refers several times to the M62 junction 7 and A570 Road as a Logistics centre. This area being also next to the Liverpool to Manchester Railway line is ideal for Employment Land Needs.
- The former Parkside colliery site has ancient history that has not been recognised in the adopted Local Plan 2012. This needs to be corrected.
- Economic growth is always needed but must take into account the impact on the environment e.g. green belt, wildlife and air pollution.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Questions 3, 4, 10 and 11, please see the Council responses to those questions set out above.

Matters where a response has not previously been provided are set out below.

Employment Land Requirement

Taking the Council's economic growth ambitions, emerging evidence about potential land requirements arising from SuperPort, economic changes and economic development initiatives such as Parkside, and the comments received from consultees during the Local Plan Scoping Consultation (2016) into consideration, it is considered that the employment land requirement for the Plan (306ha) has been set at a level that allows for enough flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA over and above that identified in the ELNS (clearly this position will need to be reviewed following the publication of the SHELMA), and the comments received in relation to the positive role St. Helens can play in meeting the needs of the general logistics and distribution sector.

Q13. Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement

Response	Number
Yes	16
No	39
Not Specified	157

Summary of Comments

A summary of the comments made in relation the objectively assessed need and employment land requirement are provided below:

- We support in its entirety the development on and around Parkside and so have no issues or objection to any of the land proposed to be released. Any traffic impact of the workforce should be considered when releasing land for development, especially residential development in the town.
- No this is against the National Policy Planning Framework and Green Belt Legislation.
- It is considered that as the impact of the Super Port expansion will be felt across the sub region, the most logical scale at which the need can be analysed and quantified is at the sub regional level.
- Too much emphasis on using Green Belt for Employment.
- It will lead to very poor outcomes for the borough environmentally and economically because it would be developer driven, and not based on the rest of the borough, aligned with wider social and environmental objectives.
- Encouragement of giant warehouses will not add much employment as local area consolidation will occur and the new buildings will be automated.
- Brownfield land should be used first.
- The process appears to be robust and appropriate. One other factor that should be taken into account is the Duty to Cooperate and any issues resulting from that.
- The 178.5 ha figure should be the very minimum target to provide for sufficient flexibility in the supply of land.
- Whilst reference is made within the ELNS, specific reference should be made within the Plan itself to the Liverpool City Region, the associated LEP and the various economic growth strategies and objectives that encompass St Helens with the wider FEMA of the Liverpool City Region.
- There is currently no provision of suitable land for distribution uses within the Borough. Given the need for large scale employment sites, and the relatively high land demands of such sites, St. Helens should pursue a significantly higher figure than the OAN when setting the employment land requirement in the emerging SHLP.
- Traffic, pollution and conservation need to be considered.
- Support the Council's approach subject to a more ambitious and aspirational approach being taken to economic growth.
- We recognise that the objectively assessed need claimed by the Council is 'policy off' and that the employment land requirement will need to take into account wider factors, such as the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints and the Council's economic growth aspirations.
- No-if the large Omega development along the M62 is anything to go by how many actual new employment's been generated?
- Local health and environmental issues.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Questions 3, 4, 10, 11 and 12, please see the Council responses to those questions set out above.

Matters where a response has not previously been provided are set out below.

The need to release Green Belt land for employment use

Since the adoption of the Core Strategy (2012) there has been a slow take-up of employment land within St. Helens with only 2.37ha developed from 2012 to 2016, with take-up being significantly below the long term average annual take-up of 5.79 hectares per year (1997-2012). Employment sites have faced increased pressure from higher value uses such as residential and retail and consequently the Borough has experienced a net loss of 34.93ha of employment land since 2012.

The AECOM Local Plan Economic Evidence Base Paper (2015) concludes that large scale logistics is the most active market in the region and a particular opportunity for St. Helens. However, none of the sites identified in the evidence base that supported the Core Strategy as suitable for large scale distribution and manufacturing uses, satisfy the criteria now suggested as being preferred by the market for large scale uses. Consequently, there is currently zero provision of suitable land for large scale distribution uses within the Borough's identified employment land supply. This shortage of available land to build large distribution facilities has meant that in recent years, when demand for such premises has been high, occupiers have had to locate elsewhere

To meet market needs for the large scale distribution sector (300,000 square feet) requires the delivery of sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in the Local Plan Preferred Options. However it is important to note that smaller existing urban employment areas will still have an important role to play in accommodating smaller scale employment development during the Plan period and as such the Local Plan Preferred Options seeks to protect the Borough's existing business and industrial areas.

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?

Response	Number
Yes	24
No	118
Not Specified	70

Summary of Comments

From those consultees who responded yes, the following points were made:

- The amount of deliverable brownfield housing land in the Borough is likely to be lower than originally envisaged; it is clear that the Council cannot ensure that the Green Belt boundaries will endure beyond the plan period, and therefore a review of

the Green Belt is required to identify the necessary deliverable sites that can beat ensure development to meet housing and employment needs.

- There are several precedents for Green Belt land release across the Liverpool City Region. It will be difficult to accommodate the level of housing and employment land required within St Helens without Green Belt land release. Knowsley Council does not currently have any ability to accommodate housing or employment development needs arising in St Helens.
- The adopted Core Strategy already acknowledges Green Belt release will be necessary to meet future housing needs post 2022, so exceptional circumstances required by the NPPF have already been established.
- The need for Green Belt release for employment land has been firmly established and there is no realistic alternative to provide the amount of land needed for the development of housing and employment uses.
- The Council acknowledged that other authorities in the same housing market area have 'no spare suitable brownfield land to meet St Helens needs'. St Helens therefore must meet its own housing needs, and it has been demonstrated that Green Belt release is the only option to achieve this.
- The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard and taking account of paragraph 7.17 of the consultation document which identifies; 'Green Belt release is now needed to meet both housing and employment needs' it is agreed that Green Belt release should be considered through the plan.
- Settlement boundaries will need to be reviewed and relaxed to genuinely ensure opportunities are afforded for a range of site types and sizes, including small sites, to be brought forward.
- There must be a Green Belt review and welcome the proposed Review that will be undertaken as part of the Preferred Options Local Plan. The Green Belt has not been substantially altered since 1983 and this plan review is the ideal opportunity to undertake that strategic revision as the other neighbouring authorities have done or intend to do.
- If Green Belt release is required this should be based on a robust evidence base. Green Belt serves five purposes (NPPF Section 9 pg 19):
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration.
- If the shortfall of land for housing is not met the spatial vision for St Helens will be undermined, with housing developments coming forward on previously undeveloped green field sites in unsustainable locations, or locations which do not maximise regeneration objectives.
- Releasing previously developed land from the Green Belt, such as this site will help to remove uncertainty for landowners and developers. In doing so, there is greater

prospect of encouraging housebuilders and developers to bring sites forward to meet housing and employment needs.

- There are few natural wild habitats around Newton le Willows /Lowton / Winwick and removal of greenbelt would be catastrophic for the well-being of both flora and fauna and that of thousands of local residents. Far more people would be adversely impacted than would benefit from the permanent loss of greenbelt.
- It is clear that there is a significant housing and employment land requirement in the borough that cannot be met by the redevelopment of the available brownfield land. On the basis that 65% of the borough is within the Green Belt it would be entirely appropriate to remove the less sensitive and more sustainable sites from the Green Belt and allow for them to be developed.
- It is important in planning for the provision of new open market and affordable homes, that sufficient consideration is given to planning provision in areas where people wish to live and which are generally sustainable. It is also important to ensure that reliance on the use of previously developed land to deliver the annual housing requirement does not constrain deliverability of housing.

From those consultees who responded no, the following points were made:

- Any Green Belt loss should be incremental, from the existing urban area outwards, so that productive land not to be built on in the short term is not sterilised from an agricultural perspective.
- If any land is removed from the Green Belt and allocated for development, then equivalent brownfield/greenfield land should be turned into wildlife meadows, allotments and so on to compensate for any Green Belt loss i.e. to improve the quality of life of people in the surrounding area.
- All current designated open spaces, including that in densely populated residential areas should be protected.
- Bringing people back into the town centres will revitalise areas this may relieve some pressure on green belt and on traffic and other factors in outline areas of the borough.
- There must be considerable evidence available to the Council to indicate that brownfield sites have been exhausted.
- Green Belt issue requires a sensible approach. It should always be the very last resort. Alternatives should be explored properly relating to the regeneration of town centre/ redundant urban space first before consideration of developing green belt.
- Whilst employment and housing are important every effort should be made to use alternative brownfield sites.
- The largest issue is not the lack of land but instead the planning conditions and Local Authority adoption issues presented when developing a site. An alternative would be for the Council to adopt a partnering agreement with Major Developers to streamline the process.
- Green Belt should only be released on an application case by cases basis so the need to circumvent special circumstances can be properly challenged based on the specific characteristics of the application.
- The Council acknowledged that other authorities in the same housing market area have 'no spare suitable brownfield land to meet St Helens needs'. St Helens

therefore must meet its own housing needs, and it has been demonstrated that Green Belt release is the only option to achieve this.

- In 2012, the need was stated in the Local Plan as 37ha, yet 3 years later it has increased by such a massive amount. What new housing and employment needs require such a huge amount of land to be developed and where is the evidence to show that all alternatives, including the existing brownfield sites in the Borough have been exhausted, generating the need to release Green Belt?
- The use of green belt land should be assessed on a case by case basis. If the amount of green belt land at Parkside is used then the impact on the local environment will be huge.

Council Response

The Council's proposed policy position concerning the need to release land out of the existing Green Belt in order to meet projected housing and employment needs over the Plan period is set out in Draft Policy LPA02 in Preferred Options Local Plan. The justification of this policy seeks to explain the rationale behind this approach in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

The Council recognises the importance of a comprehensive documented review of the Green Belt in support of this approach and has prepared a Draft Green Belt Review which will be subject to full consultation.

With regards to the need to release Green Belt land for employment use, please refer to the Council's response to Question 13 for further explanation.

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs

Summary of Comments

A summary of the comments made in relation to encouraging brownfield development is made below:

- A wider economic strategy would be more likely to utilise brownfield whereas logistics prefer flat green field sites as described in your supporting documents. This in the main because they are cheaper for the developer in what is a competitive transient industry which is land intensive and automated and has lower employment per area than other sectors and a lower regional multiplier.
- By ensuring competitively priced business rates for interested companies. The difficulty with this as is regularly evidenced across many areas of the UK is that following the removal of 'pump-priming' initial subsidies for developing employment opportunities, when business rates revert to less competitive levels, the

developments are abandoned as companies seek out more favourable financial circumstance. Evidence of this phenomenon is apparent across the North West.

- A detailed assessment that is made public of what the demand is and what land is available. This process needs to be utterly transparent.
- Any policies or approaches to planning that make it easier to develop on brownfield land (where it is constrained and viability of development is therefore questionable) may maximise the contribution of brownfield land to meeting housing and employment needs, but ultimately a realistic balance of (viable) brownfield and greenfield sites will be needed to meet housing and employment needs.
- The Council should embrace the potential for Development Orders to give “permission in principle” for allocated sites or those on a brownfield register, as proposed by the Housing & Planning Bill.
- The evidence base (including the SHLAA) has assessed the deliverability and viability of brownfield land to meet housing and employment needs, indicating the capacity is lower than first envisaged. Whilst there may be alternative means to help support the redevelopment of such sites, it is clear that in order to ensure a deliverable supply of housing and employment land during the Plan period that the Council cannot over rely on such sites to contribute towards identified needs.
- The Council already encourages the development of brownfield land to some extent through the implementation of the green belt which can direct development towards brownfield sites. Start by creating a catalogue of the land available and its characteristics. Gain an understanding of limitations and benefits of each site and then work out how to mitigate those limitations and socialise back.
- The Parkside site is in part brownfield and hence its release from the Green Belt and allocation for employment uses will significantly contribute to this objective.
- The Council should further assist by ensuring that the policy burdens applied to brownfield sites are commensurate to the viability challenges on such sites.
- The encouragement of brownfield land this should not justify a sequential approach to site selection on the basis of whether a site is previously developed. Such an approach is inconsistent with the Framework, which seeks to ‘encourage’ rather than ‘prioritise’ the development of previously developed land. The Council may need to use other powers rather than planning policy to bring forward such sites such as CPO or other funding mechanisms.
- The Local Plan should avoid the protection of brownfield employment sites within the M62 Link Road Corridor, where they are unsuitable, where there is no reasonable prospect that they will be used for that purpose, and/or where there is a need for different land uses to support sustainable communities.
- Many brownfield sites are not owned by developers but families and businesses. As planning is not their core business it can be seen as costly, time consuming and risky.
 - Removing charges for pre application advice for brownfield sites.
 - Continue to provide the excellent development team management service, one of the best in the North West.
 - Remove the need for the applicant to pay Council costs for the Section 106 appraisals.
 - Consider the use of Planning in Principle.

- Pragmatic approach to conditions.
- Reduce the affordable housing requirements and other Section 106 contributions for brownfield sites incentivising developers to continue to look to bring brown field sites forward.
- Grants for remediation should be given to force non Green Belt sites to be used. Regeneration and environmental improvement of the urban settlement will make those sites more attractive to developers who would otherwise regard housing within or near the green belt as more marketable

Council Response

The Council's proposed strategic policy position concerning the promotion of 'brownfield' land to meet housing and employment needs is set out in Draft Policy LPA02 in Preferred Options Local Plan. The policy seeks to continue the prioritisation of the reuse of previously developed land in sustainable locations in order to make a significant contribution to the housing land supply in particular. The use of previously developed land will be encouraged through: a) setting lower and more appropriate thresholds for developer contributions within existing urban areas to reflect viability constraints associated with regenerating sites; b) keeping an up to date Brownfield Register of suitable development sites.

The Council tries to bring forward existing brownfield employment sites to the market by keeping open dialogue with landowners and constantly looking for opportunities for funding to help make the development of sites more viable. However the Council, does not have the financial or staff resources to do this alone. Furthermore, even if all existing vacant employment land was brought forward, the sites are not of sufficient size or in suitable or competitive locations that the market requires. Therefore, there is no intention to bring a formal "brownfield first" approach as there is no guarantee that sufficient land will be developed and is likely to hinder the provision of a five year supply of housing land.

Regarding business rates, the Council does not set business rates.

The potential for Development Orders will be kept under review, but the first priority is to have a suitable range of sites allocated and available before Development Orders are considered.

The justification of this policy seeks to explain the rationale behind this approach in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

Regarding viability, the Local Plan aims to ensure the development of brownfield sites by setting threshold for developer contributions to levels that reflect viability of brownfield sites and the areas they are in, and to keep an up to date brownfield register to promote sites to potential developers.

At this stage, none of the sites proposed for allocation are granted Permission in Principle as the implications of Permission in Principle are not yet clear. Brownfield housing sites identified by the SHLAA will be considered for inclusion in the Council's Brownfield Register

when it is compiled, and this can indicate which sites are considered suitable for Permission in Principle.

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why?

Response	Number
Yes	13
No	28
Not Specified	171

Summary of Comments

From those consultees who responded yes, the following points were made:

- The use of an average density of 30dpha seems reasonable enough although clearly it may vary from site to site given local circumstances
- The density of 30 dwellings per ha would seem a reasonable figure but a reduced figure may be appropriate given that safeguarded land will likely be greenfield in nature. In addition, should safeguarded land also need to accommodate larger family dwellings with an associated lower density of development, a lower figure would be appropriate.
- The national Land Use Change Statistics identify that nationally densities are, on average, 32dph (net) across all sites including high density town / city centre schemes. On previously developed land the average density was 37dph and on greenfield land the average density was 26dph. The assumption of 30dph, is within this range and as such is generally appropriate, although a reduction would be warranted given that safeguarded land sites are likely to predominantly greenfield in nature.

From those consultees who responded no, the following points were made:

- This approach will result in poor outcomes for the borough. Housing should be built on an integrated and workable plan for the borough, taking into account the spirit and form of the planning legislation which was enacted for good reason. Simply building to target by advance ring fencing of the Green Belt and on a speculative basis is counter to the legislation.
- Density and net developable area is variable dependent on the size and location of the site, with smaller sites within the urban area likely to have higher density and developable area. In case of larger areas of Safeguarded land on the settlement periphery, it is likely that the net developable area will be significantly lower than the 75% stated, with a higher proportion of land required for infrastructure such as roads, services and public open space. Moreover, site specific constraints will ultimately impact on the developable area.

- The net developable area for a site will vary significantly dependent upon the type and size of site, ranging from 50% for a large strategic site with significant infrastructure works to 100% for a small urban infill. In terms of the safeguarded land sites these are all likely to require a reasonable amount of infrastructure provision and as average of 75% is likely to be too high.

Council Response

Comments received on the matter of setting an appropriate level of density for residential development have been acknowledged and recognise that densities will be need to be appropriate to context of the proposal area. The proposed approach to ensuring an efficient use of land set out in Draft Policy LPA05 along with justification. This will require new development to achieve a minimum of 30 dwellings per hectare (dph) in urban areas, between 30 to 40 dph in and adjacent to district and local centres and sustainable locations well served by frequent bus or train services, and densities of between 40 and 50 (dph) or above within St. Helens Town Centre and Earlestown Town Centre and within the edge of these Town Centres. Densities below 30 dph may be considered appropriate in areas characterised by lower densities, including certain low density suburban areas identified as Residential Character Areas, in the Green Belt and former Green Belt land now allocated for development.

The comments about the Net Developable Area assumed for sites are noted. It is accepted that some larger sites will require a larger area for infrastructure and this will be refined as the work moves forward. As a precaution, more land will be identified than is needed to allow for loss of developable area to infrastructure.

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why?

Response	Number
Yes	21
No	30
Not Specified	161

Summary of Comments

From those consultees who responded yes, the following points were made:

- This accords with the NPPF. The Council is required to demonstrate a five year supply of deliverable, viable and available housing sites. A similar approach should be adopted in respect of employment land.

From those consultees who responded no, the following points were made:

- 5 year safeguarded land supply for housing and employment is insufficient to positively plan for the Borough needs and growth over the plan period and beyond.
- Only if it is controlled and does not control the Green Belt.

- Green Belt should only be released in exceptional circumstances as per national planning law.
- We should always have a plan but a plan for the future should not be set in stone and should be flexible enough to meet changing needs. The use of any of our green spaces should be used as a last resort when all other options have been exhausted and then only sparingly as once these green spaces have gone they have gone forever.
- Securing fixed periods for development proposal can only benefit the well-being of local residents and provide some security with regard to their own aspiration and personal future planning. However these should be arrived at following genuine consultation with stakeholders, a process which currently appears to be lacking.
- It is considered that a longer period should be provided for in order to provide certainty over the Green Belt boundaries beyond the plan period. Para 85 of the NPPF says that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching well beyond the plan period and that Local Authorities should satisfy themselves that Green Belt boundaries will not be altered at the end of the development plan period. This is consistent with para 83 which states that once established Green Belt boundaries should be capable of enduring beyond the plan period.
- A period of 5 years would not meet this requirement of policy.
- As the Green Belt boundaries have been set since 1983/4 (i.e. 35 years when the Local Plan will be adopted), and the growth needs of the Borough are now likely to be significantly greater than the evidence base is outlining, a 5 year period for safeguarded land beyond the 2033 end plan date envisaged would result in a c 20 year boundary period only after which time a further boundary review would be required. This is not considered to meet the requirements of national policy for meeting longer term development needs and allowing boundaries to endure in the longer term.
- We do not consider that 5 years represents a period "stretching well beyond the Plan period as required by the NPPF (p 85) Whilst there is no specific guidance on how much land should be safeguarded a number of LPAs have tended to identify at least 10 years' worth of safeguarded land to ensure that the Green Belt boundaries retain a degree of permanence.
- Given the significant need for both types of employment and housing land, and the inherent risk that allocated sites in Local Plans may not be delivered on schedule, or at all within a plan period. A five year supply of safeguarded land is therefore not considered to be adequate for each of employment and housing land in the Local Plan.
- A 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157).

Council Response

The Council's approach to the removal of land from the Green Belt and safeguarding for a specified period to meet projected needs beyond the Plan period has been summarised in response to Question 2 above.

Q18. Are there any other forms of development that need to be accommodated in the Local Plan?

Response	Number
Yes	38
No	16
Not Specified	158

Summary of Comments

A summary of the comments made in relation to other forms of development is provided below:

- More industries with a high employment yield and with a range of skills.
- St Helens Council needs to aspire to greater the borough by improving the environment and building a strong diverse economy.
- Need to look at all options and go for a diverse approach ,not concentrating around one area, Parkside, and not focusing on one industry, logistics.
- Large scale logistics development as a component of B8 warehouse and distribution employment needs should be fully recognised in the Local Plan. Extra schools needed.
- Consideration needs to be given to all forms of employment land in addition to those within use classes B & A. There is a need for leisure (hotel, pub, and restaurant), sui generis (car showroom), trade parks etc. These could be accommodated within a variety of locations including major employment schemes and urban extensions which require a sustainable mix of uses to assist in place making and proper Master Planning.
- Council should set out relevant targets for new retail and leisure development over the plan period.
- Need for new doctors surgeries.
- Improved road infrastructure – currently this is unable to cope.
- Creation of new parkland and strategic landscape areas as an element of green infrastructure to urban extensions should be considered as a potential supporting development form.

Council Response

The Council acknowledges the comments made on other forms of development that should be provided. A summary of the how the Council proposes to approach to addressing this is summarised below.

Employment and Economic Development

The Council's propose approach to planning for a strong and sustainable economy is set out in detail in Draft Policy LPA04 of the Preferred Options Local Plan. The policy seeks to facilitate the provision of new jobs by ensuring a flexible supply of new high quality employment floorspace, utilising existing employment areas and St. Helens' strategic

location for logistics development through the allocation of a range of sites suitable for a range of employment uses. The rationale behind this policy is explained in the justification. With regards to the emphasis on logistics development, the response to Questions 3 and 13 provide further clarification.

With regards to retail and leisure, the Council has set out its proposed approach for meeting future needs in Draft Policy LPB01 based on emerging finding of an updated retail and leisure needs study (as referred to in response to Question 5)

Infrastructure

With regard to infrastructure, the Council acknowledges that there are existing capacity infrastructure issues. As stated in Draft Policy LPA08, following the consultation on the Preferred Options, the Council will prepare and Infrastructure Delivery Plan. This will specifically identify where additional infrastructure or service capacity is needed order for new development to be acceptable. This includes elements of 'social infrastructure' such as schools and healthcare facilities.

Green Infrastructure

The Council's proposed policy approach to the provision of green infrastructure has been summarised in response to Question 3 above.

Q19. Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report?

Response	Number
Yes	15
No	25
Not Specified	172

Summary of Comments

A summary of the comments made in relation to the Sustainability Appraisal is provided below:

- There is not enough emphasis on environment and climate change
- There are gaps principally on wildlife corridors and bio-diversity planning in the borough. Little information about the effects of traffic congestion and over population.
- The need to create overt plans to develop green infrastructure aligned with the likely high scale of development going forward.
- The scoping report should also look at the long term health implications of its inhabitants and that this is only enhanced not degraded.
- The SA should consider baseline economic data associated with the activities of the Combined Liverpool Regional Authority and the constraints of other areas to accommodate the economic opportunities offered by the SuperPort development.

- The need for balance between securing economic development and maintaining a community environment in which residents can take some pride, and also be confident that the quality of life for their families is considered worthy of some consideration via this and subsequent plans.
- Need to see sustainable jobs that have as low an impact on the local area as possible.
- The Local Plan should seek to locate development in sustainable locations that provide the opportunities to use a range of sustainable transportation modes.

Council Response

The 'St Helens Local Plan Sustainability Appraisal: Interim SA Report December 2016' has been prepared by consultants AECOM to inform the preparation of the Preferred Options Local Plan. This Interim SA report has considered response received in relation to the Sustainability Appraisal Scoping Report December 2016.

Section 2 of the Interim SA Report summarises out the key sustainability issues identified from the Scoping consultation and sets out the twenty SA objectives that have been established as a result of the scoping process. These are used as the basis for an SA framework against which an appraisal the proposed policies and sites in the Preferred Options has been made (sections 6 and 7). The appraisal covers all aspect of sustainability seeking assess the balance of environmental, economic and social factors. The appraisal framework considerations include climate change, impacts on wildlife, transport and air quality, health, employment and jobs amongst other issues.

Part 4.3 of the Interim report acknowledges the emergence of evidence being prepared on a City-Region wide basis (the emerging SHELMA) and its implications on the Local Plan.

Q20. Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?

Response	Number
Yes	22
No	18
Not Specified	172

Summary of Comments

A summary of the comments made in relation to the Draft Sustainability Framework is provided below:

- Strategic Aim 6 - Safeguarding and enhancing quality of life - there does not appear to be any respect or consideration for Green Belt commendations or DEFRA reports on pollution and health in these plans
- No biodiversity plan, no reference to connecting wildlife corridors - no reference to relevant DEFRA reports.

- There is no reference to any British legislation or European legislation concerning most of the points concerning the quality of life, health of the residents or the impact on wildlife.
- Objective 3 - Amend add additional criteria to: Is it located close to the strategic highways network to minimise vehicle movements through the Borough
- Objective 15 - Amend criteria to add: Is it located close to the strategic highways network to minimise vehicle movements through the Borough, and will it encourage inward investment and capture regional economic opportunities.
- Objective 16 - Amend to: To improve access to a range of good quality, family and affordable housing that meets the diverse and objectively assessed needs of the Borough.

Council Response

As set out in response to Question 19, section 2 of the Interim SA Report summarises out the key sustainability issues identified from the Scoping consultation and sets out the twenty SA objectives that have been established as a result of the scoping process. The Scoping Framework has then been set out in Appendix I.

With regards to specific reference to biodiversity strategies and legislation, the next stage of the plan (the 'Publication') will require a full SA Report and in compliance with the SEA regulations and Habitats Regulations Assessment (HRA) so will therefore need to be more comprehensive with respect to relevant plans, strategies and legislative requirements (please see response to Question 21 below).

Q21. Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan?

Response	Number
Yes	24
No	17
Not Specified	171

Summary of Comments

A summary of the other comments made in relation to the scope of the Sustainability Appraisal is provided below:

- The plan theme is developer driven in its tone. Appraisal of the plan should not be to justify a narrow range of developments but to appraise an overarching plan for the borough.
- Striving for economic growth is a wholly appropriate essential goal for any business organisation, including Local Councils. This should not be to the detriment of the current quality of aspiration and living conditions of current families and residents.

- The cumulative effect of Parkside and all the regional proposals for our motorways should be assessed.
- It important that the SA considers the economic and housing requirements of the region and the Mid Mersey SHMA
- There should be is a clear and transparent process to the assessment of all of the reasonable alternatives to meet the housing and employment requirements.
- More focus on Air Quality
- International and national conservation sites –likely impacts on environmental sites, such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Importance (SSSIs) and National Nature Reserves be considered when evaluating the suitability of nominated sites.

Council Response

As set out tin response to Question 19 the interim appraisal covers all aspect of sustainability seeking assess the balance of environmental, economic and social factors. The appraisal framework considerations include climate change, impacts on wildlife, transport and air quality, health, employment and jobs amongst other issues.

It should be noted that the interim SA Report does not constitute an 'SA Report' as defined by the SEA Regulations (i.e. the SA Report that should be prepared and consulted upon alongside the draft Local Plan at Regulation 19 stage of the Planning Regulations). Rather, this interim SA report documents the current stages of SA that have been undertaken to help influence the plan-making process. It is not a legal obligation to consult upon interim SA findings, but it is helpful to aid in decision making, as well as achieving effective and transparent consultation. The SA Report and HRA report on the next stage of the Plan (Publication) will therefore contain more detail with reference to designated environmental sites.

Any Other Information

Summary of Comments

A summary of the other comments made is provided below:

- St. Helens has totally "missed the bus" with regard to the Parkside Colliery site becoming a rail freight distribution centre. I would be surprised if any rail freight operator would want the expense of providing facilities that would compete with its own operations elsewhere. The danger is that a Parkside freight distribution centre would now become "road only".
- To create a freight terminal on the site at Parkside would lead to more traffic, poor air quality, and loss of Green Belt.

- Development should be shared equally across the parts of the Borough that can accommodate it so not to create a divide between over developed areas and areas with no investment.
- Need to become an innovative borough, look at empty units, shops, buildings and waste sites. Utilise them bring life back to the areas.
- We are not going to see the eventual merger of the urban sprawl across the Mersey Belt, the Green Belt must be protected because once it's gone it cannot be reinstated.
- Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.
- Green Infrastructure (GI) – plan should ensure that GI is an integral, cross-cutting theme. Good quality local accessible green space, ecosystems and actions to manage them sustainably offer a range of benefits, e.g.
 - Access to local greenspace can reduce health inequalities
 - Increased and improved accessibility to greenspace can help increase
 - physical activity
 - Contact with greenspace can help improve health and wellbeing
- Natural England's Accessible Natural Greenspace Standard (ANGSt) should be considered.
- The St Helens Local Plan will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information.
- Limiting the location, number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. Evidence to support this is not conclusive. No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.
- The character and identity of the Newton-le-Willows is strong and, as in the Core Strategy, should be considered as a standalone plan to develop amenities within the town.
- The present process requires a complete overhaul to ensure that the residents are afforded the opportunity to participate in what is a matter of extreme importance.
- These questions not user friendly to the public.

Council Response

Former Parkside Colliery and Approach to Planning for Employment Provision

The Council's response in relation to proposals for the former Parkside colliery and meeting strategic employment needs has been previously summarised in response to Questions 3, 4, 12 and 13.

Spatial Distribution

The Council's response in relation to proposals for the proposed distribution of development has been previously summarised in response to Question 4 above.

Geodiversity and Green infrastructure

The Council's approach to ensuring the protection of geodiversity and provision of green infrastructure is set out in Draft Policy LPA09. Draft Policy LPC06 specifically set out the approach to Biodiversity and Geological Conservation and Draft Policy LPC05 sets out the proposed approach to the provision of open space including draft standards for its accessibility based recent evidence.

Heritage

The Council's response in relation to proposals for the proposed distribution of development has been previously summarised in response to Question 3 above.

Earlestown/Newton-le-Willows

The Council acknowledges the importance Newton-le-Willows and Earlestown as the largest distinct Key Settlement after the Core Area of St. Helens. Draft Policy LPB02 of the Preferred Options Local Plan sets out the position of safeguarding the function and role of Earlestown Town Centre as the second town centre within the Borough. Its carries forward from the Core Strategy the intention to produce and implement an Area Action Plan to address key issues relating to the town.

Hot Food Takeaways

The Council's approach to placing limitations on the location of hot food takeaways is set out in Draft Policy LPD10. This carries forward the position taken by the adopted Hot Food Takeaway SPD (June 2011). It is considered that the justification to this approach based on the evidence detailed in the SPD remains valid. –

Consultation Process

The Council understands that the questions asked in relation to this and other Local Plan consultations can present a degree of complexity which in turn can be off putting. However, given the inherent technicality of certain planning matters, a balance must be struck in order to obtain a meaningful response from a wide range of consultees. The Council makes every efforts to explain and guide people through the consultation process and whilst would encourage the use of official response forms, will accept written responses in the form of letters or emails. The Council will continue to increase efforts to ensure the process is as accessible as possible to people including production of guidance notes, FAQs and information on our website.

Appendix 1: Response Form



St. Helens
Council

St. Helens Local Plan Scoping Consultation

January 20th - March 2nd 2016

Response Form

By completing this Response Form, you are writing to make comments on the proposed Scope of the new St. Helens Local Plan. If you wish submit information as part of the 2016 Call for Sites or representations on the Bold Forest Park AAP Publication Draft, there are separate forms available for these that must be completed separately.

For help in completing this form, please contact a member of the Development Plans team by telephone on 01744 676190 or email planningpolicy@sthelens.gov.uk.

Your contact details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact. Please be aware that anonymous forms cannot be included and that in order for you to submit your form you must include your details below.

	Your details	Your agent's details
Title		
Name		
Position		
Organisation		
Address		
Town		
County		
Postcode		
Telephone		
Email address		

Would you like to be updated of future stages of the Local Plan Process? Please tick one below.
We will update you when there are consultations on the Local Plan document, submission of the Plan for Examination, the issuing of recommendations by the Inspector and the adoption of the Plan by the Council. The Planning Policy website will also have more regular updates. We prefer to send any updates by email as this is faster, cheaper, more environmentally friendly and stays with you if you move home.

☐ Yes, by email ☐ Yes, by post (I do not have an email address) ☐ No

The following questions relate to the various section of the Local Plan Scoping Consultation Document available to view and download at <http://www.sthelens.gov.uk/planningpolicy>.

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q3. Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. Please tick one box and explain why below. Please be as specific as possible regarding the changes required.

☐ Yes

☐ No

Comments:

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required. *Please tick one box and explain why below. Please be as specific as possible regarding the changes required.*

☐ Yes

☐ No

Comments:

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q.12 What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q.13 Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs?

Comments:

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q18. Are there any other forms of development that need to be accommodated in the Local Plan? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q19. Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q20. Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q21. Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Any Other Information

Please tell us anything else of relevance, if not already covered above. Please continue on a separate sheet, if necessary.

Please return this form and accompanying sheets/maps, etc. by
12:00 (noon) on Wednesday 2nd March 2016 by email or by freepost to ensure your comments are fully considered in the next stages of the Local Plan.

Return by email to:

planningpolicy@sthelens.gov.uk

Return by freepost (no stamp required) to:

St.Helens Council
Freepost RLYY-RYXG-HYHS
Chief Executive's Department, Development Plans,
Town Hall, Victoria Square, St.Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the St.Helens Local Plan.

Data Protection Statement

The personal information provided on this form (address, contact details, signature) will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St.Helens Local Plan to adoption. However, your name and representation will be made publicly available and cannot be treated as confidential.

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For a translation of any St.Helens Council publication, please provide your name and address and the name of the language you require to the Contact Centre, quoting the title and/or reference number of the document.

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