

St Helens Local Plan

Sustainability Appraisal: Interim SA Report

December 2016






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Appendix I: The SA Framework

Appendix II: Site appraisal Framework

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Introduction

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1 INTRODUCTION

1.1 Background

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

1.2 Background

- 1.2.1 The new Local Plan will set out how the Borough and the places within it should develop. It should be locally distinctive, realistic and in the best interests of local people, businesses and the environment. There are seven strategic aims.
1. Regenerating and growing St Helens
 2. Ensuring quality development in St Helens
 3. Creating an accessible St Helens
 4. Providing quality housing in St Helens
 5. Ensuring a strong and sustainable St Helens economy
 6. Safeguarding and enhancing quality of life in St Helens
 7. Meeting St Helen's resource and infrastructure needs.

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Scoping

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2 SCOPING

2.1 Background

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

2.2 Key issues

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

Table 2.1: Key sustainability issues identified through scoping

1. Biodiversity, Flora and Fauna

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

2. Cultural Heritage

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

3. Landscape

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

4. Geodiversity

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

5. Soil

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

6. Contaminated Soils

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

7. Air Quality

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

Table 2.1: Key sustainability issues identified through scoping

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

9. Climate Change

Per capita emissions in St Helens are slightly higher than the North West average. The majority of CO₂ emissions originate from business, domestic use and transport.

10. Water Resources – Water Quality

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

11. Flood Risk

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

12. Open Space & Recreation

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

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

13. Population and Social Issues

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

14. Deprivation

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

15. Poor Health and Lower Life Expectancy

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

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

16. High Unemployment Rate

The unemployment rate in the Borough is higher than the regional and

Table 2.1: Key sustainability issues identified through scoping

national averages. Take up of employment land is slow.

17. Educational Underachievement

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

Low levels of educational attainment and skills.

18. Transport and Accessibility

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

2.3 SA Framework

2.3.1 Table 2.2 sets out the twenty SA objectives that have been established as a result of the scoping process. The SA objectives have been grouped into eleven SA Topics to present the findings more succinctly and avoid duplication (where objectives are very similar or complimentary). Appendix A sets out the SA Framework in full, which contains a number of sub-criteria and indicators for each SA Objective.

Table 2.2: SA topics and objectives

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

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Consideration of alternatives


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3 CONSIDERATION OF ALTERNATIVES

3.1 Introduction

- 3.1.1 A critical stage of the SA process is the consideration of alternative approaches and options for delivering the objectives of the Plan.
- 3.1.2 Appraisal of reasonable alternatives allows for a fair comparison of different policy approaches and site allocations to be undertaken. The findings of appraisal can then help to inform decisions about the preferred Plan approaches.
- 3.1.3 An important aspect of an effective SA is to help stakeholders (i.e. businesses, communities, developers, statutory bodies) understand the benefits, constraints and opportunities associated with different policy approaches / site options.
- 3.1.4 The Regulations¹ are not prescriptive, stating only that the SA Report should present an appraisal of the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.
- 3.1.5 Alternatives have been explored for the following Plan elements:
- The spatial strategy (housing and employment growth and distribution)
 - Alternative site options for housing and employment
 - Consideration of other policy options
- 3.1.6 The following chapters deal with the alternative approaches that have been identified and assessed for each of the Plan elements listed above. Each of these chapters answer the following questions:
- **Background** - *This sets out the reasons alternatives have been considered.*
 - **The reasonable alternatives** – *This describes the alternatives that have been considered and which are considered to be reasonable.*
 - **What is the preferred approach and why has it been selected?** - *An explanation is provided as to why the preferred approach has been selected and why others have been rejected.*

¹ Environmental Assessment of Plans and Programmes Regulations 2004



Alternatives appraisal: **Spatial strategy**

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4 ALTERNATIVES APPRAISAL: SPATIAL STRATEGY

4.1 Introduction

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

4.2 Consideration of alternatives

Economic growth

- 4.2.1 A key driving factor behind the new Local Plan is the aspiration to take advantage of opportunities for economic growth.
- 4.2.2 The Employment Land Needs Study (2015) identified an objectively assessed need of 190.8 ha of land, which factors in a 5 year buffer and an allowance for the multiplier effects of SuperPort and the Parkside SRFI. This is considered to be the minimum needs requirement from 2012-2033.
- 4.2.3 Taking in to account take up and losses of land since 2012, this leaves a residual plan requirement of 223.4 ha of employment land.
- 4.2.4 However, a Strategic Housing and Employment Land study (SHELMA) is currently being prepared that will identify an employment land need for each Liverpool City Region Authority. In addition, the need for large scale B8 warehousing and logistics (over 100,000sqm) for the City Region will be identified.
- 4.2.5 The timing of the SHELMA means that the preferred options document cannot have full regard to the SHELMA. However, responses to the Local Plan Consultation suggest that St Helens should be positively planning to contribute at least 70ha to the City Regions requirements.
- 4.2.6 Taking the Council's economic growth ambitions, the position of the SHELMA and the comments received from into consideration, 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.
- 4.2.7 The delivery of 306ha of employment land is considered at this stage to be the preferred approach to delivery of the Plans vision for economic growth. Alternative levels of growth were considered by the Council as follows:

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

- 4.2.8 *Reason for Rejection:* This option would not be compliant with the NPPF which requires each authority to meet its own 'objectively assessed' development needs with sufficient flexibility to adapt to rapid change. It would not proactively encourage sustainable growth and inward investment to the Borough and therefore economic demand and creation of new jobs would not be realised in St. Helens. This would result in slower growth in the Borough's economy.

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

- 4.2.9 *Reason for Rejection:* A significant oversupply of employment land could result in pressure for more housing, create labour supply difficulties and could therefore result in unsustainable commuting. It could also result in a large oversupply of development land, with many of the allocated sites remaining vacant. A significant oversupply of development land in St. Helens could also undermine the delivery of employment land in neighbouring authorities. It is considered that the Preferred Option provides a reasonable amount of employment land, above the identified objectively assessed needs, thereby offering flexibility without triggering the sustainability issues a significant amount of oversupply could generate.

Housing growth

- 4.2.10 The delivery of sufficient housing to meet local needs is a key objective of the Local Plan. The starting point for assessing different approaches is therefore to establish the full objectively assessed housing need (OAHN).
- 4.2.11 The full objectively assessed housing need has been identified in the Mid-Mersey Strategic Housing Market Assessment (2016) at 451 dwellings per year. This takes account of economic factors and affordable housing requirements.
- 4.2.12 The Council considers that housing growth below this level would not meet local housing needs and would therefore **not be a reasonable alternative** given that a key objective of the plan is to support economic growth and housing delivery.
- 4.2.13 Where there is evidence to justify potentially higher levels of growth, there is potential for reasonable alternatives to exist. Table 4.1 below outlines a range of alternative growth scenarios considered by the Council as part of the plan-making process.

Table 4.1: Alternative scenarios for housing growth

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

Distribution of housing development

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

4.2.15 Determining the distribution of housing growth involves consideration of strategic objectives, as well as the availability of suitable land. To help establish the preferred approach the Council has explored a variety of alternative distribution strategies. Those that are considered to be reasonable are outlined in table 4.3. Several alternatives that were explored were found to be unreasonable, and have therefore not been tested in the SA. These are discussed briefly below.

Alternatives to Green Belt release

4.2.16 **Option 1:** Do not release any land from the Green Belt to meet the housing and employment needs of the Borough for the Plan period or for Safeguarded land for the period following it. Development will be restricted to brownfield and greenfield in the urban area only, including making the best use of urban sites and considering re-

allocating land from other uses. Neighbouring authorities will be asked to make up shortfalls, including the provision of affordable housing.

The Council has set out detailed reasons for rejecting this option in the draft Plan document. In summary, this option has a significant risk of not meeting identified needs for market and affordable housing and employment land, leading to:

- A lack of market and affordable housing, leading to residents having to move out of the Borough to meet their housing needs, harming communities;
- Employment land needs will not be met, leading to fewer employment opportunities and worse economic conditions.

4.2.17 **Option 2:** Use brownfield and greenfield land in the urban areas, plus limited release of sites that have the least impact on the Green Belt, rather than attempting to ensure a spread of housing sites around the settlements and locating employment sites close to where locational requirements and market demand is.

4.2.18 In summary, there is also no guarantee that it will be possible to confidently rank sites according to impact on the Green Belt. Furthermore, such a ranking may not ensure that there would be a distribution of housing sites to meet needs in all settlements across the Borough, employment sites is unlikely to meet locational requirements and market demand. This could lead to unsustainable housing development patterns and reduced ability of the Borough to meet employment land need.

4.2.19 This approach might also necessitate the loss of open space in the urban area, which would lead to a reduction in the quantity / quality of recreational space in these areas.

The reasonable alternatives

4.2.20 Four alternative distribution strategies have been identified as reasonable at this stage.

Table 4.3: *The reasonable alternatives (for distribution of housing growth)*

Distribution scenario	Rationale	Assumptions
Proportionate growth / greater dispersal	<p>Each settlement takes a proportionate share of new housing development proportionate to current population size.</p> <p>All settlements make provision to meet the Borough's needs for development.</p> <p>Intensification of development in all settlements irrespective of infrastructure provision and capacity.</p>	<p>Growth would be broadly proportionate to current population size. Where sufficient sites have not been put forward to achieve this, there would be redistribution to nearby settlements with surplus capacity. This would see substantially less growth in Bold, and slightly reduced growth for Earlestown, Ecclestone and Haydock. Conversely, there would be an increase in growth in/around Rainhill, Sutton, Rainford, Moss Bank, Billinge, Garswood.</p>

Distribution scenario	Rationale	Assumptions
Balanced growth (preferred approach)	Regeneration of the main urban area but with increased distribution of development to settlements with deliverable sites, new employment allocations and adequate services and facilities.	Seeks to ensure the vitality of settlements is retained, reflecting constraints, but also take advantage of economic opportunities. Spread of development as per Policy LPA02.
Focus housing growth close to employment opportunities along key transport routes	Cluster new housing growth around existing settlements along the M6 and M62 corridor to compliment employment allocations.	This would see higher levels of growth at key settlements in close proximity to the M6/M62 strategic junctions such as Haydock (M6/A580), Newton-le-Willows (M6/M62) and Earlestown and Bold/Rainhill (M62). Conversely, there would be lower levels of growth at settlements to the north of the Borough such as Billinge, Rainford, and to the west at Eccleston.
Limited Green Belt dispersal and focus on large scale Sustainable Urban Extension	Limited dispersal to existing Green Belt sites on the edge of main settlements and focus majority of Green Belt release in large scale Sustainable Urban Extension	This would see a large volume of new housing (circa 2200 units) focused in a sustainable urban extension to the south east of the Borough at proposed safeguarded site Bold Forest Garden Suburb (HS03).

4.2.21 There are elements of the strategy that are common to each alternative:

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

Combining growth and distribution scenarios

- 4.2.22 The spatial strategy is 'built-up' from different elements including the level and distribution of employment and housing land. Table 4.3 below sets out the three growth scenarios and the distribution alternatives that are considered to be reasonable at each level of growth. The preferred approach is shaded green.

A: Meet OAHN needs (470 dpa)	B: 20% buffer for flexibility (570 dpa)	C: 900 DPA for flexibility and additional contingency
A1. Proportionate growth	B1. Proportionate growth	Proportionate growth
A2. Balanced growth	B2. Balanced growth	C1. Balanced growth plus new settlement
A3. Focus on South east	B3. Focus on South east	C2. Focus on south and a new settlement
A4. Focus on new settlement	B4. Focus on new settlement	Focus on new settlement

- 4.2.23 Under growth scenario A, there are four reasonable ways this level of growth could be distributed, ranging from proportionate growth (A1), to focus on a new settlement (A4).
- 4.2.24 Under growth scenario B, these alternatives remain appropriate, though it may become more difficult to maintain proportionate growth. There would also be a need for further development in the Green Belt as the New Settlement would not deliver all needs on its own.
- 4.2.25 Under growth scenario C, the alternatives become more limited. It would be difficult to maintain a proportionate approach as some settlements do not have the identified land to accommodate the level of growth. Therefore, this alternative (C1) is considered to be unreasonable. Focusing on a new settlement would not be sufficient to meet needs under growth scenario C, and therefore this alternative is not reasonable. It ought to be possible to still deliver a 'balanced approach', though this would involve much more growth and may need to include 'a new settlement', or a greater focus on opportunities to the south east.

4.3 Summary of appraisal findings

- 4.3.1 Overall, the lower growth scenarios A1-B4 would have the fewest significant effects. Whilst this might be favourable from an environmental perspective, these scenarios would not take advantage of opportunities for economic growth and social development.
- 4.3.2 At the preferred level of growth (570 dpa), the positive effects for each distribution alternative (B1-B4) are broadly greater than for A1-B4. This higher level of growth would therefore be more attractive in terms of tackling deprivation and boosting economic growth which is a key aim of the Plan. However, at this level of growth the potential for negative effects on environmental factors increases, mainly related to increased pressure on landscapes and the character of the built and natural environment.
- 4.3.3 In terms of distribution, alternatives A1 and A2 spread the benefits of development more evenly, and so are also less likely to have significant negative effects in any

one area. This contrasts with alternatives B3 and B4, which would have major positive effects on housing and would benefit some communities greatly, but would increase the potential for localised negative effects such as congestion, and not meeting housing needs in some settlements.

- 4.3.4 The higher growth options C1-C2 would be very positive in terms of driving housing and employment growth. However, this would be at the expense of significant negative effects upon landscape, heritage, agricultural land and air quality. Furthermore, it is uncertain whether infrastructure could cope with this level of development, which could lead to negative effects on the transport networks, water quality and access to services such as health and education.

4.4 Outline reasons for selecting the preferred approach (in light of alternatives)

Growth Scenario 1: 470 dwellings per year

- 4.4.1 All four alternatives have been rejected by the Council, in the main due to the inadequate amount of growth in housing involved. The Council consider that the alternatives:


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

Growth Scenario 3: 712 dwellings per year

- 4.4.2 Both alternatives C1 and C2 have been rejected by the Council.
- 4.4.3 A 712 unit per year target is substantially above the amount of housing achieved in the last two years (603.5), than on average over the past 5 years (478) and 10 years (422), indicating that the local housing market and infrastructure could struggle to absorb this number of dwellings and the development industry could struggle to supply this level of housing.
- 4.4.4 It is unlikely that with a 712 target that a five year land supply could be maintained for a number of years at the start of the plan period, reducing planning control over development. The housing could lead to unsustainable commuting patterns if not well connected to new jobs being created and existing jobs.

Growth Scenario 2: 570 dwellings per year

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



Alternatives appraisal: **Policies**

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5 ALTERNATIVES APPRAISAL: POLICIES

5.1 Introduction

- 5.1.1 A number of policy options (listed in table 5.1) below are predominantly procedural in nature and/or are not sufficiently discrete to allow for a meaningful appraisal in the SA.
- 5.1.2 Whilst these options are helpful to guide the plan-making process towards preferred policy approaches, an SA of all these types of options would not be proportionate or helpful to the decision making process.

Table 5.1: Plan options that are not deemed to be reasonable alternatives in the SA

Plan element / policy	Options
Development principles	<ol style="list-style-type: none"> 1. Have a more prescriptive policy 2. Selection of alternative development principles
Extent of the Greenbelt	<ol style="list-style-type: none"> 1. Maintain existing Green Belt boundaries 2. Do not safeguard land for future development 3. To safeguard significantly more land for future development
Transport and travel	<ol style="list-style-type: none"> 1. Rely on policies contained with the NPPF and the Third Merseyside Local Transport Plan
Infrastructure delivery and funding	<ol style="list-style-type: none"> 1. Introduce an infrastructure tariff 2. Have no policy on planning obligations in the Local Plan
Green Infrastructure	<ol style="list-style-type: none"> 1. Do no plan for the protection or enhancement of the Borough's green infrastructure network.
St Helens Town Centre and Central Spatial Area	<ol style="list-style-type: none"> 1. Do not identify 'Areas of Opportunity' for growth and accept decline in retail market share, encouraging diversification to other uses including residential conversion of offices. 2. Allow vacant and under-used land around the town centre for potential leisure and retail uses. 3. Draw the town centre boundary closer to the north-west and designate Duke Street as a Local Centre.
Earlestown Town Centre	<ol style="list-style-type: none"> 1. Continue to use the existing defined centre boundaries for Earlestown. 2. Not to pursue a specific policy seeking the safeguard Earlestown as a Town Centre and instead rely on Policy LPC04 to control retail development and main town centre uses.
Gypsy and Travellers	<ol style="list-style-type: none"> 1. Not allocating a new permanent site at GTA01 and let existing vacant sites and sites with permission provide new supply by preventing their loss to other uses. 2. Consider all brownfield sites in the SHLAA and Green Belt sites for use as permanent sites and select. 3. Do not allocate a transit site as levels of encampments are below historic highs in the early 2000s.

Plan element / policy	Options
Retail and Town Centres	<ol style="list-style-type: none"> 1. Continue to use existing Town, District and Local boundary definitions as defined in the Core Strategy and the 2006 Local Centre Study. 2. Do not set local thresholds for the impact test, instead relying on the default floorspace threshold in the NPPF of 2,500sq.m. 3. Set intermediate floorspace thresholds (i.e. between those recommended in the draft Retail & Leisure and the NPPF default threshold of 2,500 sq.m) for requiring an Impact Assessment 4. Set policy criteria whereby proposals for small neighbourhood shops and services proposing 150sq.m gross floorspace or less in out of centre locations are not required to submit Sequential Assessments
Open space, sports and recreation	<ol style="list-style-type: none"> 1. Do not have specific policy and rely on policies in the NPPF with regards to open space, sports and recreational buildings and land. 2. Use alternative open space standards for the Borough; for 3. example propose lower provision standards.
Biodiversity and geological conservation	<ol style="list-style-type: none"> 1. Do not allow any development that could have an impact on a natural asset. 2. Do not protect the Borough's biodiversity and geological assets. 3. Seek lower ratio of mitigation for habitat loss, for example 2 for 1 replacement to reduce land requirement and impact on viability.
Greenways	<ol style="list-style-type: none"> 1. Do not safeguard and enhance Greenways.
Ecological networks	<ol style="list-style-type: none"> 1. Do not allow any development that could have an impact on a natural asset. 2. Do not protect the Borough's ecological networks
Landscape protection and enhancement	<ol style="list-style-type: none"> 1. Do not protect landscape character.
Trees and woodland	<ol style="list-style-type: none"> 1. Do not protect trees and woodland
Historic Environment	<ol style="list-style-type: none"> 1. Do not plan for the protection, conservation, preservation 2. and enhancement of the Borough's historic assets.
Floos risk and water management	<ol style="list-style-type: none"> 1. Rely on the NPPF and the Planning Practice Guidance.
Low carbon and renewable energy	<ol style="list-style-type: none"> 1. Implement a Borough-wide target for new development to meet a percentage of their energy consumption through renewable or low carbon sources. 2. Do not identify any areas in the Borough as being potentially suitable for wind energy development

Plan element / policy	Options
Minerals	<ol style="list-style-type: none"> 1. Identify Area(s) of Search and / or Preferred Area(s) for future primary mineral extraction. 2. Safeguard additional known mineral deposits of sand (including silica sand) and peat. 3. Delineate Mineral Safeguarding Areas to exclude urban 4. (i.e. non Green Belt) areas.
Waste	<ol style="list-style-type: none"> 1. Adopt a policy approach that diverges from the Joint WLP e.g. plan for more or less waste management facilities within St. Helens.
Open space and residential development	<ol style="list-style-type: none"> 1. Do not require new development to provide incidental on 2. site open space provision or make contributions towards other open space in compensations where appropriate.

5.1.3 There are also options in the draft plan that look at whether different methodologies could be used to determine development needs, and whether different thresholds should be used to determine housing targets.

5.1.4 These are largely technical issues, that should be dealt with in corresponding evidence studies such as the SHELMA and viability assessments. Appraising such alternatives would also be difficult and the findings would be very narrow in focus (i.e. the effect of different levels of viability would largely be focused on how this might affect levels of housing and employment development. The effects on other factors would depend upon the extent to which certain policy requirements might need to be relaxed (e.g. green infrastructure and other enhancement measures). It is considered to be disproportionate and unhelpful to appraise such options within the SA. The Council's conclusions upon the benefits of each option are provided in sufficient detail in the draft Plan.

Table 5.2: *Targets/needs based options not considered to be reasonable alternatives*

Plan element / policy	Options
Housing mix	<ol style="list-style-type: none"> 1. Do not have a policy requirement for applicants to refer to the latest SHMA when considering a suitable housing mix for a site. 2. Do not have a policy that sets a requirement for the provision of lifetime homes and bungalows. 3. Introduce a higher or lower unit threshold for the provision of lifetime homes and bungalows. 4. Introduce a specific policy requirement for all new residential development over a certain unit threshold (e.g. 40 units) to supply a set percentage (e.g. 5%) of dwelling plots for sale to self or custom builders on the Borough's Self Build Register.

Plan element / policy	Options
Employment land	<ol style="list-style-type: none"> 1. Use economic forecasts to determine the objectively assessed employment land needs. 2. Provide less employment land than identified objectively assessed needs 3. Provide significantly more employment land than the identified employment land requirement 4. Relaxation of policy protecting existing employment land
Affordable housing	<ol style="list-style-type: none"> 1. Continue with the Core Strategy 30% affordable housing requirement across St. Helens (rather than have the varying requirements across different locations). 2. Seek lower than 30% affordable housing provision on greenfield sites in Affordable Housing Zones 2, 3 and 4. 3. Seek higher than 30% affordable housing provision on greenfield sites in Affordable Housing Zones 2, 3 and 4 4. Seek higher than 10% affordable housing provision on brownfield land. 5. Seek 10% affordable housing provision on all brownfield land.



Appraisal findings: Site Options

06

6 APPRAISAL FINDINGS: SITE OPTIONS

6.1 Introduction

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

The site options

- 6.1.5 A total of sixty-two sites were identified as reasonable alternatives for housing development. The majority of these sites relate to discrete parcels of land, though some represent a combination of one or more pieces of land.
- 6.1.6 Two sites for Gypsy and Traveller accommodation were also identified.
- 6.1.7 A total of sixteen sites were identified as reasonable alternatives for employment uses. One further site for Leisure uses was identified.
- 6.1.8 Each site option has been appraised against a site appraisal framework as set out in **Appendix B**. The findings of the appraisal are summarised below in a series of matrices. Detailed proformas for each site option, including a map of the site location and boundaries are contained within **Technical Appendix A**.

6.2 Summary of site appraisal findings

- 6.2.1 Tables 5.1 and 5.2 below illustrate the scores for each site option against the site appraisal criteria.

Table 5.1: Employment site options

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

Table 5.2: Housing site options

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H1	Sutton Moss Road	Parr	Discard																					
H2	Land at Florida Farm, Slag Lane	Haydock	Allocate (HA3)																					
H3	Land at Junction Road/ Stanley Avenue	Rainford	Discard																					
H4	Bold Forest Garden Suburb: land south of Reginald Road / Bold Road / Traver's Entry, west of Neil's Road, north of Gorsey Lane and east of Crawford Street, Bold	Bold	Allocate (HA6) and safeguard (HS03)																					
H5	Haydock Green, Land south west of Junc 23- M6	Haydock	Allocate (HA10)																					
H6	Land off Clock Face Road	Bold	Safeguard (HS05)																					
H7	Land off Mere Road	Newton	Discard																					
H8	Land at Castle Hill and East of Rob Lane	Newton	Safeguard (HS15)																					
H9	Land at Elms Farm, West of Rob Lane	Newton	Safeguard (HS16)																					
H10	Land at Vista Road	Earlestown	Safeguard (HS07)																					
H11	Land at Vista Road (2)	Earlestown	Allocate (HA7)																					
H12	Land to the South of Elton Head Road	Thatto Heath	Safeguard (HS24)																					
H13	Prescot Reservoir	Eccleston	Discard																					
H14	Rainford Wastewater Treatment Works	Rainford	Discard																					
H15	Eccleston Park Golf Club, Rainhill Road	Eccleston	Allocate (HA8)																					

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H16	Bell Lane (Various Plots)	Bold	Safeguard (HS04)																					
H17	Land at Gartons Lane	Bold	Allocate (HA5)																					
H18	Land at Hydes Brow	Rainford	Discard																					
H19	Land east of Higher Lane / South of Muncaster Drive / at White House Lane, Rainford	Rainford	Safeguard (HS18)																					
H20	Land rear of Deepdale Drive	Rainhill	Discard																					
H21	Land at Scott Clinic, Rainhill Road	Thatto Heath	Discard																					
H22	Land South of Station Road	Haydock	Safeguard (HS11)																					
H23	Land to East of Newlands Grange	Newton	Safeguard (HS14)																					
H24	Lords Fold	Rainford	Allocate (HA14)																					
H25	Land at Rookery Lane	Rainford	Discard																					
H26	Land at Elton Head Farm	Thatto Heath	Safeguard (HS24)																					
H27	Land north of Muncaster Drive	Rainford	Discard																					
H28	Land between Ormskirk Road and Junction Road	Rainford	Discard																					
H29	Muncaster Drive	Rainford	Discard																					
H30	Land North of MossBorough Road	Rainford	Discard																					
H31	Land South of Higher Lane	Rainford	Allocate (HA15)																					
H32	Rookery Lane	Rainford	Safeguard (HS21)																					
H33	Bushey Lane South	Rainford	Safeguard (HS19)																					

Aecom Site ID	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
H34	Red Delph Farm	Rainford	Safeguard (HS19)																					
H35	Land adjoining Ash Grove Farm, Beacon Road	Billinge	Allocate (HA1)																					
H36	Land at Martindale Road, Carr Mill	Moss Bank	Safeguard (HS12)																					
H37	Land at Weathercock Hill Farm, Garswood Road	Billinge	Allocate (HA2)																					
H38	Land at Leyland Green Farm	Billinge	Safeguard (HS02)																					
H39	Land at Moss Bank Farm	Moss Bank	Allocate (HA11)																					
H40	Eccleston Vale- Land south of East Lancs	Windle	Allocate (HA16)																					
H41	Land at Elton Head Road	Thatto Heath	Safeguard (HS24)																					
H42	Houghton Lane Plots	Parr	Discard																					
H43	Land off Common Road/ Swan Road, Newton-le-Willows	Earlestown	Safeguard (HS06)																					
H44	Land to the South of former Central Works, Ballerpon Way	Haydock	Safeguard (HS10)																					
H45	Land at Old Hey Farm	Newton	Safeguard (HS13)																					
H46	NHS Sims Ward, Bradlegh Road	Newton	Allocate (HA12)																					
H47	Land at Manor Farm, Mill Lane/ Land to the east of Hall Lane	Rainhill	Safeguard (HS23)																					
H49	Red Bank Community Home, Winwick Road,	Newton	Allocate (HA13)																					
H50	Land off Winwick Road, Newton-le-Willows	Newton	Safeguard (HS17)																					
H51	Land off Strange Road, Garswood	Haydock	Safeguard HS01																					
H52	Land to the west of Omega South (HCA)	Bold	Discard																					

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

Rationale for site selection

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

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Appraisal of the draft Plan

07

7 APPRAISAL OF THE DRAFT PLAN

7.1 Methodology

- 7.2.1 This section presents an appraisal of the draft Plan against the SA Framework. Effects have been identified taking into account a range of characteristics including: *magnitude, duration, frequency, and likelihood*. Combined, these factors have helped to identify the significance of effects, whether these are positive or negative.
- 7.2.2 To give the appraisal a clear structure but avoid repetition and duplication, the findings are presented in a summary table for each SA Topic. The table sets out all the policies within the draft Plan, and identifies the effects that different elements (groups of similar policies) of the Plan would have.
- 7.2.3 Finally, the effect of the Plan ‘as a whole’ is identified, which considers cumulative effects, synergistic effects and how the different plan policies interact with one another. This is important as Plan policies should be read in the context of the whole plan, not just on their own.
- 7.2.4 A score is given to reflect the significance of effects as follows:

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

7.3 Biodiversity and Geodiversity

7.3.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'Biodiversity and Geodiversity'. The effects of the Plan are presented in table 7.1 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.1.

Table 7.1: Appraisal of the draft Plan on Biodiversity and Geodiversity

Local Plan Chapters / Policies		Score
Strategic Spatial Policies (Including sites) LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓ LPA02: <i>Spatial Strategy</i> - LPA03: <i>Development Principles</i> ✓ LPA04: <i>A Strong and Sustainable Economy</i> - LPA05: <i>Meeting St. Helens Housing Needs</i> - LPA06: <i>Safeguarded land and extent of the Green Belt</i> ✓? LPA10: <i>Development of Strategic Rail Freight Interchange (Parkside)</i> ✗?		✓ / ✗
Retail and centres LPC04: <i>Retail and Town Centres</i> - LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> - LPB02: <i>Earlestown Town Centre</i> -		-
Housing policies LPC01: <i>Housing Mix</i> - LPC02: <i>Affordable & Specialist Housing Needs</i> - LPC03: <i>Gypsies, Travellers & Travelling Show people</i> - LPD04: <i>Householder Developments</i> -		-
Biodiversity policies LPC06: <i>Biodiversity and Geological Conservation</i> ✓✓ LPC07: <i>Greenways</i> ✓ LPC08: <i>Ecological Network and Geological Conservation</i> ✓✓		✓✓
Built and natural environment policies LPC09: <i>Landscape character</i> ✓ LPC10: <i>Trees and Woodland</i> ✓ LPC11: <i>Historic Environment</i> - LPD06: <i>Development in Prominent Gateway Locations or Character Areas</i> - LPD05: <i>Extension, Alteration or Replacement of Dwellings or conversion in the Green Belt</i> -		✓
Natural resources LPA09: <i>Green Infrastructure</i> ✓ LPC12: <i>Flood Risk and Water Management</i> ✓ LPC14: <i>Minerals</i> - LPC15: <i>Waste</i> - LPD09: <i>Air quality</i> -		✓✓
Infrastructure LPA07: <i>Transport and Travel</i> - LPC13: <i>Low Carbon and Renewable Energy Development</i> - LPD07: <i>Digital Communications</i> - LPC05: <i>Open Space and Outdoor Sports Facilities</i> -		-
Design LPD01: <i>Ensuring Quality Development in St. Helens</i> - LPD02: <i>Design and Layout of New Housing</i> - LPD03: <i>Open Space and Residential Development</i> - LPD08: <i>Advertisements</i> - LPD10: <i>Hot Food Takeaways</i> - LPD11: <i>Health and Wellbeing</i> -		-
The Local Plan ‘as a whole’ (i.e. cumulative effects)		✓✓

- 7.3.8 As well as the potential for localized effects on wildlife on the western side of the M6 (i.e. as for option 3),
- 7.3.9 Option 4 involves the loss of farmland (which is under stewardship and may therefore have some benefits for local species such as birds) adjacent to the Highfield Moss SSSI.

Spatial strategy (including sites)

- 7.3.2 In terms of biodiversity, the spatial strategy outlines the importance of *“maintaining, enhancing, connecting and expanding the ecological network, open space and recreation sites and greenway network.”* The development principles add to this stating that development should contribute to *“protecting and enhancing the quality of the Borough’s natural resources including water, air, land and biodiversity.”* This is likely to lead to a positive effect over the plan period.
- 7.3.3 Development has the potential to affect biodiversity through the loss of land, and disturbance to habitats and species. The bulk of development is anticipated to come forward in the urban area and Green Belt land allocations.
- 7.3.4 In the main, the allocations are located some distance from SSSIs and Ancient Woodland and none of the allocated or safeguarded sites would lead to the direct loss of ancient woodland. These habitats are therefore unlikely to be significantly affected.
- 7.3.5 There are protected trees on a number of allocated sites, though in the main, these are restricted to site boundaries and could be avoided through design and layout.
- 7.3.6 Though the majority of housing and employment sites are not directly within local wildlife sites, there is a wide network of locally important wildlife habitats that are adjacent to, or in some cases (with brooks and streams) pass through sites. There is therefore potential for disturbance to these habitats during construction and also as a result of increased recreational pressure. However, effects are not predicted to be significant as Plan policies ought to be sufficient to prevent harm and secure enhancements.
- 7.3.7 The Parkside SFRI is within close proximity to Highfield Moss SSSI. As well as the potential for localised effects on wildlife on site, there may be a loss of farmland (which is under stewardship and may therefore have some benefits for local species such as birds). A number of farmland birds and migrating birds have been recorded on the SSSI, and so disturbance to surrounding areas could have a knock on effect on birds feeding.
- 7.3.10 The main threats to the moss are eutrophication, burning and drying out. Changing the land use from agricultural use could reduce the threat of eutrophication, but conversely, may create its own issues with regards to drainage and disturbance (e.g. noise during construction and operation of both warehouses and a rail line) There will be a need to engage with Natural England to ensure significant effects did not occur. At this stage, an **uncertain negative effect** is predicted.

Retail and centre policies

- 7.3.11 The town centre policies are not related to biodiversity protection and enhancement and therefore a **neutral effect** is predicted.

Housing policies

- 7.3.12 The policies are not directly related to biodiversity or geodiversity and so **neutral effects** are predicted.

Biodiversity policies

- 7.3.13 Policy LPC06 outlines various requirements for development and its impact on biodiversity. The policy is likely to have a **significant positive effect** as there is a requirement that *“irrespective of any need for mitigation or compensation measures, small scale – large scale major developments must provide an overall net increase in the biodiversity resource of the Borough.”*
- 7.3.14 Similarly, the greenways policy (LPC07) should have a **positive effect** on biodiversity as it seeks to safeguard and enhance the number of greenways throughout St Helens. Development affecting greenways will be subject to stringent measures such as not impairing the integrity of a greenway as a wildlife corridor which should ensure preservation and longevity of biodiversity assets. It is possible that the effects of climate change should be considered as part of the policies, i.e. that flora/fauna sensitive to temperature changes are considered in any new development.
- 7.3.15 The ecological network policy (LPC08) should result in a **positive effect** as it requires development to demonstrate *“that where appropriate protection or retention of natural assets cannot be achieved, and there are no alternatives, mitigation and/or as a last resort compensatory provision will be required”*. This will ensure no net loss of biodiversity. Improving the links between networks may also be achieved in the longer term, which would constitute a **significant positive effect**.

Built and natural environment policies

- 7.3.16 The character of landscapes could be influenced by the presence of particular habitats (for example trees, watercourses, hedges) or geological features (rocks, landforms etc.). Therefore, protection and enhancement of landscape character ought to have an indirect **positive effect** on biodiversity and geodiversity. However, it should be acknowledged that the focus of these policies is upon landscape character, and so the effects for biodiversity and geodiversity are not predicted to be significant.
- 7.3.17 LPC10 seeks to ensure protection and enhancement of trees and woodlands, with a clear requirement that no ancient woodland is lost, resources are protected and enhanced (e.g. through the forest management plans), and compensating for loss by requiring higher levels of new provision. Overall, this policy would have **positive effects**.

Natural resources

- 7.3.18 The green infrastructure policy provides an overarching framework for the protection of green and open space, with close links to several other policies in the plan. The policy states *“The Council will protect, manage, enhance and where appropriate expand the Green Infrastructure network.”* This is demonstrated through the commitment to *“create new Local Nature Reserves including at Billinge Hill and “implement the Bold Forest Park Area Action Plan,”* two schemes that will help to protect and enhance biodiversity assets in St Helens.
- 7.3.19 Policy LPA12 requires that flood risk management measures should, where possible, contribute to the protection and enhancement of biodiversity networks.

- 7.3.20 Together, these policies are likely to have a **significant positive effect** on biodiversity, as they provide a proactive and locally specific approach to green infrastructure networks.

Infrastructure

- 7.3.21 It is possible that biodiversity corridors/schemes could be adopted in the retention and creation of open spaces, sporting and recreational facilities. However, the effects are not predicted to be significant.

Design

- 7.3.22 Although environmental quality measures are proposed, they are not predicted to directly affect biodiversity and geodiversity. Consequently, **neutral effects** are predicted.

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.3.23 The Plan will lead to the development of a variety of sites within the Green Belt and also some which have environmental constraints such as being close to wildlife sites and ancient woodland.
- 7.3.24 The effects associated with strategic site development ought to be mitigated by site specific policies and core policies throughout the plan. There is particularly strong protection for ancient woodland, and any loss of habitat would be compensated with a greater quantity of species / habitat. The Green Infrastructure network ought to be protected and enhanced, with particular benefits relating to the creation of new local wildlife sites at Billinge Hill and the Bold Forest Area Action Plan.
- 7.3.25 Overall, despite the planned growth, the plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a **significant positive effect** predicted.

7.4 Land quality

7.4.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'Land Quality'. The effects of the Plan are presented in table 7.2 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows.

Table 7.2: Appraisal of the draft Plan on Land Quality

Local Plan Chapters / Policies	Score
Strategic Spatial Policies (Including site allocations) LPA01: Presumption in Favour of Sustainable Development ✓ LPA02: Spatial Strategy ✓ / ✖✖ LPA03: Development Principles ? LPA04: A Strong and Sustainable Economy ✖ LPA05: Meeting St. Helens Housing Needs ✖ LPA06: Extent of the Green Belt and Safeguarded Land ✖✖ LPA10: Development of Strategic Rail Freight Interchange (Parkside) ✖	✖✖ / ✓
Retail and centres LPC04: Retail and Town Centres ✓ LPB01: St. Helens Town Centre and Central Spatial Area ✓ LPB02: Earlestown Town Centre ✓	✓
Housing policies LPC01: Housing Mix ✖ / ✓ LPC02: Affordable and Specialist Housing Needs ✖ / ✓ LPC03: Gypsies, Travellers & Travelling Show people - LPD04: Householder Developments -	✖ / ✓
Biodiversity policies LPC06: Biodiversity and Geological Conservation ? LPC07: Greenways ? LPC08: Ecological Network and Geological Conservation ?	?
Built and natural environment policies LPC09: Landscape character ✓ LPC10: Trees and woodland ✓ LPC11: Historic Environment ✓ LPD06: Development in Prominent Gateway Locations or Character Areas - LPD05: Extension, Alteration, Replacement of Dwellings or conversion to dwellings in Green Belt ✓	✓
Natural resources LPA09: Green Infrastructure ✓ LPC12: Flood Risk and Water Management - LPC14: Minerals ✓ LPC15: Waste ✓ LPD09: Air quality -	✓
Infrastructure LPA07: Transport and Travel - LPC13: Low Carbon and Renewable Energy Development ? LPD07: Digital Communications - LPC05: Open Space and Outdoor Sports Facilities - LPA08: Infrastructure Delivery and Funding -	-
Design LPD01: Ensuring Quality Development in St. Helens - LPD02: Design and Layout of New Housing ✓ LPD03: Open Space and Residential Development - LPD08: Advertisements - LPD10: Hot Food Takeaways - LPD11: Health and Wellbeing -	-
The Local Plan 'as a whole' (i.e. cumulative effects)	✖✖ / ✓

Spatial strategy (including sites)

- 7.4.2 The spatial strategy and supporting policies propose the use of brownfield land where possible, and more intensive use of sites in the urban area where appropriate. This will help to encourage brownfield land use and regeneration (which might involve derelict or contaminated land). Further development would also need to be in accordance with these general principles. Consequently minor **positive effects** are predicted.
- 7.4.3 However, to meet identified housing needs, the plan also proposes to release Green Belt land through a series of housing and employment land allocations. This land is predominantly agricultural or open green space, and its loss could have negative effects upon soil (namely through the loss of agricultural land).
- 7.4.4 Policy LPA04 (A Strong and Sustainable Economy) and Policy LPA02 (Spatial Strategy) both state that St Helens should embrace its potential for strategic, logistics development, however land allocated to accommodate this growth is largely classified as Grade 3. The four largest employment sites within the Borough (Parkside West, Parkside East, Land North East of Junction 23 M6, and Florida Farm North) are all located within ALC Grade 3 to the north east of the Borough.
- 7.4.5 Policy LPA06.1 (Strategic Employment Sites) and Policy LPA05.1 (Strategic Housing Sites) both make reference to allocated sites for development within St Helens. Whilst two of these twelve sites are located on lower quality land (EA8 and HA8), the majority of these sites are located within land that is classified as 'best and most versatile' (Grades 1-3a).
- 7.4.6 Land to the north east of the Borough is mapped as being of ALC Grade 1 and 2, and therefore of a particularly high quality. Rainford, and the north-eastern side of Billinge, are surrounded by land of this high quality; and site allocations HA1, HA3, consist mostly of Grade 2 agricultural land. For sites HA16 (50 ha Grade 1), HA1 (18ha Grade 2) and HA15 (11ha Grade 1), in combination this represents a substantial loss of agricultural land of high quality. HA14 is also classified as Grade 1 land, but is a much smaller size.
- 7.4.7 The loss of these sites in particular represents a **significant negative effect** on land quality, and should be confirmed through an up to date assessment of grading. It would also be beneficial to distinguish whether the sites that fall onto Grade 3 land constitute best and most versatile soils (Grade 3a) or not (Grade 3b).
- 7.4.8 Where the development of best and most versatile land is considered to be unavoidable (there may not be alternative sites at some settlements) there ought to be compensation for any loss to minimise negative effects on the baseline position for soil. This could take the form of on-site quality allotments for example (should demand exist).
- 7.4.9 Where alternative sites exist of a lower grade, the reasons for not allocating those sites should be made clear. Given the availability of alternative site options for housing, it is considered that HA16 in particular (involving the greatest loss of Grade 1 land) may not be the most suitable location for development to the west/south west of St Helens². This however, only considers the site in respect of its soil quality, and other factors need to be considered as part of the plan making process.

² National policy states that high quality agricultural land should not be developed when there are reasonable alternatives of a lower quality. The agricultural grading system is somewhat historic and often requires more detailed local assessment to determine classification.

- 7.4.10 It is necessary to determine what aspect of this is 'best and most versatile' (3a) and what is not (3b).
- 7.4.11 In addition to the allocations, Policy LPA06 (Extent of the Green Belt and Safeguarded Land) removes certain sites from the Green Belt and safeguards them from change over the plan period. This could have mixed effects. During the plan period, land will be protected from development, but a marker has clearly been set out that this land may be appropriate for allocation in the longer term (beyond the plan period). Much of the land identified is classified as best and most versatile agricultural land. Therefore, the potential for negative effects beyond the plan period is likely. However, these effects would need to be identified in light of new evidence at that time as part of a Plan review or new plan

Retail and centre policies

- 7.4.12 Policy LPC04 (Retail and Town Centres) introduces a hierarchy which prioritises the location of various town centre uses. The hierarchy should help to ensure that the scale and type of development is appropriate to its setting, and is likely to help ensure that available brownfield land is identified for development where suitable. Required Impact Assessments will also help to ensure that the land used for development is proportional to the area and in the most accessible location, utilising existing infrastructure.
- 7.4.13 Policy LPC04 (Retail and Town Centres), Policy LPB01 (St Helens Central Spatial Area) and Policy LPB02 (Earlestown Town Centre) all encourage the development of homes, shopping, leisure, tourism and cultural facilities within the Town Centre. They also state a resistance to out of centre development, and promote land located within the Town Centres. These measures ought to help support regeneration efforts, which could tackle contaminated / derelict land and property. The policies are also likely to encourage higher-density development, which has a smaller development footprint, thereby having a minor positive effect on land quality.
- 7.4.14 With a resistance to out of town locations, it is possible that peripheral land outside the defined boundaries could become poorer quality, and / or used for services such as car-parking. However, other plan policies ought to encourage links between the town centres and surrounding settlements.
- 7.4.15 Overall a minor **positive effect** on land quality is predicted.

Housing policies

- 7.4.16 Policy LPA05 sets requirements for the density of housing developments, which ought to encourage more efficient uses of land in town centre/urban locations. The need to deliver lower density development on edge of settlement development could in some instances lead to an overall greater loss of land. However, the quality of the development would likely be higher.
- 7.4.17 Policy LPC01 (Housing Mix), requires 5% of the market housing mix on greenfield sites to be delivered as bungalows. This will lead to relatively low density housing in some areas, and is not the most efficient use of land, particularly in Green Belt locations where agricultural land quality is high. However, there are needs for such property to support an aging population.
- 7.4.18 Policy LPC02 (Affordable Housing Provision) sets a lower affordable housing requirement for developments within areas where viability is not optimal. This includes much of the St Helens urban area and predominantly brownfield sites. This

could act as an incentive for developers to redevelop such land, potentially tackling contamination, dereliction and delivering higher density development.

- 7.4.19 Overall, **mixed effects** are predicted, both positive and negative; reflecting the issues discussed above. The effects are not predicted to be significant, as there are other influential factors that play a greater role in the delivery of regeneration schemes, and the location of development is largely set through the spatial strategy.

Biodiversity policies

- 7.4.20 Protection of biodiversity, geological and ecological sites under Policy LPC06 (Biodiversity and Geodiversity Conservation) and Policy LPC07 (Greenways) could potentially limit the appropriateness of some sites for development. In this instance, the policy could have a minor positive influence in encouraging the redevelopment of brownfield or derelict sites (though themselves these can contain valuable biodiversity).
- 7.4.21 Strong protection for biodiversity could however, direct development towards sites which have greater value for agriculture (and less so for biodiversity), which would have negative implications for land quality.
- 7.4.22 Overall, the minor, mixed and uncertain nature of the effects, mean that these policies are likely to have insignificant effects on the baseline.

Built and natural environment policies

- 7.4.23 Contaminated sites could potentially be remediated through the planting of trees and woodland as supported through Policy LPC (Trees and Woodland). Likewise, Policy LPC09 (Landscape Protection and Enhancement) is likely to have a minor positive effect by making it a requirement that landscape character assessments are conducted which consider the quality of the land prior to development. Such assessments should help to gauge the appropriateness of development and may help to guide development to previously developed sites rather than agricultural and greenfield land.
- 7.4.24 A minor positive effect is predicted for Policy LPD05 (Extension, Alteration or Replacement of Buildings or conversion to dwellings in the Green Belt) which sets standards for the allowed size of building extensions and should help to contain development.

Natural resources

- 7.4.25 Policy LPA09 (Green Infrastructure) supports the implementation of the Bold Forest AAP, establishment of a Local Nature Reserve at Billinge Hill, and delivery of the Sankey Catchment Hydrology Plan. These measures should have positive implications for land quality by seeking to preserve high quality land and encourage the reclamation of land.
- 7.4.26 Policy LPC14 (Minerals) and Policy LPC15 (Waste) prioritise the reduction of waste, reuse of materials and the use of materials with a high recycled content; all of which would reduce the need for virgin materials and waste management / disposal sites.
- 7.4.27 The adoption of Mineral Safeguarding Areas may help to delay the development process in the short term, and could therefore be beneficial in safeguarding high quality land should it overlap with such areas.

7.4.28 Overall, the effect of the natural resource policies is likely to be positive, but not significant.

Infrastructure

7.4.29 Focusing development in existing settlements / edge of settlement locations makes good use of existing physical and social infrastructure (thereby reducing the pressure to develop land for new infrastructure).

7.4.30 The promotion of sustainable transport methods and a reliance on cleaner energy sources under Policy LPA07 (Transport and Travel) could, in the longer term, reduce the need to extract raw materials (which would help to protect land quality). The effects are uncertain at this stage though.

7.4.31 Policy LPC05 (Open Space, Sports and Recreation) seeks to maintain access to open space and sports facilities, and as such is likely to protect some areas of land from being developed and soil resources permanently lost.

7.4.32 Policy LPC13 (Low Carbon and Renewable Energy) supports wind energy schemes where they would not have an unacceptable effect upon environmental factors such as landscape, biodiversity, and natural resources. It is not clear in the policy if soil is included within this definition of 'natural resources'. If so, the policy should afford protection of high quality agricultural land. It would be beneficial to make the policy more explicit so that effects on 'best and most versatile' agricultural land are considered strongly in the decision making process. It ought to be feasible to return land to its former use for agriculture where land loss is unavoidable. An uncertain effect is predicted at this stage.

7.4.33 Given the minor nature of the effects discussed above, the infrastructure policies are considered to have a **neutral effect** on land quality overall.

Design

7.4.34 Encouraging higher density development in the urban area / town centre ought to be positive in terms of supporting the efficient use of land, and potential reclamation of derelict sites. This is a minor positive effect, but overall, the design policies are not strongly related to land quality and are therefore unlikely to have a significant effect.

Cumulative effects (i.e. the effects of the plan as a whole).

7.4.35 The Plan will lead to substantial development on land of agricultural value; some of which is categorized as 'best and most versatile'. Once developed, this resource cannot be recovered, and so this represents a **significant negative effect** on soil resources. As a form of compensation, soil resources could be retained in part through the provision of allotments (either on or off site). This recommendation would help to mitigate the effects somewhat.

7.4.36 Conversely, the Plan seeks to make efficient use of land and infrastructure, and promotes the regeneration of land, particularly brownfield land in the urban area. This would generate **positive effects** with regard to land quality.

7.5 Traffic, Congestion and Air Quality

7.5.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'traffic, congestion and air quality'. The effects of the Plan are presented in table 7.3 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.3.

Table 7.3: Appraisal of the draft Plan on Traffic, Congestion and Air Quality

Local Plan Chapters / Policies	Score
Strategic Spatial Policies (Including strategic sites) LPA01: <i>Presumption in Favour of Sustainable Development</i> - LPA02: <i>Spatial Strategy</i> - LPA03: <i>Development Principles</i> ✓ LPA04: <i>A Strong and Sustainable Economy</i> ✗ LPA05: <i>Meeting St. Helens Housing Needs</i> - LPA06: <i>Extent of the Green Belt and Safeguarded Land</i> ✗ LPA10: <i>Development of Strategic Rail Freight Interchange (Parkside)</i> ✓✓ / ✗	✓ / ✗
Retail and centres LPC04: <i>Retail and Town Centres</i> ✓ / ✗ LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓ / ✗ LPC02: <i>Earlestown Town Centre</i> ✓ / ✗	-
Housing policies LPC01: <i>Housing Mix</i> - LPC02: <i>Affordable and Specialist Housing Needs</i> - LPC03: <i>Gypsies, Travellers & Travelling Show people</i> - LPD04: <i>Householder Developments</i> -	-
Biodiversity policies LPC06: <i>Biodiversity and Geological Conservation</i> ✓ LPC07: <i>Greenways</i> ✓ LPC08: <i>Ecological Network and Geological Conservation</i> ✓	✓
Built and natural environment policies LPC09: <i>Landscape character</i> - LPC11: <i>Historic Environment</i> - LPC10: <i>Trees and woodland</i> ✓ LPD06: <i>Development in Prominent Gateway Locations or Character Areas</i> - LPD05: <i>Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt</i> -	-
Natural resources LPA09: <i>Green Infrastructure</i> ✓ LPC12: <i>Flood Risk and Water Management</i> ✓ LPC14: <i>Minerals</i> ✓ LPC15: <i>Waste</i> ✓ LPD09: <i>Air quality</i> ✓	✓
Infrastructure LPA07: <i>Transport and Travel</i> ✓ LPC13: <i>Low Carbon and Renewable Energy Development</i> ✓ LPD07: <i>Digital Communications</i> - LPC05: <i>Open Space and Outdoor Sports Facilities</i> -	✓
Design LPD01: <i>Ensuring Quality Development in St. Helens</i> ✓ LPD02: <i>Design and Layout of New Housing</i> ✓ LPD08: <i>Advertisements</i> - LPD10: <i>Hot Food Takeaways</i> - \ LPD04: <i>New Housing and Open Space Provision</i> -	✓
The Local Plan 'as a whole' (i.e. cumulative effects)	✓ / ✗

Spatial strategy (including sites)

- 7.5.2 Given the relatively high number of people without access to a car in St Helens, the Local Plan seeks to locate new development in areas which are accessible by non-car modes. Enhancing linkages between areas of deprivation and employment is also a key principle.
- 7.5.3 Policy LPA01 (Presumption in Favour of Sustainable Development), Policy LPA02 (Spatial Strategy) and Policy LPA03 (Development Principles) each support improved accessibility, green infrastructure, pedestrian and cycling routes and public transport improvements across the Borough. This sets the basis for encouraging a modal shift away from less sustainable transport means.
- 7.5.4 The spatial strategy directs most housing growth to Key Settlements (including the allocation of a number of strategic sites on the edge of settlements), which have reasonable or good access to transport links, local services and facilities and employment.
- 7.5.5 There is a substantial amount of brownfield regeneration land in the St Helens urban area that forms part of the Plan, as well as employment and housing growth at selected Green Belt sites. The level and spread of development over the plan period is broadly proportionate to current settlement size and function. Therefore, continuation of growth is unlikely to have significant effects compared the projected baseline position (provided that growth can be accommodated by infrastructure).
- 7.5.6 The allocated strategic employment sites under Policy LPA04 (Strategic Employment Sites) are located close to primary transport routes. Whilst positively located in terms of accessibility, the increased number of employees and goods vehicles using the associated junctions could add to congestion and air quality issues in these areas. There are concentrations of development towards M6 Junction 23 (Haydock) and Junction 22 (Parkside), and so an assessment of cumulative effects here is critical. This should include consideration of strategic opportunities in Wigan along the M6 (J24 and J25) and the A580 and along the M62 in Warrington. A number of very large employment opportunities have been put forward as part of the draft Greater Manchester Strategic Framework – given the close proximity to the developments proposed at J22 and J23, it is important to consider these cross boundary effects.
- 7.5.7 Housing sites HA1, HA2, HA17, HA3 and HA10 are also located in close proximity to the A580. Though this provides good access to strategic highway routes for residents, increased housing development could have an adverse effect on highway congestion on routes, at least in the short term.
- 7.5.8 The plan acknowledges the potential for negative effects, and seeks to manage increased growth with the necessary infrastructure; making clear that certain developments should not commence until supporting infrastructure has been secured. For example, Policy LPA02 (Spatial Strategy) outlines a commitment to improve public transport interchanges and Park and Ride facilities, the availability of which could reduce the length of trips. As part of each strategic allocation, there is also a requirement to produce a Travel Plan to accompany the plans for the site. This should help to highlight potential effects of development on travel and transport and secure mitigation and enhancement measures. Consequently, the overall effects of development ought to be minor in the long term, acknowledging that there could be disruption during construction phases.
- 7.5.9 Policy LPA02 (Spatial Strategy), Policy LPA04 (A Strong and Sustainable Economy), and Policy LPA10 (Development of Strategic Rail Freight Interchange) all seek to

locate economic opportunities along strategic transport corridors. Locating large employment sites in proximity to the strategic road network of the M6 and the M62 could have mixed effects.

- 7.5.10 Should employees be travelling from outside of the Borough, they should benefit from good links to employment sites, and routes through settlements in the Borough should be avoided. For employees situated in St Helens, accessibility to these sites varies. Residents residing in the south (Clock Face) or the south-east (Newton-le-Willows or Haydock), would have relatively short journeys (by car) to new strategic employment opportunities, whilst there would be little change for those to the north and more rural parts of the Borough.
- 7.5.11 There are air quality management areas within close proximity to allocated employment sites at M6 Junction 23, and development at Parkside SRFI could potentially increase trips through Newton-le-Willows (possibly affecting the high street AQMA).
- 7.5.12 In the short-term, the construction of the SRFI may therefore cause disruption to road networks, and until a direct access to the M6 is secured, there could be negative effects upon local traffic flows (with associated air quality implications). However, the plan policies seek to minimise such disruption by requiring a phased approach to development, network management, ensuring collaboration with the Highways Agency, and promoting alternative modes of travel.
- 7.5.13 In the long term, the development of Parkside SRFI is predicted to have a positive effect on both air quality and congestion. Such infrastructure would enable the transport of heavy goods by rail, freeing up capacity on the road network from HGVs. The operation of the rail system, once constructed, is also likely to result in fewer associated air emissions from the transport of such goods. A direct link to the M6 on the eastern phase of the SRFI would help to minimise negative effects in the longer term.

Retail and centre policies

- 7.5.14 Policy LPB01 (St Helens Central Spatial Area) and Policy LPB02 (Earlestown Town Centre) both seek to maintain and improve the vitality of town centres and access to them. This ought to be positive in terms of reducing travel and locations for retail. However, whilst the town centres are broadly more accessible than other locations; the use of private vehicles is still the prominent mode of transport. Increased trips into town centres could therefore add to congestion on key routes into St Helens and Earlestown in particular. However, these policies also seek to enhance cycling, walking and public transport routes and strengthen links to out of town locations, which ought to counteract increased growth in these areas.
- 7.5.15 Overall, the retail and centre policies are predicted to have a **neutral effect** on traffic, congestion and air quality; reflecting enhancements to accessibility, but the potential for increased trips into these centres.

Housing policies

- 7.5.16 Offering individuals a choice of quality housing in proximity to local services and employment should help to minimise journeys made by car, and allow more sustainable modes of transport to be adopted.
- 7.5.17 The flexibility of the housing affordability policy should allow for necessary infrastructure improvements to be made on brownfield sites in the urban area without

affecting viability significantly. Such improvements could include upgrades to highways, and so a minor positive effect is predicted.

Biodiversity policies

- 7.5.18 Policy LPC06 (Biodiversity and Geological Conservation) Policy LPC07 (Greenways) and Policy LPC08 (Ecological Network) all support the preservation and enhancement of green infrastructure, which should help to manage air quality and promote walking and cycling as alternatives to the car. This ought to have benefits in terms of air quality, but the effects are not predicted to be significant.

Built and natural environment policies

- 7.5.19 Policy LPC09 seeks to protect local landscape character; which could in some instances affect the alignment or delivery of highways schemes. Though there are potential barriers to development, these are not likely to prevent necessary infrastructure being implemented, and so effects are not significant.
- 7.5.20 Policy LPC10 (Trees and Woodland) should lead to the protection and enhancement of trees and woodland in urban areas, which is beneficial in terms of helping to regulate air quality.
- 7.5.21 Overall, the effects of the built and natural environment policies are neutral.

Natural resources

- 7.5.22 Efforts to maintain and increase the provision of green space, GI and LNRs under Policy LPA06 (Green Infrastructure) is likely to make alternative modes of transport, such as walking and cycling, more attractive. The maintenance and presence of green infrastructure can also have a positive influence on air quality, though the effects of green infrastructure alone are unlikely to be significant.
- 7.5.23 Policy LPC12 (Flood Risk and Water Management) will help to minimise the damage of potential flood events and, in doing so, there is less likely to be disruption to the local transport systems during such events.
- 7.5.24 Primary Mineral extraction is a practice which typically releases high levels of emissions. By encouraging the use of substitute, secondary or recycled sources, Policy LPC14 (Minerals) could contribute to a reduction in emissions from such sources. However, the air quality issues within the Borough are mostly attributed to emissions from transport.
- 7.5.25 The requirement to include temporary recycling facilities on site should help to reduce the associated travel demands of transporting construction waste to either land-fill or off-site recycling facilities.
- 7.5.26 Both Policy LPC14 (Minerals) and Policy LPC15 (Waste) could help to reduce the amount of trips required to transport materials and waste. However, the effect is predicted to be minor.
- 7.5.27 Policy LPD09 (Air Quality) seeks to reduce air pollution and minimise exposure to pollutants, which ought to have a beneficial effect on air quality.
- 7.5.28 In combination the natural resource policies are predicted to have a **positive effect** on traffic, congestion and air quality.

Infrastructure

- 7.5.29 Policy LPA09 (Transport and Travel) and Policy LPC05 (Open Space, Sport and Recreation) actively promote the adoption of sustainable modes of transport within the Borough, with provision for pedestrians, cyclists, electric vehicle charging. Efforts to generate a modal shift should help to reduce dependency on the private vehicle, and therefore help to reduce the effects of economic and housing growth upon the road networks.
- 7.5.30 The requirement for Transport Assessments under Policy LPA07 (Transport and Travel) should also help to highlight potential threats to air quality, and could allow for adequate mitigation to be adopted. Likewise, public transport provision in proximity to developments may make this form of travelling a preferred option to the private vehicle, and the provision of adequate parking facilities is likely to reduce the need for on-street parking, and improve road safety.
- 7.5.31 Policy LPC13 (Renewable and Low Carbon Development) is likely to contribute to a general improvement to air quality by encouraging the adoption of low-carbon energy generation. However, the major source of air quality issues is emissions from vehicular travel, which would not be affected by this policy.
- 7.5.32 Overall, the infrastructure policies are predicted to have a **positive effect** on local traffic, congestion and air quality.

Design

- 7.5.33 Policy LPD01 (Design and Layout of New Housing) encourages the design of streets that generate low vehicle speeds, helping to improve highway safety and reduce the likelihood of accidents. The policy also seeks to improve local legibility and wayfinding which could encourage individuals to adopt more sustainable modes of transport to access local facilities and services. Whilst the policy is positive, the effects generated are unlikely to be significant with regards to traffic, congestion and air quality at a district level.

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.5.34 The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Newton le Willows and Earlestown. Increased traffic in these areas could have **negative effects** upon levels of congestion with knock-on adverse effects upon air quality.
- 7.5.35 Not all new trips would be car based though, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This will help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made. These elements of the Plan ought to reduce the significance of potential negative effects.
- 7.5.36 In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have **positive effects** for the wider region with regards to a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed. An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.

7.6 Natural resources

- 7.6.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'Natural Resources'. The effects of the Plan are presented in table 7.4 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.4.

Table 7.4: Appraisal of the draft Plan on natural resources

Local Plan Chapters / Policies		Score
Strategic Spatial Policies LPA01: <i>Presumption in Favour of Sustainable Development</i> - LPA02: <i>Spatial Strategy</i> - LPA03: <i>Development Principles</i> ✓ LPA04: <i>A Strong and Sustainable Economy</i> ✗/✓ LPA05: <i>Meeting St. Helens Housing Needs</i> ✗/✓ LPA06: <i>Extent of the Green Belt and Safeguarded Land</i> LPA10: <i>Development of Strategic Rail Freight Interchange (Parkside)</i> ✓✓		✗ / ✓
Retail and centres LPC04: <i>Retail and Town Centres</i> - LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> - LPC02: <i>Earlestown Town Centre</i> -		-
Housing policies LPC01: <i>Housing Mix</i> LPC02: <i>Affordable and Specialist Housing Needs</i> LPC03: <i>Gypsies, Travellers & Travelling Show people</i> LPD04: <i>Householder Developments</i>		-
Biodiversity policies LPC06: <i>Biodiversity and Geological Conservation</i> ✓? LPC07: <i>Greenways</i> ✓? LPC08: <i>Ecological Network and Geological Conservation</i> ✓?		✓?
Built and natural environment policies LPC09: <i>Landscape character</i> - LPC10: <i>Trees and Woodland</i> - LPC11: <i>Historic Environment</i> - LPD06: <i>Development in Prominent Gateway Locations or Character Areas</i> - LPD05: <i>Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt</i> -		-
Natural resources LPA09: <i>Green Infrastructure</i> ✓ LPC12: <i>Flood Risk and Water Management</i> ✓ LPC14: <i>Minerals</i> - LPC15: <i>Waste</i> ✓ LPD09: <i>Air quality</i> -		✓
Infrastructure LPA07: <i>Transport and Travel</i> - LPC13: <i>Low Carbon and Renewable Energy Development</i> - LPD07: <i>Digital Communications</i> - LPC05: <i>Open Space and Outdoor Sports Facilities</i> -		-
Design LPD01: <i>Ensuring Quality Development in St. Helens</i> ✓ LPD02: <i>Design and Layout of New Housing</i> ✓ LPD08: <i>Advertisements</i> -	LPD10: <i>Hot Food Takeaways</i> - LPD03: <i>New Housing and Open Space Provision</i> - LPD11: <i>Health and Wellbeing</i>	✓
The Local Plan 'as a whole' (i.e. cumulative effects)		-

Spatial strategy (including sites)

- 7.6.2 The spatial strategy should have a positive effect on natural resources, particularly as one key element for development is that previously developed land *“will make a significant contribution to the housing land supply, with the majority of housing through the plan period being provided on previously developed land in sustainable locations”*.
- 7.6.3 The Borough's development principles indicate that a key requirement of development will be “protecting and enhancing the quality of the Borough's natural resources including water” and that *“using water, energy, minerals and waste resources in an efficient and effective way”* is ensured. These broad principles should help to contribute to a positive effect on the preservation and enhancement of natural resources.
- 7.6.4 The plan will lead to a higher level of growth than might be anticipated in the absence of the Plan (i.e. planning for the full objectively assessed housing and employment needs but adding an uplift to ensure flexibility). This increased level of growth would lead to greater generation of wastes, and possible effects upon water quality. However, the distribution and quality of development ought to help reduce effects upon natural resources. In some instances it may also be possible to achieve positive effects for natural resources. For example, much of the Borough falls within a Surface Water Nitrate Vulnerable Zone, attributable mainly to agricultural activities. Conversion of the land into land for housing or employment should help to reduce polluted run-off into watercourses. Conversely, it will be important to ensure that contaminants within soil are not released during construction activities.

Retail and centres policies

- 7.6.5 The policies require a hierarchical approach to retail provision, with a preference for town centre locations. This is more likely to encourage the recycling of land and buildings in the urban areas rather than the development of new sites in out of town locations. This ought to reduce the generation of waste and the use of natural resources. However, a significant effect is unlikely to occur as these are principles that are set out in the NPPF and current Core Strategy (and would therefore be likely to occur anyway).

Housing policies

- 7.6.6 The housing policies are predicted to have a **neutral effect** on natural resources as the policies on housing mix, density, affordable housing and gypsy and travellers are not explicitly linked to natural resource use, quality or efficiency.

Biodiversity policies

- 7.6.7 It is possible that the protection and enhancement of ecological habitats and networks (which may include waterways) could have benefits for water quality (and vice versa). However, the effects upon water quality are **uncertain** and not predicted to be significant.

Built and natural environment policies

- 7.6.8 **Neutral effects** are predicted on natural resources from these policies as they are not linked explicitly waste or water quality as such.

Natural resources

- 7.6.9 The green infrastructure policy includes the requirement for (where applicable) development to contribute to the development and implementation of the Sankey Catchment Hydrology Plan. There is potential for development to incorporate green and blue infrastructure which could help to filter pollutants from water. This should help to protect and improve water quality.
- 7.6.10 The flood risk and water management policy is predicted to have a **positive effect** on natural resources as it states that *“development which could adversely affect the quality or quantity of water in watercourses or groundwater will not be permitted unless measures are included which would overcome any threat”*. In particular, *“new development will be required to enhance and protect the water quality of existing water resources, such as watercourses and groundwater”*. These measures should help to protect and improve water quality, which is a **positive effect**.
- 7.6.11 In terms of waste, the policy aligns with the Joint Merseyside and Halton Waste Local Plan and uses the waste hierarchy set out in that document. It is therefore unlikely that the baseline position would be altered significantly as a result of this policy so a **neutral effect** is predicted in this respect. Policy LPC15 does however state that design ought to take account of the need to store and collect waste. This is positive, as it will help to ensure that barriers to recycling are removed.

Infrastructure

- 7.6.12 **Neutral effects** are predicted on natural resources from these policies as they are not linked explicitly to waste, minerals or natural resources (Water, soil).

Design

- 7.6.13 Ensuring quality development in St Helens (LPD01) is likely to generate a **positive effect** on natural resources, as it includes measures to ensure environmental quality (more specifically water quality) is managed, including the safe disposal of waste and protection of watercourses from encroachment by new development.

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.6.14 The Plan is driven by economic growth, and seeks to deliver higher levels of housing than projected population forecast suggest is needed. This is likely to lead to increased generation of waste, and the use of natural resources. However, growth would still occur in the absence of a local plan, though perhaps not at the same rate.
- 7.6.15 Whilst growth could have negative implications, the policies in the Plan ought to ensure that there are no significant effects. A number of policies seek to preserve and enhance natural resources, with explicit reference to the need to enhance water quality. Therefore, **neutral effects** are concluded.
- 7.6.16 Given that much of the Borough's watercourses are vulnerable to nitrates within surface water run-off, changes in land use could actually help to reduce this problem in the longer term.
- 7.6.17 Overall, the effects of the Plan are predicted to be **neutral**; acknowledging that high levels of growth can affect the use of natural resources, but the efficiency of resource use and waste generation ought to be improved. In the long term, there could be a **positive effect** on water quality if new development reduces the amount of nitrates in surface water run-off and introduce measures to 'improve water quality' as required by policy.

7.7 Climate change and energy

- 7.7.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'climate change and energy use'. The effects of the Plan are presented in table 7.5 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.5.

Table 7.5: Appraisal of the draft Plan on climate change and energy

Local Plan Chapters / Policies	Score
Strategic Spatial Policies (Including site allocations) <i>LPA01: Presumption in Favour of Sustainable Development</i> <i>LPA02: Spatial Strategy -</i> <i>LPA03: Development Principles ✓</i> <i>LPA04: A Strong and Sustainable Economy ✕/✓</i> <i>LPA05: Meeting St. Helens Housing Needs -</i> <i>LPA06: Extent of the Green Belt and Safeguarded Land</i> <i>LPA10: Development of Strategic Rail Freight Interchange (Parkside) ✓✓</i>	✓✓
Retail and centres <i>LPC04: Retail and Town Centres -</i> <i>LPC01: St. Helens Town Centre and Central Spatial Area -</i> <i>LPC02: Earlestown Town Centre -</i>	-
Housing policies <i>LPC01: Housing Mix -</i> <i>LPC02: Affordable and Specialist Housing Needs -</i> <i>LPC03: Gypsies, Travellers & Travelling Show people -</i> <i>LPD04: Householder Developments -</i>	-
Biodiversity policies <i>LPC06: Biodiversity and Geological Conservation -</i> <i>LPC07: Greenways ✓</i> <i>LPC08: Ecological Network and Geological Conservation ✓</i>	✓
Built and natural environment policies <i>LPC09: Landscape character -</i> <i>LPC10: Trees and Woodland</i> <i>LPC11: Historic Environment -</i> <i>LPD06: Development in Prominent Gateway Locations or Character Areas -</i> <i>LPD05: Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt -</i>	-
Natural resources <i>LPA09: Green Infrastructure ✓</i> <i>LPC12: Flood Risk and Water Management ✓</i> <i>LPC14: Minerals -</i> <i>LPC15: Waste -</i> <i>LPD09: Air quality -</i>	✓
Infrastructure <i>LPA07: Transport and Travel ✓</i> <i>LPC13: Low Carbon and Renewable Energy Development ✓✓</i> <i>LPD07: Digital Communications -</i> <i>LPC05: Open Space and Outdoor Sports Facilities -</i>	✓✓
Design <i>LPD01: Ensuring Quality Development in St. Helens</i> <i>LPD02: Design and Layout of New Housing</i> <i>LPD08: Advertisements -</i> <i>LPD10: Hot Food Takeaways -</i> <i>LPD03: New Housing and Open Space Provision</i> <i>LPD11: Health and Wellbeing</i>	-
The Local Plan 'as a whole' (i.e. cumulative effects)	✓✓

Spatial strategy (including sites)

- 7.7.2 The spatial strategy sets out that development should “*reduce its contribution to Climate Change and to adapt to its impact*”, setting out a clear intention that the Plan will seek to contribute to climate change mitigation and adaptation.
- 7.7.3 The distribution of development should foster close links and accessibility between services, jobs and homes; helping to reduce car journeys and encourage more sustainable transport methods such as cycling or walking (which is a key message throughout the Plan). This should help to minimise increases in emissions associated with new development, and make new and existing communities more resilient.
- 7.7.4 The development of a Strategic Rail Freight Interchange in particular, would be positive in terms of reducing emissions from freight.
- 7.7.5 Whilst there is no reference to specifically reducing carbon emissions or encouraging renewable energy development in the spatial strategy, it is acknowledged in the Borough’s development principles that a particular key aim is to “lower St. Helens’ carbon footprint”. In terms of new development on specific sites, the policy seeks “high levels of energy efficiency in all new development”. This includes “where viable, development will be required to deliver energy efficiency measures 10% above what is required by the most up to date Building Regulations”. This measure is likely to bring a **significant positive effect** over the plan period by encouraging development that exceeds national standards. Whether developers will deliver this element of the Plan consistently is uncertain, as there is flexibility for exceptions to occur.

Retail and centre policies

- 7.7.6 No effects are predicted on climate change and energy from these policies as they are not directly linked to renewable energy or climate change adaptation.
- 7.7.7 Opportunities for district heating ought to be explored for any town centre developments that create a significant source or demand for heat.

Housing policies

- 7.7.8 No effects are predicted on climate change and energy specifically from these policies, although significant housing development is likely to bring about more car journeys and therefore emissions. Development would be likely to occur in absence of the plan, though in a less coordinated manner. Therefore, despite an increase in the level of housing being planned for, a neutral effect is predicted. A significant modal shift is unlikely to occur over the plan period, although well sited developments with good access to sustainable transports methods should support this going forward.

Biodiversity policies

The retention and enhancement of greenways, and the requirement for development to include net gains in biodiversity should be beneficial with regards to climate change adaptation. For example, greenways and other habitats (e.g. woodlands) can provide shade for people and wildlife helping to improve resilience to the predicted effects of climate change such as hotter summers and other extremes of weather.

Though the policies are likely to be beneficial in this respect, the effects are not predicted to be significant as the scale of the effects would be small.

Built and natural environment policies

- 7.7.9 A strong approach to the protection of environmental assets (i.e. landscape, biodiversity, heritage) may limit the development of some renewable energy sources such as wind or solar farms (if they are not in-keeping with local character).
- 7.7.10 Having said this, the landscape protection and enhancement policy does state that *“where impacts on landscape character are agreed to be unavoidable, the Council will require mitigation measures to reduce the scale of impacts to acceptable levels”*. This ensures a degree of flexibility and should allow well-designed renewable energy schemes to be granted planning permission where they are able to acceptably mitigate effects and be supported by local communities.
- 7.7.11 Overall the effects are predicted to be neutral.

Natural resources

- 7.7.12 Ensuring the conservation and enhancement of green infrastructure will support alternative modes of transport; helping to reduce greenhouse gas emissions from transport. This is not considered to be a significant effect as whilst the policy is positive in its approach, there is unlikely to be a huge modal shift away from vehicular travel. The protection and enhancement of Green Infrastructure may also contribute a minor positive effect in terms of resilience to hotter weather (by providing shade and helping to reduce the urban heat island effect).

Infrastructure

- 7.7.13 There is potential for a positive effect from the transport and travel policy (LPA07) as it *“actively promote[s] sustainable modes of transport”* which should help reduce vehicle emissions.
- 7.7.14 The Low Carbon and Renewable Energy Development policy (LPC13) could have a **significant positive effect** as it supports low carbon/renewable energy proposals and requires new development to deliver higher levels of energy efficiency than national standards. It is uncertain whether this aspect of the policy could be applied successfully though, as developments meeting national standards in energy and water efficiency are not required to satisfy locally specific targets. Therefore, this **effect is uncertain**.
- 7.7.15 There is a policy clause dedicated to wind energy and for Publication Draft Plan an accompanying map will be produced to identify where wind development may be appropriate. This is likely to lead to a **significant positive effect** as it takes a proactive approach to wind energy development, which should encourage developers to implement schemes in locations that are more likely to be acceptable.

Design

- 7.7.16 There are no effects predicted on climate change and energy from the development management policies. Although design can play a part in improving resilience to climate change and reducing carbon emissions, there are no explicit references to these factors. A recommendation is to encourage design that is adaptable over time and allows for retrofitting of low carbon energy technologies. This for example could be to create enough space on roofs for solar panels, and that roofs are not broken up with a skylight which prevents panels being installed. Another example is to ensure there is enough room for potential air and ground source heat pumps in future.

Cumulative effects (i.e. the effects of the plan as a whole).

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

7.8 Flooding

- 7.8.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'flooding'. The effects of the Plan are presented in table 7.6 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.6.

Table 7.6: Appraisal of the draft Plan on flooding

Local Plan Chapters / Policies	Score
Strategic Spatial Policies (including allocated sites) <i>LPA01: Presumption in Favour of Sustainable Development ✓</i> <i>LPA02: Spatial Strategy ✓</i> <i>LPA03: Development Principles ✓</i> <i>LPA04: A Strong and Sustainable Economy -</i> <i>LPA05: Meeting St. Helens Housing Needs -</i> <i>LPA06: Extent of the Green Belt and Safeguarded Land ?</i> <i>LPA10: Development of Strategic Rail Freight Interchange -</i>	✓
Retail and centres <i>LPC04: Retail and Town Centres -</i> <i>LPC01: St. Helens Town Centre and Central Spatial Area -</i> <i>LPC02: Earlestown Town Centre -</i>	-
Housing policies <i>LPC01: Housing Mix -</i> <i>LPC02: Affordable and Specialist Housing Needs -</i> <i>LPC03: Gypsies, Travellers & Travelling Show people -</i> <i>LPD04: Householder Developments -</i>	-
Biodiversity policies <i>LPC06: Biodiversity and Geological Conservation -</i> <i>LPC07: Greenways -</i> <i>LPC08: Ecological Network and Geological Conservation -</i>	✓
Built and natural environment policies <i>LPC09: Landscape character -</i> <i>LPC10: Trees and Woodland ✓?</i> <i>LPC11: Historic Environment -</i> <i>LPD06: Development in Prominent Gateway Locations or Character Areas -</i> <i>LPD05: Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt -</i>	-
Natural resources <i>LPA09: Green Infrastructure ✓</i> <i>LPC12: Flood Risk and Water Management ✓✓</i> <i>LPC14: Minerals -</i> <i>LPC15: Waste -</i> <i>LPD09: Air quality -</i>	✓✓
Infrastructure <i>LPA07: Transport and Travel -</i> <i>LPC13: Low Carbon and Renewable Energy Development -</i> <i>LPD07: Digital Communications -</i> <i>LPC05: Open Space and Outdoor Sports Facilities -</i>	-
Design <i>LPD01: Ensuring Quality Development in St. Helens -</i> <i>LPD02: Design and Layout of New Housing -</i> <i>LPD08: Advertisements -</i> <i>LPD10: Hot Food Takeaways -</i> <i>LPD03: New Housing and Open Space Provision (potentially design policy integration) –</i> <i>LPD11: Health and Wellbeing</i>	-
The Local Plan 'as a whole' (i.e. cumulative effects)	✓✓

Spatial strategy (including sites)

- 7.8.2 The overarching development principles are positive in reducing flood risk as they require development to be resilient and avoid contributing to the effects of climate change. The increased likelihood of flooding is one of the major consequences of rising global temperatures and in ensuring that development can adapt is vitally important. The general principles align closely with that of the NPPF mirroring paragraph 99, as it states *“local planning authorities should adopt proactive strategies to mitigate and adapt to climate change”*. The Development Principles for St Helens explicitly state that *“all new development addresses flood risk mitigation/adaptation”*. The site specific policies are also likely to bring a positive effect as they require all development to include *“measures to address the potential flood risk and surface water drainage issues on the site and assist in reducing flood risk downstream”*. As well as the overarching requirement, there are specific measures given at certain sites which provide more detail and future proofing measures such as *‘slowing the flow’*. This policy approach is above and beyond the detail provided in the NPPF.
- 7.8.3 The majority of housing and employment allocations are on land designated as Flood Zone 1. Effects on flooding here, is therefore predicted to be neutral (given that the Plan seeks to manage flood risk).
- 7.8.4 Several sites lie adjacent to areas at risk of flooding (HA14, HA3, HA4 ,HA13, E13) but management of surface water run-off ought to ensure there are no negative effects. Site HA16 is intersected by Windle Brook, but there should be sufficient space to avoid development in areas of flood risk.

Retail and centre policies

- 7.8.5 The retail and centre policies do not influence flooding as the focus is upon town centre uses and development rather than measures to reduce flood risk. Therefore, no effects are predicted.
- 7.8.6 However, redevelopment of brownfield land is more likely in the urban town centre areas, which presents the opportunity to reduce surface water run-off rates from brownfield sites. This is one way of improving the resilience of urban areas, and ought to be encouraged in the policy.

Housing policies

- 7.8.7 There are no effects predicted on flooding from these policies as they focus mainly on the mix, density, type and affordability of housing. Both Gypsy and Traveller site allocations are appropriately sited with regards to flood risk. Therefore, **neutral effects** are predicted.

Biodiversity policies

- 7.8.8 In combination, the policies will lead to the protection and creation of wildlife habitats across the Borough. These habitats could include wetlands, ponds, woodland and others that can be beneficial to the management of water and flooding. Overall a **positive effect** is predicted, but this is not significant as it cannot be assumed that the effects on wildlife would always correspond with flood protection measures.

Built and natural environment policies

- 7.8.9 In the main, these policies are predicted to have negligible effects upon flood risk, as the focus is upon the character of the built and natural environment. Policy LPC10 is an exception, as the protection of trees and woodland ought to have beneficial effects in terms of helping to manage flood risk. This link could be made more explicit by identifying flood and water management as a form of green infrastructure (under point 6).

Natural resources

- 7.8.10 In combination, the policies are likely to have a positive effect on flood prevention and resilience in St Helens. The Green Infrastructure policy requires contribution to the Sankey Catchment Hydrology Plan which will help to ensure that flood risk issues are captured in any future development proposals. The Flood Risk and Water Management policy outlines clear requirements for development needing to be supported by appropriate flood risk measures and assessments to ensure no new development will cause an unacceptable risk of flooding.
- 7.8.11 Whilst closely aligned with the NPPF, there are further measures required too involving locally specific rivers and catchments and aims for biodiversity and sustainable urban drainage systems (SUDs) to be incorporated in development. This is likely to bring a **significant positive effect** in the longer term as the green and blue infrastructure network is strengthened.

Infrastructure

- 7.8.12 No effects predicted on flooding from these policies as these policies do not influence flood risk.

Design

- 7.8.13 No effects predicted on flooding from these policies as these policies do not influence flood risk.

Cumulative effects (i.e. the effects of the plan as a whole).

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

7.9 Landscape

7.9.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'landscape'. The effects of the Plan are presented in table 7.7 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.7.

Table 7.7: Appraisal of the draft Plan on landscape

Local Plan Chapters / Policies	Score
Strategic Spatial Policies LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓ LPA02: <i>Spatial Strategy</i> ✓ / ✖✖ LPA03: <i>Development Principles</i> ✓ LPA10: <i>Development of Strategic Rail Freight Interchange (Parkside)</i> - LPA04: <i>A Strong and Sustainable Economy</i> ✓ / ✖ LPA05: <i>Meeting St. Helens Housing Needs</i> ✓ / ✖ LPA06: <i>Extent of the Green Belt and Safeguarded Land</i> ✓ / ✖?	
Retail and centres LPC04: <i>Retail and Town Centres</i> ✓ LPB01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓ LPB02: <i>Earlestown Town Centre</i> ✓	
Housing policies LPC01: <i>Housing Mix</i> ✓ LPC02: <i>Affordable and Specialist Housing Needs</i> - LPC03: <i>Gypsies, Travellers & Travelling Show people</i> - LPD04: <i>Householder Developments</i> -	
Biodiversity policies LPA09: <i>Green Infrastructure</i> ✓ LPC06: <i>Biodiversity and Geological Conservation</i> ✓ LPC07: <i>Greenways</i> ✓ LPC08: <i>Ecological Network and Geological Conservation</i> ✓	
Built and natural environment policies LPA09: <i>Green Infrastructure</i> ✓ LPC09: <i>Landscape character</i> ✓ LPC10: <i>Trees and woodlands</i> ✓ LPC11: <i>Historic Environment</i> ✓ LPD06: <i>Development in Prominent Gateway Locations or Character Areas</i> ✓ LPD05: <i>Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt</i> ✓	
Natural resources LPC12: <i>Flood Risk and Water Management</i> - LPC14: <i>Minerals</i> ✓ LPC15: <i>Waste</i> - LPD09: <i>Air quality</i> -	
Infrastructure LPA07: <i>Transport and Travel</i> ✓ LPA08: <i>Infrastructure and funding</i> - LPC13: <i>Low Carbon and Renewable Energy Development</i> ✓ LPD07: <i>Digital Communications</i> - LPC05: <i>Open Space and Outdoor Sports Facilities</i> -	
Design LPD01: <i>Ensuring Quality Development in St. Helens</i> ✓ LPD02: <i>Design and Layout of New Housing</i> ✓ LPD03: <i>Open Space and Residential Development</i> - LPD08: <i>Advertisements</i> - LPD10: <i>Hot Food Takeaways</i> - LPC11: <i>Health and wellbeing</i> -	
The Local Plan 'as a whole' (i.e. cumulative effects)	✓✖

Spatial strategy (including sites)

- 7.9.2 Policy LPA03 sets the principles for development, and this includes consideration of landscape value and promotes the efficient use of land within the context of its surroundings.
- 7.9.3 The spatial strategy could have mixed effects. On one hand, the strategy would help to continue landscape reclamation and environmental improvements within the Bold Forest Park and Sankey Valley Park. The positive effects in these areas are predicted to be significant in the longer term. Conversely, the strategy requires the delivery of new homes and employment land within the Green Belt, which will change the character of several settlements over the Plan period and beyond (taking into account safeguarded land).
- 7.9.4 A range of sites underpin the spatial strategy, with potential for effects at each site and in combination with others. The Plan includes the development of several strategic housing and employment sites that fall within the Green Belt. There is the potential for **negative effects** at those sites that fall within areas of more sensitive landscape, or are visible from prominent ridgelines. This is particularly the case where there are multiple sites in close proximity to one another.
- 7.9.5 The following sites fall within areas of medium to high landscape sensitivity; HA1 (Billinge), HA2 (Garswood), HA3 (Haydock), HA12, HA13 (Newton-le-Willows), HA14, HA15 (Rainford), HA16 (Windle). These sites therefore present greater potential for adverse effects upon the character of the landscape and the settlements they are related to.
- 7.9.6 Accompanying site policies do not explicitly address these effects, though there is a requirement for sites to be '*outward facing with high quality soft landscaping*'. This should help to mitigate effects to an extent. However, the overall effect on landscape at these sites is predicted to be negative. The dispersal of site allocations across the Borough means that the effects on settlement character are less likely to be significant though when considered cumulatively.
- 7.9.7 Several sites for housing and employment development are proposed for allocation at Haydock and Newton-le-Willows. The landscape in these areas is categorised as 'moderately sensitive'.
- 7.9.8 For housing sites, the accompanying site policies HA7 and HA10 seek to create a green gap to provide a separation between Haydock and Newton-le-Willows and an extension to the Lyme and Woods Pits Country Park. This should help to mitigate negative effects on landscape character and prevent the coalescence of these settlements.
- 7.9.9 Development of employment land around Haydock and M6 Junction 23 is also likely to lead to permanent changes to the character of this area. However, the character of the landscape and urban edges in these areas are dominated by the A580 and M6 and is categorised as having 'medium' sensitivity. Whilst negative effects are predicted, they are not likely to be significant provided that suitable mitigation is implemented to maintain separation between nearby settlements of Haydock, Newton-le-Willows and Ashton.
- 7.9.10 Housing sites allocated in Bold (HA5, HA6) are not predicted to have negative effects as they fall within areas of low landscape sensitivity. Therefore, there may be potential to enhance the landscape through high quality design. The same is the case for Eccleston (HA8) and Sutton Manor (HA4), though the landscape is

categorised as low to medium sensitivity (and so negative effects could be more prominent compared to sites in Bold).

- 7.9.11 Site policy EA8 (linked to policy LPA10) covers the proposed SRFI at Newton-le-Willows. Development is predicted to have **negative effects** on landscape through the loss of open Green Belt land. However, the SRFI development is located within an area of low-moderate landscape sensitivity, so the effects are not predicted to be significant provided that sufficient mitigation and compensation measures are secured (which ought to be likely in light of other plan policies (landscape)).
- 7.9.12 LPA06 would have **mixed effects**. On one hand, the policy seeks to protect Green Belt from development in the plan period. However, this is to safeguard that land for future development, and so the extent of the Green Belt beyond the Plan period would be likely to change. At this stage the effects are uncertain as any further changes to the green belt would need to be determined following a plan review and assessment.
- 7.9.13 Overall, the spatial strategy is predicted to have **mixed effects** on landscape reflecting those issues discussed above.

Retail and centre policies

- 7.9.14 These policies encourage a town centre location for retail premises, which ought to be positive in terms of reducing the likelihood of edge of centre development (and potential effects upon edge of settlement landscape character). The effects are not predicted to be significant, as the scale of retail development in sensitive locations would not be anticipated to be substantial.

Housing policies

- 7.9.15 Policy LPA05 (Housing Delivery) should have a **positive effect** upon landscape character, as it sets minimum density requirements of 30 per hectare at settlement edges, with the flexibility to implement lower densities if appropriate.
- 7.9.16 Policies LPC01 and LPC02 are predicted to have **neutral effects** on landscape character, as they are concerned with the affordability and mix of homes, and not the location, design or layout.
- 7.9.17 Gypsy and traveller sites are unlikely to have a significant effect on landscape character as they are small and relatively well contained in the urban area.

Biodiversity policies

- 7.9.18 Wildlife habitats such as trees, hedges and grassland can form an important part of the character of the landscape. Therefore, protection and enhancement of such assets should also have benefits for the Borough's landscapes, by retaining its sense of place.
- 7.9.19 Policy LPA09 (Green Infrastructure) provides the key principles for managing green and open space across the Borough. It states that the GI network will be protected and enhanced, with specific policy measures to protect and enhance environmental assets at Billinge Hill, the Sankey Valley and the Bold Forest. Improvements in these areas should help to protect landscape character, as well as better bringing people into contact with the countryside.

- 7.9.20 Overall a **positive effect** is predicted on landscape character by protecting and enhancing green corridors and wildlife assets.

Built and natural environment policies

- 7.9.21 Policy LPC09 is predicted to have a **positive effect** on landscape by ensuring that development proposals are supported by an assessment of landscape sensitivity, visual impacts, and demonstrate that landscape distinctiveness is protected and effects mitigated / compensated for where necessary.
- 7.9.22 Policies LPD05 and LPO6 are predicted to have **positive effects** for landscape character by respecting Green Belt character and highlighting the importance of gateway locations. This should help to ensure that new developments at key routes and junctions are sensitively designed and are of high quality. Policy LPC10 is also predicted to contribute positively to the protection of the Borough's landscape, particularly those that involve tree cover.
- 7.9.23 In combination, the policies are predicted to have a **significant positive effect** on St Helens landscape character and distinctiveness by focusing on the protection, management and enhancement of landscapes. The policies ought to help mitigate effects upon character associated with a number of the site allocations, particularly as many of these fall within areas of medium-high landscape sensitivity, and are at 'gateway locations'.

Natural resources

- 7.9.24 Policies LPC14 would help to ensure that minerals-related development is sensitive to landscape character. Whilst this is positive, it is unlikely to prevent effects on landscape during the operation of a site, as workings lead to significant changes in the land. However, the need to ensure sensitive aftercare could help to ensure that the long term effects are positive (i.e. the land is returned to a similar or higher quality. Safeguarding certain minerals may also have a **positive effect** on some geological features, which can contribute to landscape character.
- 7.9.25 Policies LPC12, LPC15 and LPD09 are predicted to have **neutral effects** as they don't contribute significantly towards landscape character.
- 7.9.26 Overall the policies are predicted to have a **neutral effect**.

Infrastructure

- 7.9.27 Policies LPC13 and LPD07 are predicted to have a **positive effect** on landscape character and views by requiring telecommunications developments and renewable and low carbon developments to take account of landscape character and sensitivity. Crucially, the need to take account of cumulative effects is identified, which ought to ensure effects do not accrue in the long term.
- 7.9.28 LPC05 could have some benefit for landscape character through the protection of open space, though the focus here is on recreation rather than visual appearance.
- 7.9.29 Policies LPA07, LPA08 are predicted to have **neutral effects**, as they do not relate directly to landscape management.
- 7.9.30 Overall these policies are predicted to have a **positive effect** on landscape because they generally intend to respect and protect landscape character from development.

Design

- 7.9.31 Policies LPD01 and LPD02 are predicted to have **positive effects** by requiring the consideration of landscape and townscape as vital components of the development process.
- 7.9.32 Policies LPD08 and LPD10 are predicted to have **neutral effects** because they are not especially related to landscape and are unlikely to have an influence on character.

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.9.33 The Local Plan allocates a number of housing and employment sites to ensure that the spatial strategy can be achieved. The effect on the character of landscapes is predicted to be neutral for some settlements such as Bold and Ecclestone, where the sensitivity of the landscape is low-moderate. The Plan also encourages the regeneration of brownfield land and buildings, which ought to improve townscape and landscape character.
- 7.9.34 The effects on landscapes with greater sensitivity are more likely to be negative, especially where the quantum of development around a particular settlement is higher (Haydock and Newton-le-Willows for example). For most of these areas, it ought to be possible to secure mitigation and enhancement other Plan policies (particularly LPC11). Therefore, whilst the overall effects in these locations would remain negative, it should be possible to ensure that effects are not significant.
- 7.9.35 Some sites fall within areas of medium-high sensitivity, and therefore present the potential for significant negative effects. This is the case for Rainford, Billinge and Garswood. In combination, the development around these settlements is predicted to have a significant effect (though measures recommended in this SA Report would reduce the likelihood of effects occurring and thus reduce their significance).
- 7.9.36 The spatial strategy also focuses on the regeneration of the town centre and seeks to protect the vitality of key centres such as St Helens and Earlstown. Several policies offer protection for Green Infrastructure, ecological networks and design policies ought to ensure that high quality developments are secured, particularly at gateway locations.
- 7.9.37 These policies in combination are likely to contribute to a general improvement of the townscape and settlement edges, which will help to offset the loss of character associated with Green Belt loss.
- 7.9.38 Therefore, overall, the effects upon landscape and townscape are predicted to be mixed. **Significant positive effects** are predicted in the main, reflecting the proactive approach to the management of the built and natural environment, and explicit commitment to individual improvement schemes such as the Bold Forest initiative and Billinge Hill Nature Reserve. Some strategic sites offer the opportunity for enhancement, but it should be acknowledged that negative effects are predicted for the majority of Green Belt allocations. With suitable mitigation and enhancement though, these effects could be prevented from becoming significant.

7.10 Built and natural environment

7.10.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'built and natural environment'. The effects of the Plan are presented in table 7.8 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.8.

Table 7.8: Appraisal of the draft Plan on built and natural environment

Local Plan Chapters / Policies	Score
Strategic Spatial Policies (including housing and employment sites) <i>LPA01: Presumption in Favour of Sustainable Development ✓</i> <i>LPA02: Spatial Strategy ✓ ✗</i> <i>LPA03: Development Principles ✓</i> <i>LPA10: Development of Strategic Rail Freight Interchange (Parkside) ✗</i> <i>LPA04: A Strong and Sustainable Economy ✗</i> <i>LPA05: Meeting St. Helens Housing Needs ✗</i> <i>LPA06: Extent of the Green Belt and Safeguarded Land</i>	✓ ✗
Retail and centres <i>LPC04: Retail and Town Centres ✓</i> <i>LPB01: St. Helens Town Centre and Central Spatial Area ✓</i> <i>LPB02: Earlestown Town Centre ✓</i>	✓
Housing policies <i>LPC01: Housing Mix ✓</i> <i>LPC02: Affordable and Specialist Housing Needs -</i> <i>LPC03: Gypsies, Travellers & Travelling Show people -</i> <i>LPD04: Householder Developments ✓</i>	✓
Biodiversity policies <i>LPC06: Biodiversity and Geological Conservation -</i> <i>LPC07: Greenways ✓</i> <i>LPC08: Ecological Network and Geological Conservation ✓</i>	✓
Built and natural environment policies <i>LPC09: Landscape character ✓</i> <i>LPC10: Trees and woodlands ✓</i> <i>LPC11: Historic Environment ✓</i> <i>LPD06: Development in Prominent Gateway Locations or Character Areas ✓</i> <i>LPD05: Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt ✓</i>	✓ ✓
Natural resources <i>LPA09: Green Infrastructure ✓</i> <i>LPC12: Flood Risk and Water Management ✓</i> <i>LPC14: Minerals ✓</i> <i>LPC15: Waste -</i> <i>LPD09: Air quality -</i>	✓
Infrastructure <i>LPA07: Transport and Travel -</i> <i>LPA08: Infrastructure and funding -</i> <i>LPC13: Low Carbon and Renewable Energy Development -</i> <i>LPD07: Digital Communications -</i> <i>LPC05: Open Space and Outdoor Sports Facilities -</i>	-
Design <i>LPD01: Ensuring Quality Development in St. Helens ✓</i> <i>LPD02: Design and Layout of New Housing ✓</i> <i>LPD03: Open Space and Residential Development -</i> <i>LPD08: Advertisements -</i> <i>LPD10: Hot Food Takeaways -</i> <i>LPD11: Health and Wellbeing -</i>	✓
The Local Plan 'as a whole' (i.e. cumulative effects)	✓ ✓ ? ✗

Spatial strategy (including sites)

- 7.10.2 One of the development principles within LPA03 seeks to protect, conserve, and enhance the Borough's natural, built and historic environments. This should help to provide a framework for the protection and enhancement of cultural heritage and the historic environment.
- 7.10.3 Policy LA02 seeks to continue a strategy of urban regeneration, whilst delivering appropriate development on settlement edges where feasible. In principle, this ought to be positive for built heritage as it will encourage the reuse of buildings and land that are derelict / vacant, which could be of historic or cultural value.
- 7.10.4 Policies LPA04 and LPA05 set out a number of key sites that will be crucial to delivering the spatial strategy, employment and housing targets.
- 7.10.5 There is a concentration of development proposed close to Haydock at Junction 23. This includes housing allocations HA7 and HA10 and employment land at EA4, EA7 and EA2. Though this level of development in the area will lead to substantial changes to the built and natural environment, the effects upon the historic environment are predicted to be negligible. The sites do not contain any designated heritage assets, nor is their development likely to affect the setting of any assets.
- 7.10.6 The allocation HA1 at Billinge could have some adverse effects on the setting of heritage assets, as there are a number of listed buildings within proximity (Crookhurst Farm and the Old Barn), and part of the site falls within the Conservation Area.
- 7.10.7 The site is also partially visible from Billinge Hill Beacon. Although this is not a designated heritage asset, it has local historic / cultural value, and the hill itself is the highest in Merseyside, providing panoramic views across much of St Helens. The rural nature of the immediate countryside is considered to be important to the experience at the top of Billing Hill, and development of HA1 could therefore affect the setting of the Beacon, and its enjoyment by visitors.
- 7.10.8 Though plan policies that deal with heritage and design ought to cover such an issue, it is considered beneficial to include a site specific policy clause that requires the development to incorporate sufficient screening and appropriate densities. This would help to ensure that new homes are well integrated into the existing settlement and maintains the 'rural' feel of the area.
- 7.10.9 Site HA2 is within 400m of Church of the Holy Trinity (Grade II listed) in Garswood, but lies on relatively flat land that is not prominent. Therefore, the effects on the historic environment are predicted to be neutral in this location. Beyond the plan period, safeguarded land could be developed adjacent to HA2. This expansion would still not be expected to affect heritage assets.
- 7.10.10 The Parkside proposals (LPA10) have potential to have a negative effect on the setting of several historic assets, including farm buildings and an ancient monument, which is predicted to be a **negative effect**.
- 7.10.11 Employment land expansion in Rainford is predicted to have negligible effects on the built environment, as is the smaller housing allocation at HA14. Housing land at HA15 is adjacent to a listed building (Dial Wood House). The setting of this asset is likely to be affected by development, as its character is enhanced by the open fields and wooded areas that the building overlooks. It is likely that **negative effects** upon this asset will occur as a result of substantial development here.

- 7.10.12 It may therefore be beneficial to include a clause within a site specific policy for HA15. This could seek to achieve a relatively open design and/or a buffer of green space adjacent to Higher Lane.
- 7.10.13 Housing development near to Ecclestone (HA9 and HA16) is not predicted to have a significant effect upon heritage, as there are no designated assets nearby, nor any features of particular local interest. However, a site of potential archaeological remains falls within HA16. Development here should therefore be required to ensure that potential features are recorded and any remains recovered.
- 7.10.14 Sites to the south of Bold (HA5, HA6) and Sutton Manor (HA4) are predicted to have negligible effects upon heritage as there are no designated assets nearby, and the quality of development ought to enhance the built environment.
- 7.10.15 A8, Ecclestone Golf Course is relatively well screened and some distance away from designated heritage assets, and therefore predicted to have **neutral effects**.
- 7.10.16 Overall, the strategy is predicted to have **mixed effects** on heritage. Some sites present the possibility of negative effects, whilst others are predicted to be neutral. The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are **positive effects**. The **negative effects** are generally predicted to be not significant across the Borough. However, there are particular locations where **significant negative effects** could be generated in the absence of mitigation measures.

Retail and centre policies

- 7.10.17 The effects for LPB01 and LPC04 ought to be beneficial for the town centre environment as it will encourage the use of buildings and land that could otherwise lie vacant. There should also be environmental improvements secured at Langtree Park and the existing waterway of the St. Helens Canal.
- 7.10.18 Policy LPB02 should benefit the built and natural environment of Earlestown through the implementation of an Area Action Plan/town centre Masterplan that would seek to maintain and enhance the town's built heritage.
- 7.10.19 Overall the policies are predicted to have **positive effects** upon the built environment. The effects are not predicted to be significant because key heritage assets are unlikely to be affected by improvements. The principle of protecting town centre function, vitality and vibrancy is also one that is set out in national policy and guidance (i.e. it is likely that this pattern of development would be encouraged in the absence of a new local plan).

Housing policies

- 7.10.20 The housing policies are unlikely to have significant effects upon the historic environment, as it deals with issues that are less relevant to heritage such as affordability. However, achieving a suitable housing mix is an important component in securing high quality, appropriate developments. The requirement to be flexible on the density of development in rural areas ought to help better protect heritage features that are typical of such areas like farm buildings.

Biodiversity policies

- 7.10.21 The protection and enhancement of biodiversity habitats and networks can be positive for the built environment and heritage assets by improving countryside and

urban environments. Therefore policies LPC06, LPC08 and LPC09 should have positive implications for the historic environment. Effects are not predicted to be significant, as these policies focus upon biodiversity function and appearance, rather than cultural or historic features. Therefore, effects would be indirect.

Built and natural environment policies

- 7.10.22 Policy LPC11 is the main policy within the plan that considers the historic environment. The policy is predicted to have a **positive effect** on the built and natural historic environment by seeking to protect, maintain and enhance the historic environment. A number of mechanisms for achieving this are outlined in the policy including the need to undertake an informed impact assessment, implementing Conservation Area Plans and encouraging community schemes. These measures ought to build upon the general principles set out within the NPPF.
- 7.10.23 Several other plan policies could also help to support the historic environment including the protection of ancient woodland and trees (LPC10), respect for landscape character (LPC09, LDP05) and high quality design at gateway locations (LPD06).
- 7.10.24 In combination, these policies are predicted to have a **significant positive effect** on St Helens cultural and historic environment.

Natural resources

- 7.10.25 Policy LPC14 is beneficial for the built and natural environment as it seeks to ensure that mining developments take account of heritage assets and their setting during operation and following decommission. Whilst these are **positive effects**, they are not predicted to be significant, as protection of heritage is already afforded through national policy.
- 7.10.26 Policy LPA09 should help to protect and enhance the quality of the natural environment, which can have positive knock-on effects for cultural and historic assets.
- 7.10.27 These policies are predicted to have fairly localised effects, and are therefore not predicted to be significant in the context of the Borough.

Infrastructure

- 7.10.28 Policy LPC13 requires renewable and low carbon developments to not cause significant harm to historical and cultural assets. Whilst this is positive, it is largely a reflection of national policy, and is therefore unlikely to have a significant effect upon the baseline position.
- 7.10.29 The effects for policies LPA07, LPD07 and LPC05 are predicted to be neutral as they not explicitly related to the historic environment.
- 7.10.30 Overall these policies are predicted to have a **neutral effect** on St Helens because they generally intend to protect and enhance cultural and historic assets.

Design

- 7.10.31 Policy LPD02 is predicted to have a positive effect on the built and natural environment by requiring to new developments to respect existing buildings and land uses.
- 7.10.32 Policy LPD01 seeks to secure well designed developments that respects and enhances local character.

Cumulative effects / summary

- 7.10.33 Overall, the strategy is predicted to have **mixed effects** on heritage. Some of the allocated strategic sites present the possibility of negative effects, whilst others are predicted to be neutral. The continued focus on regeneration as a key element of the strategy should also ensure that improvements to the built environment are generated, which are **positive effects**. The **negative effects** are generally predicted to be not significant across the Borough. However, there are particular locations where **significant negative effects** could be generated in the absence of mitigation measures.
- 7.10.34 Given that the Plan sets out specific measures that could help to protect and enhance the historic environment (i.e. *Particularly LPC11, site specific policies and design policies*), it is likely that the significant effects of housing, employment and infrastructure development could be mitigated effectively.
- 7.10.35 The Plan policies help to deliver the strategy and ought to reduce the significance of negative effects where they could arise, and to secure enhancements when possible, corresponding to a possible (?) **significant positive effect**.

7.11 Health and wellbeing

7.11.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'health and wellbeing'. The effects of the Plan are presented in table 7.9 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.9.

Table 7.9: Appraisal of the draft Plan on health and wellbeing

Local Plan Chapters / Policies		Score
Strategic Spatial Policies <i>LPA01: Presumption in Favour of Sustainable Development ✓✓</i> <i>LPA02: Spatial Strategy ✓✓ ✗</i> <i>LPA03: Development Principles ✓✓</i> <i>LPA04: Strong and Sustainable Economy ✓✓ ✗</i> <i>LPA05: Meeting St. Helens Housing Needs ✓✓ ✗</i> <i>LPA06: Extent of the Green Belt and Safeguarded Land</i> <i>LPA10: Development of Strategic Rail Freight Interchange (Parkside) ✓✓</i>		✓✓ ✗
Retail and centres <i>LPC01: St. Helens Town Centre and Central Spatial Area ✓</i> <i>LPC02: Earlestown Town Centre ✓</i> <i>LPC04: Retail and Town Centres ✓</i>		✓
Housing policies <i>LPC01: Housing Mix ✓✓</i> <i>LPC02: Affordable and Specialist Housing Needs ✓✓</i> <i>LPC03: Gypsies, Travellers & Travelling Show people ✓</i> <i>LPD04: Householder Developments ✓</i>		✓✓
Biodiversity policies <i>LPC06: Biodiversity and Geological Conservation -</i> <i>LPC07: Greenways ✓</i> <i>LPC08: Ecological Network and Geological Conservation ✓</i>		✓
Built and natural environment policies <i>LPC09: Landscape character -</i> <i>LPC10: Trees and Woodland ✓</i> <i>LPC11: Historic Environment ✓</i> <i>LPD06: Development in Prominent Gateway Locations or Character Areas -</i> <i>LPD05: Extension, Alteration or Replacement of Dwellings or conversion to dwellings ✓</i> <i>LPA06: Extent of the Green Belt and Safeguarded Land ✓ / ✗</i>		✓ / ✗
Natural resources <i>LPA09: Green Infrastructure ✓</i> <i>LPC12: Flood Risk and Water Management ✓</i> <i>LPC14: Minerals ✓</i> <i>LPC15: Waste -</i> <i>LPD09: Air quality ✓</i>		✓
Infrastructure <i>LPA07: Transport and Travel ✓✓</i> <i>LPC13: Low Carbon and Renewable Energy Development -</i> <i>LPD07: Digital Communications -</i> <i>LPC05: Open Space and Outdoor Sports Facilities ✓✓</i>		✓
Design <i>LPD01: Ensuring Quality Development in St. Helens ✓</i> <i>LPD02: Design and Layout of New Housing ✓</i> <i>LPD03: Open Space and Residential Development ✓</i> <i>LPD08: Advertisements -</i> <i>LPD10: Hot Food Takeaways ✓</i> <i>LPD11: Health and Wellbeing ✓</i>		✓
The Local Plan 'as a whole' (i.e. cumulative effects)		✓✓ ✗

Spatial strategy (including sites)

- 7.11.2 Policies LPA01 Presumption in favour of Sustainable Development, LPA02 Spatial Strategy criteria points 2 and 8, LPA03 Development Principles and Policy LPA10 Development of Strategic Rail Freight Interchange are each predicted to have significant positive effects on issues relating to health and wellbeing.
- 7.11.3 LPA01 Presumption in favour of Sustainable Development and LPA02 Spatial Strategy (criteria points 2 and 8) promote improved access to a range of services and opportunities for formal and informal recreation.
- 7.11.4 Policy LPA02 Spatial Strategy (criteria 9) and Policy LPA10 Development of Strategic Rail Freight Interchange (criteria point 5) seek to protect the existing active travel and public transport networks throughout St. Helens whilst encouraging improvements to public transport, this ought to have positive effects on health and wellbeing by encouraging more people to use active transport modes.
- 7.11.5 Policy LPA03 promotes a series of three criteria when assessing development; meeting the challenge of population growth, improving economic well-being of residents, contributing to inclusive communities and ensuring a high quality built and natural environment, each of these three criteria have positive effects on health and well-being.
- 7.11.6 Policy LPA10 Development of Strategic Rail Freight Interchange also encourages the development of training schemes to increase the opportunities for the local population to obtain employment, which should have positive effects on the health and wellbeing of the local population.
- 7.11.7 Policy LPA05 Meeting St. Helens Housing Needs aims to ensure that over the plan period a minimum of 10,830 dwellings are delivered in the Borough this policy is likely to have a positive effect on health and wellbeing.

Furthermore, LPA04: A Strong and Sustainable Economy seeks to improve the employment opportunities for local people which ought to help reduce the overall incidence of poverty and experience of social exclusion

Retail and centre policies

- 7.11.8 Policies LPC01, LPC02 and LPC04 reinforce the role of town centres by supporting the provision of jobs in town centre locations and encouraging the concentration of goods and services. This ought to be beneficial for health and wellbeing as the town centres are well connected to communities via maintained pedestrian links to adjacent areas and via hosting the public transport hub.
- 7.11.9 Policy LPB01 also seeks to improve the public realm by securing improvements to green infrastructure, which ought to have benefits for wellbeing. In combination, the policies are predicted to have a **positive effect** on health and wellbeing

Housing policies

- 7.11.10 The housing policies seek to deliver a range of housing types, tenures and sizes to meet the needs of the Borough.
- 7.11.11 Policy LPC01 Housing Mix aims to ensure an appropriate housing mix is delivered within the Borough including affordable and market and a range of different types, tenures and size. The policy specifically mentions the delivery of bungalows and

the use of the Lifetime Homes standard on larger development sites, which would benefit an aging population. Furthermore, the provision of specialist and supported housing for the elderly and vulnerable people, sheltered housing, extra care, retirement accommodation and residential care homes will all be supported in sustainable locations; which benefits a range of people.

- 7.11.12 Policy LPC02 Affordable and Specialist Housing Needs supports the delivery of affordable housing on development of 11 or more dwellings. This is likely to have a positive effect on health and well-being as it will help to reduce poverty and social exclusion.
- 7.11.13 Policy LPC03 Gypsies, Travellers and Travelling Show People allocates two sites for the use of gypsies, travellers and travelling show people to meet an identified need. Allocating areas will have a slight positive effect on health and well-being by reducing instances of crime from travellers being forced to use inappropriate sites elsewhere in the Borough.
- 7.11.14 Policy LPD4 Householder Developments is expected to have a slight positive effect on health and well-being as it encourages householder developments to maintain reasonable standards of privacy for neighbouring properties and gardens.
- 7.11.15 In combination, the policies are predicted to have a **significant positive effect**, reflecting the benefits that ought to be generated for those with poor access to appropriate housing (a major determinant of health and wellbeing).

Biodiversity policies

- 7.11.16 Policy LPC06: Biodiversity and Geological Conservation seeks to protect sites of biodiversity and geological conservation. Whilst experience of biodiversity can have positive effects on wellbeing, the effects of this policy alone are not predicted to be significant given its focus on wildlife and geodiversity.
- 7.11.17 However, Policies LPC07 and LPC08 are likely to have **positive effects** upon health and wellbeing, by safeguarding and enhancing recreational resources and public access through greenways and linkages.

Built and natural environment policies

- 7.11.18 The effects of Policy LPC09: Landscape Protection and Enhancement and LPD6: Development in Prominent Gateway Locations on health and well-being are predicted to be **neutral** because they focus upon maintaining landscape character and Gateway locations such as motorway, a-roads and railway lines. It is unlikely that these will have a direct effect on health/well-being issues.
- 7.11.19 Policy LPC11: Historic Environment is predicted to have a **minor positive effect** on health and well-being as it encourages community participation with archaeology projects, and enjoyment of the historic environment.
- 7.11.20 Likewise, policies LPD5 and LPA06 are predicted to have a **minor positive effect** on health and well-being as these policies make a contribution towards meeting local housing needs. Safeguarded land will be protected from development in the plan period, but in the longer term is 'earmarked' for potential release for development. This presents some confidence that longer term housing needs could be met, but may be a concern for some local communities, and hence a **negative effect** is also predicted.

7.11.21 Overall **mixed effects** are predicted reflecting those factors discussed above.

Natural resources

7.11.22 Policies LPA09, LPC12 and LPC14 are predicted to have positive effects on health and wellbeing. LPA09 aims to protect and enhance the existing green infrastructure and supports the provision of expansion, improvement of functionality, connectivity and accessibility of the green infrastructure network. Green infrastructure has a wide range of functions including public access for recreation improving the network should therefore have a **positive effect** on health and wellbeing by enabling people to access space for active recreation.

7.11.23 Policy LPC12 is predicted to have a **positive effect** on health as it seeks to reduce the risk of flooding from all new development. The policy promotes the use of a sequential approach to new development, which should ensure that more sensitive development such as hospitals are not approved within flood risk areas.

7.11.24 Policy LPC14 encourages the consideration of amenity, air quality, the landscape, flood risk and land stability amongst other factors when proposing mineral developments. Similarly Policy LPD9 seeks to ensure proposals do not hinder the achievement of AQMA objectives and major developments are to incorporate measures to reduce air quality. These considerations are directly related to issues associated with human health and wellbeing and therefore encouraging developers to consider these impacts within their proposals ought to have a **positive effect** on health and wellbeing.

7.11.25 Policy LPC15 is predicted to have a **neutral effect** on health and wellbeing because it deals entirely with the sustainable management of waste.

Infrastructure

7.11.26 Policy LPPA07 is predicted to have a positive effect on health and wellbeing as it encourages new development to be positioned where there is access to public transport services (helping access to health facilities), it promotes active modes of transport to, from and within development, and promotes the inclusion of adequate parking for those of limited mobility, service vehicles and cycles. These elements combined ought to support a reduction in health inequalities, improve access to goods, services and local centres and therefore have a **positive effect** on health and wellbeing across the Borough.

7.11.27 Policy LPC13 and LPD7 will help to ensure that residential amenity is protected; which is beneficial for those communities that could potentially be affected by energy and communications infrastructure. The policies are in-line with the national policy framework, and so a significant effect is not anticipated beyond the NPPF. The number of properties that would be affected is also likely to be relatively low, so whilst the effects could be significant to individuals and some communities, a lot of residents would be unaffected and so a minor **positive effect** is predicted.

7.11.28 Policy LPC05 encourages the protection and enhancement of open space, sporting and recreational facilities; all of which contribute to opportunities for leisure (which is beneficial for health). Consequently a **positive effect** is predicted.

Design

- 7.11.29 Policies LPD01, LPD02 and LPD03 are predicted to have a **positive effect** on health and well-being by supporting the development of housing to meet the specific needs of different groups within the Borough. Furthermore LPD03 seeks to ensure high quality new public space is provided with major residential developments.
- 7.11.30 By setting a clear exclusion zone around primary and secondary schools policy LPD10 ought to have a slight **positive effect** on health and well-being by reducing the reliance on takeaway foods for children

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.11.31 The Plan is predicted to have a **positive effect** on health and wellbeing, primarily through the delivery of housing to meet the needs of a range of groups, as well as the aspiration to provide increased job opportunities. The distribution of growth ought to ensure that jobs, services and leisure are accessible to new and existing communities and can help to reduce levels of deprivation in areas of need. Of particular importance is the continued commitment to urban regeneration and the need to secure enhancements to infrastructure as part of new development.
- 7.11.32 It is a commitment throughout the plan to enhance open space and green infrastructure, whilst also promoting active travel. These measures should all help to encourage healthier lifestyles and create attractive environments for residents.
- 7.11.33 In combination, the plan policies are predicted to have a **significant positive effect** upon health and wellbeing across the district. However, some communities may be opposed to the release of Green Belt land, and the development of such land could have a detrimental effect on wellbeing for this group of people. Congestion, may also increase in the short term / before infrastructure improvements are secured, which could lead to a poorer quality environment in parts of the Borough where development is greatest (for example St Helens urban area, Haydock, Bold).
- 7.11.34 To reflect these issues, a **negative effect** is predicted, but these should only be temporary providing that effective infrastructure is delivered to support developments.

7.12 Economy and Employment

7.12.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'economy and employment'. The effects of the Plan are presented in table 7.10 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows table 7.10.

Table 7.10: Appraisal of the draft Plan on economy and employment

Local Plan Chapters / Policies		Score
Strategic Spatial Policies (Including housing and employment allocations) LPA01: <i>Presumption in Favour of Sustainable Development</i> ✓ LPA02: <i>Spatial Strategy</i> ✓✓ LPA03: <i>Development Principles</i> ✓ LPA04: <i>A Strong and Sustainable Economy</i> ✓✓ LPA05: <i>Meeting St. Helens Housing Needs</i> ✓ LPA06: <i>Extent of the Green Belt and Safeguarded Land</i> ✓ LPA10: <i>Development of Strategic Rail Freight Interchange (Parkside)</i> ✓✓		✓✓
Retail and centres LPC04: <i>Retail and Town Centres</i> LPC01: <i>St. Helens Town Centre and Central Spatial Area</i> ✓✓ LPC02: <i>Earlestown Town Centre</i> ✓		✓✓
Housing policies LPC01: <i>Housing Mix</i> ✓✓ LPC02: <i>Affordable and Specialist Housing Needs</i> ✓ LPC03: <i>Gypsies, Travellers & Travelling Show people</i> - LPD04: <i>Householder Developments</i> -		✓✓
Biodiversity policies LPC06: <i>Biodiversity and Geological Conservation</i> ✓ LPC07: <i>Greenways</i> X LPC08: <i>Ecological Network and Geological Conservation</i> -		-
Built and natural environment policies LPC09: <i>Landscape character</i> ✓ LPC10: <i>Trees and Woodland</i> LPC11: <i>Historic Environment</i> ✓ LPDM x: <i>Development in Prominent Gateway Locations or Character Areas</i> ✓ LPDM x: <i>Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt</i> -		✓
Natural resources LPA09: <i>Green Infrastructure</i> ✓ LPC12: <i>Flood Risk and Water Management</i> - LPC14: <i>Minerals</i> - LPC15: <i>Waste</i> ✓ LPD09: <i>Air quality</i> -		-
Infrastructure LPA07: <i>Transport and Travel</i> ✓✓ LPC13: <i>Low Carbon and Renewable Energy Development</i> - LPD07: <i>Digital Communications</i> . ✓ LPC05: <i>Open Space and Outdoor Sports Facilities</i> ✓✓ LPA11: <i>Infrastructure Delivery and Funding</i>		✓
Design LPD01: <i>Ensuring Quality Development in St. Helens</i> ✓ LPD02: <i>Design and Layout of New Housing</i> - LPD08: <i>Advertisements</i> ✓ LPD10: <i>Hot Food Takeaways</i> ✓ LPD03: <i>New Housing and Open Space Provision</i> - LPD11: <i>Health and Wellbeing</i>		-
The Local Plan 'as a whole' (i.e. cumulative effects)		✓✓

Spatial strategy (including sites)

- 7.12.2 Policy LPA01 (Presumption in Favour of Sustainable Development) and Policy LPA02 (Spatial Strategy) both seek to promote healthy communities and access to green infrastructure. This could help in the long term to support a more active and healthy work force that is less likely to suffer from health problems.
- 7.12.3 The efficient use of land is likely to encourage services to be located in proximity to each other. This potential agglomeration of services and their associated infrastructure is often considered desirable to businesses of a similar type. The policy could therefore have a minor positive influence on the attraction of investment as this agglomeration grows over time.
- 7.12.4 By requiring the consideration of climate change resilience, the development principles (Policy LPA03 Development Principles) and spatial strategy should help to safeguard the Borough from potential economic disruption under certain climatic events. Greater economic robustness simultaneously protects employment, as both employment sites and housing are less likely to suffer from events which could potentially threaten an individual's ability to access work or for businesses to move goods (such as flooding).
- 7.12.5 The spatial strategy promotes strategic employment sites in proximity to the M6 and the M62 under Policy LPA02 (Spatial Strategy) which are considered to be attractive to the market. Development at these sites would generate employment opportunities in broadly accessible locations, which would be beneficial for the Borough's image as well as its communities.
- 7.12.6 To ensure that employment and development opportunities benefit those in greatest need, the strategy outlines the need for good transport links, especially to areas of multiple deprivation.
- 7.12.7 Sites previously used for employment are protected for similar uses under Policy LPA04 (A Strong and Sustainable Economy), helping to safeguard the provision of these uses within the Borough. Promoting the reuse of existing sites could potentially be unattractive to some land owners/developers who have specific ideas about the location and condition of their preferred sites. However, the variety of sites on offer, and the opportunity to develop strategic sites linked to the M6/A580 and M62 should ensure flexibility and choice in the market.
- 7.12.8 By supporting the creation and expansion of small businesses, Policy LPA04 (A Strong and Sustainable Economy) could help to further diversify the economy and provide choice and flexibility. Such diversification is likely to make the economy more robust, resilient to external factors, and support local entrepreneurs who may consider initiating a business venture.
- 7.12.9 Support is also offered to local good suppliers, helping to maintain spending within the local economy, and the creation of apprenticeships is likely to help grow a skilled workforce which could serve the long term needs of St Helens. As a result, the effects of this policy are predicted to be minor positive. Both Policy LPA04 (A Strong and Sustainable Economy) and Policy LPA10 (Development of Strategic Rail Freight Interchange) encourage apprenticeships and training schemes for the local workforce, which is then less likely to seek opportunities outside of the Borough. Likewise, the policies intention to provide adequate infrastructure for business needs should help to prevent companies relocating elsewhere.

- 7.12.10 Partnership with the Liverpool City Region is also likely to attract interest from developers and investors who seek to gain access to this wider agglomeration of businesses and opportunities, which could see increased interest in St Helens as a quality business location.
- 7.12.11 Policy LPA10 (Development of Strategic Rail Freight Interchange) offers a large scale investment opportunity which could help to diversify the local economy and make it more resilient to economic changes. The Strategic location could attract a wider market to invest in St Helens given its accessibility from the key routes of the M6 and the M62.
- 7.12.12 In support of the spatial strategy, a number of housing and employment site allocations are proposed. Policy LPA05 (Meeting St Helens Housing Need) seeks to develop an annual average of 570 dwelling units in the Borough, the construction and preparation of which is likely to support the local housebuilding economy.
- 7.12.13 In the main, housing is generally well related to employment opportunities, whether it be locally, or along strategic transport routes by car or public transport.
- 7.12.14 HA3 and HA10 in particular are in proximity of proposed employment sites EA3 and EA4,
- 7.12.15 Overall, the spatial strategy (including site allocations) is likely to have a significant positive effect on the local economy and employment. This should be achieved through the allocation of high quality employment land that can contribute to the regional economy, whilst ensuring that local residents benefit from increased employment opportunities. There is also support for local businesses and an adequate supply of housing in accessible locations to ensure that an increase in economic opportunities can be accommodated.

Retail and centre policies

- 7.12.16 Policy LPB01 (St Helens Central Spatial Area) seeks to protect and enhance St Helens town centre as a destination for retail, tourism and dwellings. This should help to maintain the role of the town centre and improve the quality and the attractiveness of town centre space.
- 7.12.17 Encouraging town centre development could help to strengthen the town centre economy, bringing with it employment opportunities and increased visitors. With the presence of online shopping and retail parks, it is unclear whether the policy will have a significant positive effect in terms of altering shopping behaviours. However, the policy is proactive in its aim to revitalise the town centre.
- 7.12.18 Continued monitoring through Town Centre Health Checks should allow for trends, barriers to development and opportunities to be identified and interventions implemented. This should help to ensure that the economic strength of the centre is maintained over the Plan period.
- 7.12.19 Growing Earlestown as a commuter settlement under Policy LPB02 (Earlestown Town Centre) should contribute to the vitality of the centre (as there will be a larger local population with a need for local services and facilities. With growth, opportunities for businesses to expand or establish in the town centre ought to be increased.
- 7.12.20 The retail and centre policies are considered to have a significant positive effect.

Housing policies

- 7.12.21 The housing policies seek to deliver and diversify additional housing provision within St Helens. Diversity within the type and tenure of housing on offer should cater to the varying needs of those employed within the Borough, allowing them to live in proximity to their workplace. This could help to increase the attractiveness of St Helens as a place of employment.
- 7.12.22 Adopting Lifetime Homes standards under Policy LPC01 (Housing Mix) should help to retain employees within the Borough by providing their housing needs over the long term, and reducing the necessity for them to relocate which could potentially disrupt their productivity and attendance in the workplace.
- 7.12.23 Supporting self-build projects under Policy LPC01 (Housing Mix) may also have a positive effect on local economies in terms of supplying opportunities and building the skills necessary for such constructions.
- 7.12.24 The affordable housing targets as introduced under Policy LPC02 (Affordable Housing Provision) help to facilitate development which may have otherwise been unviable by offering different targets for brownfield or greenfield sites. This could make development more attractive to developers.
- 7.12.25 The housing policies are considered to have a **significant positive effect**.

Biodiversity policies

- 7.12.26 Protection of SSSI under Policy LPC06 (Biodiversity and Geological Conservation) could create a requirement for the development of certain employment sites to adopt mitigation measures, potentially incurring additional costs. Most noticeably of these is the Parkside East site which is located in proximity to such a designation. The requirement for net gains in biodiversity could potentially affect development viability; however the policies offer sufficient flexibility to avoid such scenarios, and allow developments to be dealt with on an individual basis.
- 7.12.27 The protection of sites with local nature conservation/ local species value could reduce the developable-site offering within the Borough. Whilst such requirements may catalyse small-scale employment for those working in the conservation industries, is likely to have a minor negative effect on the economy and employment opportunities within St Helens.
- 7.12.28 However, increased accessibility across the Borough through Policy LPC07 (Greenways) could help to unlock an otherwise inaccessible workforce.
- 7.12.29 Overall, the biodiversity policies are considered to have a **neutral effect** on the economy.

Built and natural environment policies

- 7.12.30 Maintaining the overall quality of landscape and historic assets under Policy LPC10 (Landscape Protection and Enhancement) and Policy LPC11 (Historic Environment) could be attractive to inward investment and could help to catalyse tourism industries.
- 7.12.31 A high quality built and natural environment, as encouraged under Policy LPD06 (Development in Prominent Gateway Locations or Character Areas) is likely to be attractive to potential investors, and could help to secure further developer interest.

- 7.12.32 The built and natural environment policies are considered to have a minor positive effect.

Natural resources

- 7.12.33 Adopting GI (Policy LPA09 Green Infrastructure) as a way to commute to work could enable a more reliable work-force which avoids delays which may be associated with car travel.
- 7.12.34 Policy LPC12 (Flood Risk and Water Management) could prevent the development of potential employment sites should they exacerbate flood risk, and may therefore reduce the size and number of sites on offer within the Borough. However, the adoption of this policy overall is likely to protect employment sites from flooding in the future.
- 7.12.35 The shift towards substitute, secondary and recycled sources of minerals under Policy LPC14 (Minerals) could help to catalyse local economies associated with these practices. However this may also coincide with a loss of industry and employment related to primary mineral extraction. Mineral Safeguarding Areas could also present a barrier to the development of potential employment sites which overlap with such designations.
- 7.12.36 The requirement for health and social protection in relation to the development of hydrocarbon resources is likely to help to protect the involved workforce by reducing the potential for accidents and absence.
- 7.12.37 Encouraging the sustainable management of waste (Policy LPC15 Waste) may help to generate business opportunities in recycling, collection and storage industries.
- 7.12.38 Whilst the individual policies may have a mixed effect, overall the natural resource policies are considered to have a positive effect.

Infrastructure

- 7.12.39 The development of a SRFI (Policy LPA10 Transport and Travel) is likely to bring widespread economic benefits such as job creation associated with the rail and construction industries, a high profile investment opportunity for the whole site, and bringing a new economy to the area in the form of freight industries. It could help to facilitate the introduction of new infrastructure, such as the HS2, in the future, thereby improving the investment offering of the Borough.
- 7.12.40 The provision and protection of infrastructure under Policy LPA08 (Infrastructure Delivery and Funding) such as health, community and cultural facilities should help to maintain physical, social and mental wellbeing of the residents of the Borough. This could project into the workplace, and create a more productive and positive environment.
- 7.12.41 Policy LPC05 (Open Space, Sports and Recreation) could help to generate business opportunities in the sports, leisure, recreation and tourism sector.
- 7.12.42 Policy LPD07 (Digital Communications) removes the ambiguity surrounding potential applications for development. With increased clarity, the policy could allow for a faster processing of such applications, and for more rapid development to take place within the Borough.

- 7.12.43 The requirement for developer contributions could potentially make the investment unattractive to developers, although this is unlikely to significantly affect the viability.
- 7.12.44 The infrastructure policies are considered to have a **positive effect** on the economy and employment opportunities within the Borough.

Design

- 7.12.45 A high quality built and natural environment, as encouraged under Policy LPD01 (Ensuring Quality Development in St Helens) is likely to be attractive to potential investors, and could help to secure further developer interest. Whilst having a minor positive effect, this is likely to happen under national policy regardless.
- 7.12.46 Policy LPD08 (Advertisements) removes the ambiguity surrounding potential applications for development. With increased clarity, the policy could allow for a faster processing of such applications, and for more rapid development to take place within the Borough.
- 7.12.47 Policy LPD10 (Hot Food Takeaways) makes clear the parameters within which hot food takeaway stalls can operate within the Borough. In setting an exclusion zone around educational establishments, the policy could prevent certain vendors from operating within their desired locations, and could have a minor negative effect on entrepreneurial ambition for those which it applies.
- 7.12.48 Overall, the policy is considered to have a **negligible effect** on the economy and employment.

Cumulative effects (i.e. the effects of the plan as a whole)

- 7.12.49 The plan seeks to take advantage of growth opportunities, which ought to lead to **significant positive effects** on the economy through attracting investment and generating new jobs. The widespread economic benefits that ought to be generated through the development of strategic sites will help to strengthen the Borough's economy and its links with the Liverpool City Region.
- 7.12.50 Many of the policies help to locate employment sites and guide investment to the most appropriate / accessible areas within the Borough. The policies are also supportive of efforts to train individuals, offer apprenticeships, and increase accessibility throughout St Helens (including digital communications), creating a more robust and mobile workforce into the long term.
- 7.12.51 Although the plan seeks to protect existing industrial and businesses areas, its focus is on strategic opportunities rather than support for smaller scale businesses. This could mean that opportunities to diversify, or support 'local' economies are not fully taken advantage of. However, existing sites and the potential for conversions ought to offer the capacity and quality of sites required to support small medium enterprises.

7.13 Housing

- 7.13.1 This section presents an appraisal of the draft Plan against the SA Objectives within the SA topic 'housing'. The effects of the Plan are presented in table 7.11 below for different elements of the Plan, as well as the cumulative effects. Detailed discussion of the effects and their significance follows.

Table 7.11: Appraisal of the draft Plan on housing

Local Plan Chapters / Policies		Score
Strategic Spatial Policies (Including housing and employment allocations) LPA01: Presumption in Favour of Sustainable Development ✓ LPA02: Spatial Strategy ✓✓ LPA03: Development Principles ✓ LPA04: A Strong and Sustainable Economy ✓ LPA05: Meeting St. Helens Housing Needs ✓✓ LPA06: Extent of the Green Belt and Safeguarded Land ? LPA10: Development of Strategic Rail Freight Interchange (Parkside) - / ✗		✓✓
Retail and centres LPC04: Retail and Town Centres ✓ LPC01: St. Helens Town Centre and Central Spatial Area ✓ LPC02: Earlestown Town Centre ✓		✓
Housing policies LPC01: Housing Mix ✓ LPC02: Affordable and Specialist Housing Needs ✓ LPC03: Gypsies, Travellers & Travelling Show people ✓ LPD04: Householder Developments		✓✓
Biodiversity policies LPC06: Biodiversity and Geological Conservation X LPC07: Greenways ✓ LPC08: Ecological Network and Geological Conservation X		-
Built and natural environment policies LPC09: Landscape character X LPC10: Trees and Woodland LPC11: Historic Environment ✓ LPD06: Development in Prominent Gateway Locations or Character Areas X LPD05: Extension, Alteration or Replacement of Dwellings or conversion to dwellings in the Green Belt X		-
Natural resources LPA09: Green Infrastructure - LPC12: Flood Risk and Water Management ✓ LPC14: Minerals ✓ LPC15: Waste - LPDM: Air quality -		✓
Infrastructure LPA07: Transport and Travel ✓ LPC13: Low Carbon and Renewable Energy Development ✓ LPDM: Digital Communications ✓ LPC05: Open Space and Outdoor Sports Facilities ✓ LPA11: Infrastructure Delivery and Funding -		✓
Design LPD01: Ensuring Quality Development in St. Helens ✓ LPD02: Design and Layout of New Housing ✓ LPD08: Advertisements - LPD10: Hot Food Takeaways - LPD03: New Housing and Open Space Provision -		✓
The Local Plan 'as a whole' (i.e. cumulative effects)		✓✓

Spatial strategy (including sites)

- 7.13.2 The spatial strategy, employment and housing policies seek to create more employment opportunities, secure high quality design, and make provision for high quality housing to meet (and exceed) objectively identified needs.
- 7.13.3 Policy LPA01 (Presumption in Favour of Sustainable Development) and Policy LPA02 (Spatial Strategy) both seek to secure proximity between housing and services, improve accessibility, and enhance environmental quality. This should enhance the attractiveness of housing in the Borough.
- 7.13.4 Policy LPA02 (Spatial Strategy) seeks to deliver a substantial amount of housing development upon brownfield land, but also proposes the release of Green Belt sites to meet needs. This spread of development opportunities across both brownfield and greenfield land is likely to be attractive to developers and buyers who seek a variety and range of sites depending on their needs. The distribution of need is also relatively proportionate across the Borough and is well related to new and existing employment sites in the main. Therefore, housing needs are likely to be met where they arise, help to support the vitality of a range of settlements and create links to places of work. A buffer of 25% has been applied to ensure there is flexibility and choice in the market, which should ensure a **significant positive effect** upon the baseline position is generated.
- 7.13.5 By continuing the use of employment sites for employment uses under Policy LPA04 (A Strong and Sustainable Economy) the development of housing being built on such sites is unlikely. However, there is sufficient land identified and allocated in the plan to ensure that housing needs can be met without the need to change employment land uses.
- 7.13.6 The development of the SRFI and its associated effects on traffic, noise and air during its construction and operation could have an effect on residential amenity for housing sites in proximity to the site. Whilst Policy LPA10 (Development of Strategic Rail Freight Interchange) seeks to minimise this residential impact, the effectiveness of mitigation is yet to be determined and may not be aligned to the individual concerns of the affected residents.

Retail and centre policies

- 7.13.7 Policy LPB01 (St. Helens Central Spatial Area) and Policy LPC04 (Retail and Town Centres) seek to preserve the vitality and function of St Helens and other key centres; including for residential development where appropriate. This is also the case with regards to Earlestown under Policy LPB02 (Earlestown Town Centre). This ought to have a positive effect on the provision of housing in accessible locations, though it is uncertain how attractive these sites would be.
- 7.13.8 Overall, the retail and centre policies are predicted to have a positive effect on housing.

Housing policies

- 7.13.9 Guidance on the density and design of housing should help to ensure that housing is appropriate to its surroundings and of a consistently high quality, which ought to ensure that new homes are attractive to potential buyers.
- 7.13.10 There is also explicit reference to maintaining a 5 year supply of housing land, which itself should help to safeguard opportunities for housing supply in the short

term, and throughout the plan period if a review highlights the need for more sites within a 5 year time period.

- 7.13.11 High quality and diverse housing development of varying types and tenures is required under the Policy LPC01 (Housing Mix), and as such is likely to provide a suitable range of homes. The support of self-build projects should also increase the housing mix of St Helens and cater to the demands of those with aspirations to build homes.
- 7.13.12 The requirement for provision of affordable housing within developments (Policy LPC02 Affordable Housing Provision) is likely to enable wider access to the housing market. The policy also provides flexibility to deliver lower targets if viability could be affected. In particular, affordability targets are lower in response to deliverability and viability signals, which means that brownfield sites will remain an attractive prospect for developers.
- 7.13.13 Overall the policy is likely to have a significant positive effect on housing within the Borough.

Biodiversity policies

- 7.13.14 Policy LPC06 (Biodiversity and Geological Conservation) and Policy LPC08 (Ecological Network) could prevent the location of residential development on certain sites which are considered sensitive with regards to biodiversity, geological or ecological assets. This could therefore limit housing development in some locations. However, the plan provides sufficient housing elsewhere to avoid significant negative effects.
- 7.13.15 Conversely, the provision of an off-road travel network (Policy LPC07 Greenways) could allow for increased accessibility between housing sites and, recreation, work and services, which could increase the attractiveness and accessibility homes.
- 7.13.16 On balance, the policies are predicted to have a **neutral effect** upon housing.

Built and natural environment policies

- 7.13.17 Policy LPC11 (Historic Environment) seeks to protect, enhance and maintain heritage assets which could be redeveloped for residential uses. This could help to diversify choice and cater to a range of individual demands in the housing market, having a minor positive effect.
- 7.13.18 Safeguarding historic, landscape, woodland assets and green infrastructure could inhibit the development of potential housing sites should they be located insensitive locations. The built and natural environment policies in this case could have a negative effect on housing delivery on some locations. However, the effects are not predicted to be significant on a Borough-wide scale. On balance, a **neutral effect** is predicted overall.

Natural resources

- 7.13.19 Policy LPC12 (Flood Risk and Water Management) seeks to prevent development from locating on sites which could exacerbate flood risk, thereby helping to protect housing across the Borough from potential damage during future events.

- 7.13.20 The encouragement of SUDS, soft landscaping and sustainable transport could also help to make for more attractive communities; which is considered to be a minor **positive effect**.
- 7.13.21 The adoption of Mineral Safeguarding Areas (Policy LPC14) could inhibit the development process, and either delay or prevent the development of housing in some areas. However, it is not thought likely in practice that housing development would be sought in areas of existing minerals extraction. Furthermore, it may be possible to extract minerals prior to development being commenced. Diverting housing away from mineral extraction sites is also sensible given the potential for effects on amenity and ground stability.
- 7.13.22 The natural resource policies are therefore predicted to have a minor **positive effect** on housing within St Helens.

Infrastructure

- 7.13.23 Policy LPA11 (Infrastructure Delivery and Funding) could help to ensure the delivery of affordable housing units. However, affordable housing is not at the top of the Council's hierarchy of potential development contributions.
- 7.13.24 The policy also seeks to ensure the widespread implementation of broadband and other digital services which ought to make housing more attractive and accessible.
- 7.13.25 Proximity between housing and open space and sports provision (Policy LPC05) is likely to increase the attractiveness of developments, and may help to retain residents in the area. Likewise, accessibility to services and employment sites is likely to be a consideration for potential buyers, and as such Policy LPA07 (Transport and Travel) attempts to improve transportation links and modal choice, which could make properties within the Borough more attractive.
- 7.13.26 Policy LPC13 (Renewable and Low Carbon Development) requires that strategic housing development sites deliver energy efficiency measures 10% above national standards and as such could affect the viability of the scheme for certain developers. Though the policy is flexible to allow for this target to be reduced (where there are viability concerns), the additional costs involved could still be a barrier to housing development. Conversely, adopting these requirements, would help to reduce the future energy costs for residents within the new builds, and could therefore be more attractive to buyers who seek such measures.
- 7.13.27 Overall, the Infrastructure policies are considered to have mixed effects. A minor positive effect is predicted; reflecting the benefits that infrastructure improvements and contributions to affordable housing would be likely to have. Conversely, the additional requirements relating to renewable and low carbon energy could prove to be a barrier to some developments in the short term, reflecting a minor negative effect for some locations.

Design

- 7.13.28 Policy LPD01 (Ensuring Quality Development in St Helens), Policy LPD02 (Design and Layout of New Housing) and Policy LPD05 (Extension, Alteration or Replacement of Buildings or conversion to dwellings in the Green Belt) are likely to secure high quality, functional, legible housing design in the Borough.

- 7.13.29 Policy LPD06 (Development in Prominent Gateway Locations) is likely to contribute to a positive image of the Borough, the impression of which could help to attract developer interest and residential investment.
- 7.13.30 Policy LPD07 (Digital Communications) could help to locate telecommunication infrastructure in appropriate areas/ orientations so as not to encroach or negatively affect residential amenity for existing or new communities.
- 7.13.31 Overall, the design policies are expected to have a positive effect on local housing.

Cumulative effects (i.e. the effects of the plan as a whole).

- 7.13.32 The Plan seeks to deliver the housing needs for the Borough, with a buffer added to allow for flexibility and choice. The distribution of housing ought to ensure that housing is accessible, and that local needs can be met across the Borough.
- 7.13.33 The application of Plan policies should also help to improve the quality of housing developments and their surrounding environment, which is likely to be attractive to buyers / investors. Consequently, a **significant positive effect** is predicted throughout the plan period.
- 7.13.34 The Policy requirements to develop affordable, accessible and energy efficient homes could prove to be a barrier in some circumstances. However, the plan is sufficiently flexible to ensure that housing is delivered where viability could be an issue.
- 7.13.35 Land has also been safeguarded to ensure that sufficient land exists beyond the Plan period for longer term development needs. This is positive, though the effects would need to be identified and attributed to the next Plan that sets out the delivery of housing and employment land more explicitly.

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Mitigation and enhancement

08

8 MITIGATION AND ENHANCEMENT

8.1 Introduction

- 8.1.1 The policies for the Plan were appraised in the SA before they were ‘finalised’ in the draft Plan for public consultation. This allowed for mitigation and enhancement measures to be identified and changes made to the policies as the Council considered appropriate at this stage.
- 8.1.2 Table 8.1 below sets out the recommendations that have been made at this stage. In some instances, the Council was able to make amendments to the relevant policies.
- 8.1.3 However, as the plan-making and SA processes have been undertaken in parallel, there was insufficient time to give full consideration to all the recommendations before finalising the draft Plan. The Council will consider recommendations though as the plan moves towards Publication stage.

Table 8.1 *Mitigation and enhancement measures*

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

SA Recommendations

St Helens Response

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

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

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

To be considered for the Publication Draft of the Local Plan

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

To be considered for the Publication Draft of the Local Plan

- 8.1.4 Generally, the Plan has been positively prepared, and there was little scope for suggesting mitigation measures, as few negative effects were identified. However, as the plan was being developed, the draft policies were subjected to SA, and a small number of mitigation and enhancement measures were suggested through the SA.



Summary

09

9 SUMMARY OF FINDINGS

9.1 Introduction

- 9.2.1 Table 9.1 below presents a summary of the effects (of the draft Plan) identified for each SA topic. Table 9.2 sets out a discussion of these effects.
- 9.2.2 The SA findings will be taken into consideration alongside feedback from consultation. A further round of appraisal will then be undertaken to capture the effects of the Plan before it is finalised for publication. At this stage it may be necessary to refresh the scope of the SA, reconsider alternatives and identify potential monitoring measures.

Table 9.1 – Summary of cumulative effects of the Local Plan on the SA Topics

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

Table 9.2 – Summary of cumulative effects of the Plan

1. Biodiversity and geodiversity
<p>The Plan will lead to the development of a variety of sites within the Green Belt and also some which have environmental constraints such as being close to wildlife sites and ancient woodland. However, the effects associated with strategic site development ought to be mitigated by site specific policies and core policies throughout the plan.</p> <p>There is particularly strong protection for ancient woodland, and any loss of habitat should be compensated with a greater quantity of species / habitat. The Green Infrastructure network ought to be protected and enhanced, with particular benefits relating to the creation of new local wildlife sites at Billinge Hill and the Bold Forest Area Action Plan.</p> <p>Overall, despite the planned growth, the plan provides measures to secure the protection and enhancement of biodiversity across the Borough, with a significant positive effect predicted.</p>

2. Land quality

The Plan will lead to substantial development on land of agricultural value; some of which is categorized as 'best and most versatile'. Once developed, this resource cannot be recovered, and so this represents a **significant negative effect** on soil resources. As a form of compensation, soil resources could be retained in part through the provision of allotments (Either on or off site). This recommendation would help to mitigate the effects somewhat.

Conversely, the Plan seeks to make efficient use of land and infrastructure, and promotes the regeneration of land, particularly brownfield land in the urban area. This would generate **positive effects** with regard to land quality.

3. Traffic, congestion and air quality

The Plan directs the majority of new housing and employment land to areas with strong road links. There is therefore potential for increased levels of traffic to and from key settlements such as the town centre, Haydock, Newton-le-Willows and Earlestown. Increased traffic in these areas could have **negative effects** upon levels of congestion with knock-on adverse effects upon air quality.

Not all new trips would be car based though, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This will help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made. These elements of the Plan ought to reduce the significance of potential negative effects.

In the longer term, the development of a Strategic Rail Freight Interchange at Parkside is predicted to have **positive effects** for the wider region with regards to a reduction in the amount of HGV traffic. However, the number of trips locally could still be higher given the scale and nature of all the employment sites being proposed. An important mitigating factor is the requirement for infrastructure to be upgraded if this is necessary before development commences.

4. Natural resources

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

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

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

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

5. Climate change and energy

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

6. Flooding

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

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

7. Landscape

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

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

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

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

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

associated with Green Belt loss.

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

8. Built and natural environment

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

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

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

9. Health and wellbeing

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

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

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

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

10. Economy and employment

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

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

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

11. Housing

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

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

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

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

APPENDIX I: THE SA FRAMEWORK

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
ENVIRONMENT			
1. To protect and enhance biodiversity and geodiversity	<p>Will it protect and enhance natural/semi-natural habitats?</p> <p>Will it protect and enhance geodiversity?</p> <p>Will it maintain and enhance woodland cover and management?</p> <p>Will it improve biodiversity, especially within urban areas?</p> <p>Will it enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks?</p> <p>Will it avoid the needless sterilisation of viable minerals resources?</p>	<p>Issue 1. Biodiversity, Flora and Fauna</p> <p>Issue 4. Geodiversity</p>	<p>Biodiversity</p> <p>Flora</p> <p>Fauna</p>
2. To protect and improve land quality in St. Helens	<p>Will it seek to reclaim derelict land?</p> <p>Will it result in the positive remediation of contaminated land?</p> <p>Will it protect and enhance soil quality in St Helens including the highest quality agricultural land?</p> <p>Will it increase the amount of development on Previously Developed Land?</p>	<p>Issue 4. Geodiversity</p> <p>Issue 5. Soil</p> <p>Issue 6. Contaminated Soils</p>	<p>Soil</p>

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
3. To improve air quality in St. Helens	<p>Will it improve air quality?</p> <p>Will it reduce the number of journeys made by private car in order to reduce the high levels of nitrogen dioxide in areas of traffic congestion in the Borough?</p>	Issue 7. Air Quality	Air
4. To maintain and enhance the quality of controlled waters in St. Helens and to sustainably manage water resources	<p>Will it improve the quality of controlled waters?</p> <p>Will it ensure efficient use and management of water resources throughout the Borough?</p> <p>Will it promote sustainable design and construction measures that reduce water consumption and result in decreased run-off of polluted water (including during the construction phase).</p>	Issue 10. Water Resources/Water Quality	Water Material assets
5. To mitigate and adapt to the impacts of climate change	<p>Will it support building designs and a green infrastructure network that is adapted to climate change?</p> <p>Will it support take-up of renewable energy or low carbon technologies?</p>	Issue 9. Climate Change	Climatic factors
6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties	<p>Will it support development located outwith high flood risk areas?</p> <p>Will it incorporate sustainable urban drainage systems as part of the design?</p> <p>Will it incorporate new green spaces and habitat creation helping to mitigate flood risk?</p>	Issue 11. Flood Risk	Water Resources; Climatic factors.

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
7. To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside	<p>Will it contribute to landscape character?</p> <p>Will it protect and enhance the landscapes of the highest sensitivity in the Borough?</p>	Issue 3. Landscape	Landscape
8. To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment	<p>Will it protect and enhance sites, features and areas of historic, archaeological and cultural value in both urban and rural areas?</p> <p>Will it help to protect and enhance historic buildings through sensitive adaptation and reuse?</p>	Issue 2. Cultural Heritage	Cultural heritage including architectural and archaeological heritage
9. Ensure access to and protection and enhancement of high quality public open space and natural greenspace	<p>Will it ensure that all people have access to public open space within a reasonable walking distance from where they live?</p> <p>Will it promote access to green infrastructure such as natural greenspace?</p> <p>Will it create new areas of open space and natural greenspace?</p>	Issue 12. Open Space and Recreation	Material assets
NATURAL RESOURCES			
10. To minimise energy use and increase the proportion of energy both purchased and generated from	<p>Will it minimise greenhouse gas emissions?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Will it increase energy efficiency and make use of new and</p>	Issue 9. Climate Change	<p>Climatic Factors</p> <p>Population</p> <p>Material Assets</p>

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
renewable and sustainable sources	clean technologies? Promote sustainable design and construction standards for housing and non-housing development?		
11. To reduce the amount of waste, and to increase in order of priority, the proportion of waste reused, recycled and composted and recovered	Will it reduce waste generation? Will it increase waste reuse, recovery and recycling?	No specific issue identified.	Population Material assets
SOCIAL AND ECONOMIC			
12. To improve health and reduce health inequalities	Will it improve access to high quality health facilities? Will it encourage healthier lifestyles e.g. provide more opportunities for physical activity reduce car dependency and encourage walking and cycling and provide better access to healthy food? Will it reduce health inequalities in health between different groups by improving the health of the least healthy in society?	Issue 13: Population and Social Issues Issue 15. Poor Health and Lower Life Expectancy	Population Human health
13. To improve the education and skills levels of the population overall	Will it increase opportunities for access to education, training and employment opportunities for all, but in particular those in greatest need, such as those with low educational attainment, the unemployed and lower skilled	Issue 17. Educational Underachievement	Population

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
	<p>and those in deprived communities?</p> <p>Will it provide access to work experience, apprenticeships and training, especially for young people?</p>		
14. To ensure local residents have access to employment opportunities	<p>Will it reduce unemployment levels, particularly in areas of high employment deprivation?</p> <p>Will it help improve earnings?</p>	<p>Issue 14. Deprivation</p> <p>Issue 16. High Unemployment Rate</p>	Population
15. To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	<p>Will it improve business development and enhance competitiveness?</p> <p>Will it encourage inward investment?</p> <p>Will it encourage graduates to return and help to retain skilled employees in the area?</p> <p>Will it encourage tourism development?</p> <p>Will it provide or contribute to a balanced portfolio of employment sites?</p> <p>Will it maintain and enhance the vitality and viability of St Helens and Earlestown town centres?</p>	<p>Issue 14. Deprivation</p> <p>Issue 16. High Unemployment Rate</p>	Population
16. To improve access to a range of good quality and affordable housing that meets the diverse	<p>Will it contribute towards addressing the objectively assessed housing needs?</p> <p>Will it improve housing quality?</p>	Issue 13. Population and Social Issues	Population

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
needs of the Borough	<p>Will it increase the availability of affordable housing?</p> <p>Will it ensure that specialist housing needs, including those of an ageing population are met?</p> <p>Will it meet the identified needs of Gypsies, Travellers and Travelling Showpeople?</p> <p>Will it reduce the number of vacant properties?</p>		
17. To reduce poverty and social exclusion	<p>Will it reduce poverty in those areas most affected?</p> <p>Will it reduce social exclusion including access to employment opportunities and health and educational facilities in those areas most affected by deprivation?</p>	Issue 14. Deprivation	Population
18. To reduce crime, disorder and the fear of crime	<p>Will it reduce the potential for crime?</p> <p>Will it promote design that discourages crime?</p>	No specific issue identified	Population
TRANSPORT AND ACCESS TO SERVICES			
19. To reduce the need to travel, encourage alternatives to the car, and other motor vehicles improve highway safety and make best use of existing transport infrastructure	<p>Will it reduce traffic volumes/miles travelled by motor vehicles?</p> <p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will it reduce the effect of transport such as heavy goods traffic on people and the environment?</p> <p>Will it improve highway safety and so reduce road</p>	Issue 18. Transport and Accessibility	Air; Climatic Factors

SEA Objectives	Proposed Criteria	Link to Sustainability Issues in Chapter 5	SEA Topics
	<p>accidents?</p> <p>Will it avoid the capacity of the transport network being exceeded?</p>		
20. To improve access to and use of basic goods, services and amenities in town and local centres	<p>Will it improve accessibility to key local services (primary and secondary schools; GP surgeries; hospitals, town, district and local centres) and employment opportunities?</p> <p>Will it make access easier for those without access to a car?</p> <p>Will it protect the shopping and community services function of local service centres?</p>	Issue 18. Transport and Accessibility	Population

APPENDIX II: THE SITE APPRAISAL FRAMEWORK

	SA Objectives	Criteria
1	<p>To protect and enhance biodiversity</p> <p><i>Applicable to all site options</i></p>	<p>Effects unlikely</p> <ul style="list-style-type: none"> Over 400m from a SSSI, SAC or SPA. Over 100m from a local wildlife site. <p>Potentially adverse effects</p> <ul style="list-style-type: none"> Within 400m of a SSSI Within 100m of a local wildlife site, priority species or habitats, ancient woodland. <p>Effects likely without mitigation</p> <ul style="list-style-type: none"> Contains or adjacent (50m) to a SSSI. Loss of Local Wildlife Site. Contains priority species. TPO on site. Ancient Woodland onsite
2	<p>To protect and improve land quality in St Helens</p> <p><i>Applicable to all site options</i></p>	<p>Does not contain any agricultural land Grade 1-2</p> <p>Contains less than 10 ha of agricultural land 1-3b</p> <p>Contains more than 10 ha of agricultural land 1-2 or >20ha of 1-3b land.</p> <p>Contains more than 20ha of agricultural land 1-2 or >50ha 1-3b</p>
3	<p>To improve air quality in St Helens</p> <p><i>Applicable to all site options</i></p>	<p>Housing development under 1000 dwellings over 2km from an AQMA</p> <p>HGV generating employment development over 2km from an AQMA</p> <p>Housing development within 1km of AQMA</p> <p>HGV generating employment development within 2km from an AQMA</p> <p>HVG generating development within AQMA</p> <p>Housing development over 200 units in AQMA</p>

4	<p>To maintain and enhance the quality of controlled waters and to sustainably manage water resources.</p> <p><i>Applicable to all site options</i></p>	<p>Site is located within or adjacent to (within 100m) a groundwater source protection zone 1 or 2</p> <p>Site is not located within or adjacent to groundwater source protection zone 1 or 2</p>
5	<p>To mitigate and adapt to the impacts of climate change</p> <p><i>Applicable to all site options</i></p>	<p>Site presents opportunities for enhancement of GI network.</p> <p>Site will be required to contribute towards increased tree cover</p> <p>Site too small to accommodate green infrastructure enhancements on site.</p>
6	<p>To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.</p> <p><i>Applicable to all site options</i></p>	<p>Site is located entirely within Flood Zone 1 and / or Surface water flooding 1000 years</p> <p>Some of the site is in Flood Zones 2 or 3 (up to 50%) and / or Surface water flooding 100 years</p> <p>Most of the site is in Flood Zones 2 or 3 (more than 50%) and / or surface water flooding 30 years</p>
7	<p>To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.</p> <p><i>Applicable to all site options</i></p>	<p>Site will lead to enhancement of a derelict site.</p> <p>Site is within a landscape character area considered to have a low landscape sensitivity</p> <p>Site is within a landscape character area considered to have a low -medium or medium landscape sensitivity</p> <p>Within 400m of a prominent ridgeline</p> <p>Site is within a landscape character area considered to have a medium-high or high landscape sensitivity</p>
8	<p>To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment.</p>	<p>Site includes heritage assets in need of repair/occupation/enhancement. Development has potential to incorporate such assets into the development.</p> <p>Site more than 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological interest site</p> <p>Site in urban area more than 50m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.</p>

		<p>Urban site within 50m of listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains</p> <p>Site in open setting within 200m from listed buildings, conservation area, scheduled monument, registered park/garden, archaeological remains.</p> <p>Urban site containing heritage assets which are likely to be damaged or lost.</p> <p>Site within an open setting within 50m of heritage assets.</p>
	<i>Applicable to all site options</i>	
9	Ensure access to and protection and enhancement of high quality public open space and natural greenspace.	<p>400m from public open space or natural greenspace of at least 1ha in size</p> <p>1200m from public open space or natural greenspace of at least 1ha in size</p> <p>More than 1200m from public open space or natural greenspace of at least 1ha in size</p> <p>Severance of PROW</p>
10	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources.	No criteria established. Any development has the potential to be designed and constructed to a high quality, including energy efficiency and the use of low carbon technologies. Sites cannot therefore be distinguished on this basis. The potential for district heating networks may be higher for sites in close proximity to anchor heat loads and a heat demanding land uses (e.g. leisure facilities, residential, educational facilities). However, there are no specific opportunities identified.
11	To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered	No criteria established. Not appropriate as all development has the potential to generate waste, as well as employ efficient management techniques. Recycling of buildings could be perceived as waste minimisation, but this would require an understanding of whether buildings on site were likely to be reused or demolished (which actually would create inert waste requiring disposal).
12	To improve health and reduce health inequalities.	<p><u>Access to healthcare</u></p> <p>Within 10 minutes journey (<800m walking, cycling <1.6km, public transport 2km) of a GP or health centre</p> <p>Within 15 minutes journey (Walking 800m-1200m, Cycling 1.6km - 2.5km, public transport, 2km - 3.5km) from a GP or health centre</p>

		<p>Within 20 minutes journey (Cycling 2.5km-3.2km, public transport 3.5km-4.6km) from a GP or health centre</p> <p>Over 20 mins journey (cycling 3.2km, public transport 4.6km).</p> <p><u>Leisure facilities (Allotments, Children's play areas, cycle routes, parks and gardens)</u></p> <p>Within 1200m of more than 3 facilities Within 1200m of 2 facilities within 1200m of 1 facility No facilities within 1200m</p>
13	<p>To improve the education and skills levels of the population overall</p> <p><i>Applicable to housing sites</i></p>	<p><u>Primary</u></p> <p>Site would support new primary education facilities (over 500 dwellings) Within good walking distance (400m) of a primary school with spare capacity or with space for expansion through developer contributions. 400m-1200m from a primary school with spare capacity or with space for expansion through developer contributions. No primary school within 1200m with adequate spare capacity and no space for expansion on site. Site below 500 dwellings not considered sufficient to support new facilities.</p> <p><u>Secondary</u></p> <p>Site is within 1200m of a secondary school Site is within 5km of a secondary school. Site is more than 5km from a secondary school</p>
14	<p>To ensure local residents have access to employment opportunities.</p>	<p>Less than 1.2km from a key employment site 1.21km - 5km from a key employment site More than 5km from a key employment site</p>

15	<p>To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.</p> <p><i>Applicable to all site options</i></p>	<p>Employment site less than 1km from a Motorway/A580 Junction or offices/retail within town centre or existing successful business retail/ park</p> <p>Employment site more than 1km from Motorway/A580 or office/retail uses outside of a town centre or established successful business/retail park</p> <p>Housing site on land not suitable/attractive for employment.</p> <p>Housing site on land suitable for employment (*not mixed use).</p> <p>Housing site on high quality employment land</p>
16	<p>To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough.</p> <p><i>Applicable to housing sites</i></p>	<p>The site (or a considerable part) is considered to be available and/or achievable in the first 5 years.</p> <p>The site is considered to be potentially available and/or potentially achievable over the plan period</p> <p>The site has potential deliverability issues.</p> <p>Site is critically constrained by infrastructure (i.e. within Shell pipeline buffer zone)</p>
17	<p>To reduce poverty and social exclusion.</p> <p><i>Applicable to employment / retail</i></p>	<p>Employment generating development within 1km of areas within the top 20% most deprived in the UK</p> <p>No areas within the top 20% deprived in the UK within 1km</p>
18	<p>To reduce crime, disorder and the fear of crime.</p>	<i>No criteria established.</i>
19	<p>To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.</p> <p><i>Applicable to all site options</i></p>	<p><400m from a bus stop or train station with 2/3 or more services per hour</p> <p><800m from a bus stop or train station with 4 or more services per hour</p> <p><400m from a bus stop or train station with 1 service per hour</p> <p><800m from a bus stop or train station with 2/3 services per hour</p> <p>800-1200m from a bus stop or train station with more than 4 services per hour</p> <p>800-1200m from a bus stop or train station with 2/3 services per hour</p> <p><800m from a bus stop or train station with 1 service per hour</p> <p>>1200m from a bus or train station</p>
20	<p>To improve access to and use of basic goods, services and amenities in town and local centres.</p> <p><i>Applicable to housing sites</i></p>	<p>Within 400m walking distance to convenience store or supermarket</p> <p>Within 800m walking distance to a convenience store or supermarket</p> <p>800m-1200m walking distance to a convenience store or supermarket</p> <p>More than 1200m walking distance to a convenience store or supermarket</p>

APPENDIX C: APPRAISAL OF STRATEGIC ALTERNATIVES

This appendix presents an appraisal of the reasonable alternatives against the SA Framework (Presented as eleven SA topics). Effects have been identified taking into account a range of characteristics including: *magnitude, duration, frequency, and likelihood*. Combined, these factors have helped to identify the **significance of effects**, and whether these are positive or negative.

To give the appraisal a clear structure but avoid repetition and duplication, the findings are presented in a summary table for each SA Topic.

A score is given to reflect the significance of effects as follows:

✓✓✓	Likely to have a major significant positive effect .
✓✓	Likely to have a significant positive effect .
✓	Likely to have a minor positive effect .
-	Likely to have a negligible effect .
✓ / ✗	Likely to have a mixture of positive and negative effects
✗	Likely to have a minor negative effect
✗✗	Likely to have a significant negative effect
✗✗✗	Likely to have a significant negative effect
?	It is uncertain what effect the alternatives would have

SA Topic 1. Biodiversity and geodiversity

A. Meet OAHN needs (470dpa)		B. 20% buffer for flexibility (570 dpa)		C. Buffer for flexibility and with additional contingency (712 dpa)	
A1. Proportionate growth	-	B1. Proportionate growth	-	C1. Balanced growth	✗ ✓?
A2. Balanced growth	-	B2. Balanced growth	-	C2. Focus on South east and new settlement	✗ ✓?
A3. Focus on South east	-	B3. Focus on South east	?		
A4. Focus on new settlement	✓?	B4. Focus on new settlement	✓?		

Discussion of effects

There are no European sites within the plan area; however, there are three within 6kms including Mersey Estuary SPA and Ramsar (approx 5km away) and Manchester Mosses SAC (approx 5.5 km away). There is one SSSI (Stanley Bank Meadows) within the plan area and a number of Ancient Woodlands.

There is unlikely to be any significant differences between the options under alternative A in terms of potential effects on internationally or nationally designated biodiversity. Option A1 could potentially result in more development within and around settlements to the north of the A580. Stanley Bank Meadows SSSI and a number of Ancient Woodlands are situated close to the A580 to the east and south east of Moss Bank. If development avoids the designated areas themselves then it is unlikely that there would be any significant negative effects. Option A3 could result in a higher level of growth within and around Blackbrook and Haydock as well as Earlestown and Newton-le-Willows. There are two Ancient Woodlands in this area and as for Option A1 above; if development avoids the designated areas themselves then there should not be any significant negative effects.

Locally designated wildlife sites are spread across the plan area. Depending on where development is focussed this will determine the designated sites that are more likely to be affected. Option A1 would increase the potential for negative effects on locally designated wildlife sites north of the A580 and around Sutton as well as Rainhill. Whereas Option A3 would increase the potential for negative effects on local wildlife sites within and around settlements in the south east and the south. If development avoids the loss of these sites then it is considered that there is suitable mitigation available to ensure that there will not be any significant negative effects. At the level of growth proposed under growth scenario B, it is considered likely that effects could be avoided, mitigated and compensated for if necessary.

While Options A4, B4 could result in the loss of a local wildlife site it would also help to reduce the likelihood for and significance of negative effects on local wildlife sites in other areas. As above, development could avoid the designated wildlife site and it is considered that there are suitable mitigation measures available to ensure that there would not be any significant negative effects. Furthermore, the strategic nature of a new settlement ought to allow enhancement of the green infrastructure and make links to the Bold Forest.

The distribution of growth for the options under growth scenario B is the same as for the options under scenario A (meet OAHN needs); however, there is an increased level of development proposed and therefore more sites required under Scenario B. The higher the level of growth the greater the likelihood for and potential significance of negative effects on biodiversity. This is primarily as a result of habitat loss and fragmentation, increased disturbance and increased atmospheric pollution. Ultimately, the nature and significance of effects will be dependent on the precise location of development. There is potential for a residual neutral effect for Options B1 to B4 with an element of uncertainty to reflect the increased level of growth.

Options C1 and C2 under alternative C propose a significantly higher quantum of growth compared to the options under alternatives A and B. Taking this into account it is considered that there is a greater likelihood for a residual negative effect compared to options under alternatives A and B.

As the proposed quantum of growth increases so does the potential likelihood for and significance of negative effects on biodiversity and geodiversity. While there are no significant differences between the options in terms of their potential effect on internally and nationally designated biodiversity as a result of distribution the increased level of growth proposed through Options C presents the potential for more negative effects on locally important wildlife habitats and networks. Consequently, a minor negative effect is predicted for C1 and C2.

Uncertain positive effects are predicted for those alternatives that involve the Bold garden village. This reflects the increased potential to secure strategic improvements to green infrastructure and strengthen the existing network whilst making links to the Bold Forest.

SA Topic2: Land Quality

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	✗✓	B1. Proportionate growth	✗✓	C1. Balanced growth and new settlement	✗✗✓
A2. Balanced growth	✗✓	B2. Balanced growth	✗✓	C2. Focus on South east and new settlement	✗✓
A3. Focus on South east	✗✓	B3. Focus on South east	✗✓		
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓		

Discussion of effects

Each alternative proposes the use of brownfield land where possible, and more intensive use of sites in the urban area where appropriate. This will help to encourage brownfield land use and regeneration (which might involve derelict or contaminated land). Further development would also need to be in accordance with these general principles. Consequently minor **positive effects** are predicted for each alternative.

However, to meet identified housing needs, the plan also proposes to release Green Belt land through a series of housing and employment land allocations. This land is predominantly agricultural or open green space, and its loss could have negative effects upon soil (namely through the loss of agricultural land).

For all options, employment land allocation would involve the loss of agricultural land. The four largest employment sites within the Borough (Parkside West, Parkside East, Land North East of Junction 23 M6, and Florida Farm North) are all located within ALC Grade 3 to the north east of the borough.

Land to the north east of the Borough is mapped as being of ALC Grade 1 and 2, and therefore of a particularly high quality. Rainford, and the north-eastern side of Billinge, are surrounded by land of this high quality.

The loss of agricultural land would be inevitable under alternatives A1, A2, A3, and to a lesser extent for A4 (which largely involves development on land not classed as best and most versatile).

The loss of agricultural land represents a negative effect on land quality, and is likely to be more prominent for growth scenarios B and C (in particular), which would require the delivery of a greater number of green Belt sites (therefore it would be harder to avoid the most sensitive areas). Significant effects are predicted for both C1 as there would be a requirement to release substantial amount of agricultural land of best and most versatile quality. The effects are negative for C2 but are offset somewhat by the development of a new settlement on land with no agricultural value.

On balance, A4 and B4 perform the most favourably with regards to land quality.

SA Topic 3: Traffic, congestion and air quality

A. Meet OAHN needs		B. 20% buffer for flexibility		C. Buffer for flexibility and with additional contingency	
A1. Proportionate growth	-	B1. Proportionate growth	✗	C1. Balanced growth and new settlement	✓✗
A2. Balanced growth	-	B2. Balanced growth	✗?	C2. Focus on South east and new settlement	✓ ✗✗
A3. Focus on South east	✓✗	B3. Focus on South east	✓✗		
A4. Focus on new settlement	✓?	B4. Focus on new settlement	✓		

Discussion of effects

Under alternatives A1 and A2, growth is likely to have a **neutral effect** upon traffic and congestion and air quality. These alternatives spread growth more across the Borough, which would put less strain on the network in any one location. However, given that the major employment opportunities are along key transport routes (M6/A580/M62), the length of trips might be expected to increase from settlements to the north and west travelling south and east. This could have minor negative effects on congestion in some parts of the Borough, but these are uncertain effects.

Alternatives A3 and A4 would have mixed effects. Whilst these alternatives would possibly reduce the length and number of trips by car, the concentration of growth into these locations could lead to increased congestion along key routes in these areas, having potential negative effects on air quality. For A4, it is likely that strategic infrastructure improvements could be secured to support increased growth, so the effects would be less likely to be negative.

At a higher rate of growth (Scenario B) the number of car trips would be likely to be greater (than scenario A). The distribution of growth would influence the effects upon traffic, congestion and air quality. A proportionate/dispersed approach would be less likely to put undue pressure on any particular route, but some development would be less well related to strategic employment opportunities along transport hubs. This is reflected by a **minor negative effect**. A balanced approach (B2) would have similar effects, though a greater proportion of growth would be directed toward the areas of economic growth, which would reduce the need for trips slightly. A **minor negative effect** may still occur, but this is less certain than for B1.

Alternative B3 would focus more development into areas of employment growth, which ought to reduce the need to travel and the length of trips locally. However, such an increase in development in a short space of time (relatively speaking) in this location could be a strain on the transport network in this area, potentially having **negative effects** on air quality and levels of congestion. Alternative B4 is predicted to have a **minor positive effect** as it creates a new community that is well linked to employment opportunities. Given the strategic nature of the site, it is considered that infrastructure improvements could be more likely to be secured before in a timely manner. A **minor positive effect** is predicted.

Similar to alternative B3; alternatives C1 and C2 would locate new housing growth close to major employment opportunities, helping to reduce the length and number of trips generated. However, the much higher scale of growth could be difficult to accommodate, especially where it is focused towards the south east and a new settlement (C2). This could lead to congestion and air quality impacts, which is a **significant negative effect** for C2 and a **minor negative effect** for C1 (As growth is distributed more proportionately than C2).

In the long term, each alternative would generate benefits with regards to reduced emissions from freight. However, these are effects that would be noted on a regional scale rather than in St Helens (as the overall level of emissions may not decrease in St Helens itself which is the source of economic growth).

SA Topic 4: Natural resources

A. Meet OAHN needs		B. 20% buffer for flexibility		C. Buffer for flexibility with additional contingency	
A1. Proportionate growth	-	B1. Proportionate growth	✓	C1. Balanced growth and new settlement	✗✓
A2. Balanced growth	-	B2. Balanced growth	✓	C2. Focus on South east and new settlement	✗✓
A3. Focus on South east	-	B3. Focus on South east	✓		
A4. Focus on new settlement	-	B4. Focus on new settlement	-		

Discussion of effects

Development produces waste regardless of location during construction and also operation. Therefore, each distribution option is predicted to have similar effects. Higher growth however, is likely to lead to greater waste generation. The level of waste generated under Scenario A would be unlikely to be different from the projected baseline, which is based upon a level of growth in keeping with population projections. Scenario B would see a slight increase in waste generated, but this is not considered to be significant. However, scenario C is predicted to have minor negative effects reflecting the substantially higher housing targets involved. With regards to recycling, and the efficiency of waste collection rounds, no option is predicted to be more beneficial than another. Access to recycling facilities is widespread across the borough including at Kerbside and also at recycling points. Existing waste collection regimes span the entire borough, and are routine in urban areas. Therefore, growth in any one area could be planned into new routes relatively easily. A more dispersed / rural approach would create longer and less efficient waste collection regimes, but each of the options focuses on key settlements to one degree or another, which avoids such issues.

With regards to water quality, the effects are uncertain. On one hand, increased development could present the opportunity for impacts during construction, and also a wider issue of pollutants being concentrated in water due to decreased permeability. Conversely, much of the borough lies within a nitrates vulnerable zone which is related to dispersed pollution from agricultural practices. Therefore development that changes such land uses (designed sensitively) could help to reduce the run off of pollutants from agricultural practices. In this respect, the higher growth scenarios would be more favourable. The broad distribution of development is less of an influential factor than overall growth; though this of course depends upon the exact sites that are developed (i.e. some are non-agricultural greenfield land). At a broad level, options A1 and A2 are more likely to involve agricultural land, whilst A4 is less likely given that the new settlement at Bold is no- agricultural.

Overall, alternatives A1-A4 are predicted to have neutral effects on waste and water. Alternatives B1-B3 are recorded as having minor positive effects (uncertain) to reflect the potential to reduce diffuse pollution from agricultural practices. B4 is predicted to have neutral effects as the bulk of development would be on non-agricultural land. Alternatives C1 and C2 would have potentially positive effects upon water quality, but minor negative effects on waste.

SA Topic 5: Climate change and energy

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	-	B1. Proportionate growth	✗	C1. Balanced growth and new settlement	✗✗ ✓?
A2. Balanced growth	-	B2. Balanced growth	✗	C2. Focus on South east and new settlement	✗✗ ✓?
A3. Focus on South east	-	B3. Focus on South east	✗		
A4. Focus on new settlement	- ✓?	B4. Focus on new settlement	✗ ✓?		

Discussion of effects

Development will generate emissions regardless of location as a result of construction and accommodation of buildings. In this respect, the lower growth scenario A is predicted to have a neutral effect. In the absence of the Plan, this level of growth would be likely to occur anyway. Scenario B would lead to a slight increase in the level of growth that would be anticipated to occur in the absence of the plan. Therefore there would be an associated increase in emissions from new development. This is recorded as a minor negative effect for each alternative under scenario B. At a higher level of growth, the effects could be expected to be more prominent, and thus a significant negative effect is predicted with regards to an increase in carbon emissions.

With regards to the resilience of the Borough to the effects of climate change (e.g. hotter, drier summers, more extreme weather events) the location of development is not likely to be a major influential factor.

Each option will involve growth in the St Helens urban area, but the contribution to an urban heating effect is not considered likely to occur given the need to design developments effectively and the Council's commitment to improved green infrastructure networks.

Each alternative would also involve the development of a SRFI, which in the long term would help to reduce emissions from freight transport. This would help to offset the negative effects associated with the higher growth alternatives.

Each distribution alternative would locate growth in areas that are broadly accessible, and therefore an increase in emissions from transport is unlikely to be significantly different between the different distributions. Distribution options 3 and 4 are perhaps better located in relation to access to services and jobs and could therefore be expected to have a slightly lesser effect in terms of vehicle emissions compared to a proportionate approach.

Opportunities to deliver low carbon energy schemes as part of strategic development are considered to be more likely where there is a concentration of development, or existing demand for such energy (for example, demand for heat and anchor loads). A dispersed approach is the least likely to lead to such opportunities, but this would depend upon the use and mix of development sites. The development of a new settlement could perhaps provide better opportunities to secure strategic infrastructure for distributed energy, as it would be located close to an industrial estate, and a mixed use development would typically offer a more varied demand for energy. At this stage, effects are uncertain though.

SA Topic 6: Flooding

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	-	B1. Proportionate growth	✗ ?	C1. Balanced growth and new settlement	✗
A2. Balanced growth	-	B2. Balanced growth	-	C2. Focus on south east and new settlement	✗
A3. Focus on South east	-	B3. Focus on South east	-		
A4. Focus on new settlement	-	B4. Focus on new settlement	-		

Discussion of effects

For each alternative, the employment sites are broadly within areas that are not at risk of flooding. Their development should therefore not create a flood risk on those sites, whilst management of downstream flooding ought to be possible through the application of plan policies on water management.

Alternative A4 is predicted to have a **positive effect** on the baseline position for flooding, as a new settlement located in Bold would not fall within areas at risk of river flooding. The strategic nature of the site should also allow for enhancement of green infrastructure which could incorporate sustainable drainage systems. There would be a much lesser need for further development in the rest of the Borough to meet needs under this scenario, and therefore flood risk elsewhere would be unlikely to change as the sequential test would allow for suitable sites to be identified more easily. At a higher rate of growth under growth scenario B4, the need for additional sites to the 'new settlement' would be increased, but it should still be feasible to identify suitable sites that are not at risk of flooding. **Neutral effects** are predicted to reflect the need to develop further land and a possible increase in surface water run-off. Under growth scenarios C1 and C2 there would be a need to release substantial amounts of land in addition to the new settlement, which would increase the possibility that land in proximity to flood risk would be developed. The increased quantum of growth overall would also increase the possibility of flooding should there be an overall decrease in permeable land. Consequently, a **negative effect** is predicted for C1 and C2.

Focusing growth to the south east of the borough (scenarios A3, B3) is predicted to have a **neutral effect** upon flooding as there is sufficient land available in these areas to accommodate development without the necessity to encroach into areas at risk of flooding. Therefore, provided that development is designed to ensure no net increase in run off or impermeable land, then the effects on the baseline position ought to be negligible.

A proportionate approach to growth under scenario A1 would allow for suitable sites to be developed without the need to encroach onto areas at risk of flooding. For B2, there may be an increased potential for flood risk given that some land available around settlements (such as Ecclestone and Rainhill) is intersected by watercourses. Therefore an uncertain negative effect is predicted for B2.

The spread of development under alternatives A2 and B2 (balanced growth) is fairly proportionate, but directs higher or lower levels of growth to some settlements dependent upon constraints and opportunities. The effects are therefore predicted to be neutral.

SA Topic 7: Landscape

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 25% buffer for flexibility and with additional contingency	
A1. Proportionate growth	✗	B1. Proportionate growth	✗✗	C1. Balanced growth and new settlement	✓✗✗✗
A2. Balanced growth	-	B2. Balanced growth	✗	C2. Focus on south east and new settlement	✓✗✗
A3. Focus on South east	-	B3. Focus on South east	✗		
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓✗		

Discussion of effects

A proportionate approach to growth would lead to development across the borough, and would require the release of Green Belt land in increasing quantities from A1 to C1. The borough has landscapes that are sensitive to development and / or more prominent. Development in such areas would lead to a detrimental effect upon landscape character. In particular, there are areas of high landscape sensitivity.

In broad terms, the north of the Borough contains a higher amount of sensitive landscape and several prominent ridgelines. A proportionate approach to development would see more growth in these areas compared to the balanced approach, which is more likely to lead to a **negative effect** on landscape character. Under A1, the level of growth would be fairly modest, and so only a minor negative effect is predicted. However, at the higher level of growth under B1, the necessity to increase further land in a proportionate manner could see some of the more sensitive parts of the Borough developed, which constitutes a significant effect. Under scenario C1, the effects would be further exacerbated, leading to a **major significant negative effect**.

A balanced approach to growth would allow for development to be spread fairly proportionally, but sensitive sites avoided if necessary. Whilst it would still be difficult to avoid negative effects in the more sensitive areas such as Ecclestone, Billinge, Garswood and Rainford (as an element of development would still be involved across the district under this approach), a balanced approach would give greater scope for locating increased development to the less sensitive areas such as parts of Haydock and Bold. The effects of A2 are predicted to be **neutral** given the greater flexibility to avoid sensitive areas at this level of growth. However, under a higher level of growth B2, **negative effects** would be likely to occur.

Focusing growth towards the south east of the borough would help to avoid sensitive landscapes to the north and east. At a lower scale of growth, there would be greater scope for avoiding the more sensitive areas within the south/south east, and therefore a neutral effect is predicted for A3. However, under B3, the higher rate of growth in these areas such as Haydock, Newton le willows and Earlestown would make it more likely that the sensitive landscape in these areas could need to be developed. Therefore, a minor negative effect is predicted for B3.

Focusing a large element of growth to a new settlement at Bold would be beneficial with regards to landscape, as much of this area is classified as low quality / sensitivity. Therefore, the potential for enhancements to the landscape present themselves. This is a **positive effect** at any growth scenario. For alternative D2, there would be a greater need for land in addition to the new settlement to meet higher needs. However, the level of growth required should leave some flexibility in the choice of sites, thereby avoiding significant negative effects. Nevertheless, the potential for negative effects in other parts of the borough still exist.

Options C1 and C2 both involve high levels of growth and part of this would be delivered at the new settlement in Bold, generating positive effects. However, the need for substantially higher levels of growth would lead to negative effects. For C1, there would be a need to release further land in a more dispersed pattern of growth, which could have a **major negative effect**. For C2, there would be focus on more sites in the south east some of which fall into areas of medium-high sensitivity. Consequently, a **significant negative effect** is predicted.

SA Topic 8: Built and natural environment

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	-	B1. Proportionate growth	xx	C1. Balanced growth and new settlement	xx
A2. Balanced growth	-	B2. Balanced growth	x	C2. Focus on south east and new settlement	xxx
A3. Focus on South east	-	B3. Focus on South east	xx		
A4. Focus on new settlement	-	B4. Focus on new settlement	-		

Discussion of effects

Each alternative will involve an element of brownfield land regeneration within the St Helens town centre and urban area. This presents the potential for effects upon heritage assets and their settings. It is difficult to accurately assess the effects of development in the urban area without knowing the precise locations, design and layout. Development on brownfield land could offer opportunities to enhance the setting of heritage assets as well as bringing vacant buildings back into use. Conversely, insensitive development could affect the setting of heritage assets. Provided that design policies are used effectively, it is considered unlikely that there would be significant adverse effects to the historic environment in the urban area. At this stage, neutral effects are predicted, but there is uncertainty.

The loss of Green Belt land associated with development has the potential to affect the setting of heritage assets on the edge of settlements. It is difficult to predict effects accurately without identifying specific sites and development uses. However, some broad implications can be identified for each of the strategic alternatives.

At a lower level of growth (A1-A4), there would still be a necessity to release land from the Green Belt, but it ought to be possible to avoid sensitive areas. For A1 and A2, development would be dispersed across the borough. This should help to ensure that effects on the character of settlements are not too profound in any one location. There would also be a greater choice of sites to choose from, which should allow for sensitive areas to be avoided if necessary.

A3 would focus a greater amount of development to Haydock / Newton le Willows and Earlestown. At this level of growth though it should be possible to avoid sensitive areas such as the Newton le Willows Conservation Area. A4 would direct most growth to a new garden village at Bold. There are no heritage assets directly on the site, nor should the setting of any nearby assets be affected given they are separated from the site by industrial land and / or woodland.

At a higher level of growth under scenario B, a proportionate approach could mean that more sensitive sites across the borough needed to be developed. This could be an issue in areas containing a number of heritage assets and / or bordering Conservation Areas such as Rainhill, Rainford and Earlestown. Consequently, a significant negative effect is predicted for B1. Alternative B2 would have a similar effect to B1, though greater emphasis is placed on settlements such as Bold and Haydock/Newton le willows, which (at this level of growth) are less likely to suffer from adverse effects. Consequently, B2 is predicted to have a **minor negative effect**. Alternative B3 would place more growth into the south east, which at this level of growth would be more likely to necessitate the release of land around the settlements or adjacent to a conservation areas. Consequently, a significant negative effect is predicted. Alternative B4 is predicted to have a **neutral effect**, as the majority of growth would still occur at a garden village that is not particularly sensitive in its current form. The additional growth required elsewhere in the borough would be at a level that ought to allow for sensitive areas to be avoided.

At higher levels of growth under C1 and C2 the potential for adverse effects upon the setting of heritage assets is increased, as there would potentially be a need to release land in sensitive locations across the borough (C1), or at a very high level in the south east (C2) which would be likely to more profoundly affect the character of Newton le Willows, Earlestown and Haydock.

SA Topic 9: Health and wellbeing

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	✓	B1. Proportionate growth	✓✓	C1. Balanced growth and new settlement	✓✓✓ ✗
A2. Balanced growth	✓	B2. Balanced growth	✓✓✓	C2. Focus on south east and new settlement	✓✓✓ ✗✗
A3. Focus on South east	✓✓ ✗	B3. Focus on South east	✓✓✓ ✗		
A4. Focus on new settlement	✓✓ ✗	B4. Focus on new settlement	✓✓✓ ✗		

Discussion of effects

Each alternative is predicted to have positive effects on health and wellbeing through the delivery of housing to meet the Borough's needs. A large proportion of housing would be delivered in the St Helens urban area which is where levels of deprivation and inequality are highest. . The effects are more prominent for growth scenarios B and C which would allow for greater flexibility and choice, and would offer greater potential for delivery more affordable homes.

Though housing needs have not been identified on a settlement by settlement basis, the distribution of growth in a proportionate way would be more likely to meet needs locally across the borough.

Conversely, whilst a focus on the south east or a new settlement would focus a large amount of growth into one part of the borough, these are locations that are close to deprived communities. Increased employment and housing opportunities in these areas should therefore have a positive effect upon areas of greatest need. This approach however, would be less likely to support the needs of each settlement and could be a barrier to individuals that wish to settle or remain in those locations (where there are concealed households for example). A large increase in development in any one area could also put a pressure on social and physical infrastructure in the short and medium term, which might affect access to services for communities, and affect neighbourhood amenity.

A balanced approach to distribution ought to help support needs for the key settlements across the borough but also to add a more targeted approach to those areas where levels of deprivation are higher (such as Bold, and parts of Haydock / Newton le Willows / Earlestown. Therefore, this approach is predicted to be the most beneficial overall.

Alternatives A1 and A2 are predicted to have minor positive effects upon health as they would deliver housing at a level of need that ought to support organic population growth. A3 and A4 are also predicted to have positive effects and these could be significant for those communities where growth is targeted. However, there would be potential for negative effects on health and wellbeing in the short term for reasons discussed above.

At a higher level of growth, the alternatives B1 and B2 are predicted to have **significant positive effects**, as they would help to deliver a greater amount of growth both across the district and in specific areas of need. A major positive effect is predicted for options B2, B3 and B4 as they would locate growth in areas of need as well as across the district. However, for alternatives B3 and B4 which would place substantial development into particular locations could put pressure on services, an affect amenity. Therefore a **minor negative effect** is also predicted.

Alternatives C1 and C2 would also have significant positive effects as they would both support housing growth and employment across the district and in areas of most need. However, the scale of growth involved could be more likely to put pressure on infrastructure and create amenity issues.

SA Topic 10: Economy and employment

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	✓	B1. Proportionate growth	✓✓	C1. Balanced growth and new settlement	✓✓✓
A2. Balanced growth	✓	B2. Balanced growth	✓✓	C2. Focus on south east and new settlement	✓✓✓ ✗
A3. Focus on South east	✓	B3. Focus on South east	✓✓ ✗		
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓✓ ✗		

Discussion of effects

The level of employment land has been determined by an assessment of needs, and with uplift to reflect the Plan's aspirations for economic growth. A positive effect would be achieved for each alternative reflecting this development. However, the effects for each alternative under growth scenario A are only predicted to be minor, as the level of housing growth proposed does not leave much flexibility to help support higher levels of economic activity that the Plan is seeking to facilitate.

At higher levels of housing growth (Scenarios B and C), there would be greater opportunities for jobs in construction, which is recorded as a **significant positive effect** for alternatives B1-B4 and C1-C2.

The distribution of development would influence the effects upon the economy in the following ways:

- A proportionate approach to growth would be more supportive of the local economies and the vitality of key settlements. This is recorded as a **positive effect** for alternatives B1 and B2.
- A focus on a new settlement would generate a new community with accompanying infrastructure. This could benefit some nearby communities, but generally, this approach would not spread the benefits of growth across the Borough and wouldn't support the vitality of some key settlements such as Rainford and Billinge. This is recorded as a **minor negative effect** for B3 and B4.
- A focus on the south east would have **significant positive effects** in terms of linking housing to the majority of strategic employment opportunities. There would also be knock on benefits for the local economies of Haydock, Earlestown and Newton le Willows. However, as per option B4, some settlements in the Borough may suffer from a lack of growth and investment.

The high levels of growth under Scenario 3 are predicted to be significantly positive, especially as both alternatives would also involve substantial housing growth in areas of employment growth. Alternative C1 is predicted to have major significant positive effects, as it would drive growth in the borough, support key employment locations with adequate housing and would still disperse an element of growth to key settlements throughout the borough, helping to support local economies. Alternative C2 would also generate **major significant positive effects** through high levels of growth. However, the spread of development would not support some key settlements to the north and west of the borough, which is recorded as a **minor negative effect**.

SA Topic 11: Housing

A. Meet OAHN needs		B. 20% buffer for flexibility		C. 60% buffer for flexibility and with additional contingency	
A1. Proportionate growth	✓	B1. Proportionate growth	✓✓	C1. Balanced growth and new settlement	✓✓✓
A2. Balanced growth	✓	B2. Balanced growth	✓✓	C2. Focus on south east and new settlement	✓✓
A3. Focus on South east	✓	B3. Focus on South east	✓		
A4. Focus on new settlement	✓	B4. Focus on new settlement	✓		

Discussion of effects

All of the options will meet the identified objectively assessed housing need for the borough with long-term positive effects. The significance of this positive effect increases as the proposed quantum of development increases.

Options A1, A2, B1, B2 and C1 are more likely to meet the housing needs for communities across the plan area as they would result in a more proportionate and balanced distribution of development across the borough compared to the other options.

Options A3, A4, B3, B4 and C2 would focus the majority of development within the east and south of the borough, which is less likely to help meet the housing needs of communities in the north and west.

Focus on development in at a new settlement (A4, B4, C1, C2) could also rely too heavily on the deliverability of one large site, which may require careful phasing and supporting infrastructure. Therefore, positive effects may be less likely to occur in the short term.

Summary of appraisal findings

	Biodiversity	Land quality	Traffic & air quality	Natural resources	Climate change	Flooding	Landscape	Heritage	Health & wellbeing	Economy	Housing
Meet OAHN needs (451 dpa)											
A1. Proportionate growth	-	✓ ✗	-	-	-	-	✗	-	✓	✓	✓
A2. Balanced growth	-	✓ ✗	-	-	-	-	-	-	✓	✓	✓
A3. Focus on South east	-	✓ ✗	✓ ✗	-	-	-	-	-	✓✓ ✗	✓	✓
A4. Focus on new settlement	✓?	✓	✓?	-	✓?	-	✓	-	✓✓ ✗	✓	✓
B. 20% buffer for flexibility (570 dpa)											
B1. Proportionate growth	-	✗✓	✗	✓	✗	✗?	✗✗	✗✗	✓✓	✓✓	✓✓
B2. Balanced growth	-	✗✓	✗?	✓	✗	-	✗	✗	✓✓✓	✓✓	✓✓
B3. Focus on South east	?	✗✓	✓ ✗	✓	✗	-	✗	✗✗	✓✓✓ ✗	✓✓ ✗	✓
B4. Focus on new settlement	✓?	✓	✓	-	✓? ✗	-	✓ ✗	-	✓✓✓ ✗	✓✓✓ ✗	✓
C. 25% above option B (712 dpa)											
C1. Balanced growth and new settlement	✓? ✗	✓ ✗✗	✓ ✗	✓ ✗	✓? ✗✗	✗	✓ ✗✗✗	✗✗	✓✓✓ ✗	✓✓✓	✓✓✓
C2. Focus on south east and new settlement	✓? ✗	✗✓	✓ ✗✗	✓ ✗	✓? ✗✗	✗	✓ ✗✗	✗✗✗	✓✓✓ ✗	✓✓✓ ✗	✓✓

Discussion of alternatives appraisal

Overall, the lower growth scenarios A1-B4 would have the fewest significant effects. Whilst this might be favourable from an environmental perspective, these scenarios would not take advantage of opportunities for economic growth and social development.

At the preferred level of growth (570 dpa), the positive effects for each distribution alternative (B1-B4) are broadly greater than for A1-B4. This higher level of growth would therefore be more attractive in terms of tackling deprivation and boosting economic growth which is a key aim of the Plan. However, at this level of growth the potential for negative effects on environmental factors increases, mainly related to increased pressure on landscapes and the character of the built and natural environment.

In terms of distribution, alternatives A1 and A2 spread the benefits of development more evenly, and so are also less likely to have significant negative effects in any one area. This contrasts with alternatives B3 and B4, which would have major positive effects on housing and would benefit some communities greatly, but would increase the potential for localised negative effects such as congestion, and not meeting housing needs in some settlements.

The higher growth options C1-C2 would be very positive in terms of driving housing and employment growth. However, this would be at the expense of significant negative effects upon landscape, heritage, agricultural land and air quality. Furthermore, it is uncertain whether infrastructure could cope with this level of development, which could lead to negative effects on the transport networks, water quality and access to services such as health and education.

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