



St. Helens Local Plan Preferred Options Consultation

Ref: LPPO2016

(For official use only)

St. Helens Council **5th December 2016 – 12 noon 30th January 2017**
Comments Form

By completing this form, you are writing to make comments on the 'Preferred Options' of the new St. Helens Local Plan. You can also use this form to make comments on the accompanying Draft Green Belt Review, Sustainability Appraisal, Habitats Regulations Assessment and other supporting evidence documents. All documents are available to view and download on the Council's website:

<https://www.sthelens.gov.uk/localplan>

Please complete Parts 1 and 2 of this form and ensure it is returned to us by **no later than 12 noon on Monday 30th January 2017**. Please note that any comments received after this deadline cannot be accepted. For further guidance in completing this form, please read the accompanying Guidance Note.

Part 1 – Your Contact Details

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

| | Your details | Your agent's details |
|---------------|------------------|----------------------|
| Title | | |
| Name | | |
| Position | Asset Manager | |
| Organisation | Highways England | |
| Address | Piccadilly Gate | |
| | Store Street | |
| Town | Manchester | |
| County | | |
| Postcode | M1 2WD | |
| Telephone | | |
| Email address | | |

Would you like to be updated on future stages of the Local Plan process?

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

| | | | | | |
|---------------|-------------------------------------|---|--------------------------|----|--------------------------|
| Yes, by email | <input checked="" type="checkbox"/> | Yes, by post (I do not have an email address) | <input type="checkbox"/> | No | <input type="checkbox"/> |
|---------------|-------------------------------------|---|--------------------------|----|--------------------------|

Part 2 – Your Comments

The following questions relate to various sections of the Local Plan 'Preferred Options' consultation document available to view and download at: www.sthelens.gov.uk/localplan

Please note, **you do not have to answer every question**; only those that relate to a part of the Plan you are interested in. Please continue on a separate sheet if necessary.

A) Housing and Employment

Q1. Do you agree with the proposed approach to the distribution of development as set out in the Spatial Strategy in Policy LPA02? Please tick one box

Yes

No

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q2. Do you agree with the proposed amount of employment land required in Policy LPA04? Please tick one box

Yes

No

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q3. Do you agree with the proposed number of houses required in Policy LPA05?

Please tick one box

Yes

No

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q4. Do you agree with the proposed release of Green Belt land set out in Policy LPA02?

Please tick one box

Yes

No

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

B) Other Policies and Site Allocations

Q5. Do you have any other comments to make in relation to a particular policy, paragraph or site contained in the Plan? If so, please use the boxes below specifying what your comments relate to.

Policy / Paragraph / Site:

Policy LPA02 – Spatial Strategy

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

While the aspirations of this policy are broadly supported, there are a number of statements that require further evidence to ensure the aspirations can be met.

The policy recognises that a number of site allocations are located away from existing development and likely to have fewer existing opportunities for sustainable and active travel. The policy includes general requirements for development to make best use of land and provide these links, and reference is made to the site-specific requirements of the strategic allocations. These site-specific requirements are currently very high-level, with a lack of detail regarding sustainable and active transport provision.

The policy also focusses on employment uses in close proximity to the Strategic Road Network (SRN), located to take advantage of the enhanced connectivity this offers. Due to a lack of available sites, these are exclusively located within released green belt land, on the periphery of the existing town, and therefore lacking existing opportunities for sustainable and active travel.

In order to reduce the reliance on the SRN, the site specific requirements of the allocated sites should include detailed measures in order to maximise the potential for sustainable and active travel opportunities, including off-site works as required. This is likely to require consideration of adjacent allocated sites and potential phasing requirements as appropriate.

Policy / Paragraph / Site:

Policy LPA03: Development Principles

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

The Local Plan has a consistent overarching theme of ensuring development improves St. Helens for the existing and future population of the town, reducing the need for commuting between neighbouring boroughs for job and housing opportunities. This policy reiterates this commitment, and is supported by Highways England, as ensuring well located, appropriate, and proportional levels of both employment and housing will help to reduce the need to travel on the SRN.

The Strategic Site Allocations currently include high-level site specific requirements. As sites which are removed from the greenbelt, these are less likely to benefit from existing sustainable infrastructure for both people and freight. It is anticipated that as a result of the development of the transport evidence base, more detailed site-specific requirements can be included in the Publication Draft Local Plan in order to ensure the principles of this policy are met.

Policy / Paragraph / Site:

Policy LPA04 - A Strong and Sustainable Economy

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

This policy sets out the Local Plan's employment allocations, and sets out the justification for the focus on freight and logistics.

Due to the lack of appropriate sites in the current St. Helens Core Strategy, the sites allocated for freight and logistical purposes are those sites for release from the green belt, which are predominantly on the periphery of St. Helens and lack existing sustainable and active transport linkages.

The strategy for employment uses presented in Policy LPA04 potentially has significant implications for the SRN, inherently relying on the connectivity the network provides. Once the ongoing supporting transport evidence base and Infrastructure Delivery Plan has been finalised, it is anticipated that the conclusions of this work can be incorporated into the site-specific requirements of the Strategic Site Allocations, thereby limiting the impact on the SRN.

Policy / Paragraph / Site:

Policy LPA04.1 – Strategic Employment Sites

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Of the allocated 12 sites, 6 are of considerable size and are identified as Strategic Employment Sites:

- **EA1:** Omega South Western Extension, Phase 1, Land north of Finches Plantation, Bold – 31.2 ha, B2 & B8 uses;
- **EA2:** Land at Florida Farm North, Slag Lane, Haydock – 35.17 ha, B2 & B8 uses;
- **EA4:** Land north east of Junction M6 J23, south of Haydock Racecourse, Haydock – 42.31 ha, B2 & B8 uses;
- **EA7:** Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock – 20.58 ha, B2 & B8 uses;
- **EA8:** Parkside East, Newton-le-Willows – 64.55 ha; and
- **EA9:** Parkside West, Newton-le-Willows – 79.57 ha, B2 & B8 uses.

Site Allocation EA8 - Parkside East is allocated for the Strategic Rail Freight Interchange, while it is estimate that a further 60ha of land will be required to deliver the necessary infrastructure and landscaping required to deliver this.

While the specific requirements for each site are reviewed in Section **Error! Reference source not found.**, this policy includes overarching requirements for every site. This includes requirements to deliver a masterplan for the site, agreed in writing by the Local Planning Authority, and a robust and implementable Travel Plan for the entire site.

Considering these sites are planned specifically to provide for logistics and freight, and therefore intended to use the SRN, Highways England must be involved at the earliest opportunity in the development of these sites, including masterplanning and scoping for Transport Assessment and Travel Plans.

The Local Plan Preferred Options states that:

*“Financial contributions or the provision of on-site infrastructure may be required towards highways and improving public transport services and facilities; **this will be subject to further assessment before the Publication stage of the Local Plan.**”*

The Infrastructure Delivery Plan accompanying this Local Plan has not yet been released, nor has the transport evidence base supporting the deliverability of the site allocations. Without this information, we are unable to accurately comment on the appropriateness of an allocation or determine the exact infrastructure requirements for each site.

It should be considered of utmost importance that Highways England is involved in the determination of infrastructure requirements for these sites, particular given their intended usage. The sites are likely to have significant cumulative impacts, which should also be considered.

It is therefore also important that the policies in the Publication Draft Local Plan reflect these requirements once determined, and robustly support the need for developers to contribute toward mitigatory measures.

Policy / Paragraph / Site:

Policy LPA05 – Meeting St. Helens’ Housing Needs

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Highways England are mindful that there is a shortfall of approximately 7,000 dwellings between the allocated sites in the Preferred Options Draft Local Plan, and that the SHLAA has been unable to identify the five year supply as required by national planning policy.

The implications of this shortfall are that while the allocations in the Local Plan Preferred Options can be reviewed in the context of the above criteria, there is currently likely to be a need to further review additional sites if, as and when these are identified. Were such sites to come forward in an ad-hoc fashion, the opportunity to identify site-specific and strategic requirements may be missed.

Phasing of development could be crucial in ensuring the deliverability of the Local Plan site allocations, in particular those that are likely to rely on the SRN or on significant new infrastructure.

It is anticipated that the forthcoming transport evidence base will identify site infrastructure requirements, including deliverability and time constraints, which should inform any need for phasing of development.

Highways England's guidance document, *The Strategic Road Network: Planning for the Future (2016)* sets out how Highways England will work collaboratively with local Planning Authorities to ensure all relevant transport impacts and requirements are taken into account, which includes:

- Identify the impact the proposed allocations are likely to have on the SRN on an individual, and insofar as is necessary, a cumulative basis, factoring in the demands arising from development planned in adjacent authorities where appropriate;
- Assess the impact of the SRN on the development potential of sites that are proposed to be allocated; and
- As necessary identify the infrastructure requirements of the proposed allocations, or specific parts (phases) of proposed allocations.

Policy / Paragraph / Site:

Policy LPA04.1 – Strategic Housing Sites

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Highways England should be involved at the earliest possible opportunity in the formulation of the transport evidence base to ensure a robust, appropriate and proportional methodology, and once complete will require a commensurate period of time to review the data and conclusions.

The Infrastructure Delivery Plan and publication draft of this Local Plan should reflect the findings of this evidence base, and include the necessary infrastructure.

Policy / Paragraph / Site:

Policy LPA07 – Transport and Travel

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

This policy sets high level requirements for all development in St. Helens, including a focus on location and on active and sustainable travel. In particular, the policy sets out the need for freight to be located where rail facilities already exist or can be provided. Highways England supports this policy.

However, as discussed in this review, the Strategic Employment Sites are not primarily located to take advantage of sustainable and active transport, and, other than the Parkside site, are not located where freight rail can be provided.

Given significant emphasis is placed on the *Ensuring a Choice of Travel* SPD. This document relies on superseded, withdrawn and abolished guidance, and is no longer considered relevant in certain respects.

The new Local Plan should be considered an opportunity to include new relevant policies to supersede this document where possible.

Policy / Paragraph / Site:

Policy LPA08 – Infrastructure Delivery and Funding

Do you agree with the preferred approach?

Yes

No

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Highways England should be consulted as soon as possible on the potential infrastructure requirements considered for the Infrastructure Delivery Plan where these include the SRN. Furthermore, as this is being developed and intended for adoption alongside the Local Plan, further detail should be included within the specific site allocations, and sites phased accordingly within the Local Plan where this is identified.

C) Draft Green Belt Review

Q6. Do you have any specific comments to make in relation to the Draft Green Belt Review? If yes, please specify below.

Paragraph/Reference:

Comments:

Please type or write your comments here

D) Sustainability Appraisal, Habitat Regulations Assessment and other evidence base documents (including housing and employment)

Q7. Do you have any specific comments to make in relation to the Sustainability Appraisal, the Habitat Regulations Assessment or any other evidence base document such as those relating to housing or employment? If yes, please specify below.

Document:

Paragraph/Reference:

Comments:

Please type or write your comments here

Document:

Paragraph/Reference:

Comments:

Please type or write your comments here

Any Other Comments

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

Policy LPA10 – Development of Strategic Rail Freight Interchange

Supported

Policy LPA10 sets out the site specific requirements for Strategic Site Allocation EA8 – Parkside East SRFI. The site has the potential to generate a significant number of vehicle movements, which may impact on Junction 22 of the M6. Furthermore, the site includes a requirement to provide direct access to the site from the M6 for HGVs. It can be noted that Junction 22 is currently identified for improvements as part of the proposed M6 Smart Motorway Scheme and so any design for direct access to the site would need to pay due cognisance to this proposal.

As discussed in Chapter **Error! Reference source not found.**, the Infrastructure Delivery Plan and transport evidence base for the site allocations is not yet available for review. As this site has the potential for significant impacts on the SRN, and require Highways England's cooperation in regards to a new access point, it is essential that this transport evidence base is reviewed as soon as possible.

Returning This Form

Please return this form and any accompanying extra sheets/maps/plans, etc. by **12:00pm (noon) on Monday 30th January 2017** either via email or by post to ensure your comments are fully considered when preparing the next stage of the Local Plan.

Return by email to:

planningpolicy@sthelens.gov.uk

Return by post to:

Local Plan Preferred Options Consultation,
St.Helens Council, Town Hall, Victoria Square,
St.Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the final draft of the St.Helens Local Plan scheduled for the consultation later in 2017.

Data Protection Statement

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

Equalities Monitoring Information (Voluntary)

St.Helens Council delivers services to a diverse community where people may have different needs depending on their age, gender, disability or ethnic group. St.Helens Council is working to ensure people are not disadvantaged in receiving a quality service because of these differences. Equality does not mean that all people should be treated the same. Nor does it mean that one group is favoured over another. It simply means that we may need to adjust the way we deliver services to ensure that all people experience the same quality.

We would like to know if there are particular issues common to people from the same groups; be it gender, age, disability or ethnicity. That is why we would like you to fill this section in. We can use the information to improve our services and ensure that different people receive equal quality of service.

Submission of this information **is entirely voluntary**. The Council holds the information from this section of the form confidentially. Your personal details are protected under the Data Protection Act. This means that it is illegal for the Council to share them with any person, agency or organisation, other than for the stated purpose.

Please complete the questions below and help us find out what people really feel about our services.

Gender

| | |
|-------------------------------|---------------------------------|
| Male <input type="checkbox"/> | Female <input type="checkbox"/> |
|-------------------------------|---------------------------------|

Age

Please mark an 'x' or next to your age group:

0-4 5-11..... 12-16..... 17-18..... 19-21..... 22-44..... 45-64..... 65-74..... 75-84..... 84 +.....

Disability

Do you consider yourself disabled? If yes, please mark an 'x' next to the appropriate description:

Physical Disability..... Sensory Disability..... Mental Health..... Learning Disability.....

Any other disability (please describe)

Ethnicity

How would you describe your ethnic group? Please mark an 'x' next to the appropriate description:

| | |
|--|--|
| <p>(a) White</p> <ul style="list-style-type: none"> • British • Irish • Traveller / Gypsy • Any other White background <p>(Please write below)</p> <p>.....</p> | <p>(c) Asian or Asian British</p> <ul style="list-style-type: none"> • Indian • Pakistani • Bangladeshi • Any other Asian background <p>(Please write in below)</p> <p>.....</p> |
| <p>(b) Mixed or Mixed British</p> <ul style="list-style-type: none"> • White and Black Caribbean • White and Black African • White and Asian • Any other mixed background <p>(Please write in below)</p> <p>.....</p> | <p>(d) Black or Black British</p> <ul style="list-style-type: none"> • Caribbean • African • Any other Black background <p>(Please write in below)</p> <p>.....</p> <p>(e) Chinese, Chinese British or other ethnic group</p> <ul style="list-style-type: none"> • Chinese • Any other <p>(Please Write below)</p> <p>.....</p> |

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

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Para recibir una traducción de cualquier publicación del St Helens Council (Consejo del municipio de St Helens), por favor indíquenos su nombre y dirección y el idioma con el que se comunicará con el Contact Centre (Centro de Contacto), así como el título y/o el número de referencia del documento.

St Helens کاؤنسل کی کسی بھی اشاعت کے ترجمہ کے لئے، براہ مہربانی رابطہ مرکز کو اپنا نام اور پتہ دیں اور اس زبان کا نام جس میں ترجمہ کی ضرورت ہے، اس دستاویز کا عنوان اور/یا حوالہ نمبر دیتے ہوئے۔

St Helens काँउन्सिल के किसी प्रकाशन के अनुवाद के लिए कृपया संपर्क केन्द्र को अपना नाम, पता और उस भाषा का नाम जिसकी आपको आवश्यकता है, डाक्यूमेंट का नाम तथा संदर्भ संख्या को उद्धृत करते हुए दें।

若要获取 St Helens 委员会任何刊物的译文，请将您的姓名、地址和语言种类告知“联系中心”，并注明文件标题和/或编号。

Para sa pagsasalin ng kahit na anong publikasyon ng St Helens Council, paki paalam ang inyong panaglan at address at ang pangalan ng lenguwaheng kailangan niyo sa Contact Centre, paki saad ang titulo at/o numerong reference ng dokumento.



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